



Catalina Foothills Unified School District #16
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BOARD AGENDA ITEM

ITEM NO: 4.3

BOARD MEETING DATE: Tuesday, September 22, 2026

UNFINISHED BUSINESS: Approval of Revisions to Policy and Exhibit, BCB, BCB-E, *Board Member Conflict of Interest* (second reading)

SUBMITTED BY: Denise Bartlett, Superintendent

PRESENTED BY: Denise Bartlett, Superintendent

Revisions to Policy BCB, and the Exhibit BCB-E, *Board Member Conflict of Interest* strengthen and clarify the District's procedures for identifying, disclosing, documenting, and responding to potential conflicts of interest involving Governing Board members. They also establish clearer expectations for annual training and disclosure.

After the first reading of this policy and regulation, there were no recommended revisions.

Policy BCB – Key Changes

The proposed revisions to Policy BCB include the following:

- **Annual conflict-of-interest training.** The policy now expressly requires the District to provide annual conflict-of-interest training to all Governing Board members. The training will address District policy, substantial versus remote interests, the statutory definition of a relative, completion of the District's disclosure form, requirements for refraining from discussion or voting when a substantial interest exists, and potential penalties for violations.

- **Annual and updated disclosure requirements.** Board members will be required to complete the District's Conflict-of-Interest Disclosure Form annually each January. New Board members must complete the form within five days of beginning their term, and an updated disclosure must be submitted within 15 days of a change in circumstances. The District will maintain documentation of the guidance provided and the completed forms in accordance with the Uniform System of Financial Records (USFR) and applicable public-record requirements.
- **Clarification of what it means to refrain from participation.** The policy clarifies that a Board member with a conflict must do more than simply abstain from the final vote. The member may not participate in the process leading to the decision, including making recommendations, providing advice, or otherwise communicating with individuals involved in the decision-making process.
- **Investigation of potential violations.** A new section establishes that the District will investigate allegations involving inadequate disclosure of substantial interests or inappropriate participation by a Governing Board member when a substantial interest may exist.
- **Filing and public inspection of disclosures.** The revised policy more explicitly requires the District to maintain Board Member Conflict of Interest Disclosure Forms and related documentation in its official records for public inspection, consistent with statutory requirements.

Exhibit BCB-E – Key Changes

The accompanying exhibit has also been substantially revised to make the disclosure process clearer and more comprehensive.

The revised exhibit specifies that each Board member must file a disclosure within five calendar days of becoming a Board member and at least annually thereafter. The form must either identify any substantial interest involving the Board member or a relative or affirmatively state that no substantial interest requiring disclosure exists.

It also clarifies that disclosure forms are maintained as part of the District's official records and requires a revised disclosure within 15 calendar days after a new substantial interest arises.

The exhibit adds acknowledgments through which Board members confirm that they understand their responsibilities under Arizona law and Policy BCB, understand the consequences of noncompliance, agree to comply with restrictions imposed when a conflict exists, and agree to update their disclosure when circumstances change.

Finally, the exhibit provides separate documentation for a Statement of No Conflict, a Statement of Conflict, and a Statement of Disqualification from Participating in a Governing Board Matter. When a conflict relates to an agenda item, the Board member acknowledges the obligation to disclose the conflict, refrain from participating in the matter, and ensure the disqualification is documented with the meeting minutes.

Collectively, the proposed changes are intended to provide greater clarity and consistency regarding Board member conflict-of-interest obligations.

These revisions also provide Board members with a clearer and more comprehensive disclosure form to document compliance with Policy BCB and Arizona law.

RECOMMENDED MOTION: I move that the governing board approve Policy and Exhibit, BCB, BCB-E, *Board Member Conflict of Interest*, as presented.