



Title: **Conflict of Interest**

Code: 624

Book: Policy Manual

Section: 600 Finances

Standards of Conduct

In accordance with 2 C.F.R. §200.18(c)(1), the district maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.[\[1\]](#)

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award 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 an 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 considered for a contract.

The officers, employees, and agents of the district may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value.

District personnel shall disclose all financial interests and shall be aware that substantial interests may affect purchasing and contract agreements with the Central Greene School District. District personnel shall abstain from participation in any decision

involving businesses or real property for which they hold a financial or substantial interest.

District personnel shall not require or request that subordinate employees, or students, purchase any good specifically and/or solely from a business for which they or their immediate family member has a financial or substantial interest.

The Director of Business Affairs shall be responsible for monitoring and enforcing provisions, to the best of his/her knowledge, of applicable state and federal statute and regulation. The Director of Business Affairs may inquire about employee financial interests when in question.

Definitions

Nominal value is defined as an unsolicited gift with a value of \$25.00 or less.

Immediate family includes a spouse, children, parents, siblings, and domestic partner of the employee, officer, or agent.

Financial interest is anything of monetary value, including, but not limited to salary, consulting fees, honoraria, equity interests (e.g., stocks, stock options or other ownership interests), interests in real or personal property, dividends, royalties, rent, capital gains, intellectual property (e.g., patents, copyrights, and royalties from such rights).

Reporting Process

The process for reporting conflicts of interest, both real and potential:

All district employees shall review the provisions of the Conflict of Interest Policy annually. Principals shall be responsible for review with staff members at schools. Department directors shall be responsible for review with staff members in their department.

Members of the leadership team shall be responsible for review with department directors. The superintendent shall review annually and report his/her review to the president of the Board of Education.

District administrative personnel (Act 93) shall be required to complete the Ethics and Conflict of Interest training and form annually. Act 93 personnel shall update this form as necessary if financial interest, substantial interest or employment information changes prior to annual review.

All Ethics and Conflict of Interest disclosure information shall be kept with the Business Office. Procurement and district employees shall contact the Business Office when submitting contracts for approval in excess of one thousand dollars (\$1000) for appropriate disclosure information and notification.

The alternative process for reporting conflicts of interest, both real and potential if the person receiving the report is involved in the potential conflict shall be the supervisor of person who would normally receive the report.

The Superintendent will remove an employee from a procurement transaction if there is a conflict of interest, as well as document that the employee has properly recused him or herself.

Disciplinary Actions

District personnel who knowingly violate provisions in the Governmental Conduct Act and in this procedural directive may be subject to disciplinary action, including dismissal, demotion or suspension. District personnel who knowingly violate provisions of the Governmental Conduct Act may also be subject to criminal and/or civil action in a court of law.

Confidentiality Of Disclosure Information

To the extent allowable by law, the district shall keep disclosure information confidential. However, disclosure information may be subject to an inspection of public records request pursuant to the Inspection of Public Records Act.

Adopted: **October 18, 2016**

Legal References:

- [1. 2 CFR 200.18](#)
 - [2 CFR 200.112](#)
 - [2 CFR 200.318](#)
 - [51 PA Code 15.2](#)
 - [65 Pa. C.S.A. 1101 et seq](#)
 - Pol. 004
 - Pol. 011
 - Pol. 317
 - Pol. 319
 - Pol. 322
 - Pol. 609
 - Pol. 702
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