



DATE: July 8, 2016

DIRECTIVE NO: 38-16

RECISSION: La Cooperativa Directive No. 04-09

TO: All La Cooperativa Subrecipients

SUBJECT: Conflict of Interest

REFERENCES:

- 2 CFR 200.318 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule

PURPOSE:

To establish policy and ensure that La Cooperativa Campesina De California (LCCDC) and its subrecipients administer federal funds in accordance with the guidelines established in the above referenced regulations.

POLICY:

LCCDC and its subrecipients shall maintain this policy as a written code or standards of conduct which shall govern the performance of their officers, employees or agents engaged in the award and administration of contracts and agreements supported by Federal funds.

PROCEDURE:

LCCDC and its subrecipients shall ensure that no member of any committee shall cast a vote on the provision of services by that member or any organization which that member directly represents; or vote on any matter which would provide direct financial benefit to that member.

No employee, officer or agent shall participate in selection, award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

- a. The employee, officer or agent;



- b. Any member of his immediate family;
- c. His or her partner;
- d. Any organization which employs, or is about to employ, any of the above; or
- e. Has a financial or other interest in the organization selected for award.

Officers, employees or agents of LCCDC and its subrecipients shall neither solicit nor accept gratuities, favors or anything of monetary value from service providers, potential service providers or parties to subagreements.

LCCDC and its subrecipients may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.

To the extent permitted by State, local law or regulations, violations of these standards of conduct shall provide for penalties, sanctions, or other disciplinary actions by LCCDC.

ACTION:

LCCDC and its subrecipients shall follow this policy. This policy shall remain in effect until such time that a revision is required.

INQUIRIES:

Inquiries should be addressed to Fernando Gonzalez at 916-388-2225.



Marco Lizarraga
Executive Director