

Department of Environmental Conservation (DEC)

Conflict of Interest - Standard Operating Procedure

Conflict of Interest

As stated in section 22 of the State of Vermont Attachment C: Standard State Provisions for Contracts and Grants:

“Conflict of Interest: Party must disclose in writing any potential conflict of interest in accordance with Uniform Guidance §200.112, Bulletin 5 Section IX and Bulletin 3.5 Section IV.B.”

In order to enforce this section of Attachment A, DEC will require all vendors to complete a standard subcontractor/subgrantee approval form (subform). This form will require the vendor to certify that they have disclosed any conflict of interest in writing to the State prior to the State approving the subcontractor/subgrantee to work under the original agreement.

Disclosure of a Conflict

If a conflict of interest is disclosed to DEC, DEC will request a copy of the vendor’s conflict of interest policy and review it according to the following criteria:

- 1) Defines conflict of interest;
- 2) Specifies who in the organization is affected;
- 3) Includes a disclosure policy for the above specified individuals;
- 4) Outlines a clear and reasonable procedure to address any conflicts.

Once the policy has been reviewed, the policy will be placed in the grant/contract file. If accepted, the subform will be approved and the work will be allowed to proceed. If not accepted, the subform will not be approved and the vendor will need to select a new subcontractor or subgrantee.