



Policy: Conflict of Interest

ChildNet Number: CN 009.029

Original Approved Date: June 30, 2003

Revised Date(s): August 1, 2007, October 2009, June 22, 2010, January 18, 2011, May 14, 2014

Sunset Date:

COA Standard(s): ETH 1.05, 2.01, 2.02, 2.03, RPM 2.01, HR 1.03, GOV 6.01

Statement of Policy:

All staff, board members, consultants, and volunteers of ChildNet will act with honesty, integrity, and openness in all their dealings as representatives of the organization. ChildNet promotes a working environment that values respect, fairness, and integrity.

The Board of Directors recognizes that potential or perceived conflicts of interest may arise on the part of officers, consultants, directors, or employees in the course of carrying out their respective roles within ChildNet. Officers, consultants, directors, and employees shall have the continuing, affirmative duty to appropriately report any personal ownership, interest, or other relationship that might affect their ability to exercise impartial and ethical judgment in their areas of their responsibility. Each director of the Board recognizes the responsibility to recuse themselves on matters where an actual or potential conflict may jeopardize their objectivity.

Any activity, interest, or relationship that presents or appears to present a conflict of interest between ChildNet and its clients on the one hand and an employee, member of any governing body or advisory board or any other person on the other hand is prohibited.

Board Chair's Signature:

Date:

5/23/14



Procedure: Conflict of Interest

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Original approved Date: June 30, 2003

Procedure Revised Date(s): August 1, 2007, October 2009, June 22, 2010, November 17, 2010, January 18, 2011, April 10, 2013, May 14, 2014, February 21, 2018, March 13, 2024

Procedure Sunset Date:

COA Standard(s): ETH 1.05, 2.01, 2.02, 2.03, RPM 2.01, HR 1.03, GOV 6.01

Statement of Procedure:

Any clarification of, or request for an exception to, this policy should be made in writing to ChildNet's Legal Department explaining the circumstances and the type of response sought. The Conflict of Interest disclosure form must be completed and accompany any written request for exception. All employees and Board Members will submit disclosures of any Conflict of Interest within 30 days of hire or Board appointment and at least annually thereafter.

- A. All ChildNet employees, volunteers, and Board Members are required to review, complete, and sign ChildNet's Professionalism, Conflict of Interest, and Development/Intellectual Property Acknowledgement Form within the first 30 days of hire.
- B. ChildNet's Legal Department shall review any reported conflicts of interest and provide any requested clarification.
- C. In the case of a request for an exception, ChildNet's Legal Department shall forward the request and his or her recommendations to the Chief Executive Officer (CEO), who will, at his or her discretion, make a final decision and consult with the Board of Directors. For any conflict with the CEO or Board Members, issues shall be brought before the Board of Directors for Determination.
- D. Employees should understand that any clarification or other information provided by ChildNet's Legal Department pursuant to this policy does not constitute legal advice by ChildNet's Legal Department to that employee and should not be considered by any ChildNet employee to create any attorney-client relationship between ChildNet's Legal Counsel and that employee.

This policy shall be further subject to the following principles:

- A. Officers, consultants, directors, employees, and volunteers of ChildNet shall interact with respect to suppliers, customers, and other persons doing or seeking to do business with ChildNet in a professional and impartial manner, without favor or



preference, and based upon no considerations other than the best interests of the agency.

- B. Officers, consultants, directors, employees, and volunteers shall not seek or accept, directly or indirectly, any payments, fees, services, loans, or other personal benefits from any person or business entity that does or seeks to do business with ChildNet. This does not, however, prohibit an officer, consultant, director, or employee from receiving compensation for services that he or she may render, where services will not affect the impartial discharge of his or her duties or obligations to the agency. All potential conflicts should be promptly reported through the Conflict of Interest disclosure.
- C. Gifts to officers, consultants, employees, and volunteers or any members of their families from any person or business entity that does or seeks to do business with ChildNet should not exceed \$25 except as reported and reviewed for reasonableness by the Legal Department. This includes but is not limited to entertainment or other favors of a character that goes beyond common courtesies consistent with ethical and accepted business practices.
- D. Employees who own, directly or indirectly, a significant financial interest in, or who manage or are employed by, any business entity that does or seeks to do business with ChildNet, shall refrain from voting on any issue pertaining to that relationship. The relationship will be promptly disclosed to the Board of Directors and Chief Legal Officer. In the event a member of the board of directors, as an agency, obtains ownership, partnership, or governance arrangements with any providers of direct services of ChildNet clients, such involvement is to be disclosed in all written material describing ChildNet. In addition, no staff member or relative of a staff member is to serve on the board of directors.
- E. Officers, consultants, employees, and volunteers shall not engage in the practice of nepotism. They shall not conduct business on behalf of ChildNet with a relative or business entity with which the officer or employee or a relative is associated, except where such dealings have been disclosed and specific approval and authorization have been given.

When qualified relatives work for ChildNet, one relative cannot work for or in the same department or in the chain of command of another relative, nor may that relative be employed in a payroll, accounting or personnel function, or in any other position which may create a conflict of interest or a job-related, unsuitable working arrangement, which could have a negative impact on employee morale or customer service.

No managerial or supervisory employee of ChildNet shall request, accept, or participate in any arrangement in which any substantial economic or non-economic benefit (including but not limited to the performance of outside work, errands or tasks, whether for pay or otherwise) is conferred or provided to the managerial/supervisory employee by any person at any level below the managerial/supervisory employee in the agency operational structure (both inside and outside the managerial/supervisory



employee's direct chain-of-command). Even where entirely voluntary, such arrangements can lead to perceived favoritism, perceived coercion, or the appearance of impropriety, which is unacceptable to ChildNet and must be avoided under all circumstances.

1. An employee or the Board of Directors cannot hire a relative.
 2. Related persons shall not be involved in evaluating the family member's job performance or in making recommendations for salary adjustments, promotions, or other budget decisions.
- F. Employees, consultants, officers, or volunteers may serve the needs of children in the dependency system outside their role and responsibilities to ChildNet by serving as foster and adoptive parents. ChildNet has procedures in place to ensure that the best interest of a child is always paramount and potential conflicts of interest (or the appearance of such conflicts) in the fostering or adoption of such children do not occur.
- G. Employees, consultants, officers, or volunteers shall provide disclosure at least annually regarding their participation as a director, officer, or employee of any other corporation or business.
- H. Employees, consultants, officers, or volunteers who participate knowingly in activities that constitute a conflict of interest as described above, without properly reporting the existence of such a conflict to Chief Legal Officer according to the Conflict of Interest procedures, may be subject to termination of such employment and/or any other action which may be deemed appropriate.
- I. If contracted with a Medicaid Managed Care Organization (MCO), ChildNet will notify the MCO within five (5) business days of discovery of any of the following:
- The name of any officer, director or agent who is an employee of the State of Florida, or any of its agencies.
 - The name of any State employee who owns, directly or indirectly, an interest of five percent (5%) or more in your organization or any of its affiliates, if applicable.
 - The name of any AHCA or Department of Elder Affairs (DOEA) employee who owns, directly or indirectly, an interest of one percent (1%) or more in your organization or any of its affiliates, if applicable.

President's Signature: _____

Date: _____

04-02-24