ADMINISTRATION

*po1129

CONFLICT OF INTEREST

ADOPTED May 4, 2023 · REVISED Apr 9, 2026

1129 - **CONFLICT OF INTEREST**

The proper performance of school business is dependent upon high standards of honesty, integrity, impartiality, and professional conduct by Corporation employees. Further, such characteristics are essential to the Corporation's commitment to earn and keep the public’s confidence. For these reasons, the Governing Board adopts the following procedures to assure that conflicts of interest do not occur. These procedures are not intended to be all-inclusive, nor to substitute for good judgment on the part of all Corporation members, employees, officers, and agents.

A. No employee, officer, agent, or Board member shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts with the employee's job duties and responsibilities in the Corporation.

B. No employee, officer, agent, or Board member shall engage in business, private practice of their profession, the rendering of services, or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, or parents of such students, or clients in the course of their employment with the Corporation.

   Included, by way of illustration rather than limitation, are the following:

   1. the provision of any private lessons or services for a fee;

   2. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee’s employment or through access to Corporation records;

   3. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration;

4. the requirement of students or clients to purchase any private goods or services provided by an employee or any business, or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.

C. No employee, officer, agent, or Board member shall make use of materials, equipment, or facilities of the Corporation in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.

Exceptions to any provision in parts A through C of this policy shall be approved in advance by the CEO and shall be consistent with State law.

No employee, officer, agent, or Board member with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that 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 an entity considered for a contract.

An employee, officer, agent, or Board member may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or vendors. However, pursuant to Federal rules, the Corporation may permit, on an individual basis, gifts to occur when the financial interest is not substantial, ~~or~~ the gift is an unsolicited item with a value under $25, or the gift is from an organization not in business or attempting to do business with the Corporation.

Notwithstanding the above, an employee, officer, agent or Board member may accept an item or prize won or received as the result of participation in a random drawing or lottery, provided the drawing or lottery is open to the general public or to a broad group of participants on equal terms. Any employee, officer, agent or Board member who wins or receives an item or prize valued at more than $25.00 must report the receipt of the prize to CEO within 2 business days of receipt. The report must be in writing and include: i) the name of the organization that gave the prize; ii) a description of the drawing or lottery, including how and to whom it was made available; iii) a description of the prize and the approximate value of the prize. The Corporation reserves the right to determine if the prize should be returned, donated or otherwise disposed of if, in the sole discretion of the Corporation, it determines that receipt of the

prize may compromise or have the appearance of compromising the integrity of the Corporation or the recipient of the prize.

If the Corporation has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the Corporation may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the Corporation is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.

Employees, officers, agents, and Board members must promptly disclose any potential conflict of interest that may lead to a violation of this policy to the Corporation. Upon discovery of any potential conflict of interest, the Corporation will promptly disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.

The Corporation will also promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729–3733). The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity. The Corporation is also required to report matters related to recipient integrity and performance in accordance with Appendix XII of 2 C.F.R. Part 200.

Employees, officers, agents, and Board members found to be in violation of this conflict of interest policy will be subject to disciplinary action up to and including termination, pursuant to Board Policy 1139.01, *Discipline of Administrative Staff* and/or State law.

Effective 7/1/23
Revised 6/5/25
Revised 4/9/26

Legal
F.S.112.312
F.S.112.313
F.S. 1006.32
2 C.F.R. 200.112
2 C.F.R. 200.113
2 C.F.R. 200.318

INSTRUCTIONAL STAFF

*po3129

CONFLICT OF INTEREST

ADOPTED May 4, 2023 · REVISED Apr 9, 2026

3129 - **CONFLICT OF INTEREST**

The proper performance of school business is dependent upon high standards of honesty, integrity, impartiality, and professional conduct by Corporation employees. Further, such characteristics are essential to the Corporation's commitment to earn and keep the public’s confidence. For these reasons, the Corporation adopts the following procedures to assure that conflicts of interest do not occur. These procedures are not intended to be all-inclusive, nor to substitute for good judgment on the part of all Governing Board members, employees, officers, and agents.

A. No employee, officer, agent, or Board member shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts with the employee’s job duties and responsibilities in the school system.

B. No employee, officer, agent, or Board member shall engage in business, private practice of their profession, the rendering of services, or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, or parents of such students or clients in the course of their employment with the Corporation.

   Included, by way of illustration rather than limitation are the following:

   1. the provision of any private lessons or services for a fee;

   2. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee’s employment or through access to Corporation records;

   3. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration;

4. the requirement of students or clients to purchase any private goods or services provided by an employee or any business, or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.

C. No employee, officer, agent, or Board member shall make use of materials, equipment, or facilities of the Corporation in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.

