Conflict of Interest – Federal Awards

Definition
An interest may be defined as a commitment, goal, or value held by an individual or an institution. A conflict of interest is defined as a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest.

Standards of Conduct
Employees of the Gordon County School System who are engaged in the selection, award and administration of contracts shall abide by the following:

- No employee, officer, or agent may participate in the selection, award or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the school system may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. No employee, officer, or agent of Gordon County Schools shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with assigned duties and responsibilities. No employee, officer, or agent of Gordon County Schools shall not engage in work of any type where the source of information concerning customer, client, or employer originates from any information obtained through the school system. In addition, all employees shall comply with the Code of Ethics for Educators by the Georgia Professional Standards Commission. Violators of the Code of Ethics shall be subject to disciplinary action, including but not limited to, termination of employment with the district.

Definition of Nominal Items
There are situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. These items are reasonable and not given in order to improperly influence business decisions. Items of nominal value are those items that are $25 or less in value. Items may include a perishable item, meal, certificate, plaque, and token promotional items.

Chain of Command for Reporting Potential Conflicts of Interest
Anyone who becomes aware of a potential conflict of interest related to the use of federal funds should report their suspicion to their immediate supervisor. If at the school level, it should be reported to the principal. The principal should report the suspected conflict of interest to the superintendent or BOE Chairman. Levels may be skipped if the immediate supervisor is involved in the potential conflict.

Violations of the Conflict of Interest Policy
Violation of these standards will result in reporting of said personnel to the superintendent/designee and if appropriate, local authorities. The superintendent or his/her designee shall be responsible for initiating the investigation. If an investigation substantiates occurrence of a fraudulent activity, the superintendent/designee shall issue a report to the appropriate personnel and to the Board of Education. Final disposition of the matter and any decision to file a criminal complaint or refer the matter to the appropriate law enforcement and/or regulatory agency for independent investigation shall be made in consultation with legal counsel.

Any misconduct could result in suspension, loss of employment, and any other consequences that are applicable by law.