

Conflict of Interest Checklist

Is there a documented conflict?	
	Is the vendor or service provider listed as a "related entity" in the List of Documented Conflicts of Interest ?* (Column E)
	Is the requesting employee under a management plan listing that entity? (Column D)
	Does the Management Plan Status show as "active?" (Column B)

If the answer to **each** of these questions is "yes," please confirm that the purchase or payment is **allowable** under the management plan.

OR

Is there a known conflict?	
	Have you received a conflict of interest management plan for the requesting employee in the past?
	Does that management plan list the vendor or service provider?
	Has the Research and Innovation Office confirmed that the management plan is still active?

If the answer to **each** of these questions is "yes," **please confirm** that the purchase or payment is **allowable** under the management plan.

--- NEXT STEP ---

Is the purchase allowable under the management plan?	
	Does the management plan say: "[the requesting employee] will not... make decisions regarding the procurement of products or services" from the entity?
	Does the management plan have other limitations that would prohibit this purchase?

If the answer to **any** of these questions is "yes" the purchase is **not** allowable.

If the answer to **each** these questions is "no" then please confirm that the purchase is allowable under CU Policies & Procedures (e.g., the Test for Propriety), any grant/gift/fund terms, and other applicable standards.

--- NEXT STEP ---

Is an Evaluation Form Necessary?	
New order	Yes
Renewal order	Yes
Existing service contract with related entity expired and is being renewed.	Yes
Existing contract with related entity was amended to include changes in price, quantity or quality of goods or services, or duration of service.	Yes
Existing contract with related entity was amended to include non-material edits that did not affect cost, or the goods/services procured (e.g., fixing typos, formatting).	No

Prior quote from related entity was revised <i>after</i> the invoice and purchase order were created on Marketplace.	Yes
Parts for existing equipment are being serviced by related entity, and payment is being issued with new purchase order.	Yes
Parts for existing equipment are being re-ordered from related entity, and payment is being issued with new purchase order.	Yes
Modifications are being made to existing equipment by the related entity, and payment is being issued with new purchase order.	Yes
Purchase from related entity is for low sum.	Yes

If the answer is **yes**, please complete a [Conflict of Interest Evaluation Form](#), which can be found on the Procurement Service Center website.

Is the Evaluation Form complete?	
	Has the section titled "Describe the Conflict of Interest Situation" been filled out to include the conflicted relationship, any management plan restrictions, and how those restrictions are being followed?
	Has the form been signed by the appropriate fiscally disinterested person? This person appears in the List of Documented Conflicts of Interest (column I) and in the appropriate management plan.

If the answer to **each** of these questions is "yes," the Evaluation Form is **complete**.

Undocumented Conflicts

Is there an undocumented conflict?	
	If the requesting employee divulged an outside professional or personal relationship with the vendor or service provider that does not appear in the List of Documented Conflicts of Interest , please contact fiscalcompliance@colorado.edu for additional guidance.

Is an order unallowable?	
	If you believe an order is unallowable under policy and needs to be cancelled, please consult with the Procurement Service Center.