

REGULATION Board of Education of Queen Anne's County Public Schools

Responsible Office:	Superintendent's Office
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CODE OF ETHICS AND CONFLICT OF INTEREST

I. REGULATION ELEMENTS

Conflict of Interest

A. Participation

1. Except as permitted by the Board of Education of Queen Anne's County's ("Board") regulation(s) or in the exercise of an administrative or ministerial duty that does not affect the disposition or decision in the matter, an official may not participate in:
 - (a) Any matter in which, to the knowledge of the official, the official or a qualified relative of the official has an interest; or
 - (b) Any matter in which any of the following is a party:
 - (i) A business entity in which the official has a direct financial interest of which the official may reasonably be expected to know;
 - (ii) A business entity for which the official or a qualified relative of the official is an officer, director, trustee, partner, or employee;
 - (iii) A business entity with which the official or, to the knowledge of the official, a qualified relative of the official is negotiating or has any arrangement concerning prospective employment;
 - (iv) A business entity that is a party to an existing contract with the school official or which, to the knowledge of the official, a qualified relative of the official, if the contract reasonably could be expected to result in a conflict between the private interests of the official and the School System or the Board duties of the official;
 - (v) An entity, doing business with the Board or School System, in which a direct financial interest is owned by another entity in which the official has a direct financial interest, if the official may be reasonably expected to know of both direct financial interests; or

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- (vi) A business entity that:
 - a. The official knows is a creditor or obligee of the official or a qualified relative of the official with respect to a thing of economic value; and
 - b. As a creditor or obligee; is in a position to directly and substantially affect the interest of the official or qualified relative of the official.
- 2. An official who is disqualified from participating under this section shall disclose the nature and circumstances of the conflict and may participate or act if:
 - (a) The disqualification leaves a body with less than a quorum capable of acting;
 - (b) The disqualified official is required by law to act; or
 - (c) The disqualified official is the only person authorized to act.
- 3. The prohibitions of section A do not apply if participation is allowed by opinion of the Ethics Panel.
- 4. A former regulated lobbyist who is or becomes subject to this Regulation as an employee or official, other than a member of the Board, may not participate in a case, contract, or other specific matter as an employee or official, other than a member of the Board, for one calendar year after the termination of the registration of the former regulated lobbyist if the former regulated lobbyist previously assisted or represented another party for compensation in the matter.

B. Employment and Financial Interests

- 1. Except as permitted by Board policy or QACPS regulation when the interest is disclosed or when the employment does not create a conflict of interest or appearance of conflict, an official or employee may not:
 - (a) Be employed by or have a financial interest in an entity that is:
 - (i) Subject to the authority of the School System or Board;
 - (ii) Negotiating or has entered a contract with the School System or Board;
 - (iii) Holding any other employment relationship that would impair the impartiality or independence of judgment of the official or employee; or
 - (iv) Affecting their productivity as officials or employees in the School System by making time and/or energy demands that interfere with their ability to

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perform their regularly assigned duties, adversely affect their employment status, or would in any way conflict with assigned duties.

2. This prohibition does not apply to:

- (a) An official whose duties are ministerial, if the private employment or financial interest does not create a conflict of interest or the appearance of a conflict of interest, as permitted in accordance with regulations adopted by the Board;
- (b) Subject to other provisions of regulation and law, a member of the Board in regard to a financial interest or employment held at the time of the oath of office, if the financial interest or employment was disclosed on the financial disclosure statement filed with the certificate of candidacy to be a candidate to be a member of the Board; or
- (c) Employment or financial interests allowed by opinion of the Ethics Panel if the employment does not create a conflict of interest or the appearance of a conflict of interest or the financial interest is disclosed,

C. Post-Employment

A-former official may not assist or represent any party other than the Board or School System for compensation in a case, contract, or other specific matter involving the Board or the School System if that matter is one in which the former official significantly participated as an official.

D. Contingent Compensation

Except in a judicial or quasi-judicial proceeding, an official may not assist or represent a party for contingent compensation in any matter before or involving the Board or the School System.

E. Use of Prestige of Office

- 1. (a) An official may not intentionally use the prestige of office or public position for the private gain of that official or the private gain of another, or to influence, except as part of the official duties of the official; or as a usual and customary constituent service by a member of the Board without additional compensation; or the award of a State or local contract to a specific person.
- (b) An official may not directly or indirectly initiate a solicitation for a person to retain the compensated services of a particular regulated lobbyist or lobbying firm.

