



TITLE	POLICY NUMBER	
Conflict of Interest Policy	DCS 04-12	
RESPONSIBLE AREA	EFFECTIVE DATE	REVISION
Human Resources	06/18/2024	

I. POLICY STATEMENT

The Arizona Department of Child Safety (DCS) expects all employees to adhere to the highest standards of accountability, which requires honest and ethical conduct. This demands that any potential conflicts of interest between an employee’s personal interests and the best interests of DCS do not result in undue personal gain, are divulged, and are reviewed and approved before they occur.

All employees of DCS are prohibited from having or entering into conflicts of interest with individuals, organizations and businesses.

II. APPLICABILITY

This policy applies to DCS State Employees, contract employees, and interns.

III. AUTHORITY

[A.R.S. §§ 38-501 through 38-511,](#)

Conflict of Interest of Officers and Employees

[State of Arizona Employee Handbook](#)

[SPS Rules](#)

R2-5A-501, Standards of Conduct R2-5A-305, Employment of Relatives

IV. DEFINITIONS

Department or DCS: The Arizona Department of child Safety

Employee: An individual who, on a full-time or part time basis, receives compensation from the Department for services performed, whether covered or uncovered status.

Contract Employee: An individual who receives compensation directly from the Department pursuant to a contract for personal services.

Intern: A student or trainee who works for DCS in order to gain job experience.

Conflict of Interest: A conflict between the employee's private interests and their official responsibilities.

Contract Governance: All employees whose duties are to regulate, inspect, audit or procure goods and/or services for DCS.

Relatives: Two employees or an employee and a job applicant in the relationship of: wife, husband, domestic partner, son, daughter, mother, father, sister, brother, nephew, niece, aunt, uncle, grandmother, grandfather, granddaughter, grandson, first cousin; father-in-law, mother-in-law, son-in-law, daughter-in-law, grandson-in-law, granddaughter-in-law, brother-in-law, sister-in-law, stepmother, stepfather, stepdaughter, stepson, stepsister, stepbrother, step-granddaughter, step-grandson, half-sister, half-brother; or a legal dependent as claimed on the most recent federal income tax return.

Gift: Any gratuity, discount, entertainment, hospitality, loan, forbearance, or other tangible or intangible item having monetary value.

Personal/Private interest: One has the potential to gain or lose money, other consideration, gifts, favors, or preferential treatment for oneself or another, depending upon the outcome of a decision, review or other transaction.

Preferential Treatment: Treatment of one individual or group of individuals in a manner that is likely to lead to greater benefits, access, rights, opportunities or status than those of another individual or group of individuals.

V. POLICY

- A. All employees of DCS are prohibited from any action that may result in or create the appearance of:
1. using public office for private gain;
 2. exploiting others to further personal, political, or business interests;
 3. giving preferential treatment to any person, contractor; employee, client or relative;
 4. impeding Department efficiency or economy;
 5. using Department property for private and/or personal gain;
 6. using, disclosing, or allowing the use of official information which has not been made available to the general public for the purpose of furthering the private interest and/or personal profit of any person, including the employee; or
 7. engaging in a financial transaction as a result of, or primarily relying upon, information obtained through their position.
- B. Conflicts of interest prohibited for client services include, but are not limited to the following:
1. accepting gifts or favors from any child, child's family members or representative;
 2. providing gifts or favors to any child, child's family members or representative, except as specifically authorized in the official performance of duties;
 3. referring children/families to treatment facilities where the employee is otherwise employed or has a financial interest; and/or
 4. soliciting gifts or favors for any service performed or intended.
- C. Hiring & Career Advancement

1. All employees shall avoid any action which might result in or create the appearance of preferential treatment or nepotism in hiring or career advancement.
2. Employees will not participate in considerations or actions involving individuals in the employee's immediate family (relatives) or, individuals employed by the employee's family or the employee's organization, services provided by the employee, or any other matter in which the employees participation may create an appearance of bias or impropriety.

VI. PROCEDURES

A. All employees are responsible for:

1. Reviewing [A.R.S. §38-501](#) through [§38-510](#), [State Personnel Rules](#), and the [State Personnel System Employee Handbook](#).
2. Completing the annually required DCS Computer Based Training – [CH10023 Conflict of Interest](#).
3. Completing [ASPS/HRD-FA5.03, Arizona State Personnel System, Disclosure Statement](#), upon hire and when there is a change in circumstances. The signed statement will be placed in the employee's official personnel file.

