

LOMPOC UNIFIED SCHOOL DISTRICT

Problems on the Board

SUMMARY

The 2015-2016 Santa Barbara County Grand Jury (Jury) completed an investigation into the Lompoc Unified School District (LUSD) after receiving complaints concerning a perceived conflict of interest involving a member of the Lompoc Unified School District Board of Education (Board) and his spouse, an employee of LUSD. The complainants reported that they came to the Grand Jury because they feared retaliation if they spoke out publicly on the issue, having already been subjected to threats of termination and other workplace hostility.

The Jury found that there was at least the appearance of a conflict of interest. Consistent with its role as “the public’s watchdog” in civil matters, the Jury deferred to the Santa Barbara County District Attorney the question of whether any criminal laws were broken.

The Jury also found that the Board lacks adequate internal financial controls regarding transfers from the General Fund and payments of travel expenses.

Finally, the Jury found that the Board did not adequately oversee staff attendance, allowed unethical behavior, and permitted a hostile work environment to exist.

BACKGROUND

The Lompoc Unified School District (LUSD) has close to 1,700 employees serving approximately 9,300 students, about 1,000 of whom require special education. There are eight elementary schools, two intermediate schools, and two high schools in the district. The Lompoc Unified School District Board of Education (Board) consists of five members who are elected to four-year terms that are staggered so an election occurs every two years. According to the Board’s bylaws, the Board “*shall ensure that the district is responsive to the values, beliefs, and priorities of the community.*” Its mission is “to provide leadership and citizen oversight of the district.”¹

The Superintendent of LUSD is employed by the Board and serves as the chief executive officer of the school district. He is the professional advisor to the school board, chief administrator of the schools within the district, and leader of the staff. He is responsible for the implementation of Board policies and the development of procedures for management of the entire school district. (See Chart 1.)

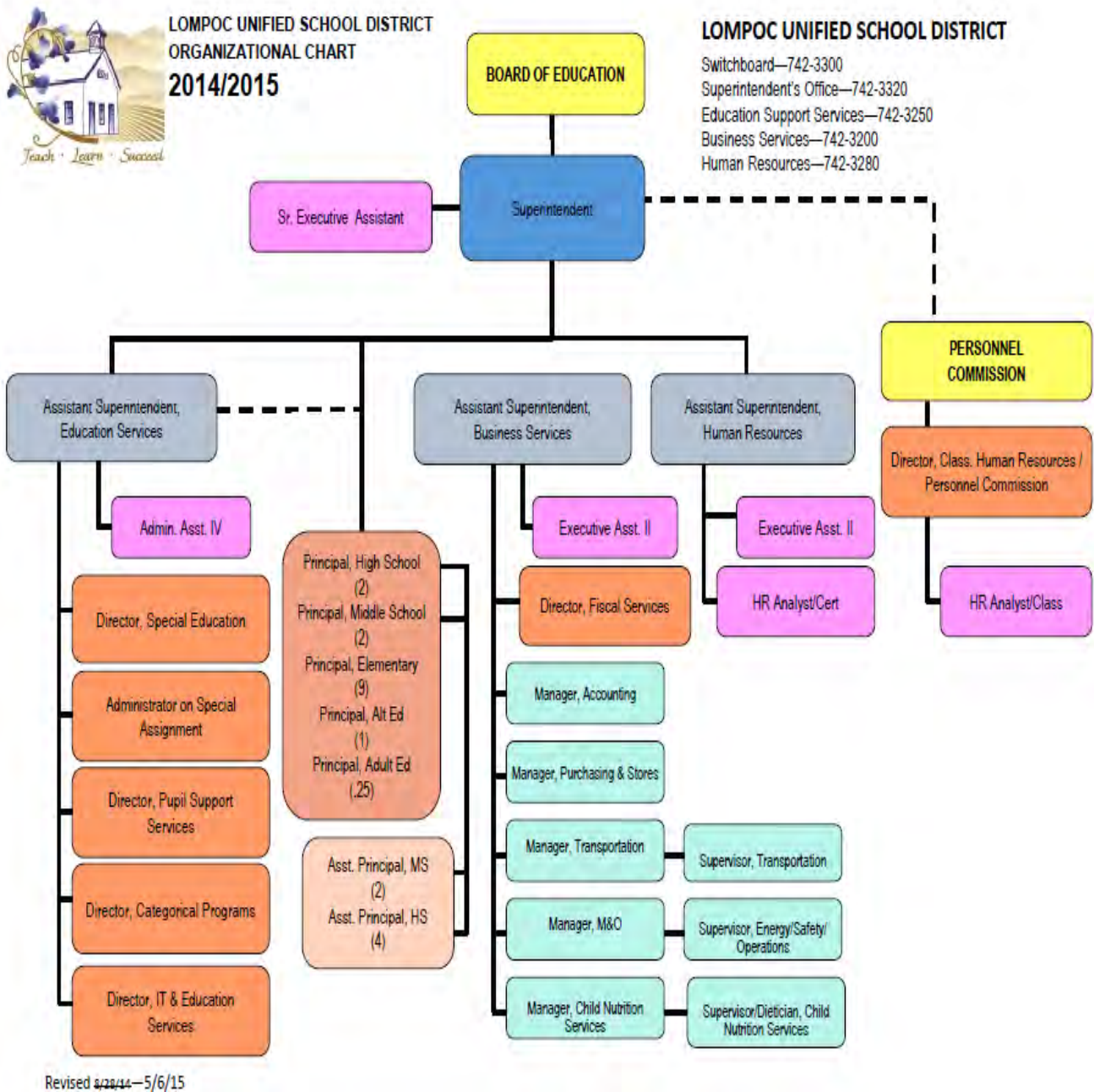
¹ Lompoc Unified School District Bylaws of the Board, § BB 9000.