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(c) The performance of usual and customary constituent services by a member of the Board without additional compensation does not constitute the use of prestige of office or public position.

(d) Neither an official nor a member of the Board may use public resources to solicit a contribution as regulated under Maryland or local law. In addition, an official, other than a member of the Board, may not use the title of the official to solicit a political contribution as regulated under Maryland or local law.

2. (a) This subsection does not prohibit the performance of usual and customary constituent services by a member of the Board without additional compensation.

(b) An official, other than a member of the Board, may not use public resources or the title of the official to solicit a contribution as that term is defined in the Election Law Article.

(c) A member of the Board may not use public resources to solicit a contribution as that term is defined in the Maryland Election Law Article § 1-101.

F. Reporting Fraud and Abuse

It is the responsibility of all Board members and employees to be alert for any indications of fraud and abuse involving QACPS funds or property.

The following procedures will be followed for all Board members and employees reporting fraud and abuse:

1. Notification: any individual who has knowledge of an occurrence of fraud and abuse, or has reason to suspect that such an event has occurred, will notify his/her immediate supervisor. If there is reason to believe that this supervisor may be involved, the employee will instead notify his/her supervisor's supervisor, principal, program manager, or director.
2. Investigation: the supervisor, principal, program manager, or director will follow QACPS policies and procedures and will notify the Internal Auditor and, as appropriate, the executive staff member and the Coordinator of School Security. With the advice of the Coordinator of School Security and legal services, the supervisor will consult with law enforcement personnel, prior to investigation, to review whether the investigation will impinge on a criminal investigation.

The investigation will ensure that due process is provided to the employee. After investigation, the supervisor will determine whether disciplinary action is warranted. Any disciplinary action will be issued in accordance with QACPS policies and procedures.

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3. Confidentiality: any information reported will be considered confidential and every effort will be made to protect the identity of the person reporting, unless the information is needed for law enforcement or other purposes. The Board will ensure that employees reporting such allegations will be protected from any retaliatory acts for doing so.

Protecting Against Retaliation: no action or reprisals may be taken against an employee reporting a suspected violation of good faith.

G. Gifts

1. An official may not solicit any gift.
2. An official may not directly solicit or facilitate the solicitation of a gift, on behalf of another person, from an individual lobbyist.
3. An official may not knowingly accept a gift, directly or indirectly, from a person that the official knows or has reason to know:
 - (a) Is doing business with or seeking to do business with the School System or Board;
 - (b) Is subject to the authority of the School System or the Board;
 - (c) Is a lobbyist with respect to matters within the jurisdiction of the official; or
 - (d) Has financial interests that may be substantially and materially affected, in a manner distinguishable from the public generally, by the performance or nonperformance of the School System duties of the official.
4. An official may not accept a gift:
 - (a) That would tend to impair the impartiality and independence of judgment of the official receiving the gift;
 - (b) Of significant value that would give the appearance of impairing the impartiality and independent judgment of the official; or
 - (c) Of significant value that the recipient official believes or has reason to believe is designed to impair the impartiality and independent judgment of the official.
5. Notwithstanding any other provision under this section, an official may accept:
 - (a) Meals and beverages consumed in the presence of the donor or sponsoring entity;
 - (b) Ceremonial gifts or awards that have insignificant monetary value;

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- (c) An unsolicited gift that does not exceed \$20 in value, or an unsolicited series of gifts not exceeding \$100 in value in a calendar year, or trivial items of informational value;
- (d) Reasonable expenses for food, travel, lodging, and scheduled entertainment of the official at a meeting which is given in return for the participation of the official in a panel or speaking engagement at the meeting;
- (e) Gifts of tickets or free admission extended to members of the Board to attend a charitable, cultural, or political event, if the purpose of the gift or admission is a courtesy or ceremony extended to the Board;
- (f) A specific gift or class of gifts which the Ethics Panel exempts from the operation of this section upon a finding, in writing, that acceptance of the gift or class of gifts would not be detrimental to the impartial conduct of the business of the School System or the Board and that the gift is purely personal and private in nature;
- (g) Gifts from a person related by blood or marriage, or any other individual who is a member of the household of the official; or
- (h) An honorarium for speaking to or participating in a meeting, provided that the offering of the honorarium is in no way related to the School System or Board position of the official.

H. Disclosure of Confidential Information

Other than in the discharge of his official duties, an official may not disclose or use confidential information that the official acquired by reason of the official's public position and that is not available to the public for the economic benefit of the official or the economic benefit of another person.

