

Wabasha-Kellogg Public Schools Policy

702-2 STATE AND FEDERAL REVENUE SOURCES CONFLICT OF INTEREST

I. PURPOSE

As trustee of local, state, and federal funds allocated for use in public education, the Wabasha-Kellogg School District board and employees will be vigilant in fulfilling the responsibility to see that these funds are used wisely for achievement of the purpose for which they are allocated.

II. GRANTS AND AWARDS

The Superintendent shall be authorized to:

- A. Apply, on behalf of the Board, for any and all special federal and state grants and awards as deemed appropriate for the School District's operation.
- B. Approve commitment of School District funds for matching, cost sharing, cooperative, or jointly funded projects up to the amounts specifically allowed under the School District budget approved by the Board; and
- C. Approve grant and award amendments as necessary.

The District shall comply with all requirements for state and federal grants and awards imposed by law, the awarding agency, or an applicable pass-through entity. The Superintendent shall develop and enforce financial management systems, internal control procedures, procurement procedures, and other administrative procedures as needed to provide reasonable assurance that the School District is complying with requirements for state and federal grants and awards.

III. FEDERAL AWARDS: CONFLICT OF INTEREST

- A. Each employee, Board member, or agent of the School District who is engaged in the selection, award, or administration of a contract supported by a federal grant or award and who has a potential conflict of interest as defined at Code of Federal Regulations, title 2, section 200.318 shall disclose to the School District, in writing, a conflict that meets the disclosure threshold in Chapter 176 of the Local Government Code.
- B. In addition, each employee, Board member, or agent of the School District shall comply with any other conflict of interest requirements imposed by the granting agency or a pass-through entity.
- C. For the purposes of this policy, "immediate family member" shall have the same meaning as "family member" as described in Chapter 176 of the Government Code.

- D. For the purposes of this policy, “partner” shall have the same meaning as defined in the Hiawatha Valley Education District Agreement and Bylaws as “Member District.”
- E. An employee, Board member, or agent of the School District who is required to disclose a conflict in accordance with the provisions above shall not participate in the selection, award, or administration of a contract supported by a federal grant or award.

IV. GIFTS AND GRATUITIES

- A. The School District recognizes that students, parents, and others may wish to show appreciation to School District employees. It is the policy of the School District, however, to discourage gift-giving to employees, and to encourage donors instead to write letters and notes of appreciation or to give small tokens of gratitude as memorabilia.
- B. Employees, Board members, and agents of the School District shall not solicit any gratuities, favors, or items from a contractor or a party to a subcontractor for a federal grant or award and shall not accept gifts that violate federal statute, state statute or local School District policy.
- C. Employees who violate the provision of this policy may be subject to discipline, which may include reprimand, suspension, and/or termination or discharge.

Legal References: **MS§ 10A.071. Subd.1.]**

Cross References: Wabasha-Kellogg Policy 209 (Code of Ethics)
 Wabasha-Kellogg Policy 210 (Conflict of Interest – School Board Members)
 Wabasha-Kellogg Policy 306 (Administrator Code of Ethics)
 Wabasha-Kellogg Policy 403 (Discipline, Suspension and Dismissal of School District Employees)
 Wabasha-Kellogg Policy 404 (Employment Background Checks)
 Wabasha-Kellogg Policy 421 (Gifts to Employees)
 Wabasha-Kellogg Policy 511 (Student Fundraising)
 Wabasha-Kellogg Policy 701 (Establishment and Adoption of School District Budget)
 Wabasha-Kellogg Policy 701.1 (Modification of School District Budget)
 Wabasha-Kellogg Policy 702 (Accounting)
 Wabasha-Kellogg Policy 702-1 (Fiscal Management Goals & Objectives-Financial Objectives)
 Wabasha-Kellogg Policy 702-1 (State and Federal Revenue Sources
 Conflict of Interest
 Wabasha-Kellogg Policy 705 (Investments)

Wabasha-Kellogg Policy 706 (Acceptance of Gifts)

Wabasha-Kellogg Policy 715 (Inventory and Sale of Federal Funded
Equipment)

Add Procurement Procedures when completed