



Requirements Regarding Employee Acceptance of Gifts

State law, as well as the district's employee code of ethics (Policy #2160) prohibit any employee from accepting gifts, in any form, that have a value in excess of \$75. All district staff are governmental employees, who are held to higher standards of conduct, and must abide by the laws and policies that are applicable.

It is understood that gifts are a way to show appreciation for the professional care of students, but the district cannot condone any staff members being placed in a situation where they violate Public Officers' Laws, or risk the appearance of being potentially compromised in their professional duties.

While the district will communicate these policies to members of our community, should an employee receive a gift that does not comply with the policy, it must be returned to the donor, and it should also be reported to the building principal or department supervisor.

The following elements are intended to address frequently asked questions about this policy:

- The \$75 threshold is an aggregate value of gifts given over the course of the district's fiscal year, by a donor.
 - If four separate individuals gave \$25 staff gifts at the holidays, such that the aggregate value received by the staff member exceeded \$75, because the gifts are from multiple individuals, and are individually below the threshold, this is permissible.
 - If a parent gave a staff gift of \$50 at the holidays, and the same parent gave \$50 at the end of the school year, this is impermissible as it exceeds the annual \$75 aggregate limitation.
 - If a group of individuals pool their gifts, the aggregate value of the gift cannot exceed the annual limit of \$75. Tracking individual donations throughout the year, to make sure individual donations are under \$75, but still providing a group gift in excess of \$75, is not permissible. \$75 is the statutory threshold for attributing "influence", therefore pooled gifts must be below this amount.

- The value of a gift is determined by looking at its retail cost. It does not matter if the gift was attained by the donor at a below-market price.
- Gifts to a public official's family or friends are also generally impermissible.
- Events organized as a broad-based staff recognition (such as luncheons during Teacher Appreciation Week), which include provision of a meal and/or snacks, are permissible.

Donors wishing to make a gift in excess of \$75 may choose to make a donation in honor of a district employee, by making a donation to the school or program. Gifts that serve a public purpose by benefitting the school are permissible, even if the gifts ultimately benefit a specific classroom. The acceptance of these types of gifts should be coordinated through the building principal.

If there are any questions about the acceptability of gifts and/or potential violations of the ethics policy, please contact Judi Kehoe.