I. Procurement

1. An individual or person that employs an individual who assists the School System or the Board in the drafting of specifications, an invitation for bids, or a request for proposals for a procurement may not submit a bid or proposal for that procurement, or assist or represent another person, directly or indirectly, who is submitting a bid or proposal for the procurement.
2. The Ethics Panel may establish exemptions from the requirements of this section for providing descriptive literature, sole source procurements, and written comments solicited by the procuring unit of the School System.

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J. Financial Disclosure

1. This section applies to all members of the Board, all candidates to be members of the Board, and the Superintendent. This section does not apply to other QACPS officials or employees.
2. Except as provided in subsection (D) of this section, a member of the Board, candidate to be a member of the Board, and the Superintendent shall file the financial disclosure statement required under this section:
 - (a) On the Board of QACPS Financial Disclosure Form provided by the Ethics Panel;
 - (b) Under oath or affirmation; and
 - (c) With the office designated by the Ethics Panel.

K. Deadlines for Filing Statements

1. An incumbent official shall file a financial disclosure statement annually no later than April 30 of each year for the preceding calendar year.
2. An official who is appointed to fill a vacancy in an office for which a financial disclosure statement is required and who has not already filed a financial disclosure statement shall file a statement for the preceding calendar year within 30 days after appointment.
3. An individual who, other than by reason of death, leaves an office for which a statement is required shall file a statement within 60 days after leaving the office.
4. The statement shall cover:
 - (a) The calendar year immediately preceding the year in which the individual left office, unless a statement covering that year has already been filed by the individual; and
 - (b) The portion of the current calendar year during which the individual held the office.

L. Candidates to be members of the Board

1. Except for an official who has filed a financial disclosure statement under another provision of this section for the reporting period, a candidate to be a member of the Board shall file a financial disclosure statement each year beginning with the year in which the certificate of candidacy is filed through the year of the election.

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2. A candidate to be a member of the Board shall file a statement required under this section:
 - (a) In the year the certificate of candidacy is filed, no later than the filing of the certificate of candidacy;
 - (b) In the year of the election, on or before the earlier of April 30 or the last day for the withdrawal of candidacy; and
 - (c) In all other years for which a statement is required, on or before April 30.
3. A candidate to be a member of the Board:
 - (a) May file the statement required under this Regulation with the Board of Election Supervisors with the certificate of candidacy or with the Ethics Panel prior to filing the certificate of candidacy; and
 - (b) Shall file the statements required under this Regulation with the office designated by the Ethics Panel.
4. If a statement required to be filed by a candidate is overdue and not filed within 8 days after written notice of the failure to file is provided by the Board of Election Supervisors, the candidate is deemed to have withdrawn the candidacy.
5. The Board of Election Supervisors may not accept any certificate of candidacy unless a statement required under this section has been filed in proper form.
6. Within 30 days of the receipt of a statement required under this section, the Board of Election Supervisors shall forward the statement to the Ethics Panel, or the office designated by the Ethics Panel.

M. Public Record

1. The Office of the Superintendent, has been designated by the Ethics Panel, as the office that shall maintain all financial disclosure statements filed under this section.
2. The Office of the Superintendent shall make financial disclosure statements available during normal office hours, for examination and copying by the public who appear in person in the Office of the Superintendent and subject to reasonable fees and administrative procedures established by the Ethics Panel or the Board.
3. If an individual examines or copies a financial disclosure statement, the Office of the Superintendent shall record:

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- (a) The name and home address of the individual reviewing or copying the statement; and
 - (b) The name of the person whose financial disclosure statement was examined or copied.
4. The individual whose financial disclosure statement was examined or copied shall be provided with a copy of the name and home address of the person who reviewed the individual's financial disclosure statement by the Ethics Panel or the Office of the Superintendent. Additionally, the party who examines or requests a copy of the financial disclosure statement shall be advised of this rule.
 5. For statements filed after January 1, 2019, the Ethics Panel or the Office of the Superintendent may not provide public access to an individual's home address that the individual has designated as the individual's home address.

N. Retention Requirements

The Office of the Superintendent shall retain financial disclosure statements for four years from the date of receipt after which they will be destroyed.

