



2017.05.17.C.2

Strategic Policy

Title:	CareerSource Florida Board of Directors Conflict of Interest Disclosure Policy
Adopted:	05/17/2017
Effective:	05/17/2017

I. PURPOSE AND SCOPE

The CareerSource Florida Board of Directors promotes an ethical and transparent structure within the public-private corporation. Board members are expected to safeguard their ability to make objective, fair and impartial decisions. Board members may not accept benefits when it could be inferred by a reasonable observer that the benefit was intended to influence a pending or future decision, or to reward a past decision. Board members will not use the powers and resources of CareerSource Florida, Inc. (CSF) for personal benefit or for the benefit of immediate family members.

Board members may be employed by companies with existing state contracts or may contract with CSF subject to this Conflict of Interest Disclosure Policy and State of Florida statutes. CSF contracts are transparent and administered through processes designed to ensure fairness and accountability. CSF contracts with board members, or with entities with which board members are involved, are approved when a quorum has been established and the contract is approved by two-thirds of the voting members present.

Board members who may have a conflict of interest relating to a CSF contract or agreement are compelled to openly disclose a potential, real, or perceived conflict as soon as the issue arises. Board members are required to disclose conflicts of interest in writing to the CSF professional team and its general counsel prior to any board meeting in which business involving these interests will be discussed. Board members who could benefit financially from a transaction must abstain from discussion and voting on the corresponding contract.

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Board members are in a conflict of interest whenever they themselves, or members of their immediate family, place of employment, business partners or close personal associates may personally benefit either directly or indirectly, financially or otherwise, from their position on the CSF Board of Directors. For the purpose of this policy, "immediate family" is defined as parents, step-parents, spouses or domestic partners, children, step-children, full or half siblings, in-laws, sibling in-laws, grandparents, great-grandparents, step-great-grandparents, aunts, uncles, nieces, nephews and grandchildren. Board members who may have a conflict of interest related to a CSF contract or agreement are compelled to disclose the conflict and abstain from voting on decisions impacting the contract or agreement.

A conflict of interest may be real, potential, or perceived; the same duty to disclose applies to each. Full disclosure does not remove a conflict of interest. If a board member is not certain he or she is in a conflict of interest position, he/she may consult the CSF general counsel, who serves as the ethics and public records officer for the Board of Directors.

All board members shall sign an acknowledgement of this policy to be filed with the CSF professional team upon appointment to the CSF Board of Directors.

This policy benefits CSF board appointees by giving them the opportunity to disclose conflicts of interest and ensure the integrity of business before the board. This policy sends a strong message to those doing business with CSF about the importance of ethics in operations and transparency in public meetings. This policy relates to the CSF Board of Directors and the CSF general counsel, who helps board members identify potential conflicts of interest.

II. **BACKGROUND**

As described in Chapter 445, Florida Statutes, state and federal funds provided to CSF may not be used directly to pay for meals, food, or for travel for board members except as expressly authorized by state law. Any reimbursements shall be at the standard travel reimbursement rates established in section 112.061, Florida Statutes, and shall follow applicable federal and state requirements.

The CSF Board of Directors is prohibited from expending state or federal funds for entertainment costs and recreational activities for board members and employees as these terms are defined by 2 C.F.R. Part 230.

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Members of the CSF Board of Directors are subject to Chapters 119 and 286, Florida Statutes, and section 24, Article I of the Florida Constitution. CSF board meetings, including committee meetings, are publicly noticed under the Sunshine Law and are open to the public. Meeting minutes are available for public access.

III. AUTHORITY

[Article I, Section 24, Florida Constitution](#)

[Chapter 112, Florida Statutes](#)

[Chapter 119, Florida Statutes](#)

[Chapter 286, Florida Statutes](#)

[Chapter 445.007, Florida Statutes](#)

[2, CFR Part 230](#)

IV. HISTORY

Date	Description
05/17/2017	Policy drafted by the CSF Policy and Performance unit for review by the CSF Strategic Policy & Performance Council and the CSF Board of Directors at the May 17, 2017, board meeting.

IV. ATTACHMENTS

CareerSource Florida Board of Directors Acknowledgement

CareerSource Florida Board of Directors Conflict of Interest Disclosure Statement