CONFLICT OF INTEREST PROCUREMENT COMMITTEE – COIPC

Internal Review and Approval Process

Committee Members: Associate Vice President Finance Services

Strategic Academic Personnel and Policy Advisor – Provost Office

Chief Procurement Officer

Appeals Committee: Senior Vice President for Operations and Finance

Deputy University Counsel

Effective: August 26, 2011

Revised: June 13, 2013

February 18, 2015

October 14, 2015

August 1, 2016

July 21, 2021

Process

Conflict of Interest (COI) vendors shall submit a written request for approval to do

business with Iowa State University to the Director of Procurement Services. This

request shall state the type of goods or services to be offered to ISU and the nature of

the COI relationship.

The Director of Procurement Services shall obtain any additional information necessary

for the committee to fully evaluate the request and verify a COI disclosure is on file. If

the conflict is incidental, the Director of Procurement Services can grant authorization

with notice to the COIPC.

The Committee shall determine if special oversight or management plan is necessary for

approval of the COI vendor. The COIPC shall develop any necessary management plan

or oversight process as part of the approval process. All members of the COIPC and the

COI vendor shall sign any management plan. Director of Procurement Services shall

coordinate any actions or information with the VPR Office, as necessary. The COIPC

shall review requests and convene as necessary, no more frequently than once per

month.

The Director or Procurement Services, on behalf of the COIPC, shall sign approvals and

communicate the decision of the COIPC to the COI vendor along with procedures for

doing business with COI vendors and any special conditions.

Should the Committee deny approval of a COI vendor to do business with the University,

the COI vendor may appeal that decision to the Appeals Committee.

Guiding Policies

(IC 68B.3‐1) A state employee shall not sell, in any one occurrence, any goods or services having a value

in excess of $2,000 to any state agency unless the sale is made pursuant to an award or contract let after

public notice and competitive bidding.

(IC 68B.3‐5) A state employee making a permissible sale shall file a report with the Iowa Ethics and

Campaign Disclosure Board within twenty days of making the sale. The report shall include, but not be

limited to, the parties to the sale, the date of the sale, the total amount of the sale, and the type of

goods or services being sold.

(681 IAC 8.9) No employee of a regent institution, employee of the regent board office, or member of

the board shall sell any goods or services to any regent institution or state agency or the board office,

unless it is consistent with the requirements of 68B. To help ensure conflicts of interest are properly

managed, the regent institutions shall develop an internal review and approval process for all sales by

an employee in excess of the bid threshold established by IC 68B.3. Blanket approval may be granted.

2 CFR §200.318(c)(1): No employee, officer, or agent shall participate in the selection, award, or

administration of a contract supported by Federal funds if a real or apparent conflict of interest would

be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her

immediate family, his or her partner, or an organization which employs or is about to employ any of the

parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm

selected for an award or contract.

Procurement Procedures

All transactions to COI vendors must be handled through the Procurement Services

Department. Departments cannot use P‐Cards to conduct business with COI vendors,

unless approved by the Director of Procurement Services.

COI vendors will not be allowed to sell goods or services to their own department,

unless failure to allow would be detrimental to the mission of the university.

All transactions of $2,000 or more, involving a COI vendor, must be competitively bid by

the Procurement Services Department.

A complete list of COI vendors approved to do business with the university shall be

maintained by the Procurement Services Department and reported annually to the

appropriate Board of Regents personnel.

De minimis payments ($100 or less) to student employees (XH) for musical

performances at commencements will not be subject to Procurement Services

Department processing. These transactions may be handled by the Registrar’s Office as

honoraria payments.

COI vendors will not be allowed to sell goods or services to their spouse’s or partner’s

department, unless failure to allow would be detrimental to the mission of the

University.