



Ethics & Conflict of Interest Policy for Grants and Contracts
Human Services Agency

1. Introduction The Human Services Agency (HSA) is dedicated to upholding the highest standards of ethics and transparency in its grant-making and contracting processes. In the City and County of San Francisco, grant agreements are governed by Chapter 21G, while Contracts are governed by Chapter 21. This policy outlines our ethical expectations, guidelines for managing conflicts of interest, and procedures for disclosure and recusal. This policy also reinforces HSA's commitment to integrity, fairness, and accountability in administering public funds and resources. We aim to ensure fairness, open competition, accountability, and compliance with all laws and regulations regarding grants and contracts.

2. Scope This policy applies to all individuals involved in the grant-making and contract administration processes at HSA, including, but not limited to, employees who make grant and contract decisions, reviewers, review panel members, divisional leadership, and commissioners (collectively referred to as "Process Participants or Decision-Makers"). It does not apply to City employees who perform solely clerical work on contracts and grants.

- Examples of decision-making include but may not be limited to substantially participating in the drafting of the solicitation document(s) beyond high-level discussions of departmental needs, scoring proposals, determining funding allocation model and final award amounts, and determining grantmaking strategy (e.g., whether to do a public solicitation, amend an existing grant agreement, or seek a solicitation waiver).
- Examples of clerical work include but may not be limited to analytical work supporting the grantmaking or contracting process (e.g., score tabulation, technical assistance).

In addition to the requirements of this Policy, City employees must also comply with various state and local laws that govern public contracting, including but not limited to the California Political Reform Act (Government Code Sections 81000 et seq.), California Government Code 1090, the San Francisco Government Ethics Ordinance (Campaign and Governmental Conduct Code Section 3.200 et seq.) and various State and City mandated conflict of interest disclosure forms such as the State of California Form 700 and the San Francisco SFEC Forms 126f(2) and 126f(4). Failure by City employees and officers to comply with these laws may be grounds for discipline or penalties.

3. Defining Conflicts of Interest A Process Participant may have a conflict of interest if they or any related person:

- a) Have received or anticipate receiving income or gifts from an entity submitting a grant proposal or contract application within the past 12 months.

Department of Benefits
and Family Support

Department of Disability
and Aging Services



Daniel Lurie
Mayor

Trent Rhorer
Executive Director, SFHSA

Kelly Dearman
Executive Director, DAS



- b) Hold ownership interests or investments (excluding mutual funds) in such an entity.
- c) Seek or intend to seek employment, contractual engagements, or volunteer opportunities with such an entity.
- d) Previous employment with such an entity for within the past 12 months.
- e) Serve on such an entity's board of directors or advisory board.
- f) Have any other relationship with the entity that could impair impartial judgment in the evaluation process.

Note: These are examples of conflict of interest. If you have questions, please consult with your program director or contract manager.

4. Disclosure and Recusal Procedures Process Participants must disclose potential or actual conflicts of interest by:

- a) Indicating any conflicts on the Impartiality/Confidentiality Attestation Form annually.
- b) Notifying the Contract Manager, Program Director, or Program Deputy Director of HSA in writing within Twenty-Four (24) working hours of awareness. Individuals should also follow the HR policies and procedures.
- c) Recusing themselves from any involvement in scoring, decision-making, or influencing discussions related to the entity in question.

5. Impartiality and Confidentiality Requirements

- a) All Process Participants must complete and sign an Impartiality/Confidentiality Attestation Statement before engaging in grant or contract evaluations.
- b) Participants must not disclose any non-public information about solicitations, evaluation criteria, or scoring processes that could unfairly advantage any applicant.
- c) All documents related to the process, including score sheets, notes, and email correspondence, must be securely maintained and returned at the end of the evaluation.

6. Compliance and Consequences Failure to adhere to this policy may result in corrective action, including removal from participation in the process, disciplinary measures, or termination. Suspected violations must be reported to the Program Director and the Office of Contract Management Director. Serious breaches may be escalated to legal authorities for further review.





7. Additional Rules by Process Phase

- **Solicitation Development Phase:** Participants must exercise caution in discussing solicitation details with unauthorized persons and ensure all related documents remain confidential.
- **Solicitation Phase:** Participants must direct inquiries to designated contacts in Office of Contract Management and refrain from providing selective assistance.
- **Evaluation & Scoring Phase:** Scores must be based solely on submitted materials, without external information or bias. Participants must not attempt to influence each other's assessments.
- **All documents, including score sheets, emails, and other notes, may be subject to public disclosure.**

8. Action Items for Participants

Before participating in the grant-making or contract administration process, each participant must:

1. For HSA Employees: Complete the Form 700 on the Ethics Commission website training, if applicable. Review and sign the Impartiality/Confidentiality Statement annually.
2. Review panelist will sign an impartiality/confidentialty form that they've read this policy.

9. Reporting and Resources

For questions regarding ethics and conflicts of interest, Process Participants should contact their Contracts Point of Contact, Division Director, or Director of Office of Contract Management.

