

FIT Academy

721.1 EMPLOYEE CONFLICT OF INTEREST

I. PURPOSE

FIT Academy (FIT) adopts this policy to provide guidance for complying with the federal Uniform Grant Guidance, 2 C.F.R. Part 200, sections 200.112-200.113.

II. GENERAL STATEMENT OF POLICY

FIT employees must avoid activities or relationships that conflict with FIT's interests or adversely affect the FIT's reputation. No policy can describe every situation that may constitute a conflict of interest. The purpose of these guidelines is to provide general direction so that FIT employees can seek further clarification on issues related to conflicts of interest. Contact the FIT Executive Director if you have any questions about conflicts of interest.

III. CONFLICT OF INTEREST EXPLAINED

A conflict of interest can generally be described as a situation in which an FIT employee's loyalty is, or may appear to be, divided between self-interest or the interests of a third-party and the interests of FIT. The types of activities and relationships an employee must avoid include, but are not limited to:

- A.** Accepting, agreeing to accept, or soliciting money or other tangible or intangible benefits in exchange for favorable decisions or actions in the performance of the employees job or that might appear to influence the employee's decision-making or professional conduct;
- B.** Accepting employment or compensation or engaging in any business or professional activity that might require disclosure of confidential information or trade secrets;
- C.** Accepting employment or compensation that could reasonably be expected to impair the employee's independent judgment in the performance of the employee's duties;
- D.** Accepting a kickback, bribe, substantial gift, or special consideration as a result of any business dealings involving FIT; and
- E.** Giving preferential treatment to any person or company in which the employee, a relative, spouse, partner, child, or a friend has a significant ownership interest or relationship.

IV. EMPLOYEE TRAINING AND DISCLOSURE OF CONFLICT OF INTEREST; CONSEQUENCES OF NON-DISCLOSURE

Approved: February 15, 2017

Revised: _____

FIT employees will participate annually in training regarding conflicts of interest and complete a *Conflict of Interest Disclosure Form*. Employees must disclose actual or potential conflicts, or any relationship that may create the appearance of a conflict of interest, to their supervisor, in writing, as soon as the employee becomes aware of the conflict of interest so that safeguards can be established to protect all parties.

The Executive Director will investigate any conflicts of interest and determine if disciplinary action, including suspension or termination, is warranted.

Failure to make required disclosures or resolve conflicts of interest satisfactorily may result in discipline up to and including termination of employment, as determined by the Executive Director and the FIT Board of Directors.

The Executive Director will disclose in writing any potential conflicts of interest to the Minnesota Department of Education (MDE). The disclosure will be sent to the Chief Financial Officer at MDE.

The Executive Director will disclose any violation of federal criminal law involving fraud, bribery, or gratuity violations to the appropriate authorities to the FIT Board of Directors, and to MDE.