

Capital Conflict of Interest Procedure

General Information

Any identified potential conflicts of interest on Form A or Form B must be reviewed and resolved through appropriate University and State personnel. Below are general guidelines to follow for processing forms:

1. Identified potential conflicts of interest need to be vetted through the University process for both Prime and Sub Vendors.
2. If a Prime Vendor and/or Sub Vendor identifies a potential conflict(s) of interest, it must be forwarded to the University Office of Capital Programs and Real Estate Services (UOCPRES) with the required documentation.
 - a. Any Professional Services Consultants that will be interviewed and have submitted a disclosure form that identifies a potential conflict(s) of interest (COI) may be sent to UOCPRES for a preliminary internal review prior to interview.
3. Potential conflicts must be vetted through the COI review process including University and State review prior to the award being submitted for review and posting to the IPHEC Bulletin.
 - a. Vendors will not receive a “blanket waiver” for future contracts with the University unless a CPO Financial Disclosures Affidavit is approved. The Form A or Form B, Conflict of Interest Review and Determination form and any identified potential conflicts of interest must follow this review process for each submittal/proposal/contract.
 - b. If a vendor has a completed and accepted an Illinois Procurement Policy Board (PPB) Conflict of Interest Review and Determination form within the last one calendar year from the date of posting to the Illinois Procurement Bulletin, the vendor can submit a CPO Financial Disclosures Affidavit form instead to seek approval.
4. The Award posting sent electronically to UOCPRES must include:
 - a. The standard contract award information.
 - b. CPO Form A or Form B.
 - c. An approved Conflict of Interest Review and Determination Form from the SPO and PPB/Commission on Equity and Inclusion (CEI), if necessary, indicating that the identified potential Conflict of Interest has been reviewed and does not impact the University contracting with the Vendor.
 - d. A CPO Financial Disclosures Affidavit form (if applicable)
5. The fully executed contract that is filed at the Board of Trustees office must have attached:
 - a. Approved Form(s) A or Form(s) B.

- b. An approved Conflict of Interest Review and Determination Form from the SPO and PPB/CEI, if needed indicating that the identified potential conflict of interest has been reviewed and does not impact the University contracting with the Vendor.
 - c. A CPO Financial Disclosures Affidavit form (if applicable)
6. The project procurement file must have:
- a. Approved Form(s) A or Form(s) B with PPB and CEI waivers, as necessary.
 - b. All documentation sent and received from the Vendor, University COI contact, State Purchasing Officer (SPO)/Chief Procurement Officer (CPO), and Procurement Policy Board (PPB) related to an identified potential conflict of interest.
 - c. An approved Conflict of Interest Review and Determination Form from the SPO and PPB/CEI, if needed indicating that the identified potential Conflict of Interest has been reviewed and does not impact the University contracting with the Vendor.

Review Process

1. Campus Construction Unit (CCU) reviews the submitted Form(s) A or Form(s) B provided by the Vendor at the time of bid or proposal submittal. (If procurement is not done via QBS or bid, then with contract.)
 - a. Refer to the checklists / training materials available to assist in reviewing the forms and identifying items that require vetting.
2. If a Potential COI is identified, CCU performs the following steps:
 - a. Download the PPB Conflict of Interest Review and Determination Form (pdf format only with Adobe signature blocks enabled)

<https://ppb.illinois.gov/content/dam/soi/en/web/ppb/documents/resources/Conflict%20of%20Interest%20Review%20and%20Determination%20Form%2020160225%20V10.pdf>

and complete all sections but do not sign, and forward to UOCPRES.
 - b. Electronically forward the completed form as a separate document to UOCPRES for signature along with the following documentation combined in 1 pdf file:
 - i. Copy of a proposed boilerplate contract or agreement that will be used to create the project specific contract.
 - ii. Copy of Form(s) A or Form(s) B.
 - iii. Conflict of Interest Form Review and Determination Form (with Adobe Signature Block enabled).
 - iv. Reviewed Conflict of Interest Form Review and Determination Form for this Vendor within the last year (if applicable).

3. The COI designee from UOCPRES will:
 - a. Review the documentation for completeness and ask any questions for clarity.
 - b. Sign the PPB Conflict of Interest Request for Review as the Agency/University Representative.
 - c. Forward all documentation to the SPO/CPO.
4. The SPO/CPO will:
 - a. Review the documentation and ask any questions for clarity.
 - b. Provide signature on the Conflict of Interest Request for Review and Determination Form.
 - c. Forward all documentation to the PPB if deemed necessary.
5. The PPB/CEI if required, will:
 - a. Review the documentation and ask any questions for clarity.
 - b. Provide a signed Conflict of Interest Request for Review and Determination Form to all the parties involved.

Contact Information

All potential conflict of interest relating to capital procurement for the University are to be reviewed by UOCPRES Director - Capital Programs Administration crogan@uillinois.edu or above. This is a delegated signature from the President.