

## Attachment A

### Florida Department of Commerce – Office of Long-Term Resiliency CDBG-DR

#### Program Staff Conflict of Interest Memorandum

The State of Florida Department of Commerce's Office of Long-Term Resiliency (FloridaCommerce OLTR) hereby incorporates a conflicts of interest policy consistent with U.S. Department of Housing and Urban Development (HUB) requirements, specifically 24 CFR 570.489 which is available at <https://www.govinfo.gov/app/details/CFR-2012-title24-vol3/>. FloridaCommerce OLTR's conflicts of interest policy is in addition to any conflicts of interest policy described in the employee handbook or otherwise required by FloridaCommerce and specifically applies to those who:

- a. Exercise functions or responsibilities regarding CDBG-DR funded/assisted activities;
- b. Are in a position to participate in decision-making or gain inside information on activities;
- c. May obtain financial interest/benefit from activity;
- d. Have interest in CDBG-DR funded activity contract/subcontract/agreements; and
- e. May receive proceeds for themselves or those whom they have family/business ties, during their tenure or for two years thereafter.

No employee, trustee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. [2 CFR 200.318(c)(1)]

If you, an immediate family member, or someone with whom you have business ties, are applying for federal grant assistance or may have financial gain through federally-funded grants, contracts or subcontracts, you must notify your supervisor and complete the Conflict of Interest worksheet. Immediate family members are defined as: (1) a spouse or partner; (2) a child, grandchild, parent, grandparent, sibling, uncle, aunt, nephew, or niece, or the spouse of any such person; (3) a person having a step-relationship described in (2) above; (4) a parent-in-law or a brother- or sister-in-law; or (5) any other person who resides in the same household as the trustee, officer, or employee. You should also list any relationship with a person or entity that a "reasonable person" might consider a conflict of interest due to a relationship which you maintain.

If at any point during the performance of your duties, you become aware of a situation which may fall under the conflicts previously listed above, it is your duty to immediately report the situation to your supervisor, so an assessment can be made. Failure to do so may result in disciplinary action including but not limited to the termination of your employment relationship with FloridaCommerce.

Please refer questions to FloridaCommerce-OLTR Compliance Officer, who can be reached at (850) 717-8509 or via email at \_\_\_\_\_.