
GST MICHIGAN WORKS! POLICY 15-02

TO: GST Michigan Works! Service Providers & Agency Staff

FROM: Jody Kerbyson, CEO

SUBJECT: Conflict of Interest and Disclosure Policy

EFFECTIVE: October 1, 2015

PROGRAMS AFFECTED: All

RESCISSIONS: None

BACKGROUND: This policy is being established to specify GST Michigan Works! Conflict of Interest and Disclosure Policy.

POLICY:

No Workforce Development Board member, employee or Service Provider, hereafter referred to collectively as "affected parties" of GST Michigan Works! (GSTMW), shall create or allow to be created any situation which causes a conflict of interest or the appearance of a conflict of interest with the "affected parties" job responsibilities. The "affected parties" shall disclose each contact between the "affected parties" and any person doing business with GSTMW in which the "affected parties" receives anything of value.

DEFINITIONS:

1. Conflict of Interest - a situation where the "affected parties" conduct or the personal or financial interest of an "affected parties" immediate family may tend to impair "affected parties" independence of judgment or action in a performance of official duties.
2. Financial Interest - exists when an "affected parties" immediate family owns or controls securities or in any way stands to obtain financial benefit from an organization. Additionally, no employee, officer, agent, any member of his or her immediate family, his or her partner, or an organization, which employs or is about to employ any of the parties indicated herein, shall participate in the selection, award or administration of a contract supported by federal funds due to the real or apparent conflict caused by a financial or other interest in the form selected for an award.
3. Immediate Family - includes the "affected parties" spouse, dependent children, partners, and other individuals for whom the "affected parties" maintains the legal Power of Attorney.
4. Personal Interest - exists when an "affected parties" or immediate family member of the "affected parties" has financial interest or is employed in any manner by an organization for which the "affected parties" has the ability to substantially influence the activities of that organization (e.g.: procurement awards, grants, contracts, etc.).

PROCEDURES:

- A. Each GST Michigan Works! "affected party" must do the following:
- Each "affected party" must submit a GST Michigan Works! Disclosure Letter to GST Michigan Works! President if they have or believe they have a conflict of interest.
 - A new Disclosure Letter must be filled out in the event of a change in employment, which may create a conflict of interest or any changes in financial or personal interest. This should be done within 15 days of any such change.
- B. Any "affected parties" given an assignment which causes or appears to cause a conflict of interest shall discuss the issue with their Department Manager, and/or the CEO.
- C. The President, in conjunction with the CEO, will review all Disclosure Letters and make a determination on whether a conflict of interest exists and notify the "affected parties" accordingly.
- D. "Affected parties" will be allowed 15 calendar days to eliminate the conflict of interest. Refusal to eliminate a conflict of interest may result in appropriate discipline or termination of employment.
- E. "Affected parties" shall disclose in writing any contracts with any person doing business with GST Michigan Works! in which the employee receives something of value over \$25.00.
- F. Officers, employees, and agents of "affected parties" shall neither solicit nor accept gratuities, favors, or anything of monetary value from the contractors, potential contractors, or parties to sub agreements, except small consumable items with a value not in excess of \$25.00 ((i.e. business luncheons).
- G. Disclosure letters will be maintained in a file separate from the personnel records and will remain confidential to the extent allowed by law or as required by the review process.
- H. No "affected parties" will be subject to discipline under this policy for conflicts disclosed as a result of the adoption of this policy if such conflicts were not otherwise prohibited and if such are eliminated with the required time period.

ACTION:

Any "affected parties" shall take the appropriate actions necessary to meet all the directives of this policy issuance. "Affected parties" officials shall ensure the information contained in this policy is disseminated to all appropriate staff.

INQUIRES:

Questions regarding this policy issuance should be directed to Sharon Bowen, at 810-233-5974 Ext. 154.

SIGNED:



Jody Kerbyson, CEO

10/1/15

Date