B. Contract Governance

The positions in the table below have been identified as holding contract governance and/or official decision making within DCS:

Position Number	Position Description	Position Number	Position Description
AUN01006	DIRECTOR	AUN04467	CONTRACTS MANAGEMENT SUPERVISOR 2
AUN01105	DEPUTY DIRECTOR	AUN04593	PROGRAM ADMINISTRATOR 2
AUN01214	ASSISTANT DIRECTOR	AUN04910	CONTRACTS MANAGEMENT SUPERVISOR 1
AUN03714	HUMAN SERVICES SPECIALIST 3	AUN04916	COMPLIANCE OFFICER
AUN03833	LICENSING COORDINATOR	AUN07050	MANAGEMENT ANALYST 3
AUN04023	MANAGEMENT ANALYST 2	AUN07368	PROCUREMENT TECHNICIAN
AUN04145	LICENSING SPECIALIST	AUN07370	PROCUREMENT SPECIALIST SENIOR
AUN04259	PROGRAM COMPLIANCE AUDITOR 2	AUN07371	PROCUREMENT MANAGER
AUN04264	CONTRACTS MANAGEMENT SPECIALIST 3	AUN07379	PROCUREMENT OFFICER, CHIEF
AUN04334	MANAGEMENT ANALYST SENIOR	AUN08175	STATE LICENSING SURVEYOR
AUN04336	PROGRAM MANAGER	AUN08298	PROGRAM SERVICES EVALUATOR 2
AUN04463	PROGRAM PROJECT SPECIALIST 2	AUN08299	PROGRAM SERVICES EVALUATOR 3

1. Annually in June, DCS Human Resources will send an email reminder to all contract governance/official decision-making employees. This is prior to the beginning of the new fiscal year on July 1.
2. Any employee holding a position of contract governance and/or official decision-making within the Department of Child Safety will complete the [State of Arizona Annual Declaration and Disclosure \(GAO-CI-101\)](#) on an annual basis. This is an annual form that must be completed every year even if there are no changes from the prior year.

C. Hiring & Career Advancement

All members of an interview panel are required to disclose conflicts of interest. Panel members are required to sign the [Confidentiality and Disclosure Statement](#) and submit to the appropriate Human Resources Liaison prior to conducting any interviews.

D. Disclosure:

1. All employees will avoid all known conflicts of interest, and to the extent they become aware of a conflict of interest in connection with any matter, they will disclose such conflict to the appropriate supervisor.
2. The Supervisor will notify DCS Human Resources (HR) at Hr@azdcs.gov when a disclosure is received and DCS HR will contact the employee and provide them with the following forms to complete if applicable:
 - a. [GAO CI 101 FORM A.pdf](#)
 - b. [GAO CI 101 FORM B1.pdf](#)
 - c. [GAO CI 101 FORM B2.pdf](#)
 - d. [GAO CI 101 FORM B3.pdf](#)
 - e. [GAO CI 101 FORM B4.pdf](#)
3. Once all forms are completed DCS HR will route the forms to the appropriate leadership for review.

4. If approved, DCS HR will notify the employee to continue business as usual.
5. If denied, DCS HR will conduct a meeting with the appropriate leadership to set forth a course of action.
6. DCS HR will maintain a separate file folder and spreadsheet with all employee disclosures, readily available for public review.

E. Policy Violations

1. Violations of this policy may result in disciplinary action, up to and including dismissal.
2. Any employee who has reasonable cause to believe that an employee is in violation of any of the provisions of this policy shall inform their appropriate supervisor who will inform DCS Human Resources.
3. The Department may require any employee who appears to be in violation of any of the provisions of this policy to document all of their actions undertaken in order to determine compliance.

VII. FORMS INDEX

[ASPS/HRD-FA5.03, Arizona State Personnel System, Disclosure Statement](#)

[Confidentiality and Disclosure Statement](#)

[State of Arizona Annual Declaration and Disclosure \(GAO-CI-101 Form A\)](#)

[GAO CI 101 Form B1](#)

[GAO CI 101 Form B2](#)

[GAO CI 101 Form B3](#)

[GAO CI 101 Form B4](#)