

**CITY OF BRADFORD  
CONFLICT OF INTEREST (INTEGRITY) POLICY**

The following provides the terms of the City of Bradford's Conflict of Interest Policy with respect to its administration of federal programs and provides safeguards to prohibit employees, agents, consultants, officers or elected officials of the City of Bradford from using positions for a purpose that is, or gives the appearance of being motivated by a desire for private gain (24 CFR 570.611).

**(a) *Applicability***

**(1)** In the procurement of supplies, equipment, construction, and services by the City of Bradford and its sub recipients, the conflict of interest provisions in 2 CFR 200.317 and 200.318 shall apply.

**(2)** In all cases not governed by 2 CFR 200.317 and 200.318, the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the City of Bradford or by its subrecipients to individuals, businesses, and other private entities under eligible activities that authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to § 570.202; or grants, loans, and other assistance to businesses, individuals, and other private entities pursuant to § 570.203, 570.204, 570.455, or 570.703(i)).

**(b) *Conflicts Prohibited.***

The general rule is that no persons described in paragraph (c) of this section who exercise or have exercised any functions or responsibilities with respect to federally funded activities assisted under this part, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a federally assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a federally assisted activity, or with respect to the proceeds of the federal assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

**(c) *Persons Covered.***

The conflict of interest provisions of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the City of Bradford, or of any designated public agencies, or of sub-recipients that are receiving funds under this part.

**(d) *Exceptions.***

Upon the written request of the recipient, HUD or its authorized representatives may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it has

satisfactorily met the threshold requirements of (d)(1) of this section, taking into account the cumulative effects of paragraph (d)(2) of this section.

**(1) Threshold requirements.** HUD or its authorized representatives will consider an exception only after the City of Bradford has provided the following documentation:

- (i)** A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
- (ii)** An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

**(2) Factors to be considered for exceptions.** In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d)(1) of this section, HUD or its authorized representatives shall conclude that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

- (i)** Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
- (ii)** Whether an opportunity was provided for open competitive bidding or negotiation;
- (iii)** Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;
- (iv)** Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted activity in question;
- (v)** Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;
- (vi)** Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and
- (vii)** Any other relevant considerations.

**Adopted the 14<sup>th</sup> day of November 2017 by City Council Resolution No. \_\_\_\_\_.**

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**City Administrator**

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**Mayor**