The LUSD has classified employees who are union members and are hired, fired, and promoted on a merit system from within. These employees include the kitchen staff, bus drivers, janitors, and other workers in similar jobs. There are also certified staff who are part of the Association of Lompoc School Administrators (ALSA), which is not a bargaining unit. ALSA includes teachers and management staff who are promoted by seniority when applying for new positions. Some ALSA employees are also confidential employees who work with management to develop or present positions during collective bargaining.

METHODOLOGY

The Santa Barbara County Grand Jury (Jury) interviewed current and past employees of the LUSD, members of the LUSD Board, and a member of the Santa Barbara County Education Office. Board member Bill Christen declined to meet with the Jury. In addition, the Jury reviewed the LUSD budgets for the past four years, independent audits, travel expenses, and department expenditure records. Jury members also attended a LUSD Board meeting.

Chart 1.
Lompoc Unified School District Organizational Chart



OBSERVATIONS AND ANALYSIS

During the Jury's investigation of the LUSD, the following deficiencies were identified:

- Conflicts of Interest
- Financial Irregularities
- Inadequate and Unenforced Internal Financial Controls
- Hostile Work Environment
- Other Unethical Behavior
- Lack of Ethics Training

Conflict of Interest

Government Code § 1090 generally prohibits school board members (and other public officials) from having a financial interest in any contract their board makes. Under *GC § 1091.5*, a school board member whose spouse is employed by the school district has a prohibited financial interest in any board contract that impacts the spouse's financial interest, unless the spouse was employed by the district for at least one year before the member joined the board. *GC § 1097* provides that an official who willfully violates, or aids or abets in a violation of *GC § 1090* is punishable by a fine or imprisonment, "and is forever disqualified from holding any office in this state." (See Appendix A.)

Mr. Bill Christen was elected to the Board in December 2012, five months after his spouse was hired as Director of the Special Education Department (SED) in July 2012. Mr. Christen twice voted to increase the salaries of management and confidential employees who were members of ALSA, including his spouse. On January 28, 2014, Mr. Christen moved to approve a one-time four percent off-schedule salary increase, and on May 12, 2015, Mr. Christen voted with the Board to unanimously approve a 4.25 percent compensation adjustment to begin immediately and another 4.25 percent salary increase scheduled to begin on June 1, 2015. In all of these instances, Mr. Christen's spouse benefited from the salary increases.

