

Policy Number 203 Rev. 01

CONFLICT OF INTEREST

Date of Adoption July 10, 2008

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APPROVED *Ruth C. Blk*
BOARD CHAIRMAN
WPCS

Board Policy

It is the policy of the Board of Directors of the White Pines Charter School to comply with the requirements and regulations set forth by the Internal Revenue Service organizational tests under section 501 (c) (3) of the Internal Revenue Code and to insure that the organization is furthering public purposes. The White Pine Charter School must not be operated for the benefit of designated individuals or the persons who created it.

Guidelines

The following procedures will be established to implement the above policy:

1. Procedures requiring disclosure of financial interest and all material facts relating thereto.
2. Procedures for determining whether the financial interest may result in a conflict of interest.
3. Procedures for addressing the conflicts of interest after determining such conflicts exist.
4. Procedures requiring detailed record keeping.
5. Procedures ensuring that copies of this policy are distributed to all trustees, principal officers, and members of committees with board-delegated powers.
6. Procedures requiring trustees, principal officers, and members of committees with board delegated powers to sign an annual statement acknowledging receipt of a copy of the policy, they have read and understand it, and agree to comply.

CONFLICT OF INTEREST

Procedure

Determining Financial Conflict of Interest

1. A conflict of interest exists when a personnel decision or a decision to incur a financial expenditure is to be made by an interested person.
2. An interested person directly or indirectly holds, controls or owns more than 5% of the voting or equity securities of a corporation or company, or is a partner, director, manager, officer, person in control of any entity, or is a relative within the second degree of consanguinity, living in the same residence, or romantically involved with any employee, administrator, or board member of White Pine Charter School, or an interested person.
3. An interested person shall immediately disclose a conflict of interest as defined above, or any other conflict.

Addressing a Conflict of Interest

1. The identification of a possible conflict of interest will be recorded in the Board of Directors' meeting minutes.
2. The Board will address the issues at the following scheduled Board meeting or if necessary schedule a special hearing.
3. Public input will be allowed. Individual comments will be limited to five (5) minutes.
4. The Board will determine the necessary steps to resolve the conflict of interest.
5. Persons identified as having a possible conflict of interest may not be present when determining conflict of interest issues.
6. On financial transactions, the Board must follow the provisions in I.C. 33-5204 (5) I.C. 18-1361, and I.C. 18-1361A to determine whether a potential transaction should occur, and whether a past transaction should be rescinded.
7. As to personnel decisions, if the board determines a conflict of interest exists prior to a hearing, the conflict will be resolved prior to the hearing to the satisfaction of the board and affected personnel. If a conflict is alleged after a hearing, the affected personnel will be allowed a new hearing, unless the conflict was known and not disclosed by the affected personnel prior to the hearing, which will be consider of waiver of the conflict by the affected personnel.

Adequate Record Keeping

1. Meeting of the Board of Directors, will follow the open meetings laws, keep accurate minutes and make the minutes available to the public, according to the Bylaws of the Charter School Corporation.
2. The minutes of board meetings and all committees with board delegated powers will include names of persons who disclose financial interest. Names of all present, details of discussions, alternatives discussed, and results of votes taken will be included in the record.
3. Persons desiring a copy of the board minutes may submit a verbal request to the

Board Secretary or a written request to the Board of Directors.

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Distribution of the Conflict of Interest Policy

1. Copies of the Conflict of Interest Policy will be distributed to members of the Board of Directors, Operating Council, committees with board-delegated powers, and the school Administrator.
2. Board of Directors and Operating Council Members will sign a statement acknowledging receipt of the policy at the beginning of the annual Board Meeting held in July.
3. The Administrator will sign a statement acknowledging receipt of the policy at the time an annual employment contract is signed.
4. Originals of these signed forms will be maintained in the school office.

Attachment A

**Statement Certifying Receipt of
Conflict of Interest Policy**

I acknowledge receipt of a copy of the White Pine Charter School Conflict of Interest Policy and certify my understanding of said policy.

Signature

Position

Date