

Conflict of Interest Policy 200.318(c)

Definition: such a conflict of interest arises 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.

Potential conflicts should be reported to the Finance Director and Superintendent. Should the employee being reported be potentially involved in the conflict, a Director shall be the alternate.

Violation of these standards will result in the reporting of the personnel involved to the Superintendent of Schools and, if appropriate, local authorities. Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law. Please report any violation of these procedures in writing as soon as possible. All violations of federal criminal law involving fraud, bribery, or gratuity violations that potentially affect federal awards must be reported as failures to make disclosures. These can result in remedies for noncompliance, including suspension and debarment.

The ACSS ensures that any purchase/contract, from any funding source, that has anything that could be considered a conflict of interest is disclosed, transparent, and provided in writing. The Finance Director and/or Superintendent will ensure that reporting of potential conflicts is conducted. If the decision is made to purchase with non-federal funds after the conflict of interest has been disclosed, a written statement of explanation must be provided, showing that the system has received competitive pricing and that no one personally benefits from the purchase/contract. An employee, officer, agent, or board member of the ACSS may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or vendors. The only allowable gift from a contractor or vendor would be a meal or a conference/workshop that is beneficial to both the school system and the vendor. 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. Any employee, officer, or agent of ACSS must not have an interest as defined in our personnel manual in awarding a firm in which they have a financial interest. No employee shall give a written or oral endorsement to any company or representative for any periodical, book, or product that may be offered for sale to schools. Information regarding conflict of interest is contained in each school's faculty handbook and is distributed and signed off by all employees in the district's onboarding process. Reference: 2 CFR 200.318(c)(1)

Definition of Nominal Items

Nominal items are those that cost less than \$100.