

Nerstrand Elementary School Policy 202.8
Independent Charter School District #4055
Adopted: 11/14/2016

202.8 Employee Conflict of Interest Policy

I. PURPOSE

Nerstrand Elementary School has established this guidance in accordance with the Uniform Governance Guidance 2 CFR 200, Subpart B, Section §200.112-113.

II. GENERAL STATEMENT OF POLICY

Employees must avoid activities or relationships that conflict with Nerstrand Elementary School's interests or adversely affect the school's reputation. No policy can describe every situation that may constitute a conflict of interest. The purpose of these guidelines is to provide general direction so that you can seek further clarification on issues related to conflicts of interest. Contact the Director if you have any questions about conflicts of interest.

III. GENERAL PROHIBITIONS AND RECOGNIZED STATUTORY EXCEPTIONS

A conflict of interest can generally be described as a situation in which your loyalty is, or may appear to be, divided between self-interest or the interests of a third-party and the interests of Nerstrand Elementary School. The types of activities and relationships you must avoid include, but are not limited to:

- Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for favorable decisions or actions in the performance of your job or that might appear to influence your decision-making or professional conduct;
- Accepting employment or compensation or engaging in any business or professional activity that might require disclosure or confidential information or trade secrets;
- Accepting employment or compensation that could reasonably be expected to impair your independent judgement in the performance of your duties;
- Accepting a kickback, bribe, substantial gift, or special consideration as a result of any business dealings involving Nerstrand Elementary School;
- Giving preferential treatment to any person or company in which you, a relative, spouse, partner, child, or a friend has a significant ownership interest or relationship.

Employees will participate annually in training regarding conflicts of interest and complete a Conflict of Interest Disclosure form. Employees must disclose actual or potential conflicts or any relationship that may create the appearance of a conflict of interest to your supervisor, in writing, as soon as you become aware of them so that safeguards can be established to protect all parties. The Director will investigate any

conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted.

Failure to make required disclosures or resolve conflicts of interest satisfactorily may result in discipline up to and including termination of employment, as determined by the Director and Board of Directors.

The Director will disclose in writing any potential conflicts of interest to the Minnesota Department of Education (MDE). The disclosure form will be sent to the Chief Financial Officer at MDE.

The Director and Board of Directors Chairperson will disclose all violations of federal criminal law involving fraud, bribery, or gratuity violations to appropriate authorities and the Minnesota Department of Education (MDE).

See Conflict of Interest Policy Disclosure Forms Part 1 and Part 2

Nerstrand Elementary School
Conflicts of Interest Disclosure Form for Employees
Part 1

Directions: Please complete this form, sign, date and return it to the Director.

I, the undersigned, acknowledge I have received a copy of the Nerstrand Elementary School's Conflicts of Interest Policy. I received training on this topic on _____(date).

I, the undersigned, acknowledge this Conflicts of Interest Disclosure Form indicates whether I have any actual or apparent Conflict of Interest with any individual or entity whose interests may reasonably appear to be affected by selecting, awarding, or administering a contract with the entity.

I understand a Conflict of Interest exists when the following individuals or entities have a financial or other interest in any entity with which Nerstrand Elementary School is contracting:

1. Board Member, Employee, Officer, or agent;
2. Immediate family of the Board Member, Employee, Officer, or agent;
3. Business Partner of the Board Member, Employee, Officer or agent;
4. An organization that employs, or is about to employ any individual mentioned in the aforementioned lines.

I agree not to participate in the selecting, awarding, or administering any contract if a conflict of interest exists.

I understand that I have a continuing duty to report any potential Conflicts of Interest and agree to report to the Board of Directors any possible conflicts that may develop in addition to any possible conflicts stated below.

I understand a Conflict of Interest may arise in a situation not stated above and this disclosure does not limit Nerstrand Elementary School's rights concerning any other conflicts of interest which may arise.

I understand that Nerstrand Elementary School will conduct an investigation of any conflict of interest and may result in discipline up to and including termination of employment.

Nerstrand Elementary School
Conflicts of Interest Disclosure Form for Employees
Part 2

I have read, understand, and agree to the provisions of the Conflicts of Interest Policy.

I declare that:

Check one:

_____ I have no conflicts to declare.

_____ I am declaring the following conflict or potential conflict:

I understand that if a conflict is declared, Nerstrand Elementary School, Director, employee, officer, or agent will notify the Board of Directors' Chairperson.

Print Name _____

Signature _____

Date _____

Office use:

C of I Trainer _____

Date of Training _____