

BALTIMORE CITY PUBLIC SCHOOLS

Baltimore City Board of School Commissioners
200 E. North Avenue
Baltimore, Maryland 21202

ETHICS PANEL

Process to Review Financial Disclosure Forms and Address Potential Conflicts of Interests

I. Filing of Financial Disclosures

- A. Pursuant to the Board of School Commissioners (Board) Code of Ethics policy, BCA III.D.4, identified employees of City Schools and members of the Board are required to electronically complete and file a financial disclosure statement (disclosure statement) on or before March 31 of each year.
- B. By March 15, and again on March 30, the Information Technology Department (ITD) will generate a list of those individuals who have not filed the annual disclosure statement. The Chief Executive Officer (CEO)/ CEO designee will have reminders sent to those individuals and their supervisor to file the disclosure statements. The expectation is that the supervisor will work to ensure that the individuals file disclosure statements by the March 31 deadline.
- C. Within 7 days after the March 31 deadline, ITD will generate a list of those individuals who failed to file a disclosure statement. This list will be sent to the CEO/CEO designee to ensure that these individuals file disclosure statements. The Ethics Panel will receive a copy of this list.
- D. Within 30 days after the March 31 deadline, ITD will provide to the Ethics Panel an updated list of those individuals who failed to file disclosure statements as of the date the list is generated. The Ethics Panel, in consultation with the Office of Legal Counsel, will recommend to the CEO/CEO designee and Board that appropriate action be taken for failure to comply with the filing deadlines.

II. Review of Financial Disclosures

- A. The Panel will review and investigate all potential conflicts of interest by May 30 of each year.
 - a. Within 15 days after the March 31 deadline, ITD will provide the Ethics Panel with a complete list of the individuals who, based on requirements provided by the Code of Ethics policy, responded affirmatively to any question indicative of a potential conflict of interest.

- b. Using the Code of Ethics policy as the foundation of its analysis, the Ethics Panel will review and evaluate all affirmative responses to assess if a potential or actual conflict of interest exists.
 - c. If additional information is needed, the Ethics Panel will contact the individual in writing, generally via email, to seek clarification or additional information.
 - d. At its discretion, the Ethics Panel may seek guidance from the Office of Legal Counsel.
- B. In instances where the filings reveal an actual conflict of interest exists, the Ethics Panel will notify the CEO/CEO designee and Board no later than June 30 of each year of its findings.

Proposed: February 1, 2013

Adopted: February 6, 2013