



Conflict of Interest Form

State of Iowa Department of Management, Division of Information Technology Broadband Equity, Access, and Deployment (BEAD) Program

This form is to be completed by the Subrecipient and returned within 30 days of receipt. The State of Iowa Department of Management, Division of Information Technology (DOM DoIT) requires each subrecipient of federal funding through the Broadband Equity, Access, and Deployment (BEAD) Program to confirm that the recipient has a Conflict of Interest policy in place and to disclose any actual or potential conflicts of interest. If you have been directed to complete this form, your organization is a recipient of federal funding through BEAD.

The obligation to disclose any conflicts of interest is ongoing. The Subrecipient is required to disclose any conflicts of interest that arise after the date on which this form was executed. Failure to disclose and resolve any conflicts of interest discovered in the procurement process may result in claw back of funding and/or termination of the funding contract and may impact the Subrecipient's eligibility for future funding opportunities.

Refer to applicable federal guidance requirements and definitions below.

Federal Guidance Requirements:

- [2 CFR 200.318\(c\)\(1\)](#): The Non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts.
- [2 CFR 200.112](#): The Non-Federal entity must disclose in writing any potential conflicts of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy.

Definitions:

- *Non-Federal entity (NFE)* means a State, local government, Indian tribe, Institution of Higher Education (IHE), or nonprofit organization that carries out a federal award as a recipient or subrecipient.
- *Pass-through entity (PTE)* means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a federal program.
- *Federal awarding agency* means the Federal agency that provides a federal award directly to a non-Federal entity.

Grant Agreement ([Attachment A Section 10.28](#)):

- *Conflicts of Interest*. Grantee represents, warrants, and covenants that no relationship exists or will exist during the term of the Agreement between Grantee, Grantee Contractors, or Grantee Personnel and the Agency or the State of Iowa that is or may constitute a conflict of interest or the appearance of impropriety. To the extent applicable, the provisions of Iowa Code Chapter 68B shall apply to this Agreement, and Grantee, Grantee Contractors, and Grantee Personnel shall not engage in any conduct or permit any third party from engaging in any conduct that would violate that chapter.

Subrecipient Certification and Disclosure: *(Please fill out all lines and boxes below, if applicable.)*

Does your organization maintain written standards of conduct covering conflicts of interest and governing the actions of employees engaged in the selection, award, and administration of contracts?

☐ Yes

☐ No

Are there any conflicts of interest that are present or may arise during the grant's period of performance?

☐ Yes

☐ No

If "Yes", then please complete the sections below:

Please provide a description of the nature of the conflicts of interest:

Please detail the proposed arrangement to resolve or manage the conflicts of interest:

Do you acknowledge that the requirement to disclose and resolve conflicts of interest is ongoing and agree to disclose any conflicts of interest that arise in the future?

☐ Yes

☐ No

Signature: _____

Printed Name and Title: _____

Date: _____

Name of Subrecipient: _____

Email: _____

Title of Grant: Broadband Grants Program—Empower Rural Iowa, Broadband Equity, Access, and Deployment Funds ("BEAD") Notice of Funding Availability ("NOFA") #009