O. Contents of Statement

1. Interests in Real Property

- (a) A statement filed under this section shall include a schedule of all interests in real property wherever located.
- (b) For each interest in Real Property, the schedule shall include:
 - (i) The nature of the property and the location by street address, mailing address, or legal description of the property;
 - (ii) The nature and extent of the interest held, including any conditions and encumbrances on the interest;
 - (iii) The date when, the manner in which, and the identity of the person from whom the interest was acquired;
 - (iv) The nature and amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired;
 - (v) If any interest was transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount

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of the consideration received for the interest, and the identity of the person to whom the interest was transferred; and

(vi) The identity of any other person with an interest in the property.

2. Interests in Corporations and Partnerships

- (a) A statement filed under this section shall include a schedule of all interests in any corporation, partnership, limited liability partnership, or limited liability corporation, regardless of whether the corporation or partnership does business with the School System or the Board.
- (b) For each interest reported under this paragraph, the schedule shall include:
- (c) The name and address of the principal office of the corporation, partnership, limited liability partnership, or limited liability corporation;
- (d) The nature and amount of the interest held, including any conditions and encumbrances on the interest;
- (e) With respect to any interest transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount of the consideration received for the interest, and, if known, the identity of the person to whom the interest was transferred; and
- (f) With respect to any interest acquired during the reporting period:
 - (i) The date when, the manner in which, and the identity of the person from whom the interest was acquired; and
 - (ii) The nature and the amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired.
- (g) An individual may satisfy the requirement to report the amount of the interest held under item (2)(d) of this section by reporting, instead of a dollar amount:
 - (i) For an equity interest in a corporation, the number of shares held and, unless the corporation's stock is publicly traded, the percentage of equity interest held; or
 - (ii) For an equity interest in a partnership, the percentage of equity interest held.

3. Interests in Business Entities Doing Business with the School System or the Board

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- (a) A statement filed under this section shall include a schedule of all interests in any business entity that does business with the School System or the Board, other than interests reported under paragraph (2) of this section.
- (b) For each interest reported under this paragraph, the schedule shall include:
 - (i) The name and address of the principal office of the business entity;
 - (ii) The nature and amount of the interest held, including any conditions to and encumbrances on the interest;
 - (iii) With respect to any interest transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount of the consideration received in exchange for the interest, and, if known, the identity of the person to whom the interest was transferred; and
 - (iv) With respect to any interest acquired during the reporting period:
 - a. The date when, the manner in which, and the identity of the person from whom the interest was acquired; and
 - b. The nature and the amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired.

4. Gifts

- (a) A statement filed under this section shall include a schedule of each gift in excess of \$20 in value or a series of gifts totaling \$100 or more received during the reporting period from or on behalf of, directly or indirectly, any one person who does business with the School System or the Board.
- (b) For each gift reported, the schedule shall include:
 - (i) A description of the nature and value of the gift; and
 - (ii) The identity of the person from whom, or on behalf of whom, directly or indirectly, the gift was received.

5. Employment with or Interests in Entities Doing Business with the School System or Board

- (a) A statement filed under this section shall include a schedule of all offices, directorships, and salaried employment by the individual or member of the

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immediate family of the individual held at any time during the reporting period with entities doing business with the School System or Board.

- (b) For each position reported under this paragraph, the schedule shall include:
- (c) The name and address of the principal office of the business entity;
 - (i) The title and nature of the office, directorship, or salaried employment held and the date it commenced; and
 - (ii) The name of each School System or Board unit with which the entity is involved.

6. Indebtedness to Entities Doing Business with or Regulated by the School System or the Board

- (a) A statement filed under this section shall include a schedule of all liabilities, excluding retail credit accounts, to persons doing business with the School System or Board owed at any time during the reporting period:
 - (i) By the individual; or
 - (ii) By a member of the immediate family of the individual if the individual was involved in the transaction giving rise to the liability.

(b) For each liability reported under this paragraph, the schedule shall include:

- (i) The identity of the person to whom the liability was owed and the date the liability was incurred;
- (ii) The amount of the liability owed as of the end of the reporting period;
- (iii) The terms of payment of the liability and the extent to which the principal amount of the liability was increased or reduced during the year; and
- (iv) The security given, if any, for the liability.

7. Employment with the School System or Board

A statement filed under this section shall include a schedule of the immediate family members of the individual employed by the School System or Board in any capacity at any time during the reporting period.