Through his attorney, Mr. Christen has denied breaking any conflict of interest laws, and has pointed out that those laws are "complex," with "many exceptions." The Jury does not express or imply any opinion on whether Mr. Christen violated those laws. As the California Supreme Court put it, the Jury's role here is "to act as the public's 'watchdog' by investigating and reporting on the affairs of local government." It is the role of the Santa Barbara County District Attorney (DA) to determine whether any criminal conduct occurred, and the Jury defers that determination to the DA. Whatever that determination may be, however, the Jury believes that even the appearance of a conflict of interest seriously harms the public's confidence in the Board of Education. The Board can reduce the risk of similar harm in the future by implementing the Jury's recommendations below.

Financial Irregularities and Lack of Internal Financial Controls

After interviewing staff from the business office and reviewing financial records, the Jury was unable to determine exactly how expenditures of the LUSD's General Fund are being allocated and tracked. Past LUSD independent financial audits have noted a lack of adequate controls and use of public funds.² A

² 2010-2011 Independent Financial Audit, Glenn Burdette Public Accounting Agency and 2014-2015 Independent Audit, Vavrinek, Trine, Day and Co. LLP

more specific audit of the General Fund expenditures by the Board would serve to clarify the use of public funds.

Some witnesses expressed concern that, since Mr. Christen became a member of the Board, the department where his wife is the director—the Special Education Department (SED) received favoritism. The Jury’s investigation found that allocations from the LUSD general fund to the SED (designated as “Contributions” in Table 2) increased over 85 percent in the first year after Bill Christen was elected. The Contributions revenue represent the LUSD General Fund and the Expenses represent the Total Expenditures for the SED.

Table 2.
LUSD Special Education Income and Expenditures^a

Special Ed. Program		6/302013	6/302014	6/302015	6/302016
8010-8099	Revenue Limit	2,253,553.00	1,391,749.00	1,786,082.00	1,739,890.00
8100-8299	Federal Revenue	1,568,977.00	1,585,482.00	1,745,143.00	1,685,598.00
8300-8599	Other State Revenue	(707,623.00)	2,351,302.39	3,061,133.00	3,006,030.00
8600-8799	Local Revenue	265,692.81	975,603.02	1,093,738.06	791,860.00
	Total Revenues	3,380,599.81	6,304,136.41	7,686,096.06	7,223,378.00
8980-8999	Contributions	2,766,064.65	5,125,610.85	6,303,528.83	7,649,905.00
			85.30%	22.98%	21.36%
1000-1999	Certificated Personnel	3,681,065.04	4,515,080.64	5,079,477.98	5,218,593.55
2000-2999	Classified Personnel	1,067,487.85	1,321,979.31	1,692,113.53	1,846,379.50
3000-3999	Employee Benefits	1,280,746.22	1,518,814.45	1,890,800.47	2,130,193.05
4000-4999	Books & Supplies	48,889.90	292,929.24	233,860.01	227,551.69
5000-5999	Services&Other Operating	68,475.45	391,111.72	338,790.96	677,229.21
6000-6999	Capital Outlay	-	78,601.81	-	-
7000-7999	Other Out Go&Transfers Out	-	3,311,230.09	4,754,581.94	4,773,336.00
	Total Expenditures	6,146,664.46	11,429,747.26	13,989,624.89	14,873,283.00
			85.95%	22.40%	6.32%

^a From: “Fiscal Staff\Comparative Analysis\Routine Restricted Maintenance Comparative Report, three years”

The Jury also found that the SED Director submitted invoices for payment of over \$283,000 for books without any preapproval of the expenditures by the Board. This bypassing of budgetary controls was also indicated in two of the “Observations” of an external Audit ending June 30, 2015³ which are summarized below,

1 “Segregation of Duty - System Access-

Observation

In our review of system accessibility in purchasing and accounts payable systems, we noted that various personnel have access to functions not necessary for their assigned responsibilities. Specifically, we noted that at least one accounts payable clerk has access to AS400, the purchasing module, which allows the clerk to create new vendors.”

