



Governing Board Agenda Item

Meeting Date: September 24, 2026

From: Thomas Bogart, Chief Financial Officer

Subject: Policy DJ, Purchasing Ethics

Priority: To plan for future needs in a proactive, accountable manner

Consent ☐ Action ☐ Discussion ☒

Background:

Policy DJ and DJ-R are being revised at the recommendation of the Arizona School Boards Association. The revisions incorporate the guidance in the Arizona Auditor General's Uniform System of Financial Records (USFR) regarding the approval and documentation of food and beverage purchases made with public monies.

The USFR authorizes a governing board to adopt a policy or resolution identifying specific events or activities where food and beverages may be provided, establishing expenditure limits, identifying allowable funding sources, documenting the public purpose, and delegating implementation to the Superintendent.

These revisions articulate that providing food and beverages at official District functions directly supports the District's educational mission by facilitating training, governance, planning, emergency response, recruitment, employee development, and other official District business that benefits students and the public.

Approved fundraising activities may include:

- Governing Board meetings, workshops, and retreats, regardless of how titled.
- Emergency operations that require employees to remain on duty after hours.
- District leadership meetings.
- New employee training and orientation.
- District-sponsored employee training and professional development.
- Employee recruitment activities and student recruitment fairs.
- Beginning and end of year events.
- Parent-Teacher Conferences.
- Positive Behavior Intervention Support (PBIS) or Character-building recognitions.
- Student activities approved by the Superintendent or designee.

Expense Limitations

The following per-person dollar limits shall not be exceeded for food and beverages, including taxes, gratuities and/or delivery costs.

Breakfast-	\$15.00
Lunch-	\$25.00
Dinner-	\$40.00
Snacks/refreshments	\$5.00

Approved for transmittal to the Governing Board: 
Dr. Daniel Streeter, Superintendent

*Questions should be directed to: Thomas Bogart, Chief Financial Officer
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DJ © PURCHASING ETHICS

Governing Board

The District's Governing Board members and employees shall not use their offices or positions to receive any valuable things or benefits that would not ordinarily accrue to them in the performance of duties if the things or benefits are of such value or character as to manifest a substantial and improper influence upon the performance of their duties.

Food and Beverages

The Governing Board may provide food and beverages at School District events, including official school functions and trainings, as allowed by the Arizona Constitution, laws pertaining to travel and subsistence, gifts, grants (including federal grants), or devises, and policies of the Department of Education.

Food and beverage purchases shall be approved in advance by the Governing Board. For each purchase, the Governing Board will approve the total amount to be spent or an allowable per-person cost and identify the District fund to be used. The District will document how the purchase benefits the District and serves a public purpose and will determine that the purchase complies with applicable state law, the Arizona Constitution's Gift Clause, and the allowable uses of the identified funding source.

Personal Gift or Benefit

A person who supervises or participates in contracts, purchases, payments, claims or other financial transactions, or a person who supervises or participates in the planning, recommending, selecting or contracting for materials, services, goods, construction, or construction services of a school district or school purchasing cooperative is guilty of a Class 6 felony if the person solicits, accepts or agrees to accept any personal gift or benefit with a value of three hundred dollars (\$300) or more from a person or vendor that has secured or has taken steps to secure a contract, purchase, payment, claim or financial transaction with the school district or school purchasing cooperative. Soliciting, accepting or agreeing to accept any personal gift or benefit with a value of less than three hundred dollars (\$300) is a Class 1 misdemeanor.

Any person or vendor who has secured or has taken steps to secure a contract, purchase, payment, claim or financial transaction with a school district or school purchasing cooperative that offers, confers or agrees to confer any personal gift or benefit with a value of three hundred dollars (\$300) or more on a person who supervises or participates in contracts, purchases, payments, claims or other financial transactions, or on a person who supervises or participates in planning, recommending, selecting or contracting for materials, services, goods, construction or

construction services of a school district or school purchasing cooperative, is guilty of a Class 6 felony. Offering, conferring or agreeing to confer any personal gift or benefit with a value of less than three hundred dollars (\$300) is a Class 1 misdemeanor.

Definitions

For the purpose of this policy, a *gift or benefit* means a payment, distribution, expenditure, advance, deposit or donation of monies, any intangible personal property or any kind of tangible personal or real property. A *gift or benefit* does not include an item of nominal value such as a greeting card, t-shirt, mug or pen. A *gift or benefit* does not include food or beverage, or expenses or sponsorships relating to a special event or function to which individuals involved in procurement and purchasing are invited.

Reprisals

A District employee who has control over personnel actions may not take reprisal against a District employee or that employee's disclosure of information that is a matter of public concern, including a violation of District policy or laws/regulations governing the District.

Adopted: ~~←-- SOP:AdoptionDate -->~~

LEGAL REF.:

A.R.S.

15-213

15-323

15-341

15-342

38-501 to 38-511

A.A.C.

R7-2-1001 to R7-2-1003

R7-2-1308

Uniform System of Financial Records (USFR)

Article IX, section 7, Constitution of Arizona

Policies adopted by the Department of Education

CROSS REF.:

DJE - Bidding/Purchasing Procedures

GBEAA - Staff Conflict of Interest

DJ-R ©

REGULATION

PURCHASING ETHICS

(Events and Expense Limits of Food and Beverage Purchases for Board Members, Staff, Students, and Community)

District food and beverage purchases shall comply with Governing Board Policy DJ and advanced authorization by the Superintendent for the following events and expense limitations. Governing Board approval is required in advance of purchases outside of these parameters.

Events:

- A. Governing Board meetings, workshops, and retreats, regardless of how titled.
- B. Emergency operations that require employees to remain on duty after hours.
- C. District leadership meetings.
- D. New employee training and orientation.
- E. District-sponsored employee training and professional development.
- F. Employee recruitment activities and student recruitment fairs.
- G. Beginning and end of year events.
- H. Parent-Teacher Conferences.
- I. Student activities approved by the Superintendent or designee.

Expense Limitations

The following per-person dollar limits shall not be exceeded for food and beverages, including taxes, gratuities and/or delivery costs. (District enters amounts)

Breakfast	\$15.00
Lunch	\$25.00
Dinner	\$40.00
Snacks and refreshments	\$5.00

Other Limitations

Prior to each food and/or beverage purchase authorized by this regulation, the District fund or funds from which the purchase will be paid shall be identified in writing. No such purchase shall be paid from a District fund unless the expenditure of that fund for food and beverages is authorized by law.

To demonstrate compliance with the Arizona Constitution, applicable state law, the Uniform System of Financial Records, and Governing Board policy, the District shall prepare and maintain documentation for each food and/or beverage purchase authorized by this regulation and retained in accordance with the records retention schedules.

No District funds shall be expended for alcoholic beverages.

Delegation

Pursuant to Arizona Revised Statutes §15-341(F), the Governing Board delegates to the Superintendent the authority to prescribe any administrative procedures necessary to implement this regulation.