

## ADMINISTRATIVE POLICY

The online version of this policy is official.  
Therefore, all printed versions of this  
document are unofficial copies.

### CONFLICT OF INTEREST

All Clarksville-Montgomery County School System (CMCSS) employees are required to abide by local, state, and federal laws, and maintain the highest level of honesty, integrity, impartiality and conduct. This will ensure that all actions of, and work performed by, employees is transparent and avoids any actual or perceived misconduct or conflict of interest. Although certain behavior may not break any particular law or may not be in violation of strict interpretation of the law, some behaviors are not acceptable within CMCSS.

Since it is impossible to describe all the situations that may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and include only some of the more clear-cut examples. Any employee violating provisions of this policy shall be subject to appropriate disciplinary action up to, and including, termination.

#### Persons Covered

This policy applies to all employees of the Clarksville-Montgomery County School System.

#### Employee Responsibilities:

Each CMCSS employee shall avoid any action, whether or not specifically prohibited by this policy, which might result in or create the appearance of:

- Using their position in CMCSS for private gain;
- Providing preferential treatment to any person or business entity;
- Discriminating against any person or business entity;
- Losing the ability to make decisions that are independent and impartial;
- Making a decision that does not follow approved guidelines and that is not in the best interest of CMCSS;
- Affecting adversely the confidence of the public in the integrity of CMCSS; and/or
- Reducing the operational efficiencies or economies of CMCSS.

Each employee is responsible for the integrity and accuracy of CMCSS documents and records in order to comply with regulatory and legal requirements and also to ensure records are available to support business practices and actions.

#### Gifts, Entertainment, and Favors

Employees of the Clarksville-Montgomery County School System must adhere to the Staff Gifts and Solicitations Policy ([HUM-A013](#)) regarding acceptance of gifts, solicitations, favors, etc. as it relates to the potential for a conflict of interest.

#### Exceptions

Travel Awards: Any employee who travels for CMCSS may keep their points or travel awards. This is a benefit to employees who are away from their families while doing work for CMCSS.

Donations: Offers to donate money, furniture, equipment, etc. to a particular school or department shall be referred to the school principal/supervisor to ascertain if there is a conflict of interest. Any other offers to donate money shall be referred to the CMCSS Chief Financial Officer for

consideration. Donations may not be accepted if the potential exists that such might influence a decision that provides monetary gains to the donor or the person accepting the donation.

Camps: ([INS-A045](#)) Camps may be sponsored and administered by individual school system employees.

### **Financial Interests**

No employee of CMCSS shall enter into any contractual arrangement with an immediate family member per [HUM-A039](#) within their own school or department. In recognition of the fact that many husbands and wives have separate careers, the normal employment compensation of a spouse or any other immediate family member per [HUM-A039](#) whose regular, ongoing employer has a contractual arrangement with CMCSS shall not be considered a “benefit” to the CMCSS employee, provided the contract with CMCSS was procured without any participation, assistance or influence by the CMCSS employee and provided the compensation of the immediate family member is not influenced by the contractual agreement.

No CMCSS employee, in the performance of his or her official duties, should request or demand that any other person or entity make or offer to make any monetary contribution to any campaign or to any political campaign committee in exchange for, or as condition of, receiving some benefit from CMCSS or any department, agency or official thereof, to the person or entity whose contribution is requested or demanded, or to the person making the request.

Any CMCSS employee having controlling stock or ownership interest in public or privately held companies that do business or may potentially do business with CMCSS should report such to their Principal or Department Head.

### **Contracting with CMCSS**

No employee of CMCSS shall enter into any contractual agreement with CMCSS.

### **Use of Information**

No employee of CMCSS shall directly or indirectly:

- Use, disclose or allow the use of official information which was obtained through or in connection with his or her employment, and which has not been made available to the general public, for the purpose of furthering the private interest or personal profit of any person, including the employee, or
- Engage in a financial transaction as a result of, or primarily relying upon, information obtained through his or her CMCSS employment.

### **Use of Government Property**

No employee shall use the facilities, equipment, personnel or supplies of CMCSS or its agencies other than for officially approved activities, except to the extent that they are lawfully available to the general public.

### **Questions on Interpretation of this Policy**

When a CMCSS employee is in doubt as to the proper interpretation of this policy, he/she is expected to seek the advice of his/her Department Chief, School Principal or the Chief Human Resources Officer. Any CMCSS employee who accepts any gift or favor is subject to (a) disciplinary action which may include immediate termination from employment; (b) personal liability to CMCSS; and, (c) if criminal actions are involved, referral to appropriate law enforcement authorities.

### **Other Ethical Responsibilities**

Employees who prepare, approve, sign, or submit E-rate applications, technology plans, or other forms related to the E-rate program are subject to more stringent ethical requirements. For more information, see Federal Communications Commission Regulations. (47 C.F.R. § 54.503)

### References/Authority

Federal Communications Commission Regulations, 47 C.F.R. § 54.503

### Definitions

Contractual Agreement - purchase orders, or any exchange of compensation for goods and/or services

Implementing Procedures:  
None

### Associated Documents:

<a href="#">PUR-A001</a>	Purchasing
<a href="#">HUM-A013</a>	Staff Gifts and Solicitations
<a href="#">HUM-A039</a>	Nepotism
<a href="#">PUR-P004</a>	Formal Bid Procedure
<a href="#">PUR-P009</a>	Informal Bid Procedure
<a href="#">PUR-F018</a>	Conflict of Interest Declaration

### Revision History:

<u>Date:</u>	<u>Rev.</u>	<u>Description of Revision:</u>
12/15/14	IR	
11/9/15	A	Added conflict of interest documents to associated documents list.
9/15/22	B	Added camp section.

\*\*\* End of Policy \*\*\*