Note: For conflicts of interest and gifts and gratuities related to federal grants and awards, CB and CBB.

An employee shall not accept or solicit any gift, favor, service, or other benefit that could reasonably be construed to influence the employee’s discharge of assigned duties and responsibilities.

Gifts

No gift, favor, loan, service, entertainment, or anything of more than token value shall be accepted by District employees from any District vendor or prospective vendor seeking to do business with the District. Items of token value include trinkets of minimal value such as coffee mugs, key chains, caps, and the like. Plaques and commemorative items are not considered to be gifts. [See CAA, CB, and CBB]

Meals

Meals exceeding $100 in the aggregate per year from any single source, District vendor, or prospective District vendor are strictly prohibited. Meals that exceed $50 per meal or up to $100 in the aggregate per year from any District vendor or prospective vendor must be reported.

E-rate

In the case of E-rate matters, governance provided at CAA supersedes these requirements.

Conflict of Interest

An employee shall not have a personal financial interest, business interest, or any other obligation (e.g., Board member, consultant) that in any way creates a substantial conflict with the proper discharge of assigned duties and responsibilities or that creates a conflict with the best interest of the District.

The Board and the District require employees to put the interests of the District before the interests of external organizations with which they are affiliated, such as being a board member of a volunteer organization. To avoid the appearance of a conflict of interest, any work with outside organizations that are interested in or likely to be interested in any contract, purchase, or financial transaction with the District shall be subject to disclosure by an administrative employee as defined in administrative regulation.

Disclosure Statement

Each employee shall be required to execute the semiannual disclosure statement (i.e., semiannually), certifying that the employee will conform with the requirements of Section 16 of the Special Act of 1923, which created the District.

Definition

“Conflict of interest” includes the common law conflict of interest and the following definition in Section 16 of the Special Act of 1923:

No Superintendent, business manager, or any other person holding any position of employment under said Board, shall...
be directly or indirectly interested in any purchase, sale, business, work or contract, the expense, price or consideration of which is paid from the school funds of said District; nor shall any employee purchase any warrants or claims against said Board or District, or any interest therein, or become surety for any person or persons having a contract or any kind of business with said Board, for the performance of which security may be required. Anyone violating this provision shall be discharged from services.

If the employee is in doubt about a particular item, written clarification shall be requested concerning any transaction or potential transaction that might create a conflict of interest.

**Conflict of Interest Review Committee**

The conflict of interest review committee shall analyze possible conflict of interest disclosures submitted to the Superintendent or the Human Resources Department/Office of Talent/designee, and the committee shall make recommendations to the Superintendent for appropriate action by the Board, if necessary.

The committee shall analyze possible conflict of interest disclosures involving the Superintendent and shall make recommendations to the Board for appropriate action, if necessary. Conflict of interest disclosures involving the Superintendent should be submitted directly to the conflict of interest review committee.

**Effective Date**

This policy shall be effective as of the adoption date, September 9, 2022.