

Vandergrift Public Library

Conflict of Interest Policy

Adoption Date: 07/08/2026 by the Board of Vandergrift Public Library

Policy Number: 009

Purpose of Policy: The Vandergrift Public Library's Conflict of Interest Policy is designed to protect the library's interests and maintain public trust when considering transactions or agreements that could benefit the personal interests of an employee, officer, or board trustee. This policy governs the actions of the library's employees, officers, and board trustees. It is intended to support and comply with all applicable local, state, and federal laws.

Scope of Policy: The policy applies to all employees, officers, and board trustees of Vandergrift Public Library.

Policy Statement: Vandergrift Public Library provides the information you need to help maintain the highest ethical standards when conducting business on behalf of the library. All employees, officers, and board trustees have a responsibility to avoid any real or apparent conflict of interest between the library's interests and their own personal, professional, or business interests.

Definitions:

- **Abstention:** Choosing not to vote on a proposal or decision.
- **Compensation:** Money, benefits, or gifts given in exchange for work or services.
- **Conflict of Interest:** A situation where someone has personal interests or relationships that could affect how they make decisions for the library, or make it difficult for them to stay neutral and fair in making decisions.
- **Interest:** A situation where someone stands to personally benefit from a decision they are involved in, except for benefits that are available to the public or a specific group of people.
- **Contract:** A legally binding agreement where the vendor agrees to provide goods or services, and the library agrees to pay for them.
- **Disinterested Person:** A person involved in a decision who does not have any personal financial interest in the outcome.
- **Gift:** Anything of value, such as money, services, or favors.

- **Interested Person:** A person involved in a decision who has a financial interest in the outcome.
- **Financial Interest:** A financial stake in a business or arrangement that the library is involved in, including ownership, investment, or payment for services. This could be a direct or indirect financial interest through an interested person's business, investment or family.
- **Officer:** An elected officer of the library's board of trustees, including the roles Board President, Vice President, Treasurer, and Secretary.
- **Personal Connection:** Any relationship or association a person has that could influence their actions or decision making, including but not limited to family members, business partners, or former colleagues.
- **Recusal:** Stepping away from a decision due to an actual or perceived conflict of interest.
- **Relative:** A family member, including spouse, children, siblings, extended family, and members of the household.
- **Spouse:** A partner in a legally recognized marriage or domestic partnership of an employee, officer, or board trustee, unless legally separated.

Staff and Board Trustee Responsibilities:

1. **Know the Policy:** Familiarize yourself with the Conflict of Interest Policy to understand how it impacts you as an employee or board trustee.
2. **Act Ethically:** You are expected to perform your duties in accordance with your highest ethical standards, this policy, and applicable local, state, and federal laws.
3. **Follow Other Policies and Procedures:** Make sure to also follow the policies in Vandergrift Public Library's Personnel Manual, in addition to the Conflict of Interest Policy.

Vandergrift Public Library's Philosophy and Strategy:

At Vandergrift Public Library, openness and transparency are key to building trust with our community and achieving our mission. All employees, officers, and board trustees must maintain high ethical standards when doing business on behalf of the library. The library relies on you to uphold the mission, vision, and values of the library while acting ethically and in the best interests of the library.

Library employees, officers and board trustees bring valuable skills and experiences, but their other interests may sometimes create actual or potential conflicts of interest. Having outside interests does not automatically disqualify someone from being employed by the library or serving as an officer or on the library's board of trustees. These situations can be

managed through full disclosure of outside interests and by not being involved in decision-making where there is a conflict of interest.

What Could Cause a Conflict of Interest:

A conflict of interest can happen if library employees, officers, or board trustees have connections with any of the following groups:

1. Companies or people who supply goods and services to the library.
2. Companies or people the library rents property or equipment from.
3. Companies or people the library is working with or planning to work with on buying, selling, or gifting property, real estate, or securities.
4. Competing or affinity organizations.
5. Donors or others who support the library.
6. Organizations, agencies, or associations that impact how the library operates.
7. Family members, friends, or other employees.

