

# **CONFLICT OF INTEREST POLICY DOCUMENT**

## **(From St. Charles County Children’s Resource Board)**

### ***CONFLICTS OF INTEREST***

**Section 9.1.** CCRB Policies. The policies of the CCRB shall adhere to applicable Ethics Laws in the State of Missouri.

**Section 9.2.** Disclosure of Potential Conflicts of Interest.

### **Section 1 - Declaration of Policy**

The proper operation of the CCRB requires that board members and employees be independent, impartial and responsible to the people; that decisions and policy be made in the proper channels of the CCRB structure; and not be used for personal gain; and that the public have confidence in the integrity of the CCRB. In recognition of these goals, there is hereby established a procedure for disclosure by CCRB members and the Executive Director of private financial or other interests in matters affecting the CCRB.

### **Section 2 - Conflicts of Interest**

- a. All CCRB-appointed members as well as the Executive Director of the CCRB must comply with section 105.454 of Missouri Revised Statutes on conflicts of interest.
- b. Any member of the governing body of the CCRB who has a “substantial or private interest” in any proposed or pending financial decision before such governing body must disclose that interest to the Board Chair and such disclosure shall be recorded in the following month’s CCRB minutes.

Substantial or private interest is defined as ownership by the individual, his or her spouse, or his or her dependent children, whether singularly or collectively, directly or indirectly of 1) an interest having a value of \$10,000 or more or 2) the receipt of a salary, gratuity, or other compensation or remuneration of \$5,000 or more, per year from any CCRB funded agency.

### **Section 3 - Disclosure Reports**

Each CCRB member shall disclose the following information by May 1, or the appropriate deadline as referenced in Section 105.487 RSMo, if any such transactions occurred during the previous calendar year:

- a. For the CCRB members, and all persons within the first degree of consanguinity or affinity of such person, the date and the identities of the parties to each transaction with a total value in excess of five hundred dollars, if any, that such person had with the CCRB, other than compensation received as an employee or payment of any tax, fee or penalty due to the CCRB, and other than transfers for no consideration to the CCRB.
- b. The date and the identities of the parties to each transaction known to the person with a total value in excess of five hundred dollars, if any, that any business entity in

which such person had a substantial interest, had with the CCRB, other than payment of any tax, fee or penalty due to the CCRB or transactions involving payment for providing utility service to the CCRB, and other than transfers for no consideration to the CCRB.

c. The name and address of each nonprofit agency for which a CCRB member served in the capacity as director, officer, or receiver.

d. The Executive Director also shall disclose by May 1, or the appropriate deadline as referenced in Section 105.487, RSMo., the following information for the previous calendar year:

1. The name and address of each of the CCRB members from whom income of one thousand dollars or more was received during the year covered by the statement;
2. The name and address of each sole proprietorship owned by the Executive Director; the name address and the general nature of the business conducted of each general partnership and joint venture in which he was a partner or participant; the name and address of each partner or co-participant for each partnership or joint venture unless such names and addresses are filed by the partnership or joint venture with the secretary of state; the name, address and general nature of the business conducted of any closely held corporation or limited partnership in which the Executive Director owned ten percent or more of any class of the outstanding stock or limited partnership units; and the name of any publicly traded corporation or limited partnership that is listed on a regulated stock exchange or automated quotation system in which the person owned two percent or more of any class or outstanding stock, limited partnership units or other equity interests;
3. The name and address of each nonprofit agency for which the Executive Director served in the capacity of a director, officer, or receiver.

#### **Section 4 – Filing of Reports**

a. The financial interest statements shall be filed at the following times, but no person is required to file more than one financial interest statement in any calendar year;

1. Every CCRB member and the Executive Director is required to file a financial interest statement and shall file the statement annually not later than May 1 and the statement shall cover the calendar year ending the immediately preceding December 31; provided that any member of the CCRB member or the Executive Director may supplement the financial interest statement to report additional interests acquired after December 31 of the covered year until the date of filing of the financial interest statement.
2. Each CCRB member and the Executive Director shall file the statement within thirty days of such appointment or employment covering the calendar year ending the previous December 31;
3. Every CCRB member required to file a personal financial disclosure statement shall file no later than fourteen days after the close of filing at which the candidate seeks nomination or election or nomination by caucus. The time

period of this statement shall cover the twelve months prior to the closing date of filing for candidacy.

b. Financial disclosure reports giving the financial information required in Section 3 shall be filed with St. Charles County and with the Missouri Ethics Commission. The reports shall be available for public inspection and copying during normal business hours.

**Section 9.3. Directors, Officers, and Employees.** Each director, officer, and employee of the CCRB shall adhere to applicable Ethics Laws.

**Section 9.4. Employment.** Individual board members shall not be eligible for employment by the board within twelve (12) months of termination of service as a member of the board. No person may be employed by the board who is related within the third degree by blood or by marriage to any member of the board.

**Section 9.5. Questions.** The board of directors, by resolution, may refer any question arising under Ethics Laws in relation to CCRB policies or the actions of a director, officer, or employee to the appropriate authority.

**Section 9.6. Other Relationships.** Board members, officers and employees are not allowed to serve in any capacity, as an employee, board member, or volunteer, with any agency that the CCRB funds. Board members are allowed to serve in a volunteer capacity for up to twelve (12) hours per year with an agency that is being funded and may make financial contributions to any agency of their own choosing.