Hawkeye Area Community Action Program, Inc.	Policy # 220
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Conflict of Interest	
	Effective: April 28, 1983
APPROVED BY: HACAP Board of Directors **October 22, 2026**	**Revised: May 25, 2023**

Policy Statement

HACAP prohibits staff from using their position or their relationship with HACAP employees, vendors, and consumers for private advantage or personal gain. HACAP employees cannot conduct their work or personal activities in any manner that would obstruct the efficient operation or adversely affect the public image of HACAP. All employees are required to avoid or disclose any actions or inactions that would create a conflict of interest or the appearance of a conflict of interest.

Standard Operating Procedure

Target Audience

Hawkeye Area Community Action Program, Inc. Employees

Necessities

Disclosure of Conflict of Interest Forms

- Located on CoreDocs: Human Resources>More HR Documents Here>Conflict of Interest

Procedures Involving Disclosure of Conflict of Interest:

Employees are responsible for disclosing Conflicts of Interests.

The following is a list of situations that provide the potential for a Conflict of Interest that employees should avoid or obtain specific written guidance from the CEO:

1. HACAP employees, their relatives, members of their households, and their friends must always meet normal eligibility rules and cannot receive a priority of any sort in applying for or receiving a HACAP service.

2. HACAP employees cannot participate in the application processing or approval process for themselves, their relatives, members of their household, or their friends. Applications for supervisors must always be reviewed by someone outside their supervisory line and under the direction of someone higher on the chain-of-supervision. **Service approval for supervisory employees and those connected to them always creates an "appearance of Conflict of Interest" and must be carefully scrutinized.**

3. HACAP personnel in positions to authorize purchases or to monitor the performance of HACAP contractors and vendors may not conduct personal business with those contractors and vendors without the approval of the CEO or designee. The President of the Board of Directors must approve any action related to the CEO in this area. **This does not apply to**

retail vendors who offer products to the general public at a known retail price. It does apply if the price is negotiable.

4. HACAP employees may not solicit personal gifts/donations of any kind from subordinates, consumers, or vendors without the approval of the CEO or designee.

5. HACAP supervisory personnel may not require or allow subordinates to work on (or volunteer to work on) personal projects of their own, their families, or members of their household without the approval of the CEO or designee. The President of the Board of Directors must approve any action related to the CEO in this area.

6. HACAP employees may not use HACAP buildings, vehicles, supplies, equipment or proprietary information for personal projects, activities or causes without the approval of the CEO or designee. The President of the Board of Directors must approve any action related to the CEO in this area.

7. HACAP employees may not remove or convert to personal use any discarded HACAP materials, supplies, or equipment without the approval of the CEO or designee. The President of the Board of Directors must approve any action related to the CEO in this area.

8. HACAP supervisors/managers may not hire, supervise, or evaluate members of their immediate family.

9. HACAP employees may not seek or hold a partisan elective office.

10. HACAP employees may not serve on community boards, councils or other policy advisory groups in their capacity as HACAP employee without the approval of the CEO or designee.

11. HACAP employees may not serve on community boards, councils or other policy advisory groups that directly impact HACAP operations or mission without the approval of the CEO.

12. HACAP employees with outside employment or business interests must obtain the approval of the CEO or designee. The President of the Board of Directors must approve any action related to the CEO in this area. **Outside employment and business interests must always be kept separate from the employees' role at HACAP. Employees and their outside businesses may not contract for service with HACAP. Employees or clients and their outside businesses may not adversely affect the operations or public image of HACAP.**

13. HACAP professional employees may not engage in activities with program participants that conflict with the Codes of Conduct or established Professional Ethics Standards for their position.

Process Manager

This policy was written by the Human Resource Department for use by all HACAP operations. Questions regarding this policy should be directed to the Human Resources Department at 319-393-7811.