This list does not cover every possible situation, and a conflict of interest can occur in other areas. If you are unsure about a conflict of interest, ask your manager, the Library Director, the Board President, or Vandergrift Public Library's legal counsel, depending on your role at the library.

Conflict of Interest Activities:

A conflict of interest may arise if a library employee, officer, or board trustee engages in the following activities:

Personal Financial Interests:

1. **Stock or Financial Interest in Related Companies:** Owning stock or having money involved in a bank or company the library does business with, including if a relative holds that investment.
2. **Conflicting Investments:** Having personal investments, or investments by relatives, that could interfere with your library responsibilities. This does not apply if you own less than 5% of a publicly traded company.
3. **Gifts or Loans from Third Parties:** Accepting gifts or loans from people or businesses that work or compete against the library.
4. **Financial Interest in Library Contracts:** Being involved in decisions or contracts where you could personally benefit financially, such as helping to create, negotiate, or approve those contracts for the library.

Third-Party Relationships:

1. **Employment or Position with Companies Doing Business with the Library:** Holding a current or past job with a company that works with the library.

2. **Personal Relationships with Company Employees or Owners:** Having a personal connection with employees or owners of companies that do business with the library, especially if these relationships influence contract decisions or when the work is awarded without competition or through a bidding process. Refer to the Bid, Procurement, and Purchasing Policy and Procedures for more information.
3. **Private Jobs or Offering Services for Personal Gain:** Taking on private work or offering services for personal benefit if it conflicts with your duties at the library, including sharing confidential library information.

Library Resources and Property:

1. **Personal Use of Library Resources:** Using the library's time, equipment, resources, or brand for personal purposes without approval.
2. **Unauthorized Use of Library Property:** Using library property for anything other than official purposes or without approval.
3. **Personal Financial Gain:** Using your position or authority for personal gain, or to benefit relatives, personal connections, or businesses you are involved with.

Decision Making and Influence:

1. **Conflict of Interest in Property Transactions:** Participating in the acquisition of a property for the library that you, a relative, or personal connection have an interest in, including promoting or negotiating the purchase.
2. **Using Confidential Information for Personal Gain:** Disclosing or using confidential library information for personal gain, unless required by law or for official library duties.
3. **Financial Interest in Library Decisions:** Being involved in any decision or action concerning the library where you have a financial interest, directly or indirectly.
4. **Personal Financial Interest in Contracts:** Participating in decisions or actions related to contracts for goods or services in which you have a financial interest.

Nepotism:

1. Hiring relatives for employment with the library.
2. Supervising, promoting, or disciplining relatives employed by the library.

Political Activities:

1. **Use of Library Resources for Political Activity:** Using library property, equipment, resources, or brand for political purposes.
2. **Political Pressure:** Pressuring others employed by the library or a member of the board of trustees to make political contributions or take political actions.
3. **Political Influence in Employment Decisions:** Making decisions about hiring, firing, promotions, or pay based on political activity or beliefs.

4. **Separation of Personal and Official Roles:** When engaging in political activities, employees, officers, or trustees must clearly separate their personal actions from their official library roles.

This section does not prevent you from receiving your legal salary and necessary expenses if you hold one or more public jobs, as long as those positions are not prohibited by law.

This list does not cover every possible situation, and a conflict of interest can occur in other areas. If you are unsure about a conflict of interest, ask your manager, the Library Director, the Board President, or Vandergrift Public Library's legal counsel, depending on your role at the library.

