

## SUGAR VALLEY RURAL CHARTER SCHOOL

POLICY NUMBER: 626.4  
SECTION: FINANCES  
TITLE: **FEDERAL PROGRAMS - CONFLICT OF INTEREST**  
DATE ADOPTED: JANUARY 2017  
DATE LAST REVISED: JANUARY 2017

### **FEDERAL PROGRAMS - CONFLICT OF INTEREST**

#### DEFINITION

*Nominal value* – 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 or other interest* – 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).

#### GUIDELINES

##### **Standards of Conduct**

In accordance with 2 C.F.R. §200.18(c)(1), Sugar Valley Rural Charter School 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.

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 School 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.

**State Law.** This Policy does not supersede the Pennsylvania Public Official and Employee Ethics Act, 65 Pa. C.S. §1101 et seq. It is mandatory that in all respects the State Ethics Act also be followed.

The Business Manager shall be responsible for monitoring and enforcing provisions, to the best of his/her knowledge, of application state and federal statute and regulation, including but not limited to, the Pennsylvania Public School Code and the Pennsylvania Public Official and Employees Ethics Law. The Business Manager may inquire about employee financial interests when in question.

### **Reporting Conflicts of Interest**

School personnel shall abstain from participation in any decision involving businesses or real property for which they hold a financial or substantial interest. All employees have an obligation to report the facts and circumstances of any known conflict of interest, both real and potential, to their immediate supervisor immediately upon learning of the conflict.

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

The CEO will remove an employee from a procurement transaction if there is a conflict of interest, in addition to securing proper documentation to show that the employee has properly recused him or herself.

### **Review and Training**

All School employees shall review the provisions of the Conflict of Interest Policy annually. Principals shall be responsible for review with staff members at schools. Training on the reporting process will take place with central office administrators and principals annually during one of the regularly scheduled administrative meetings held with the CEO.

### **Organizational Conflicts**

If there are any organizational conflicts, as detailed, proper notification will be given to the Business Office so that it may be reviewed with the School's solicitor for legal guidance. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. 2 C.F.R. §200.318(c)(2)

### **Disciplinary Actions**

Disciplinary actions will be taken against any individual who violates the standards of conduct.