Policy 210.1 – Conflict of Interest

(DRAFT – recommended for adoption September 28, 2026)

I. PURPOSE

The purpose of this policy is to observe Minnesota's charter school conflict of interest laws and to conduct CCS business in a way that avoids any conflict of interest or the appearance of impropriety.

II. GENERAL STATEMENT OF POLICY

Board members, employees, officers, and agents of CCS make decisions in the district's interest — never for personal benefit — and will comply with Minnesota Statutes section 124E.14 and related law.

III. CONTRACTS

A. No board member, employee, officer, or agent of CCS may participate in selecting, awarding, or administering a contract if a conflict of interest exists.
B. A conflict exists when that person, a member of their immediate family, their partner, or an organization that employs (or is about to employ) any of them has a financial or other interest in the entity CCS is contracting with.
C. A contract entered in violation of this prohibition is void.
D. Exception: these provisions do not apply to compensation paid to a teacher employed as a teacher by CCS (or providing instructional services through a chapter 308A cooperative) who also serves on the Board of Directors.

IV. DISCLOSURE AND RECUSAL

A. Anyone covered by this policy discloses a potential conflict in writing to the Board Chair (or, for the Chair, to the Vice Chair) as soon as they become aware of it, and before any related discussion or vote.
B. A conflicted board member does not participate in discussion or vote on the matter; the recusal is recorded in the minutes.
C. Board members complete an annual conflict of interest disclosure at the organizational meeting; the District Administrative Assistant retains the disclosures with board records.

V. GIFTS AND COMPENSATION

A. CCS board members, employees, and officers are "local officials" under Minnesota's gift law and may not accept gifts from interested persons, subject to the narrow exceptions in law.
B. No board member, employee, or officer may receive compensation from a group health insurance provider.
C. Donations to the district are governed by Policy 706 and may never be tied to enrollment preference, contracts, or personal benefit.

VI. AUTHORIZER RELATIONSHIP

A. No CCS employee or board member may serve on the board or a decision-making committee of the district's authorizer, Osprey Wilds Environmental Learning Center.
B. Any employee or board member who receives paid compensation from the authorizer discloses it to the CCS Board of Directors.

VII. ADMINISTRATION

The District Superintendent and HR/Business Manager apply this policy in procurement, vendor selection, and hiring (see Policy 721 and the district's purchase order requirement); questions are routed to the Superintendent and, when needed, district legal counsel. Nepotism in employment is addressed in the district's Nepotism Policy.

Legal References:	Minn. Stat. § 124E.14 (Charter Schools; Conflicts of Interest); Minn. Stat. § 124E.07 (Board of Directors); Minn. Stat. § 471.895 and § 10A.071, subd. 1 (Gifts); Minn. Stat. ch. 317A (Nonprofit Corporations)
Cross References:	Policy 208 (Development, Adoption, and Implementation of Policies); Policy 706 (Contributions, Fundraising, and Acceptance of Gifts); Policy 721 (Procurement); CCS Nepotism Policy; MSBA/MASA Model Policy 210.1