2 “Disbursements

³ 2014-2015 Independent Audit, Vavrinek, Trine, Day and Co. LLP

Observation

Four of 15 disbursements tested were not pre-approved by the ASB. The invoice date on these disbursements was prior to the purchase request approval date indicating that the order was placed prior to approval."

The Jury also found a lack of oversight in LUSD's payment of travel expenses. For example, District Policy AR 3350 states, "...if an employee stays with a spouse the reimbursement is linked to one-half of the double room rate." (See Appendix B.) Yet the District pre-paid the full double room rate when the SED director traveled to New Orleans for an SED conference accompanied by her husband, a Board member, for a Board-approved conference. (See Appendix C.) The LUSD should have paid for only half of the hotel bill. No internal controls exist by which the LUSD can collect these pre-paid expenses from their employees. Travel funding comes from the General Fund and must be approved by the Board.

In addition, the Jury found that employees continue to be away from work without approval or appropriate "time away" forms being submitted. The issue was noted in an independent audit dated June 30, 2015⁴ and continues to be an ongoing problem.

"Payroll - Vacation Requests-

Observation:

During our testing of vacation request procedures, we noted vacation request forms are not utilized consistently for requests of vacation. Without these forms, there is no evidence of prior approval of vacation requests by the employee's immediate supervisor."

The Jury recommends that the LUSD Board ensure that existing vacation and attendance policies are enforced.

Hostile Work Environment

Former and current employees interviewed by the Jury reported a hostile and confrontational work environment. Several key employees gave this as their primary reason for resigning. Among the contributing factors often cited by LUSD employees were the increasingly contentious working relationship between the Superintendent and Mr. Christen, and between the SED director and her colleagues. LUSD employees stated they did not have recourse to prevent these problems, for "fear of retaliation."

LUSD has a "Nondiscrimination in Employment" policy, but it expressly prohibits only "unlawful" conduct. That legalistic limitation undercuts the policy's usefulness in preventing and remedying workplace conduct that may be harmfully abusive, but not clearly unlawful. LUSD could easily plug this potential loophole by clarifying that the policy prohibits individuals at every level of the organization from engaging in abusive conduct as defined in Government Code section 12950.1, subdivisions (b) and (g)(2): "conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct may include ... verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance."

⁴ Ibid

Lack of Ethics Training

The Jury learned that the Board has not required ethics training for itself or the certified staff employees. An ethics training course is available online, at no cost, from the California Fair Political Practices Commission⁵. This training course covers subjects such as conflict of interest, and greater awareness of those subjects might have avoided or limited the unethical conduct described in this Report. Although this training is not specifically required by AB 1234, the Jury recommends that the Board adopt a policy that requires such training.

CONCLUSION

The 2015–2016 Santa Barbara County Grand Jury’s investigation of the Lompoc Unified School District (LUSD) and its Board of Education (Board) found that, by permitting both the appearance of a conflict of interest and an ongoing hostile work environment to exist, the Board has failed in its self-proclaimed mission “to provide leadership and citizen oversight of the district.” Additionally, the Board has not provided adequate oversight of its financial responsibilities.

The 2015 - 2016 Santa Barbara County Grand Jury found other issues which require action. The Lompoc Unified School District needs to enforce policies to process employee complaints without fear of retaliation. District attendance policies need to be enforced to provide accountability for staff absences during the workday. The Board should require ethics training for its members. Finally, internal controls need to be established to provide adequate monitoring and enforcement of Board policies and the budgetary process.

FINDINGS AND RECOMMENDATIONS

Finding 1

A Lompoc Unified School District Board of Education member twice voted on pay increases that benefited his spouse.

Recommendation 1a

That the Lompoc Unified School District Board of Education require that the spouse’s pay increases be reimbursed to the Lompoc Unified School District.

