



CONFLICT OF INTEREST POLICY

PERSONNEL | 300.307

Last Evaluation

06/11/2026

Executive Staff Approval

08/10/2026

Board Approval

08/19/2026

1. Policy Purpose

Mountainland Technical College (MTECH) is committed to maintaining the highest standards of integrity, impartiality, and public trust in all institutional operations. The purpose of this policy is to establish standards for identifying, disclosing, managing, and resolving actual, potential, and perceived conflicts of interest involving MTECH employees, officers, and administrators.

This policy supports compliance with the Utah Public Officers' and Employees' Ethics Act and other applicable state and federal laws and regulations.

2. Definitions

Conflict of Interest - A situation in which an employee's personal, financial, familial, professional, or outside interests could compromise, or reasonably appear to compromise, the employee's objectivity, judgment, or ability to perform institutional duties in the best interest of the College.

Employee - A person whose salary, wages, pay, or compensation is paid from college-managed funds provided by the State of Utah.

Immediate Family Member - A spouse, domestic partner, parent, child, sibling, in-law, or any individual residing in the employee's household.

Recusal - The removal of an individual from participation in discussions, recommendations, decisions, approvals, evaluations, negotiations, or transactions involving a conflict of interest.

Substantial Interest - A financial or ownership interest as defined by applicable Utah law.

3. References

Utah References

Utah Code Title 67, Chapter 16, Utah Public Officers' and Employees' Ethics Act.

Utah Code Title 63G, Chapter 6a, Utah Procurement Code.

Federal References

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Part 200.

2 C.F.R. § 200.318(c)(1), General Procurement Standards—Conflicts of Interest.

Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 C.F.R. Part 99.

4. Policy

4.1 General Standards

4.1.1 Employees shall conduct institutional business in a manner that promotes public confidence in the integrity of MTECH.

4.1.2 Employees shall avoid:

- Actual conflicts of interest;
- Potential conflicts of interest; and
- Situations that create the appearance of a conflict of interest.

4.1.3 Employees are responsible for promptly disclosing conflicts of interest and cooperating in efforts to eliminate, reduce, or manage such conflicts.

4.2 Financial Interests and Business Relationships

- 4.2.1 Employees shall not participate in institutional decisions, transactions, or activities in which they or an immediate family member have a substantial financial interest.
- 4.2.2 Employees shall not use their position to obtain personal financial gain or preferential treatment for themselves, family members, or affiliated organizations.
- 4.2.3 Employees shall not receive compensation, benefits, or other consideration in connection with transactions between MTECH and any business entity in which the employee has a substantial interest.

4.3 Procurement and Contracting

- 4.3.1 Employees involved in purchasing, procurement, contracting, vendor selection, grant administration, or related decision-making shall not participate in any matter involving a business or organization in which they or an immediate family member has a financial interest.
- 4.3.2 Employees shall disclose any actual, potential, or perceived conflict involving procurement activities and shall recuse themselves from participation in the matter.
- 4.3.3 When federal funds are involved, employees shall comply with all applicable federal conflict-of-interest requirements.

4.4 Outside Employment and Professional Activities

- 4.4.1 Employees may engage in outside employment or professional activities, provided such activities:
 - a. Do not interfere with the employee's institutional responsibilities;
 - b. Do not impair the employee's independent judgment;
 - c. Do not create a conflict of interest; and
 - d. Do not require the use of confidential institutional information.
- 4.4.2 Full-time employees shall devote scheduled work hours to the performance of their assigned duties.

4.5 Confidential Information

4.5.1 Employees shall not disclose, use, or permit the use of confidential information acquired through their employment for personal benefit or for the benefit of another person or organization.

4.5.2 Confidential information includes, but is not limited to:

- a. Student records;
- b. Personnel records;
- c. Procurement information;
- d. Proprietary business information;
- e. Donor information; and
- f. Information protected by law, regulation, or institutional policy.

4.6 Gifts and Gratuities

4.6.1 Employees shall not knowingly solicit, accept, receive, or offer gifts, favors, loans, services, entertainment, or anything of value that could influence, or reasonably appear to influence, the performance of their institutional responsibilities.

4.6.2 Employees shall comply with all applicable state ethics laws governing gifts and gratuities.

4.6.3 Employees shall not accept cash or gifts valued at more than \$25.00.

4.7 Employment Relationships

4.7.1 Employees shall not participate in hiring, supervision, evaluation, promotion, compensation, disciplinary action, or other employment decisions involving an immediate family member or an individual with whom the employee has a close personal relationship.

4.7.2 Such relationships must be disclosed promptly to Human Resources.

4.8 Use of Institutional Resources

4.8.1 Institutional facilities, equipment, technology, personnel time, and other resources shall not be used for personal financial gain except as authorized by institutional policy.

5. Disclosure and Management of Conflicts

5.1 Initial Disclosure

- 5.1.1 Employees shall complete a Conflict of Interest Disclosure Form during the hiring process and disclose any known actual, potential, or perceived conflicts of interest.

5.2 Ongoing Disclosure

- 5.2.1 Employees shall submit an updated disclosure whenever circumstances arise that create a new or changed conflict of interest.

5.3 Review

- 5.3.1 Disclosures shall be reviewed by the employee's supervisor and the Vice President of Administrative Services, Human Resources, or another designated institutional official.

5.4 Conflict Management

- 5.4.1 MTECH may implement appropriate measures to manage identified conflicts, including:
- Recusal from decisions or activities;
 - Reassignment of duties;
 - Increased oversight;
 - Elimination of the conflicting activity; or
 - Other appropriate corrective actions.

6. Violations

- 6.1 Employees who knowingly violate this policy or applicable state or federal ethics requirements may be subject to disciplinary action, up to and including termination of employment.
- 6.2 Violations may also result in reporting obligations or penalties as required by law.

7. Evaluation History

Last Evaluation	Executive Staff Approval	Board Approval
		7/1/2004

5/29/2020	6/8/2020	8/19/2020
06/11/2026	08/10/2026	08/19/2026