Standards of Conduct:

1. The following standards must be followed in the event of a potential or actual conflict of interest:
2. **Duty to Disclose:** If there is a potential or actual conflict of interest, you must disclose any financial or personal interest and provide relevant information to the board of trustees.
3. **For a Library Employee:** Disclosure of a financial or personal interest must be made to the Library Director, who will refer the matter to the board of trustees. If it is determined that a conflict of interest prevents you from doing your job, your manager will assign your duties to another library employee.
4. **For a Board Trustee:**
 - a. You may not participate in any discussion, decision, or vote on matters that could benefit you, your relatives, personal connections, or affiliated organizations, either financially or materially.
 - b. Disclosure of a financial or personal interest should be made during a board meeting, and you must leave the room while the board discusses and votes on whether a conflict of interest exists.
 - c. The board of trustees will determine if a conflict exists and whether the proposed matter is fair and in the best interest of the library and its mission. This decision is at the board's sole discretion.
 - d. If a conflict of interest is confirmed, you must not vote or discuss the matter, and you are excluded from the quorum.
 - e. If a conflict of interest prevents you from fulfilling your duties as a board trustee or as an employee in your organization, another board trustee or officer will take over your duties.
 - f. If a conflict of interest prevents you from fulfilling your duties to an outside employer, the task will be delegated to another authorized person.
 - g. The following must be recorded in the board meeting minutes:

- i. The name of the person who disclosed the conflict and the nature of the disclosure.
 - ii. Actions taken to assess the conflict.
 - iii. The board's decision, including any abstentions and quorum impact.
 - iv. Names of those present, a summary of the discussion (including alternatives considered), and a record of the final vote.
5. **Addressing Possible Alternatives to a Conflict of Interest:**
- a. The Board President may appoint a neutral person or committee to investigate alternatives.
 - b. After considering alternatives with due diligence, the board of trustees will decide if the library can pursue another option without creating a conflict of interest.
 - c. If no better options exist, the board of trustees will vote to determine if the transaction or arrangement is in the library's best interest.

Compensation:

1. **No Direct Pay for Officers or Trustees:** Officers and board trustees cannot receive direct pay from the library.
2. **No Voting on Own Compensation:** A trustee receiving indirect compensation from the library cannot vote or provide input on matters related to their own compensation.
3. **Committee Participation and Compensation:** Committee members who receive direct or indirect compensation from the library cannot vote or provide input on issues related to their own compensation.

Exceptions to Conflicts of Interest:

1. **Exceptions to Conflicts of Interest Policy:**
 - a. Approving the library's annual budget.
 - b. Decisions affecting all library employees, officers, trustees, and the public.
 - c. Matters that do not involve judgment or discretion.
2. **Exceptions for Gifts:**
 - a. **Direct Gifts:** Gifts given directly to Vandergrift Public Library.
 - b. **Personal Gifts:** Gifts from someone with a personal relationship to a library employee, officer, or trustee, if the gift is based on that relationship, not their library role.
 - c. **Special Occasion Gifts:** Modest and reasonable gifts for occasions like weddings, illness, or retirement.
 - d. **Promotional Items:** Low-value items like pens, notepads, or calendars.
 - e. **Awards/Recognition:** Awards or plaques / gifts given publicly for service to the library or community.
 - f. **Meals at Professional Events:** Meals provided during a professional event where the library representative is a speaker or participant, offered to all attendees.

Federal Award of Funds Impact on Conflict of Interest:

1. When Vandergrift Public Library uses federal funds for employee compensation and benefits, this policy is followed to ensure compliance with federal regulations and protect the integrity of procurements under federal awards.
2. To comply with the federal Uniform Administrative Requirements for grants ([2 CFR §§ 200.300 - 200.345](#)), the library ensures a conflict of interest policy is in place that governs the actions of its employees, library officers, and board trustees who engage in the selection, award, and administration of contracts, including disciplinary actions should this policy be violated. The sections applicable include [2 CFR § 200.318\(c\)](#).

Organizational Conflict:

An organizational conflict of interest occurs when the library's relationship with an affiliated organization, involved in a federally funded project, could make it difficult to remain impartial in selecting a contractor.

If a conflict is suspected, the board of trustees will review the situation to decide if the library can make an unbiased decision. If impartiality is questionable, the following actions will be taken:

1. **Disclosure of Relationship:** The library's relationship with the organization will be disclosed in public notices for potential contractors.
2. **Exclusion of Involved Individuals:** Library employees or trustees connected to the affiliated organization will be excluded from the selection and award process.
3. **Follow Procurement Procedures:** The Bid, Procurement, and Purchasing Policy and Procedures will be followed.
4. **Board Approval:** The board must determine that working with the affiliated organization is in the best interest of the program or project.

