

CSC Nepotism Policy

“No individual shall be employed, serve as a member of the Board of Directors, or be hired as a consultant, vendor or contractor by any agency, with respect to any Children’s Services Council of Palm Beach County (CSC) funded program, which will (i) result in the existence of a subordinate-superior relationship between such individual and any family member of such individual through a direct line of authority or (ii) result in multiple family members serving as members of the Board of Directors.

The Executive Director, or other person authorized to bind the organization, will present certification of compliance to CSC as part of all Requests for Proposal. Agency must continue to be in compliance throughout the course of the contract.”

This Policy will be effective as of November 1, 2008 and will apply to: (i) all agencies funded for the first time by CSC after the effective date, and (ii) all agencies applying for a CSC ITN or RFP (i.e. agencies must be in compliance with this policy to apply) after the effective date. All other CSC-funded agencies will be controlled by CSC Council Policy 0001, last updated August 19, 2004. Note: this policy would not apply to governmental entities (which are governed by State law) or Special Initiatives.

For the purpose of the above outlined policy the following definition applies:

Nepotism - The employment of family member(s) in direct line of authority; the utilization of family member(s) as consultants, vendors or contractors; and/or the involvement of multiple family member(s) as members of the Board of Directors.

Family Member – An individual who is related to another as father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, grandmother, grandfather, great grandparent, great grandchild, step grandparent, step great grandparent, step grandchild, step great grandchild, person who is engaged to be married to a person in a direct line of authority who otherwise holds himself or herself out as or is generally known as the person whom the employee, in a direct line of authority, intends to marry or with whom the person, in direct line of authority, intends to form a household, or any other person having the same legal residence as the person in direct line of authority.

CSC funding is contingent upon Agency being in full compliance with CSC Nepotism Policy.

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Policy

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General Description

Description: No individual shall be employed, serve as a member of the Board of Directors, or be hired as a consultant, vendor or contractor by any agency, with respect to any CSC funded program, which will result in the existence of a subordinate-superior relationship between such individual and any relative of such individual through any line of authority.

Relatives employed, in a direct line of authority, at the time of the initial contract will be identified by name and position. These individuals will be allowed to continue in their present positions. If they leave the agency they will not be replaced with relatives

The Executive Director and the Chairperson of the Board of Directors will present certification of compliance, along with names and position of currently employed relatives to CSC as part of the RFP and Base Application processes. Agency must continue to be in compliance throughout the course of the contract.

Purpose: The employment of relatives in the same line of authority within an organization may cause serious conflicts and problems with favoritism and accountability, whether actual or perceived, and employee morale which may lead to increased staff turnover. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships.

The results of a CSC study reviewing all agencies appearing before the Program Review Committee indicates that agencies engaging in nepotism are more likely to appear before the Program Review Committee (PRC).

To ensure accountability and role clarity for all staff and to provide for a healthy work environment.

Scope: Applies to CSC and all funded programs

Responsibility: Finance
Program Services

Program Specialist, as part of the RFP and Base application process will ensure through review of the "Certification of Compliance", signed by the agency and with the assistance of the Fiscal Analyst, will review the proposed budget Form A-1. Further, the Program Specialist and Fiscal Analyst and others will be aware and follow-up on indications that an agency is out of compliance with their certification.

Requirements

Approvals: Children Services Council

Definitions: Family

For the purposes of this policy family member means an individual who is related to another as father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, grandmother, grandfather, granddaughter, grandson, great grandparent, great grandchild, step grandparent, step great grandparent, step grandchild, step great grandchild, person who is engaged to be married to a person in a direct line of authority who otherwise holds himself or herself out as or is generally known as the person whom the employee, in a direct line of authority, intends to marry or with whom the person, in direct line of authority, intends to form a household, or any other person having the same legal residence as the person in direct line of authority.

Nepotism

The employment of family members in a direct line of authority. The utilization of family members as consultants, vendors or contractors. The involvement of family members as members of the Board of Directors.

Line of Authority

A direct line of authority extending vertically through one or more organization levels of supervision or management

Performance Evaluation

Desired Outcome: The quality of program and agency accountability will improve. It is also anticipated that implementation of this policy will reduce the number of agencies appearing before the PRC, will improve the quality of work experience and longevity of employees of CSC funded programs and will improve agency accountability by removing real or perceived conflict of interest situations.

Children of employees, if they meet all eligibility requirements of the program, can receive services. The person making the eligibility determination and those delivering services will not be a relative of the child receiving services.

Consequences: Referral to PRC with recommendation

Upon discovery of an agency being out of compliance a specific time period, not to exceed 1 month, will be given for the agency to become compliant. This situation will be brought to the attention of the PRC.

Agencies not in compliance at the end of the period during which they were to come into compliance, will be referred to PRC with a recommendation to withdraw CSC funding for the position identified as being out of compliance or to defund the agency.

Special Notes / Appendix

Phase-in: All new program contracts entered into by CSC will be required to adhere to this policy effective 10-1-2000. Relatives, in direct line of authority, will be allowed to continue their employment within a CSC funded program of the agency in their current position. No additional relatives, in direct line of authority, will be hired, within a CSC funded program of the agency during the course of CSC funding.