

BCB BOARD MEMBER CONFLICT OF INTEREST

Voting Restrictions

Notwithstanding any other provision of law, a Governing Board member shall be eligible to vote on any budgetary, personnel, or other question that comes before the Board, except that it shall be unlawful for a member to vote on a specific item that concerns the appointment, employment, or remuneration of such member or any person related to such member as a dependent as defined in A.R.S. [43-1001](#). [LEGAL REF.: A.R.S. [15-323](#)]

Employment Limitation

No dependent, as defined in Section [43-1001](#), of a Governing Board member may be employed in the District, except by consent of the Board. [LEGAL REF.: A.R.S. [15-502](#)]

No employee of the District or the spouse of such employee may hold membership on the Governing Board of the District. [LEGAL REF.: A.R.S. [15-421](#)]

The District is allowed to employ, including through a third (3rd)-party contractor that provides services to the District, any person who served as a member of the School District Governing Board during the preceding two (2) years only in a position in which the person will provide services directly to students. Pursuant to A.R. S. [15-421](#), the District is authorized to increase the time period for this restriction to be more than two (2) years.

Conflict of Interest

The District shall annually provide conflict of interest training to all board members. The training shall include information regarding the District's policies regarding conflict of interest, what constitutes a substantial and remote interest under applicable statute, the definition of relative pursuant to A.R.S 38-502(9), how and when to complete the District's annual Conflict-of-Interest Disclosure Form, the requirements to refrain from discussion or voting on a matter in which they or a relative has a substantial interest, and the penalties for violating the applicable statutes.

Each Board member shall annually complete and sign the District's Conflict-of-Interest Disclosure Form (BCB-E) and within fifteen (15) days of any change in circumstance. Board members shall complete and sign the Conflict-of-Interest Disclosure Form every January of their term, and, if they are a new Board member, within five (5) days of starting their term. Evidence of the guidance provided and signed Disclosure Forms shall be maintained by the District in compliance with the Uniform System of Financial Records

(USFR) and all disclosures shall be kept on file for public inspection as required by A.R.S 38-509.

Any Board member or employee of the District who has, or whose relative has, a substantial interest in any contract, sale, purchase, or service to the District shall make known that interest in the official records of the District and shall refrain from voting upon or otherwise participating in any manner as a Board member or employee in such contract, sale, or purchase. [LEGAL REF.: A.R.S. [38-503](#)]

Any Board member or employee who has, or whose relative has, a substantial interest in any decision of the District shall make known such interest in the official records of the District and shall refrain from participating in any manner as a Board member or employee in such a decision. [LEGAL REF.: A.R.S. [38-503](#)]

"Refrain from participating in any manner" means more than just refraining from making a final decision. It means participating in any way in the process leading up to a decision. A Board member with a conflict of interest must not make recommendations, give advice, or otherwise communicate in any manner with anyone involved in the decision-making process.

Investigations

The District will investigate allegations of inadequate disclosure of substantial interests and/or inappropriate participation in a Governing Board meeting or other discussions when a substantial interest may exist.

**Purchases from Governing Board
Members for Districts with
3,000 or More Students**

School district procurement rules are required for all purchases of service from Governing Board members, regardless of the dollar amount. Purchases of supplies, materials, and equipment from Board members are subject to the following:

- Purchases of services, regardless of value are required to be competitively bid;
- Purchases for goods are limited to three hundred dollars (\$300) per transaction;
- Total purchases within any twelve (12) month period are limited to one thousand dollars (\$1,000);
- The purchases comply with the Uniform System of Financial Records (USFR) guidelines for oral and written quotations.

- The Board has, by majority vote, adopted or reconfirmed a policy authorizing such purchases within the preceding twelve (12) month period.

[LEGAL REF.: A.R.S. [38-503](#); [15-323](#); A.G.O. I84-012; I06-002]

Filing of Disclosures

The District shall maintain in the District's official records and for public inspection in a special file all Board Member Conflict of Interest Disclosure Forms and all other documents necessary to memorialize all disclosures of substantial interest made known pursuant to the statutory conflict-of-interest provisions. [LEGAL REF.: A.R.S. [38-509](#)]

Adopted: ~~November 28, 2023~~ **September 22, 2026**

LEGAL REF.:

A.R.S.

[15-213](#)

[15-323](#)

[15-421](#)

[15-502](#)

[38-481](#)

[38-503](#)

[38-509](#)

[43-1001](#)

A.G.O.

I84-012

I87-035

I88-013

I06-002

Attorney General Arizona Agency Handbook, Chapter 8

Uniform System of Financial Records

CROSS REF.:

[BBBA](#) - Board Member Qualifications

[DJE](#) - Bidding/Purchasing Procedures