

PROCUREMENT AND CONFLICT OF INTEREST

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Services Administration

Transparency

“Council Grants Have No Strings”

“There appears to be no oversight for tens of millions of dollars given at members’ discretion”

WEBSITE for this Session

<https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1>

Conflict of Interest

The use of your position, on the Board or Staff to enrich or gain for oneself, family or friends

Major Changes in Procurement for Non-Profits

Major change was the establishment of fixed categories for procurement by Federal Grantees

The major revision to the procurement requirements are that there five (5) methods of procurement with dollar thresholds associated to each method of procurement. Section 200.320 found below describes the five methods of procurements:

- 1) Micro-purchase (less than to \$3,000),
- 2) Small purchase (less than \$150,000),
- 3) Sealed bids purchases (more than \$150,000),
- 4) Competitive proposal purchases (more than \$150,000),
- 5) Noncompetitive purchases (special circumstances which are applicable for all purchase levels).

All changes must be incorporated into the Board approved
Center's Procurement Policy

Contract for Substantive Program Work

All contracts for substantive program work (i.e., contracting for MH/SA services must be compressive with specific Guidelines, tasks, costs, record retention, etc.

All contracts must have HRSA approval

Subawards vs. Contracts

A CHC is totally responsible for the results of a subaward as if the CHC was performing the duties that were the subaward

Standards of Conduct

The Corporations should have a policy which explains to Board and Staff the responsibilities which everyone associated with the organizations should follow. Penalties for violation of Standards: Employees -- suspension without pay, demotion or dismissal and Board members -- suspension or dismissal from the Board

Dissemination of Standards of Conduct

All staff should be advised of his/her responsibilities when first employed or a new Standards of Conduct is approved. A certificate is initiated and signed annually acknowledging acceptance and adherence to the policy.

Board members should initiate a check list affidavit each year acknowledging adherence to the Conflict of Interest Policy

QUESTIONS AND ANSWERS

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