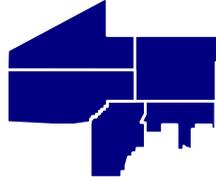


# Northwestern Pennsylvania



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## Emergency Response Group

[www.nwpadisasterresponse.org](http://www.nwpadisasterresponse.org)

*Serving the citizens of Erie, Crawford, Forest, Venango, & Warren Counties & the City of Erie*

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### Memorandum

**TO:** All NW PA ERG members, contractors, agents, representatives and grant fund recipients

**FROM:** Dale Robinson, NW PA ERG Chairman

**DATE:** July 27, 2015

**SUBJECT:** Conflict of interest

Per the NW PA ERG grant agreement with the Pennsylvania Emergency Management Agency (PEMA), the “Subgrantee” (NW PA ERG) shall:

“establish internal personnel safeguards that will prohibit employees, contractors, agents, members, or representatives from using their positions for a purpose that creates, or gives the appearance of creating, a desire for private gain for themselves or for others, particularly those persons who have a family, business, or other ties to the employee, contractor, agent, member, or representative.”

Therefore, those who have a personal pecuniary interest, such as instructors whose fees would be paid for by NW PA ERG, must not submit the request for NW PA ERG funding, nor can they initiate the process.

If you have a pecuniary interest, you must also make it known to the respective sub-committee, the executive board and abstain from all voting (subcommittee/executive board) on that particular expenditure.

If instructional fees are NOT being requested or paid for in any manner by the NW PA ERG to an instructor that has ties to the NW PA ERG as an executive board member, sub-committee chair, sub-committee member or attendee, the instructor can request books, materials and food for the course attendees, but must not vote on the request at any time and must inform the sub-committee and executive board concerning the instructor’s personal connection to the requested course.

Payment by the NW PA ERG to a 3<sup>rd</sup> party (community college, etc.) for courses, who then pays the instructor(s) with ties to the NW PA ERG creates a conflict and therefore the instructor(s) must not request or vote on these request(s) and must inform the sub-committee and executive board concerning their personal connection to the requested course.

Remember, it is the “appearance of creating a desire for private gain for themselves or others” that we must avoid. If you are in doubt or have questions, please contact the executive board.