

**RSU 19  
PURCHASING AND CONTRACTING:  
PROCUREMENT STAFF CODE OF CONDUCT**

**Conflict of Interest**

All employees of RSU 19 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 RSU 19 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.

**Conflict of Interest Disclosure**

All employees with real or apparent conflicts of interest as defined above must disclose the conflict of interest to the superintendent of schools who will investigate the circumstances of the transaction. The superintendent of schools 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 superintendent of school determines that the proposed transaction is in the best interest of RSU 19 and is fair and reasonable, it may proceed with the transaction. In the event that the Superintendent of Schools may have a conflict of interest, an adjunct committee of the school committee will investigate and make a determination regarding the transaction.

**Staff Gifts and Solicitations**

RSU 19 employees are prohibited from accepting money or things of material value from persons or entities doing business with, or desiring to do business with, the RSU. Employees 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 RSU 19 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.

Legal Reference: 34 CFR 74.40-74.48; 80.36 (Education Department General Administrative Regulations (EDGAR)  
Commissioner's Administrative Letter No. 6, June 18, 2016– (Fiscal Compliance)

Cross Reference:   BCB       Board Member Conflict of Interest  
                      DJ         Purchasing  
                      DJE       Bidding Procedures  
                      DJG       Vendor Relations  
                      GBEBC   Staff Gifts and Solicitations  
                      KCD       Public Gifts/Donations to Schools