BP-3315 (a)

ACCEPTING GIFTS FROM VENDORS

No district employee or Board member shall accept personal gifts, commissions, or expense-paid trips from individuals or companies selling equipment, materials, or services required in the operation of district programs. Gifts include any gift purchased specifically for an employee which is not generally offered to other buyers.

This policy does not prohibit employees from accepting promotional or advertising items ("swag") which are offered by businesses free to all as part of their public relations programs.

Note: Although it is impossible to weigh every scenario, transparency is best. If a staff member receives a gift, it is best to discuss the situation with a supervisor so that nothing is being hidden and the best decision can be made based on the actual circumstances and nature of the gift. Some sample scenarios are:

*If a staff member wins a door prize at a conference and every participant had the equal opportunity to win, the prize would belong to the staff member.

*In the case of a flight where every single passenger is offered unsolicited gifts, the gift would belong to the staff member.

*If a staff member is purchasing items with district funds and an incentive is offered, the incentive would belong to the district.

*If a staff member is completing a survey during their hours of employment and receives a gift for doing so, the gift would belong to the district.

District employees who work for or serve as consultants for potential vendors shall not participate in evaluation any equipment, materials, or services of that vendor or its competitors.

No employee, officer or agent of the District may participate in the selection, award, or administration of a contract supported by federal funds if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm under consideration for a contract. The employees, officers, and agents of the District may neither solicit, nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

BP-3315 (b)

ACCEPTING GIFTS FROM VENDORS

Universal Service Program/e-Rate Vendors

Note: Effective 2011, the FCC amended its e-Rate program rules and adopted gift restrictions for schools and districts participating in e-Rate. The receipt of gifts by applicants from service providers and potential providers is a competitive bidding violation. The gift prohibitions are always applicable, not just during the bidding process. Relevant school district personnel may not solicit or receive any gift or other thing of value from a service provider participating in or seeking to participate in the e-Rate program. There are limited exceptions, including when the value of the item is work $20 or less, so long as items do not exceed $50 per year per employee from any one service provider.

The District takes advantage of federal technology funding through the universal service program known as e-Rate. E-Rate participants may not, at any time, solicit or accept gifts or other things of value from an existing or potential e-Rate service provider. Nominal gifts and refreshments may be allowed as authorized by the Superintendent or designee.

E-Rate gift prohibitions apply to the School Board and to employees, consultants, or contractors involved in the District's e-Rate program who prepare, approve, sign, or submit e-Rate applications, technology plans, or other e-Rate forms; prepare bids, communicate, or work with e-Rate service providers, e-Rate consultants, or the Universal Service Administrative Company; and those responsible for monitoring compliance with the e-Rate program.

Charitable donations by service providers in support of schools are permitted. These contributions may not be directly or indirectly related to e-Rate procurement activities or decisions.

The Superintendent or designee shall develop guidelines to implement this policy in compliance with e-Rate program rules.

Legal Reference:

CODE OF FEDERAL REGULATIONS

47 C.F.R. Part 54, subpart f, Universal Support for Schools and Libraries

ALASKA STATUES
11.56.100-56.130 Bribery and related offenses

Adoption Date: June 3, 2024