



Catalina Foothills Unified School District #16  
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## **BOARD AGENDA ITEM**

**ITEM NO:** 4.1

**BOARD MEETING DATE:** Tuesday, October 13, 2026

**UNFINISHED BUSINESS:** Approval of Revisions to Policy and Exhibit, GBEAA, GBEAA-E, *Staff Conflict of Interest* (third reading)

**SUBMITTED BY:** Mindy Westover, Associate Superintendent

**PRESENTED BY:** Mindy Westover, Associate Superintendent

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This is the third reading of Policy GBEAA and Exhibit GBEAA-E, *Conflict of Interest*. After the second reading, an additional change to a subsection title is recommended. The policy and exhibit are being revised to align more closely with Arizona conflict-of-interest law and the Uniform System of Financial Records (USFR).

At the Board's request, administration reviewed whether the section *District Purchases from Employees* should be expanded to include relatives. The language remains specific to employees because it reflects A.R.S. 38-503(C), which requires public competitive bidding when a District employee supplies goods or services to the District. Transactions involving an employee's relative are addressed separately under subsections A and B, which require disclosure and nonparticipation when the employee or relative has a substantial interest. Adding relatives to the *District Purchases from Employees* provision would impose the competitive bidding requirement on all purchases from relatives, even when no substantial interest exists. We are recommending a title change to the subsection to clarify that this is specific to District Employees.

Policy GBEAA was revised to clarify restrictions related to the employment and supervision of close relatives and to more closely align the Business Relations section with statutory requirements regarding substantial interests and an employee's obligation to refrain from participating in matters in which a conflict exists. The policy also clarifies procurement requirements for District purchases from employees, including that these requirements apply regardless of the dollar amount or source of District funds.

The Employee Training and Acknowledgement section was expanded to require annual conflict-of-interest training and annual employee disclosures. Employees must also update their disclosure when circumstances change, and related records will be maintained in accordance with USFR and statutory requirements. The Investigations section was revised to clarify the District's responsibility to address and document steps taken when a substantial interest is identified.

Exhibit GBEAA-E was revised to clarify when disclosures must be submitted, where they are filed and maintained, and the employee's responsibility to submit an updated disclosure when a new substantial interest arises. The exhibit also clarifies the process for disclosing a conflict and refraining from participation when a conflict exists.

The titles of the policy and exhibit were also updated from *Staff Conflict of Interest* to *Conflict of Interest*.

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**RECOMMENDED MOTION: I move that the governing board approve the revisions to Policy and Exhibit, GBEAA, GBEAA-E, *Conflict of Interest*, as presented.**