

PURCHASING AND CONTRACTING: PROCUREMENT STAFF CODE OF CONDUCT

Conflict of Interest

All employees of CRCS shall perform their duties in a manner free from conflict of interest to assure the proper performance of school business as well as to earn and keep public confidence. No employee of CRCS with a real or an apparent conflict of interest in a proposed transaction shall participate in the selection, award, or administration of a contract pursuant to the transaction.

Conflict of interest is defined as when an interested party has a financial interest in the firm selected for the award. Interested party is defined as 1) the employee; 2) a member of the employee's immediate family; 3) his/her partner; or 4) an organization that employs or is about to employ a person described above. For the purpose of this policy, "immediate family" is defined as spouse, brother, sister, parent, son or daughter

Conflict of Interest Disclosure

All employees with real or apparent conflicts of interest as defined above must disclose the conflict of interest to the Executive Director who will investigate the circumstances of the transaction. The Executive Director will exercise due diligence in investigating the circumstances of the transaction and if necessary, will make reasonable efforts to find alternatives to the proposed transaction or arrangement that would not give rise to a conflict of interest. If the Executive Director determines that the proposed transaction is in the best interest of CRCS and is fair and reasonable, it may proceed with the transaction. In the event that the Executive Director may have a conflict of interest, an ad hoc committee of the Board will investigate and make a determination regarding the transaction.

Staff Gifts and Solicitations

Employees, officers and agents of CRCS may neither solicit nor accept gratuities, favors or anything of monetary value from contractors or parties to subcontracts.

Employees, officers and agents of CRCS may accept unsolicited items of nominal value such as those that are generally distributed by a company or organization through its public relations program.

Violations

Employees of CRCS who violate this code of conduct may be subject to discipline, up to and including termination of employment, and, if appropriate, referral to law enforcement.

Conflict Resolution/Protest and Claims

In the event of a conflict, protest or claim, an ad hoc committee of the Board will investigate and make a determination regarding the transaction in accordance with options suggestion in the Uniform Grant Guidance.

Legal Reference:

34 CFR parts 74 and 80 (Education Department General Administrative Regulations (“EDGAR” for federal awards made prior to 12/26/2014)

2 CFR part 200.318 (Uniform Administrative Requirements for federal awards made on or after 12/26/2014)

Cross Reference:

DJ - Bidding/Purchasing Requirements

DJ-R - Federal Procurement Manual

Adopted: 8/29/2012

Revised: 1/8/2024