


**Catholic Charities Disabilities Services
Agency Standard and Procedure**

Standard Category	Administration
Standard Title	Conflict of Interest Disclosure
Original Issue Date	7/15/09 & 6/17/13
Latest Revision Date	12/6/17
Number of pages	2
Attachments	System-Wide Conflict of Interest Disclosure Standard & Statement
Approved By: Anne M. Ogden, Executive Director	

I. Standard

Employees and board members have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Business dealings by Catholic Charities with outside entities should not, unless specifically addressed by the Board and CC Compliance Office, result in personal gain for Catholic Charities or a board member or and employee.

This standard establishes only the framework within which Catholic Charities wishes its business to operate. The purpose of these guidelines is to provide general direction so that board members and employees see further clarification on issues related to the subject of acceptable standards of operation.

An actual or potential conflict of interest occurs when a board member of an employee is in a position to influence a decision that may result in personal gain or gain for a relative as a result of Catholic Charities' business dealings. For the purpose of this standard, a relative is any person who is related by blood or marriage, or whose relationship with the board member or employee is similar to that of persons who are related by blood or marriage.

No presumption of a conflict is created by the mere existence of a relationship with outside firms. Personal gain may result not only in cases where board members, an employee, or a relative has a significant ownership in a firm with which Catholic Charities does business, but also when a board member, an employee, or a relative receives compensation, substantial gift, or special consideration as a result of any transaction or business dealings involving Catholic Charities.

If a board member of an employee has any influence on a material business transactions which involve a business in which the board member or employee has a significant ownership interest, it is imperative that they disclose to appropriate management personnel, human resources, board or the Compliance Officer as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. At a minimum, that board member or employee will rescues himself or herself from any decision making on the business transactions.

II. Procedure

The Conflict of Interest Disclosure Statement will be obtained prior to the hiring or the appointment of any of the identified positions and will be renewed annually in January thereafter. For employees, these signed statements obtained prior to hiring by the Human Resources Department will be issued and tracked by the Quality Assurance Department on an ongoing basis. The Human Resources Department will maintain signed copies of the Conflict of Interest Disclosure Statement in personnel files. For Board Members, the Executive Director, or designee, will issue and track the Conflict of Interest Disclosure Statements and will file these statements in Board Members' folders.

A signed Catholic Charities Conflict of Interest Disclosure Statement will be obtained from the following groups in the agency:

- Board Members
- Executive Director
- Fiscal Director
- Senior Management Positions
- Employee positions that influence purchasing, contracts or policy

The Catholic Charities Compliance Officer will investigate any violations of this standard.



VINCENT W. COLONNO
CHIEF EXECUTIVE OFFICER

Conflict of Interest Disclosure Statement

Identify the agency you are affiliated with: (Not applicable for members of the Board of Trustees or the CEO) _____

Please identify your relationship to the agency:

- Board of Trustee
- Local Agency Board Member
- CEO
- Executive Director
- Senior Management Position or employee who has influence on any material business transactions

Please initial that you have reviewed the Conflict of Interest Standard and Procedure. initials

Initial the space at the end of Item A. OR Item B., whichever is appropriate.

If you initial Item A., skip to the end of this form and print, sign & date this form.

If you initial Item B., complete the balance of this form and sign and date the statement as defined in the system wide conflict of interest disclosure statement.

Item A. I am **not** aware of any relationship or interest or situation involving myself or relative that might result in or give the appearance of being a conflict of interest between such relative or myself on one hand and the agency referenced above on the other. initials

Item B. The following are relationships, interests, or situations involving myself or relative that I consider might result in or appear to be an actual, apparent, or potential conflict of interest between such relative or myself on one hand and Catholic Charities of the Diocese of Albany on the other. initials

Corporate (either nonprofit or for-profit) directorships, positions, and employment:

Memberships in the following organizations:

Contracts, business activities, and investments with or in the following organizations:

Other relationships and activities:

My primary business or occupation at this time:

I have read and understand Catholic Charities of the Diocese of Albany System Wide Conflict of Interest Standard & Procedure and agree to be bound by it. I will promptly communicate any material change that develops in the information contained in the foregoing statement.

Name

Signature

Date

BOT & Agency Board members, return this signed document to your Board Secretary. For agency employees, return this signed document to your supervisor.