

NEPOTISM AND CONFLICT OF INTEREST

SECTION 5.03

Effective Date: October 15, 2015

Approved By: Governing Board 

A. Nepotism: For the purpose of this section, members of an immediate family shall include any of the following persons:

Husband	Father-in-law
Father	Mother-in-law
Mother	Sister-in-law
Brother	Brother-in-law
Sister	Daughter-in-law
Son/Daughter	Son-in-law
Wife	Grandparents
Grandchildren	

B. The following rules shall be observed with respect to persons employed by the agency:

1. No person shall hold a job while s/he or a member of his/her immediate family serves on the Governing Board or the Head Start Policy Advisory Council. (See note)
2. No person shall hold a job over which a member of his/her immediate family exercises supervisory authority.
3. No person shall hold a job over which a member of his/her immediate family serves on a Board or Committee which either by rule or practice, regularly nominates, recommends, or screens candidates for the agency or program by which he is employed.

Note: Children of Board Members and Policy Advisory Council members may be hired under the agency's WIA program if they meet program rules and regulations. However, WIA employees may not be promoted or hired into regular agency positions when in contravention of this policy.

Prohibition Against Acceptance of Gifts and Gratuities

Employees of the agency are prohibited from accepting gifts, money and gratuities from persons receiving benefits or services under the agency programs or performing services under contract or otherwise in a position to benefit from an employee action.

C. CONFLICT OF INTEREST.

1. Public Agencies or Units of Government: The Governing Board recognizes that there are potential areas for conflict of interest between the agency and public

agencies or units of government. However, the Board also recognizes that in many cases, it would be in the best interest of the Community Action agency and the public agency to cooperate in various endeavors. Examples might include joint programs with the county Jobs and Family Services Department, County Commissioners, etc. In situations where a public agency or unit of government has a representative sitting on the Governing Board, that member shall abstain from voting in matters pertaining to their agency.

2. Non-Profit Business and Service Agencies: The same principle applies to public agencies and units of government shall be applied to non-profit business and service agencies. In other words, a Board member who represents or is employed by a non-profit business or service agency shall abstain from voting on matters pertaining to their business as they come before the Governing Board.
3. Private for Profit Business: It is the policy of the Board that services offered for sale to the public are offered to employees and Board members as well, providing that customary and usual prices and procedures are followed.

Examples of these services include automotive repair and copying services.

When the agency is purchasing supplies or services from private individuals or businesses, the following procedure shall be followed:

The Governing Board recognizes that in certain situations it might be in the interest of the agency to authorize a private business arrangement between the agency and a Board member, Board member's immediate family, employee, or an employee's immediate family. However, in all cases these business arrangements, if they exceed \$25 in value, must be brought before the Governing Board for approval. In those instances, the Governing Board would acknowledge that a potential conflict of interest has been disclosed and that no conflict exists. The Board further wishes to emphasize that no employee should exert pressure or influence on a subordinate to enter into a private business arrangement which might involve a conflict of interest.

Whenever the Governing Board is considering a potential conflict of interest, the affected Board member shall abstain from voting.

4. Annual Conflict of Interest Certification: It is the policy of the Governing Board that all Board members shall make an annual certification to the Board disclosing any potential area of conflict of interest of which they are aware.
1. Minutes of Board Meetings: The Minutes of Board Meetings will reflect potential conflict of interests being reviewed by the Board. The Board will then determine whether or not a conflict exists and when no conflict exists the Minutes will reflect no conflict of interest exists.

In accordance with the Uniformed Grant Guidance 200.112 the Community Committee of Pike County will disclose, in writing, any potential conflict of interest to the Federal awarding agency or pass-through entity.