

GBEAA — CONFLICT OF INTEREST

Code: GBEAA **Section:** G — Personnel **District:** Joseph City Unified School District No. 2
Adopted: Tuesday, May 12, 2026 **Source:** ASBA PolicyBridge —
<https://policies.sparqdata.com/asba/browse/josephcity/josephcity/GBEAA> **Captured:**
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Employment of Close Relatives

The Superintendent, Principals, or other administrators with hiring authority may not participate in the hiring of any person related to them within the third degree of consanguinity, affinity, or by law, and no District employee shall be placed in a position where they directly supervise or are directly supervised by such a relative.

No dependent, as defined in A.R.S. 43-1001 (see also Internal Revenue Code 26 U.S.C. 152), of a Governing Board member may be employed in the District, except by consent of the Board in accordance with A.R.S. 15-502. Small school Districts, as defined by A.R.S. 15-901, are granted an exception regarding employment of substitute teachers. A.R.S. 15-421(E).

This policy will apply for summer or part-time work as well as for full-time employment.

Business Relations

Any Governing Board member, administrator, or employee 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 participating in any manner as an employee in such contract, sale, or purchase, as provided in A.R.S. 38-501, 38-502 and 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 Governing Board member, administrator, or employee 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.

Vendor Relations

No employee of the District will accept a gift or benefit from any person, group, or entity doing, or desiring to do, business with the District as described in Policy DJ, Purchasing Ethics.

District Purchases from Employees

The District must comply with competitive purchasing rules for any acquisition of goods or services from District employees regardless of the dollar amount. The District may only

acquire equipment, material, supplies, or services from its employees under an award or contract after public competitive bidding (A.R.S. 38-503; A.G.O. I06-002). The requirement applies to any purchase using District monies, including extracurricular activities fees, tax credit contributions, and monies held in trust by the District such as student activities monies, when a District employee acts as the vendor.

Employee Guidance and Acknowledgement of Understanding

The District shall annually provide written guidance to all employees regarding what constitutes a substantial interest, and each employee shall annually complete and sign the District's conflict-of-interest disclosure form (GBEAA-E). 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.

Investigations

The District will investigate allegations of inadequate disclosure of substantial interests and/or inappropriate participation when a substantial interest may exist.

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LEGAL REF.: A.R.S. 15-213 15-323 15-421 15-502 38-481 38-501 - 38-511 (Title 38, Chapter 3, Article 8) 43-1001 A.G.O. I82-004 I83-093 I83-111 I00-013 I03-005 I06-002 Attorney General Arizona Agency Handbook, Chapter 8, Appendix 8.1, Conflict of Interest Disclosure Memorandum Uniform System of Financial Records 26 U.S.C. 152

CROSS REF.: BCB - Board Member Conflict of Interest DJ - Purchasing Ethics DJE - Bidding/Purchasing Procedures GBP - Reprisals