

DEFINITIONS

Board Vendor Any person or legal entity doing business with or seeking to do business with the Board, also referred to as a contractor

Secondary Employment Any employment or activity outside of CPS for which an employee receives any type of compensation

Gift Anything of value given without expectation of payment, e.g. presents, event tickets, or travel expenses.

EMPLOYEES AS BOARD VENDORS

Being a Vendor - A person may not be a Board Vendor and a CPS employee (even a miscellaneous employee) simultaneously, because of the inherent conflict of interest this situation creates.

Royalties - A CPS employee who develops a product, e.g. a book, film, training material, app, etc., may not receive royalties by selling or licensing it to the Board, either directly or through a vendor.

EMPLOYEES WORKING FOR BOARD VENDORS

A CPS official or employee may work for a Board vendor as secondary employment if there are no substantive or time conflicts with CPS duties.

All secondary employment requires that a secondary employment form be filed with the Ethics Advisor. Please complete either a Secondary Employment Approval Form or an Intersession Secondary Employee Notification Form as required.

Please refer to the Ethics Guidelines for Secondary Employment.

CONFLICTS OF INTEREST

For-Profit Boards – A CPS employee may not serve on a board of directors of a For-profit company that is a Board vendor. However, an employee may be on the board of directors of a for-profit company that is not a vendor. Any payment received for such service is considered secondary employment.

Not-For-Profit Boards - With approval by the Ethics Advisor, a CPS employee **may** serve on the board of directors for a not-for-profit Board vendor but must abstain from any discussion or vote involving doing business with the Board. If a CPS employee can impact a not-for-profit organization’s ability to obtain business with the Board, he or she should refrain from serving on the organization’s board of directors.

Charter & Contract Operators - A CPS official or employee **may not** sit on the governing board of a charter or contract school operator that holds a charter or contract agreement issued by the Board. This restriction also applies to spouses/partners and other household members. In addition, a number of other provisions in the Code of Ethics impact CPS employees’ involvement with charter conflicts from secondary employment and representation of other persons or entities in proceedings before the Board. Please consult with the Ethics Advisor for individual review.

LOCAL SCHOOL COUNCILS (LSCs) & VENDORS

During LSC Membership Terms - While an LSC member employed by CPS may not be a Board vendor, a parent or community LSC member may be a Board vendor if not doing business with the school where he or she serves. **Any** LSC member may work for a Board vendor, but may not be employed by the vendor at the school where he or she serves. For example, an LSC member may work for an SES or other afterschool program, but only at a different school.

After LSC Membership Terms – A parent or community LSC member **may not** work in any capacity at the school where he or she served for one year after ending LSC membership. **Any** LSC member must wait one year after the end of LSC service to have an economic interest in any contract with that school.

Please refer to the Code of Ethics for a complete definition of “economic interest”.

GIFTS FROM BOARD VENDORS

General Prohibition A CPS official or employee **may not** accept a gift that may be understood as an attempt to influence official decisions, or in exchange for advice on matters concerning CPS. A contractor **may not** give a gift, directly or indirectly, to CPS or another contractor in order to secure a contract. This restriction also applies to spouses/partners and other household members. However, when not meant to influence official actions, single gifts of \$50 or less, or multiple gifts totaling \$100 or less from one source in one calendar year, are acceptable.

Please note that the Department of Procurement has a separate, zero tolerance policy regarding gifts.

Please refer to the Ethics Guidelines for Gifts.

Receiving Unacceptable Gifts A prohibited gift or a gift that causes discomfort should be returned, donated to charity, or turned over to the Chief Financial Officer (CFO). If the gift is perishable, it may also be shared with the employee's department or school. Please consult with the CFO and Ethics Advisor if any of these occur.

DEMONSTRATION & ASSISTANCE

Product Demonstrations – A Board vendor may demonstrate new products at CPS work sites or the vendor's own locations if more convenient. Reasonable hosting may be provided, but demonstrations should not include excessively costly meals or other gifts designed to influence decision making (see Vendor Sponsored Events below).

Technical Assistance - A Board vendor may provide support to implement existing contracts, including training and assistance in product use or installation. This support may occur at CPS work sites or vendor sites.



VENDOR-SPONSORED EVENTS

Reasonable Hosting - A CPS employee may accept reasonable hosting expenses when attending a professional development or educational event sponsored by a Board vendor, as long as he or she is attending as an official CPS representative. Meals, lodging, and entertainment may not be excessively costly. Please consult with the Ethics Advisor for individual review.

Dinner, Sporting, & Cultural Events - If a Board vendor offers tickets or hosting for any dinner, sporting, cultural, or similar event (even for charity), the recipient must consult with the Ethics Advisor for individual review.

Parties - A Board vendor may not sponsor a party for a CPS employee, school, or department, e.g., a retirement party or holiday party. If an employee attends a separate vendor party open to CPS personnel, the event still must comply with gift rules: valued at \$50 or less, and not designed to influence official actions.

Travel - Paid travel must be approved by the Ethics Advisor. Please submit a travel request in the CPS Oracle Application system. This should include an Ethics Travel Certification Form, which can be found in the Oracle system or the Ethics section of the CPS website, as well as brochures, invitations, and other relevant documents. Vendor sponsored travel must directly relate to an employee's CPS duties.

POST-EMPLOYMENT WITH BOARD VENDORS

A CPS official or employee who exercised contract management authority over a Board contract is permanently prohibited from assisting any other party involving that contract. Otherwise, for one year after the end of service, an official or employee who participated personally and substantially in a transaction during membership or employment may not assist or represent any other person or entity in the same subject matter of that transaction.

Please refer to the Ethics Guidelines for Post-Membership & Post-Employment.

QUESTIONS & ANSWERS

Q: I am an art teacher at a CPS school and I have started a company with other teachers to provide afterschool art programming. May we contract with the Board and be paid for conducting these programs at CPS schools?

A: You may not be a Board vendor if you are also a CPS employee, so your company may not contract with the Board.

Q: I am a department head, and an IT vendor wants to cater a holiday party for our staff for free. Is this acceptable?

A: No, Board vendors may not sponsor CPS parties.

Q: I am an LSC member for School A who manages a construction company during the day. May I contract to perform construction work at School B?

A: Yes, because the work is being done at another school, you are allowed to accept the work.

Q: I am a contract manager and the contracting company's vice president has offered me Cubs tickets to celebrate the successful completion of our work. The company is planning to bid on future work with CPS. May I accept the tickets?

A: No, this gift might be seen as an attempt to influence your official actions and should be declined.

ADDITIONAL INFORMATION

Violations of our Code of Ethics may result in disciplinary action up through discharge for employees, removal from office for officials, and debarment for vendors or contractors.

The above Guidelines are meant to explain and supplement, but not replace, the Code provisions regarding Board vendor relations.

Please review the complete [CPS Code of Ethics](#)

For specific inquiries, contact Jennifer L. Chan, Ethics Advisor, at ethicsinquiries@cps.edu.