

## **Charles County Literacy Council Gift Acceptance Policy**

Board members and employees of the Charles County Literacy Council (CCLC) shall not personally profit from their association with the CCLC. As a non-profit organization, our focus is on providing free literacy and math tutoring to the adults of Charles County who request our assistance. Public perception of an ethically managed organization is crucial to obtaining the donations from public and private sources that the CCLC depends on to carry out our important educational mission.

### **Gifts From Outside Sources**

Generally, CCLC board members and employees may not solicit or accept a gift (1) from a "prohibited source" or (2) if given because of your official position. A "prohibited source" is a person or organization seeking official action by the CCLC; a contractor or grantee of the CCLC; a person or organization with an interest that may be substantially affected by the performance or nonperformance of your official duties; or an organization whose members are any of the above.

There are certain common exceptions to this rule that may permit acceptance of an otherwise prohibited gift:

- Individual gifts of \$20 or less provided one source does not give more than an aggregate of \$50 per year.
- Gifts based on outside business or employment relationships (such as a gift from a friend, or a gift to your spouse unaffected by your official position).
- Invitations to certain widely attended events (events where a large number of people with common interests, but diverse perspectives are expected to attend).

You may not, under any circumstance:

- Accept a meal in return for being influenced in the performance of an official act;
- Solicit or coerce the offer of a meal;
- Accept meals from the same or different sources on a basis so frequent that a reasonable person would be led to believe you are using your office for private gain; or
- Accept a gift in violation of any statute.

Contractors and others with CCLC-related interests may offer gifts, including meals, or host events that include food. Whether you may accept or attend is dependent upon whether the gift falls into one of the three exceptions described above or you pay the full value of the gift as described below. If you are invited to an event you believe may qualify as a widely attended event, discuss the invitation with the full CCLC Board for an ethics "sanity check" at either the monthly Board meeting or via email and obtain a majority concurrence before accepting the invitation. If you choose to pay for a gift, you must pay the donor its full value. You are responsible for ensuring that the amount you pay is an accurate reflection of the full value. The

full value for an event that has tickets, such as a sporting event, is the price on the face of the ticket. However, even when you pay the face value questions concerning loss of impartiality may still exist. For an event without tickets such as a meal, it is the full cost that the donor paid. This not only includes the value of the food and drink, but also a portion of the related costs for room rental, wait staff, decorations, etc. You may not accept a gift simply by paying the amount that exceeds the \$20 limit. If you are offered a meal as a gift, be wary of situations in which the host may quote the value at a suspiciously low price, or one off the top of his/her head. It is your responsibility to verify that the value of the meal does not exceed the \$20 limit. Although an exception to the gift rule may apply, it is never inappropriate to refuse a gift if to accept it will create an appearance of impropriety. Acceptance of gifts from contractors, even under \$20, is generally discouraged.

### **Gifts Between CCLC Board Members, Employees, Tutors and Students**

Generally, you may not give a gift to a CCLC Board Member or employee unless the gift is given under one of the following situations:

- Occasional gifts of \$20 or less.
- Food and refreshments shared in the office.
- Personal hospitality at one's home and gifts given in connection with the receipt of personal hospitality from a Board Member, if it is of the type and value customarily given on such occasions; and special infrequent occasions (such as marriage, illness, retirement, or the birth or adoption of a child).

Generally, CCLC Board Members, employees and Tutors may not accept gifts from students. If a student offers a gift to a CCLC Board Member, employee or tutor, the student should be reminded that the services are provided free of charge and that if they would like to make a gift to the CCLC they should make it in the form of a donation as opposed to an individual gift. In rare occasions, such as at the completion of a long association between a student and tutor, receiving a gift of nominal value (\$20.00 or less) is acceptable.

Gifts and/or awards of a nominal value (\$20 or less) may be provided to CCLC Board Members and/or tutors as recognition for their significant contributions. These gifts will not exceed \$20.00 per year and should be kept to a minimum.

Questions may arise regarding CCLC holiday parties and gift exchanges. You may collect voluntary contributions for holiday parties. Those associated with the CCLC (Board members, employees, tutors, and students) who wish to participate in attending a party may be required to contribute a set amount to pay per person costs; however, participation cannot be mandatory. Those attending may participate in a gift exchange, provided the gift value limit does not exceed \$20. Generally, CCLC parties/banquets will be of a "pot luck" nature to avoid the need to handle and account for money.

If you have any questions about this policy, please contact the CCLC office.