Recommendation 1b

That the Lompoc Unified School District Board of Education members recuse themselves from discussing and voting on issues that give rise to the perception of a conflict of interest.

Finding 2

The Lompoc Unified School District Board of Education does not have adequate control of how expenditures of the General Fund are being allocated and tracked.

Recommendation 2

That the Lompoc Unified School District Board of Education obtain an independent, specific audit of

⁵ <http://www.localethics.fppc.ca.gov/login.aspx>

the General Fund expenditures to clarify the use of public funds.

Finding 3

A Lompoc Unified School District employee traveled to a conference with her spouse, a Lompoc Unified School District Board of Education member, and she failed to reimburse expenses as required by “Travel Expenses” AR 3350.

Recommendation 3a

That the Lompoc Unified School District Board of Education enforce the Lompoc Unified School District travel policy as required by “Travel Expenses” AR 3350.

Recommendation 3b

That the Lompoc Unified School District Board of Education prepare appropriate forms or put in place a tracking system so that the business office has a method to collect pre-paid travel expenses from employees.

Finding 4

The Lompoc Unified School District Board of Education has allowed a hostile work environment to exist.

Recommendation 4a

That the Lompoc Unified School District Board of Education add a policy prohibiting all District employees, Board members, and officials from engaging in abusive conduct as defined in Government Code section 12950.1, subdivisions (b) and (g)(2) [“conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to an employer’s legitimate business interests. Abusive conduct may include ... verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person’s work performance.”]

Recommendation 4b

That, after the Lompoc Unified School District adopts the policy described above, the District post, distribute, and provide training on that policy throughout the organization, and enforce it.

Finding 5

The Lompoc Unified School District does not adequately account for the presence of its staff and management during work hours.

Recommendation 5

That the Lompoc Unified School District enforce an attendance policy for staff and management to ensure they are present and accounted for during work hours.

Finding 6

The Lompoc Unified School District Board of Education does not include its members in the “Employment of Relatives” Policy BP 4112.8/4312.8 (See Appendix D).

Recommendation 6

That the Lompoc Unified School District Board of Education revise its Policy, BP 4112.8/4312.8, to 2015-16 Santa Barbara County Grand Jury

include members of the Lompoc Unified School District Board of Education.

Finding 7

Members of the Lompoc Unified School District Board of Education are not required to receive ethics training.

Recommendation 7

That the Lompoc Unified School District Board of Education adopt a policy to require ethics training for Board members on par with AB1234 “Local Ethics Training” requirements.

REQUEST FOR RESPONSE

Pursuant to *California Penal Code Section 933 and 933.05*, the Santa Barbara County Grand Jury requests each entity or individual named below to respond to the enumerated findings and recommendations within the specified statutory time limit:

Santa Barbara County District Attorney – Information Copy – No Response Required

Superintendent Santa Barbara County Education Office – 90 days

Finding 2

Recommendation 2

Santa Barbara County Board of Education– 90 days

Finding 2

Recommendation 2

Lompoc Unified School District Board of Education – 90 days

Findings 1, 2, 3, 4, 5, 6, and 7

Recommendation 1a, 1b, 2, 3a, 3b, 4a, 4b, 5, 6, and 7

APPENDIX A
Government Code 1090

GOVERNMENT CODE

SECTION 1090-1099

1090. (a) Members of the Legislature, state, county, district, judicial district, and city officers or employees shall not be financially interested in any contract made by them in their official capacity, or by any body or board of which they are members. Nor shall state, county, district, judicial district, and city officers or employees be purchasers at any sale or vendors at any purchase made by them in their official capacity.

(b) An individual shall not aid or abet a Member of the Legislature or a state, county, district, judicial district, or city officer or employee in violating subdivision (a).

(c) As used in this article, "district" means any agency of the state formed pursuant to general law or special act, for the local performance of governmental or proprietary functions within limited boundaries.