Personal Representations and Claims Permitted:

This policy does not prevent a library employee, officer, or board trustee from:

1. Representing themselves, or their spouse or children, in dealings with the library.
2. Making a claim against the library for themselves, or on behalf of their spouse or minor children.

Policy Distribution and Attestation:

The Library Director and Board President are responsible for ensuring that all library employees, officers, and board trustees:

1. Receive a copy of the Conflict of Interest Policy and sign an attestation statement confirming they have read and understood it.

2. Sign the attestation when they are hired, appointed, or elected.
3. Sign the attestation annually, if they are involved in hiring or purchasing decisions.

In addition, all employees, officers, and board trustees must disclose any actual or potential conflicts of interest:

1. Annually, through a formal disclosure process.
2. Whenever circumstances change that could create a conflict between annual disclosures.
3. When a related matter is presented to the board of trustees.

The signed attestations will be kept on file.

By signing the attestation, you confirm:

1. You have received a copy of the Conflict of Interest Policy.
2. You have read and understand the policy.
3. You agree to follow the policy.
4. You understand the library is a charitable organization, and to keep its federal tax exemption, it must mainly focus on activities that serve its tax-exempt purpose.

Periodic Reviews:

To ensure Vandergrift Public Library stays true to its mission as a nonprofit organization and retains its tax-exempt status, reviews are regularly conducted. These reviews will cover, at a minimum:

1. **Compensation and Fringe Benefits:** To ensure that compensation and benefits are provided to employees and that the library continues to follow the Compensation and Fringe Benefits Policy. Refer to this policy for further information.
2. **Business Relationships:** To ensure that partnerships, joint ventures, or similar arrangements:
 - a. Follow Vandergrift Public Library's policies.
 - b. Are properly documented.
 - c. Involve fair payments and investments
 - d. Support the library's mission.
 - e. Do not result in any improper personal gain or misuse of library resources.
3. **Use of a Consultant:** The library may bring in outside experts to assist with the review process. However, this does not remove the board of trustees' responsibility to govern the organization and ensure proper policies and all applicable laws and regulations are followed.

Violations of Conflicts of Interest, Reporting a Concern, and Board Procedures:

Any employee, officer, or board trustee can report a concern about a conflict of interest involving someone else, without fear of retaliation. All staff and board trustees are expected to use this policy seriously and responsibly.

If a conflict of interest is reported, the board of trustees will address it according to this policy and all applicable laws.

Depending on who is involved, the Library Director, Board President, or Board Vice President will lead the investigation and take necessary action. All reports will be handled confidentially.

- If an employee is suspected of not disclosing a conflict, the Library Director will address it, provide an opportunity for an explanation, and bring the matter to the board of trustees. The board will investigate, clearly document the process, and take appropriate action, which could include disciplinary action, termination of employment, and/or legal action.
- If an officer or board trustee is suspected, the board will review the issue, offer an opportunity for an explanation, and clearly document the process. If the conflict was not properly disclosed, the board of trustees will take appropriate action, which could include asking the trustee to step down from the board of trustees and or legal action.

Monitoring for Compliance and Consequences:

All library employees, officers, and board trustees must manage Vandergrift Public Library's affairs honestly and responsibly, using your best judgment and skills for the library's benefit. You must act in good faith and not use your position or the knowledge you have of the library for your own personal gain. Vandergrift Public Library's interests should always come first when making decisions in your role.

If this Conflict of Interest Policy is not followed, it may result in disciplinary action, legal consequences, or termination from your role at the library. If an investigation finds that this policy was violated in relation to a federal award, the violation will be reported to the state and federal awarding agency in writing, following their specific policies.

Policy Notice: This policy is subject to change without notice.

Original Approval and Amendments:

Policy originally approved by Vandergrift Public Library Board 7/8/2026.