

Pennsbury School District

School Board Policy

Effective Date	Supercedes Index No.	Index No.
6/9/16	New	626.2

Title: Conflict of Interest – Federal Programs

Purpose: This procedure was established to ensure compliance with federal regulations on conflict of interest.

Policy: 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.

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. The Pennsbury School District follows the laws, regulations, and guidance of the PA State Ethics Commission, including, but not limited to the PA Public Schools and District practices related to the standards of conduct and conflicts of interest.

Please refer to the Pennsbury School District Board Policies and Procedures:

1. 011.1 – Board of Governance Standards – Code of Conduct
2. 303.1 – Hiring of Relatives of Employees (Procedure)
3. 708.1 – Lending of School-Owned Equipment

Organizational Conflicts

The District at this time does not have a parent, affiliate or subsidiary organization that is not a state, local, government or Indian tribe that would pose organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, 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 taken against an individual who violates this policy will be leveled upon completion of a full investigation. Applicable due process shall be afforded to the employee. Actions taken will be based upon the nature of the offense and the recommendation of the Superintendent at the conclusion of the investigation. Disciplinary actions may include reprimand, suspension, or termination.

Responsible

Administrator: Superintendent