8. Sources of Earned Income

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- (a) A statement filed under this section shall include a schedule of the name and address of each place of employment and of each business entity of which the individual or a member of the individual's immediate family was a sole or partial owner and from which the individual or member of the individual's immediate family received earned income at any time during the reporting period.
 - (b) A minor child's employment or business ownership need not be disclosed if the School System or Board does not regulate, exercise authority over, or contract with the place of employment or business entity of the minor child.
 - (c) For statements filed on or after January 1, 2019, if the individual's spouse is a lobbyist regulated by the Board, the individual shall disclose the entity that has engaged the spouse for lobbying purposes.
 - (d) A statement filed under this section may also include a schedule of additional interests or information that the individual making the statement wishes to disclose.
- P. For the purposes of this Regulation, the following interests are considered to be the interests of the individual making the statement:
- 1. An interest held by a member of the individual's immediate family, if the interest was, at any time during the reporting period, directly or indirectly controlled by the individual.
 - 2. An interest held by a business entity in which the individual held a 30% or greater interest at any time during the reporting period.
 - 3. An interest held by a trust or an estate in which, at any time during the reporting period:
 - (a) The individual held a reversionary interest or was a beneficiary; or
 - (b) If a revocable trust, the individual was a settlor.
- Q. 1. The Ethics Panel shall review the financial disclosure statements submitted under this section for compliance with the provisions of this section and shall notify an individual submitting the statement of any omissions or deficiencies.
2. The Board may take appropriate enforcement action to ensure compliance with this section.
- R. Financial disclosure employees and appointed officials.
- 1. This section only applies to the following School System officials and employees: Deputy Superintendent, Chief Financial Officer, Chief Operating Officer, Director of

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Human Resources, supervisors, principals, assistant principals, facilitators and employees responsible for district purchasing and contracting.

- (a) A Board of QACPS Financial Disclosure Short Form filed under this section shall be filed with the Ethics Panel or Office of the Superintendent under oath or affirmation.
- (b) On or before April 30 of each year during which an official or employee holds office, an official or employee shall file a statement disclosing gifts received during the preceding calendar year from any person that contracts with or is under the authority of the Board or the School System, including the name of the donor of the gift and the approximate retail value at the time of receipt.
- (c) An official or employee shall disclose employment and interest that raise conflicts of interest or potential conflicts of interest in connection with a specific proposed action by the employee or official sufficiently in advance of the action to provide adequate disclosure to the public.
- (d) The Ethics Panel or Office of the Superintendent shall maintain all disclosure statements filed under this section as public records available for public inspection and copying.
- (e) The individual whose disclosure statements are examined or copied shall be provided with a copy of the name and home address of the person who reviewed the individual's documents by the Ethics Panel or the Office of the Superintendent.

S. Lobbying

- 1. A person shall file a lobbying registration statement with the Ethics Panel or Office of the Superintendent if the person:
 - (a) Personally, appears before any school official or employee with the intent to influence that person in performance of the official duties of the official or employee; and
 - (b) In connection with the intent to influence, expends or reasonably expects to expend in a given calendar year in excess of \$500 on food, entertainment, or other gifts for officials, employees of the Board or School System.
- 2. A person shall file a registration statement required under this section on or before the later of January 15 of the calendar year or within five days after first performing an act that requires registration in the calendar year.
- 3. Registration statement shall identify:

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- (a) The registrant;
 - (b) Any other person on whose behalf the registrant acts; and
 - (c) The subject matter on which the registrant proposes to make appearances specified in subsection (A) of this section.
4. The registration statement shall cover a defined registration period not to exceed one calendar year.
 5. Within 30 days after the end of a calendar year during which a person was registered under this section, the person shall file a report with the Ethics Panel or the Office of the Superintendent disclosing:
 - (a) The value, date, and nature of any food, entertainment, or other gift provided to a school official or employee; and
 - (b) If a gift or series of gifts to a single official or employee exceeds \$20 in value, the identity of the official or employee.
 6. The Ethics Panel or Office of the Superintendent shall maintain the registrations and reports filed under this section as public records available for public inspection and copying.
 7. The individual whose registrations and reports were examined or copied shall be provided with a copy of the name and home address of the person who reviewed the individual's documents by the Ethics Panel or the Office of the Superintendent.
 8. Exemptions and modifications
 9. The Ethics Panel or the Board, as appropriate, may grant exemptions and modifications to the provisions of sections (Conflict of Interest) and (Financial Disclosure) of this Regulation and associated Policy to employees and appointed officials who are not members of the Board when the Ethics Panel or Board determines that application of those provisions is not required to preserve the purposes of this Regulation and associated Policy and would:
 - (a) Constitute an unreasonable invasion of privacy; and
 - (b) Significantly reduce the availability of qualified persons for public service.
 10. Forms

Disclosure Statement, Lobbying Registration and all other necessary forms required by this Regulation and associated Policy shall be those most recently

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revised and available from the Office of the Superintendent, 202 Chesterfield Avenue, Centreville, Maryland 21617-1308.