1091.5. (a) An officer or employee shall not be deemed to be interested in a contract if his or her interest is any of the following:

(6) That of a spouse of an officer or employee of a public agency in his or her spouse's employment or officeholding if his or her spouse's employment or officeholding has existed for at least one year prior to his or her election or appointment.

1097 (a) Every officer or person prohibited by the laws of this state from making or being interested in contracts, or from becoming a vendor or purchaser at sales, or from purchasing scrip or other evidences of indebtedness, including any member of the governing board of a school district, who willfully violates any of the provisions of those laws, is punishable by a fine of not more than one thousand dollars (\$1,000), or by imprisonment in the state prison, and is forever disqualified from holding any office in this state.

(b) An individual who willfully aids or abets an officer or person in violating a prohibition by the laws of this state from making or being interested in contracts, or from becoming a vendor or purchaser at sales, or from purchasing scrip, or other evidences of indebtedness, including any member of the governing board of a school district, is punishable by a fine of not more than one thousand dollars (\$1,000), or by imprisonment in the state prison, and is forever disqualified from holding any office in this state.

(AMENDED BY STATS. 2014, CH. 483, SEC. 3. EFFECTIVE JANUARY 1, 2015.)

APPENDIX B

Lompoc School District Travel Policy

AR 3350

Business and Non-Instructional Operations

Travel Expenses

Reimbursement Procedures

The following instructions must be followed when submitting claims for reimbursement for in-state and out-of-state travel and other incurred expenses:

- 1 All claims must be submitted on district approved forms with original signatures on all pages.
- 2 All claims must be by individual, have a valid budget account number, and have copies of the fully signed trip request and travel form attached.
- 3 List name of person traveling or incurring expense. Only expenses, or prorated portions, incurred as representatives of the school district are payable. **AN EMPLOYEE CAN BE REIMBURSED ONLY FOR HIS/HER OWN EXPENSES;**
- 4 State mode of transportation - railroad, bus, airplane or personal automobile. List amount of fare separately. Travel vouchers/receipts must be submitted in case of private carrier. Car mileage is reimbursed at the current Internal Revenue Service (IRS) standard mileage rate or as specified in personnel contracts. **Travel is computed from and to the school district as starting and completion point.** An exception to this rule occurs when an employee begins/completes travel from a point other than the district, and the mileage to/from this other point is less than the mileage to/from the district. In instances such as these, the mileage will be computed as the lesser of the district or the other starting/ending point. If a personal car is used, the travel expense approved will be no greater than the expense that would have been incurred if it had been by airplane. Exceptions to this require prior approval of the immediate management supervisor. When a private car is used, the mileage must be listed in the expense claim. **Mileage will be paid only for the approved distance between place of departure and destination based on the official Automobile Club of Southern California mileage chart (<http://www.aaa-ca.com>), unless an explanation is given to justify additional mileage related to district business.**
- 5 Hotel - when traveling on school district business, with proper school district identification, hotels may grant a special government/state rate. **Employees shall request the state government hotel rate or lowest rate available, whether it is the state government rate or any other available rate.** Exceptions to the state rate or the lowest rate available must be pre-approved by the Superintendent. **When possible, two employees shall share a room as long as the employee is the same gender.** If a room is occupied by a district employee and other persons, the employee may claim only their portion of the room rate. For example, if an

Page 1 of 4

Business and Non-Instructional OperationsTravel Expenses (continued)

employee stays with a spouse the reimbursement is linked to one-half of the double room rate. If a room is occupied by two or more employees, each employee may claim only his/her prorated portion of the expense. **The receipt must be the original hotel/motel receipt.** Each employee must pay his/her own share of the expense as pre-approved on the LUSD travel form.

Travel Advance

The Superintendent or designee may approve an advance not to exceed \$75/day for meals, tolls, and short-term parking of one hour or less in lieu of other procedures and limits established here within. Other per diem rates may be established by the Board in individual employment contracts. Only actual and appropriate expenses below the \$75 per diem are reimbursed.

