



## **Conflict of Interest Policy**

Propel is committed to high standards of honesty, integrity and impartiality to maintain the trust of students and the public. Propel's reputation requires that the Board, its officers and other representatives avoid misconduct and conflicts of interest. The Board, its officers and other representatives are to conduct themselves ethically at all times and are to exercise reasonable judgment when performing their duties.

Confidential information obtained through your association with Propel must be used only for Propel. You must not use or permit others to use Propel's confidential information for furthering a private interest or for making a profit.

All Board Members, Officers, and other representatives of Propel must avoid potential conflicts of interest. A potential conflict of interest exists whenever you have an outside interest, direct or indirect, which conflicts with your duty to Propel or adversely affects your judgment in performing your duties with Propel. Because the appearance of a conflict of interest may be just as damaging to Propel's reputation as a real conflict, you must avoid situations that appear to conflict with your duties to Propel.

Propel's name is not to be used as leverage by Board Members or Officers to enhance their own opportunities. Propel's name is not to be used by Board Members or Officers when dealing with others in political, investment, business or purchasing activities.

If a conflict of interest or potential conflict of interest arises a description of the conflict and its extent must be fully disclosed immediately to Propel's attorney, who, after making a thorough review of the circumstances, will report to the Board's Executive Committee. The Executive Committee will determine appropriate action to be taken.

No contract or transaction between Propel and a Board Member or Officer, or any organization in which the Board Member or Officer has a financial or beneficial interest or is serving as a Board Member or officer shall be authorized unless it has been adopted and approved in accordance with the Public School Code of 1949, 24 P.S. § 1-101, *et seq.* and the Non-profit Corporation Law at 15 Pa. C.S.A. § 5725(a).

Unless specifically approved by the Board or a committee of the Board, a Board Member or Officer shall not serve on the board of any entity that competes directly with Propel. Should a conflict develop, Propel reserves the right to request the Board Member or Officer involved to resign from either the Board or from the conflicting position.



Board Members and Officers are to render efficient and courteous service without expectation of reward. Cash or gifts be declined or redirected to Propel as a contribution.

A Board Member or Officer shall not acquire or appropriate for personal use any Propel property, service, or revenue opportunity.

A Board Member or Officer shall not use Propel funds contributing or otherwise supporting any candidate for any election to any local, state, or federal office.

## **STATEMENT OF FINANCIAL INTEREST**

The Public Office and Employee Ethics Act requires Board Members to file annual statements of their personal financial interests. Board members are required to file such statements annually by May 1. A copy of each Member's annual statement of personal financial interest will be kept on file by Propel. Members joining the Board between January 1 and May 1 must file the statement no later than May 1 of the year in which they joined the Board. Members joining after May 1 must file the statement by May 1 of the following year. The law provides for penalties and fines for failure to file the required annual statement of personal financial interests. Questions about the statement should be directed to Propel's attorney.

## **Standards of Conduct**

Propel maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees and Board members engaged in the selection, award and administration of contracts.

No employee or Board member may participate in the selection, award or administration of a contract supported by a federal award if s/he has a real or apparent conflict of interest as defined above, as well as any other circumstance in which the employee, Board member, any member of his/her immediate family, his/her business partner, or an organization which employs or is about to employ any of them, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

Propel shall not enter into any contract with a Board member or employee, or his/her spouse or child, or any business in which the person or his/her spouse or child is associated valued at \$500 or more, nor in which the person or spouse or child or business with which associated is a subcontractor unless the Board has determined it is in the best interests of Propel to do so, and the contract has been awarded through an open and public process, including prior public notice and subsequent public disclosure of all proposals considered and contracts awarded. In such a case, the Board member or



employee shall not have any supervisory or overall responsibility for the implementation or administration of the contract.

When advertised formal bidding is not required or used, an open and public process shall include at a minimum:

1. Public notice of the intent to contract for goods or services;
2. A reasonable amount of time for potential contractors to consider whether to offer quotes; and
3. Post-award public disclosure of who made bids or quotes and who was chosen.

Any Board member or employee who in the discharge of his/her official duties would be required to vote on a matter that would result in a conflict of interest shall abstain from voting and, prior to the vote being taken, publicly announce and disclose the nature of his/her interest as a public record.

No public official or public employee shall accept an honorarium.

### **Organizational Conflicts**

Organizational conflicts of interest may exist when due to Propel's relationship with a subsidiary, affiliated or parent organization that is a candidate for award of a contract in connection with federally funded activities, Propel may be unable or appear to be unable to be impartial in conducting a procurement action involving a related organization.

In the event of a potential organizational conflict, the potential conflict shall be reviewed by the Superintendent or designee to determine whether it is likely that Propel would be unable or appear to be unable to be impartial in making the award. If such a likelihood exists, this shall not disqualify the related organization; however, the following measures shall be applied:

1. The organizational relationship shall be disclosed as part of any notices to potential contractors;
2. Any Propel employees or officials directly involved in the activities of the related organization are excluded from the selection and award process;
3. A competitive bid, quote or other basis of valuation is considered; and
4. The Board has determined that contracting with the related organization is in the best interests of the program involved.

### **Reporting**

Any perceived conflict of interest that is detected or suspected by any employee or third party shall be reported to the Superintendent. If the Superintendent is the subject of the perceived



conflict of interest, the employee or third party shall report the incident to the Board President.

Any perceived conflict of interest of a Board member that is detected or suspected by any employee or third party shall be reported to the Board President. If the Board President is the subject of the perceived conflict of interest, the employee or third party shall report the incident to the Superintendent, who shall report the incident to the solicitor.

In the event an investigation determines that a violation of this policy has occurred, the violation shall be reported to the federal awarding agency in accordance with that agency’s policies.

**Disciplinary Actions**

If an investigation results in a finding that the complaint is factual and constitutes a violation of this policy, Propel shall take prompt, corrective action to ensure that such conduct ceases and will not recur. Propel staff shall document the corrective action taken and, when not prohibited by law, inform the complainant.

Violations of this policy may result in disciplinary action up to and including discharge, fines and possible imprisonment. Disciplinary actions shall be consistent with Board policies, procedures, applicable collective bargaining agreements and state and federal laws.

| <b>Date Last Modified</b> | <b>Name</b>   |
|---------------------------|---------------|
| 4/6/2018                  | Jaclyn Hoover |
| 3/1/2023                  | Jaclyn Hoover |

| <b>Approved By</b> | <b>Date</b>    |
|--------------------|----------------|
|                    |                |
| Board of Trustees  | July 17, 2013  |
| Dr. Tina Chekan    | March 20, 2023 |
| Board of Trustees  | March 20, 2023 |