T. Advisory Opinion

1. All Board members and employees may seek an advisory opinion from the Ethics Panel by making a request in writing.
2. The Board encourages employees to be proactive in seeking assistance from the Ethics Panel to determine an appropriate course of action to resolve potential ethical issues because, by their nature, some ethical issues and conflicts of interest are difficult to discern.
3. The Board has established a process which enables employees to seek an advisory opinion, in writing, from the Ethics Panel when the employee is uncertain if activities, or planned activities, comply with the Ethics Regulations. Employees are encouraged to use this process, especially prior to committing to any action if any ethical issue is present. Employees acting in accordance with an Ethics Panel advisory opinion, with full disclosure of relevant information, will not be subject to disciplinary action if that opinion is later found to be in violation of this ethics policy. Within 20 calendar days of receiving the written notice, the Ethics Panel will provide an advisory opinion to the Board member(s) and/or employee.

U. Complaints

1. Process and make determinations regarding complaints alleging violations of this policy and associated regulation;
 - (a) Any person may file a complaint with the Ethics Panel alleging a violation of any of the provisions of this policy or related regulation.
 - (b) A complaint shall be in writing and under oath.
 - (c) The Ethics Panel may refer a complaint to the Board Attorney or other legal counsel, if appropriate, for investigation and review.
 - (d) If the Ethics Panel determines that there are insufficient facts upon which to base a determination of a violation, the Ethics Panel shall recommend to the Board that the complaint be dismissed.
 - (e) If there is a reasonable basis for believing that a violation has occurred, the subject of the complaint (“Respondent”) shall be given an opportunity for a hearing conducted by the Ethics Panel in accordance with the applicable provisions of the Board’s *Rules of Procedure for Hearings and Appeals*.

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- (f) (i) A Respondent may propose a settlement or resolution to the Ethics Panel before a hearing.
 - (ii) If the Ethics Panel determines that a proposed settlement or resolution is consistent with the purposes of this policy, the Ethics Panel shall recommend that the Board accept the proposed settlement or resolution.
 - (iii) If the Board concurs with the recommendation of the Ethics Panel, the Board shall accept the proposed settlement or resolution.
- (g) The Ethics Panel's findings of a violation resulting from a hearing shall include findings of fact and conclusions of law.
- (h) The Ethics Panel shall report its findings and recommendations for action to the Board.
 - (i) If there is a reasonable basis for believing that a violation has occurred and the Respondent is a member of the Board, after providing a hearing before the Ethics Panel (in accordance with the applicable provisions of the Board's Rules of Procedure for Hearings and Appeals), the Ethics Panel shall report its findings and recommendations to Board Counsel (or other legal counsel, if appropriate) for further review and investigation if necessary.
 - (ii) Upon further review and investigation, Board Counsel (or other legal counsel) shall issue a Memorandum summarizing the investigative findings and issue a recommendation to the Board for action.
- (i) If the Board concurs with the findings of a violation and recommendations of the Ethics Panel, the Board may take enforcement action as authorized in this policy.
- (j) The Board may dismiss a complaint:
 - (i) On the recommendation of the Ethics Panel; or
 - (ii) If the Board disagrees with a finding of a violation by the Ethics Panel.
- (k) (i) After a complaint is filed and until a final determination by the Board, all actions regarding a complaint are confidential.
 - (ii) Concurrence by the Board with the finding of a violation by the Ethics Panel is public information.

V. Sanctions

1. Any official or employee who violates this Regulation or the associated Policy is subject to discipline, personnel action, or removal from office, as provided by law.

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- 2. A finding of a violation of this Regulation or associated Policy by the Board is public information.

II. IMPLEMENTATION

The Superintendent directs QACPS staff to implement this Regulation.

III. EFFECTIVE DATE

Date: February 5, 2020



Andrea M. Kane, Ph.D.
Superintendent, Queen Anne’s County Public Schools

HISTORY:

Initial Adoption	02/01/2012	Revised	n/a	Reviewed	02/05/2020	Next Review	01/22/2024
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