

## POLICY

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<b>Series:</b>	<b>Governance</b>	<b>COA: GOV 7</b> <b>CFOP: NA</b>
<b>Policy Name:</b>	Conflict of Interest	
<b>Policy Number:</b>	GOV002	
<b>Revision #/Date:</b>	12/29/2008, 2/29/2012, 03/27/2014, 8/25/2016, 5/10/2019, 9/23/2021	
<b>Review Date:</b>	06/14/2016, 9/20/2021	
<b>Effective Date:</b>	06/26/2008	
<b>Applicable to:</b>	Brevard Family Partnership Family of Agencies (BFP FOA) Board members, officers, employees, consultants, and volunteers	

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**PURPOSE:** BFP FOA Board members, officers, employees, consultants, and volunteers will act with honesty, integrity, and openness in all their dealings as representatives of the agency. The BFP FOA promotes a working environment that values respect, fairness, and integrity. BFP FOA have a clearly stated mission and purpose, approved by the BFP board, in pursuit of the public good. All its programs support that mission and all who work for or on behalf of the BFP FOA understand and are committed to that mission and purpose.

**References:** HR2502 – Conflict of Interest, GOV-011 Governance Model

### **POLICY:**

The BFP FOA Board of Directors recognizes that potential or perceived conflicts of interest may exist on the part of board members, officers, employees, consultants, or volunteers in carrying out their respective roles with BFP FOA. It is the policy of the BFP FOA Board of Directors that board members, officers, employees, consultants, and volunteers shall have the continuing, affirmative duty to appropriately report any personal ownership, interest, or other relationship that might affect their ability to exercise impartial and ethical judgment in the area of their responsibilities.

In support of this Policy, The FOA Board Chair will inquire at the beginning of each regularly scheduled Board meeting if any board member has a potential conflict related to any item or topic appearing on the draft agenda for that meeting and if any board member has a business relationship with any other board member. The questions and responses will be reflected in the minutes of each meeting. If a board member discloses a potential conflict s/he will complete the Conflict-of-Interest Disclosure which is attached hereto and will refrain from participation in any discussion or vote related to the disclosure.

This policy shall be further subject to the following principles:

1. BFP FOA Board members, officers, employees, consultants, and volunteers, shall conduct their interactions with respect to suppliers, customers, and other persons doing or seeking to do business with BFP FOA, in a completely impartial manner, without favor or preference based upon any consideration other than the best interest of the agency.
2. BFP FOA Board members, officers, employees, consultants, and volunteers shall not seek or accept, directly or indirectly, any payments, fees, services, or loans from any person or business entity that does or seeks to do business with the BFP FOA. This does not, however, prohibit a board member, officer, employee, consultant, or volunteer from receiving compensation for services that such persons may render, where services will not affect the impartial discharge of such person's duties or obligations to the agency. All potential conflicts should be promptly reported through the Conflict-of-Interest Disclosure.
3. Employees of BFP FOA who wish to pursue outside employment will follow the Conflict-of-Interest procedures outlined in HR 2502.

4. BFP FOA Board members, officers employees, consultants, and volunteers shall not seek or accept for themselves or any members of their families from any person or business entity that does or seeks to do business with BFP FOA, any gifts, entertainment, or other favors of a “nominal value” that goes beyond common courtesies consistent with ethical and accepted business practices.
5. BFP FOA Board members who own, directly or indirectly, a financial interest in, or who manage or are employed by, any business entity that does or seeks to do business with the agency, shall refrain from participating in any discussion and voting on any issue brought to any Board of Director meeting pertaining to that relationship. This relationship will be promptly disclosed to the Board of Directors.
6. BFP FOA Board members who have any business relationship with any other Board member will disclose this upon the effective date of the relationship and thereafter annually for the duration of the relationship.
7. BFP FOA Board members, officers, employees, consultants, and volunteers shall not knowingly conduct business on behalf of BFP FOA with a relative or business entity with which the individual or a relative of such individual is associated, except where such dealings have been disclosed and specific approval and authorization have been given.
8. BFP FOA Board members, officers, employees, consultants, and volunteers shall provide disclosure at least annually regarding their participation as a board member, director, officer, employee or volunteer of any other organization and request to complete a Conflict-of-Interest form.
9. BFP FOA Board members, officers, employees, consultants, and volunteers shall provide a disclosure statement upon engagement. At any time that a potential conflict of interest arises or there are any changes to the initial disclosure, it is the responsibility of each board member, officer, employee, consultant, or volunteer to immediately disclose any potential conflict of interest which arises at any time by requesting a new Conflict of Interest form.
10. BFP FOA Board members, officers, employees, consultants, or volunteers who knowingly participate in activities that constitute a conflict of interest as described above, without proper reporting through the Conflict-of-Interest Policy the existence of such a conflict, may be subject to consequences and/or actions that may result in the termination of the relationship with BFP, impact on professional licensure, certification, associations, accreditation etc.

Approved by the Brevard Family Partnership Board of Directors September 23, 2021.

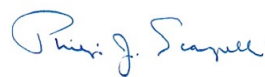
AS APPROVED BY THE BOARD OF DIRECTORS:



BARBARA J. LOFTUS  
Board Chair

Signature Date: 10/6/2021

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI  
Chief Executive Officer

Signature Date: 10/6/2021

**BREVARD FAMILY PARTNERSHIP FAMILY OF AGENCIES (BFP FOA) BOARD MEMBERS, OFFICERS, EMPLOYEES, CONSULTANTS AND VOLUNTEERS OF BREVARD FAMILY PARTNERSHIP, BREVARD C.A.R.E.S., FAMILY ALLIES, THE NATIONAL CENTER FOR INNOVATION AND EXCELLENCE, and THE BREVARD FAMILY PARTNERSHIP FOUNDATION**

**CONFLICT OF INTEREST DISCLOSURE**

Name: \_\_\_\_\_  
(PRINT)

BFP Policy GOV. 002 requires that each BFP FOA board member, officer, employee, consultant, and volunteer provide an initial Conflict of Interest Disclosure of potential conflicts of interest in serving as a BFP FOA board member, officer, employee, consultant, or volunteer. BFP FOA Board Members will complete this Conflict-of-Interest Disclosure form annually.

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I acknowledge that I have read and understand BFP's Conflict of Interest Policy, GOV 002

\_\_\_\_\_ I am in compliance with the policy.

\_\_\_\_\_ I am reporting the following potential conflicts (including any financial business relationship between board members or system of care service providers).

\_\_\_\_\_ I am reporting other organizations of which I am a Board Member, Officer, employee, consultant, or volunteer.

I understand that I am expected to report promptly any changes in my affiliations or business relationships that might affect compliance with this policy. I also understand that I could be held personally liable for failure to disclose a conflict of interest in which an improper personal benefit is derived, or which violates the law.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Disclosures required above are as follows:

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Revised September 23, 2021