Claim Forms

Claim forms are required for the following expenses:

- 1 Meals - Reasonable expenditures are allowed for meals. Meals with an original, signed receipt by the LUSD claimant will be reimbursed up to the following rates not to exceed the following: (except as provided for in individual employee contracts):

Breakfast \$11;

Lunch \$16;

Dinner \$34.

With prior approval from the Superintendent and based on special circumstances and locality, meals will be reimbursed at the above rates. The rates are based on the U.S. General Services Administration (GSA) for Meals and Incidental Expenses (M&IE) for Santa Barbara County. Rates will be reviewed annually and based on GSA rates.

If any meals are included in the pre-paid conference registration fees and the employee chooses to eat elsewhere that meal cost will not be reimbursed. Employees shall submit receipts and are reimbursed on actual food expenses for days enumerated on the approved conference request form.

2. If an employee is on school business for a portion of the work day the employee will be entitled to the meal reimbursement for the meals consumed, except as provided for in individual employee contracts.

If expenses are to be paid for informal meetings, including but not limited to luncheon meetings between the Superintendent and an administrator, or a District board member or a member of the community, the Superintendent or designee is authorized to determine in advance whether or not such expenditures promotes District business and whether or not as a matter of policy such expenses can be incurred.

3. Signed receipts by the LUSD claimant are required for all of the following expenses:
 - A. Meal Reimbursement
 - B. Taxi-list separately and indicate points of travel
 - C. Telephone or telegrams – list separately all points of call and charges
 - D. Registration, dues, or any other incurred expenses must be substantiated
 - E. Car rental – when a choice of rental service is available, the most economical car rental is required.
 - F. Hotel charges - list separately and support by hotel voucher/receipt. Employees sharing a hotel room must submit a travel reimbursement claim for their share of the cost of the hotel room. Hotel charges must be at State Rate or lowest available rate, unless pre-approved by the Superintendent or designee
 - G. Parking. Actual self-parking expenses are reimbursed; valet parking, while not usually approved, must be pre-approved and a written explanation is required for the extenuating circumstance.
4. Gratuities - other than for normal tips for taxis, bellboys, maids (for extended stays), baggage handling, and meals, gratuities are not authorized. If gratuities of an unusual amount or nature are required for a major meeting, convention, etc., they must be approved in advance and detailed on the individual travel expense report.
5. Travel expenses for a spouse are not reimbursable.
6. The Superintendent or designee shall in advance determine if any employee shall be reimbursed for expenses incurred in attending local civic organization functions to the extent that such expenses are incurred in the course of performing services for the school district.
7. Claims must be submitted within two weeks after completion of the trip. Unless all directions are adhered to and proper evidence presented, claims will be returned unreimbursed.

Business and Non-Instructional Operations

Travel Expenses (continued)

8. Group travel (e.g. groups of 3 or more) shall be managed by the administrator leading the trip. Travel pre-approval forms are required for each LUSD employee participating on the trip, and the administrator shall coordinate event registration, transportation, hotel accommodations and shall be accountable for the pre-approved expenses.

Lompoc Unified School District
Approved: (4/87 6/87 12/99 4/07) 10/25/11

APPENDIX C Travel Expenses



Lompoc Unified School District
Address all invoices to the Accounting Department:
P.O. Box 8000
Lompoc, CA 93438-8000
(805) 742-3190 FAX (805) 737-1708

