

CARLISLE AREA SCHOOL DISTRICT

SECTION: OPERATIONS

TITLE: FEDERAL PROGRAMS
CONFLICT OF INTEREST

ADOPTED: August 18, 2016

REVISED:

827 FEDERAL PROGRAMS CONFLICT OF INTEREST	
<p>1. Authority</p> <p>2 C.F.R. §200.18(c)(1)</p>	<p>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.</p>
<p>2. Definitions</p> <p>65 Pa.C.S. Sec. 1102, 13A03</p>	<p>Immediate family – a parent, spouse, child, brother, sister, or in-laws.</p> <p>Gift – anything of value which is provided to the extent that payment or consideration of equal or greater value is not received in return including but not limited to tickets to sporting or cultural events; items of food; meals; use of facilities; forgiveness of debts; interests in real property, investments, or merchandise; or a rebate or discount (unless the rebate or discount is normally given to any member of the public).</p>
<p>3. Standards of Conduct</p> <p>2 CFR Sec. 200.18(c)(1)</p>	<p>No employee, officer, or agent employed by the District 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.</p> <p>A School District employee shall not advertise business or professional activities on School District property or use School District work hours, property, or services to perform or promote personal or commercial enterprises or to campaign or raise money for any candidates for political office.</p>
<p>65 Pa.C.S. Sec. 1103</p> <p>22 Pa. Code Sec. 235.9</p>	<p>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. Description of a gift that is a nominal value is outlined in school board policy 702 that ensure that this is compliant with state and local rules.</p>
<p>4. Conflict of Interest</p>	<p>The standard of behavior at Carlisle Area School District is that all staff, volunteers,</p>

	<p>and board members avoid conflicts of interest between the interests of Carlisle Area School District, and personal, professional, and business interests. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest.</p> <p>The purpose of this policy is to protect the integrity of Carlisle Area School District's decision-making process, to enable our constituencies to have confidence in our integrity, and to protect the integrity and reputations of volunteers, staff, and board members. Upon or before election, hiring or appointment, a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest will be made. This written disclosure will be kept on file and will be updated as appropriate.</p> <p>In the course of meetings or activities, an employee, officer, or agent will disclose any interests in a transaction or decision where (including business or other nonprofit affiliations), family and/or my significant other, employer, or close associates will receive a benefit or gain.</p>
<p>4. Organizational Conflicts</p> <p>2 CFR Sec. 200.318(c)(2)</p>	<p>A real or perceived conflicting interest may be defined as an interest, direct or indirect, with any persons or firms. Such an interest might arise through:</p> <ol style="list-style-type: none"> 1. Owning stock or holding debt or other proprietary interests in any third party dealing with Carlisle Area School District. 2. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with the District. 3. Receiving compensation for services with respect to individual transactions involving the school district. 4. Using school district's time, personnel, equipment, supplies, or goodwill for other than the school district-approved activities, programs, and purposes. 5. Receiving personal gifts or loans from third parties dealing or competing with the District. Receipt of any gift is disapproved except gifts of a value less than \$50, which can not be refused without discourtesy. No personal gift of money should ever be accepted.
<p>5. Disciplinary Actions</p>	<p>A conflict of interest disclosure in the District should be made to the immediate supervisor, then to the Director of Finance, which will ultimately be reported then to the Board President, who shall bring the matter to the attention of the Board. The Board shall determine whether a conflict exists and in the case of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to the District. The decision of the Board on these matters will rest in their sole discretion, and their concern must be the welfare of the school district and the advancement of its purpose.</p>