Exceptions to any provision in parts A through C of this policy shall be approved in advance by the CEO and shall be consistent with State law.

No employee, officer, agent, or Board member with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that 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 an entity considered for a contract.

An employee, officer, agent, or Board member may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or vendors. However, pursuant to Federal rules, the Corporation may permit, on an individual basis, gifts to occur when the financial interest is not substantial, ~~or~~ the gift is an unsolicited item with a value under $25, or the gift is from an organization not in business or attempting to do business with the Corporation.

Notwithstanding the above, an employee, officer, agent or Board member may accept an item or prize won or received as the result of participation in a random drawing or lottery, provided the drawing or lottery is open to the general public or to a broad group of participants on equal terms. Any employee, officer, agent or Board member who wins or receives an item or prize valued at more than $25.00 must report the receipt of the prize to CEO within 2 business days of receipt. The report must be in writing and include: i) the name of the organization that gave the prize; ii) a description of the drawing or lottery, including how and to whom it was made available; iii) a description of the prize and the approximate value of the prize. The Corporation reserves the right to determine if the prize should be returned, donated or otherwise disposed of if, in the sole discretion of the Corporation, it determines that receipt of the

prize may compromise or have the appearance of compromising the integrity of the Corporation or the recipient of the prize.

If the Corporation has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the Corporation may not conduct a procurement action involving the parent, affiliate, or subsidiary organization if the Corporation is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.

Employees, officers, agents, and Board members must promptly disclose any potential conflict of interest which may lead to a violation of this policy to the Corporation. Upon discovery of any potential conflict of interest, the Corporation will promptly disclose, in writing, the potential conflict of interest to the appropriate Federal awarding agency or, if applicable, the pass-through entity.

The Corporation will also promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act (31 U.S.C. 3729–3733). The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity. The Corporation is also required to report matters related to recipient integrity and performance in accordance with Appendix XII of 2 C.F.R. Part 200.

Employees, officers, agents, and Board members found to be in violation of this conflict of interest policy will be subject to disciplinary action up to, and including termination, consistent with substantive and procedural due process and as permitted by applicable Board policy, and/or State law.

Effective 7/1/23
Revised 6/5/25
Revised 4/9/26

Legal
F.S. 112.312
F.S. 112.313
F.S. 1002.411
F.S. 1006.32
2 C.F.R. 200.112

SUPPORT STAFF

*po4129

CONFLICT OF INTEREST

ADOPTED May 4, 2023 · REVISED Apr 9, 2026

4129 - **CONFLICT OF INTEREST**

The proper performance of school business is dependent upon high standards of honesty, integrity, impartiality, and professional conduct by Corporation employees. Further, such characteristics are essential to the Corporation's commitment to earn and keep the public's confidence. For these reasons, the Governing Board adopts the following procedures to assure that conflicts of interest do not occur. These procedures are not intended to be all-inclusive, nor to substitute for good judgment on the part of all Board members, employees, officers, and agents.

A. No employee, officer, agent, or Board member shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts with the employee's job duties and responsibilities in the Corporation.

B. No employee, officer, agent, or Board member shall engage in business, private practice of their profession, the rendering of services, or the sale of goods of any type where advantage is taken of any professional relationship they may have with any student, or parents of such students or clients in the course of their employment with the Corporation.

   Included, by way of illustration rather than limitation, are the following:

   1. the provision of any private lessons or services for a fee;

   2. the use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee's employment or through access to Corporation records;

   3. the referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration;

4. the requirement of students or clients to purchase any private goods or services provided by an employee or any business or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.

C. No employee, officer, agent or Board member shall make use of materials, equipment, or facilities of the Corporation in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the checking out of items from an instructional materials center for private practice.

Exceptions to any provision in parts A through C of this policy shall be approved in advance by the Chief Education Officer (CEO) and shall be consistent with State law.

No employee, officer, agent, or Board member with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award. A conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that 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 an entity considered for a contract.

An employee, officer, agent or Board member may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or vendors. However, pursuant to Federal rules, the Corporation may permit, on an individual basis, gifts to occur when the financial interest is not substantial, ~~or~~ the gift is an unsolicited item with a value under $25, or the gift is from an organization not in business or attempting to do business with the Corporation.

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Employees, officers, agents, and Board members found to be in violation of this conflict of interest policy will be subject to disciplinary action, up to and including termination, pursuant to Board Policy 4139.01, *Staff Discipline,* and/or State law.

Effective 7/1/23
Revised 6/5/25
Revised 4/9/26

Legal
F.S. 112.312
F.S. 112.313
F.S. 1006.32
2 C.F.R. 200.112
2 C.F.R. 200.113
2 C.F.R. 200.318