PURCHASE ORDER

NO. PO16-01224

VENDOR: #000066/1

RECEIVED
OCT 15 2015
ACCOUNTING

SHIP TO: Special Education

MARRIOTT HOTEL SERVICES INC
P.O. Box 403003
Atlanta, GA 30384-3003

PO Date 10/14/2015		F O B		Ship Via		Tax Rate 8.0000		Terms		Required by	
Requisition # R16-01369		Requisition Date 09/22/2015		Requisitioner		Site SPED		Room			
ITEM	QTY	UNIT	DESCRIPTION					UNIT COST	EXTENSION		
			HOTEL ACCOMODATIONS FOR STAFF ATTENDING THE NASP CONVENTION. SEE ATTACHED MAILING INSTRUCTIONS & EMAIL CONFIRMATIONS								
1	1	EACH	[REDACTED] CHECK IN 2/9/16, CHECK OUT 2/14/16; RESERVATION ID 2SJM8					\$ 1,214.15	\$	1,214.15	
2	1	EACH	[REDACTED] CHECK IN 2/9/16, CHECK OUT 2/14/16; RESERVATION ID HQXP26					1,214.15		1,214.15	
3	1	EACH	[REDACTED] CHECK IN 2/9/16, CHECK OUT 2/14/16; RESERVATION ID WXVTS5					1,214.15		1,214.15	
4	1	EACH	[REDACTED]; CHECK IN 2/9/16, CHECK OUT 2/14/16; RESERVATION ID XZ85JY					1,214.15		1,214.15	
5	1	EACH	[REDACTED] CHECK IN 2/9/16, CHECK OUT 2/14/16; RESERVATION ID Z57JX5					1,214.15		1,214.15	
6	1	EACH	[REDACTED] CHECK IN 2/8/16, CHECK OUT 2/14/16; RESERVATION ID N4XH84 PORTION BILLED TO [REDACTED] PREPAY WARRANT #					1,456.98		1,456.98	

PAID

IMPORTANT REMINDERS:

1. Itemized invoices in duplicate.
2. Enclose packing list with ALL shipments.
3. No deviation in price or substitution in kind permitted.
4. All deliveries F.O.B. destination unless otherwise specified. If freight is to be charged, prepay and add to invoice.
5. THE LAW REQUIRES MATERIAL SAFETY DATA SHEETS FOR ALL TOXIC MATERIALS. PLEASE ENCLOSE WITH INVOICE.
6. This Purchase Order number must be printed on all invoices, packing lists, correspondence, and on all boxes, cartons or packages.
7. School districts are not subject to Federal Excise Tax. Exemption certificates furnished upon request.

Order Sub-Total	\$	7,527.73
Sales Tax		.00
Shipping		.00
Adjustment		.00
Order Total	\$	7,527.73

PREPAY N^o 10/22/15
SB 10-14-15

ACCOUNT DISTRIBUTION	PERCENT	DOLLAR AMOUNT
01- 6500- 0- 5001- 2100- 5200- 000- 2200- BI LL	3. 23%	\$ 242. 83
01- 6512- 0- 5750- 3110- 5200- 000- 0000- 0000	96. 77%	\$ 7, 284. 90

NO. PO16-01224

Accounting
Page 1 of 1

APPENDIX D
BP4112.8/4312.8
Employment of Relatives

BP 4112.8/4312.8

Personnel

Employment Of Relatives

The Governing Board desires to maximize staff and community confidence in district hiring, promotion, and other employment decisions by promoting practices that are free of conflicts of interest or the appearance of impropriety. (cf. 4030 - Nondiscrimination in Employment) (cf. 9270 - Conflict of Interest)

The Board prohibits the appointment of any person to a position for which his/her relative maintains management, supervisory, evaluation, or promotion responsibilities and prohibits an employee from participating in any decision that singularly applies to any of his/her relatives. (cf. 4111/4311 - Recruitment and Selection) (cf. 4115 - Evaluation/Supervision) (cf. 4315 - Evaluation/Supervision)

For purposes of this policy, relative includes the individual's spouse, domestic partner, parents, grandparents, great-grandparents, children, grandchildren, great-grandchildren, brothers, sisters, aunts, uncles, nieces, nephews, and the similar family of the individual's spouse or domestic partner.

In addition, the Superintendent or designee may determine, on a case-by-case basis, whether to appoint a person to a position in the same department or facility as an employee with whom he/she maintains a personal relationship when that relationship has the potential to create (1) an adverse impact on supervision, safety, security, or morale of other district employees or (2) a conflict of interest for the individuals involved which is greater because of the their relationship than it would be for another person. (cf. 4031 - Complaints Concerning Discrimination in Employment)

An employee shall notify his/her supervisor within 30 days of any change in his/her circumstances that may constitute a violation of this policy.