



SPED Federal Conflict of Interest Policy

Canyon Rim Academy

Adopted by the Board of Trustees: 6/26/2025

I. Purpose

This policy establishes the standards for identifying and managing conflicts of interest related to the procurement and administration of contracts supported by federal funds, including those allocated for Special Education (IDEA) and other federal programs. The goal is to ensure compliance with federal regulations and maintain the integrity and transparency of all federally funded activities.

II. Prohibition on Personal Benefit

In accordance with **2 CFR § 200.318(c)(1)**, no employee, officer, board member, or agent of Canyon Rim Academy may participate in the selection, award, or administration of a contract supported by federal funds if they have a real or apparent conflict of interest.

A conflict of interest arises when the individual, or any member of their immediate family, partner, or an organization with which they are affiliated, has a financial or other beneficial interest in a firm considered for a contract.

III. Mandatory Disclosure of Conflicts

All actual or potential conflicts of interest must be disclosed in writing to the Executive Director and, when required, to the pass-through entity (e.g., Utah State Board of Education) prior to engaging in procurement or contracting activities.



Disclosures must be:

- Submitted annually via a Conflict of Interest Statement
- Updated promptly upon any change in circumstances
- Reviewed and documented by administrative leadership with appropriate mitigation strategies

IV. Prohibition on Gifts and Favors

Consistent with **2 CFR § 200.318(c)(1)(ii)**, officers, employees, agents, and board members must not solicit or accept gratuities, gifts, favors, or items of monetary value from contractors, subcontractors, or vendors doing business with the school.

Zero-tolerance policy applies to all gifts with more than nominal value.

Any offers of gifts must be reported immediately to the Director or Financial Manager.

V. Policy Implementation and Oversight

This policy shall be supported through the following procedures:

Annual Conflict of Interest Disclosure: All relevant personnel must complete and sign a Conflict of Interest Disclosure Form annually and at the onset of any new potential conflict.

Training: Employees involved in federal procurement and financial management shall receive annual training on conflict of interest standards and federal procurement requirements.

Reporting and Enforcement: Suspected violations of this policy must be reported to the Director or Financial Manager. Violations may result in disciplinary action, up to and including termination or removal from their present position.



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VI. Segregation of Duties

To ensure fairness and accountability, Canyon Rim Academy requires the separation of duties in the procurement process. No individual may both recommend and approve a procurement decision, nor may a single person control multiple steps in the purchasing and contract administration process.

Responsibilities will be clearly defined and assigned to ensure that no conflict exists and that procurement decisions are made objectively, fairly, and in compliance with federal regulations.

VII. Policy Review

This policy shall be reviewed and reaffirmed annually by the Board of Trustees, or more frequently if required by changes in law or regulation. Any updates or revisions shall be documented and communicated to all relevant stakeholders.