APS Policy Review Team
2110 Washington Blvd
Arlington, VA 22204

TO: Arlington School Board
FROM: Policy Review Team
THROUGH: Dr. Francisco Durán, Superintendent
DATE: October 30, 2026
RE: Proposed Amendments to Policies G-1.8 Employee Conflict of Interests and G-30 Whistleblower Protection

These policies are being amended to update the name of the hotline and align the disclosure form requirement with state law and are scheduled for the Board's Consent Agenda on November 12.

Staff are proposing the following changes to G-1.8 Employee Conflict of Interests.

- Change the disclosure form requirement from all employees to employees of trust as listed in the PIP and in accordance with Virginia Code.
- Change the training requirement from all employees to employees of trust as listed in the PIP.
- Require that information be distributed to all employees on ethics, conflicts of interest, and reporting requirements.
- Update the name of the hotline.
- Minor technical changes.

Staff are proposing the following changes to G-30 Whistleblower Protection.

- Update the name of the hotline.
- Minor technical changes.

These policies were reviewed by the Policy Review Team and Policy Subcommittee.

All Arlington Public Schools employees shall comply with the State and Local Government Conflict of Interests Act of the Code of Virginia. All Arlington Public Schools employees, contractors, and vendors shall avoid the appearance of or acts of impropriety.

A conflict of interest exists when an individual's personal, financial, or familial interests could compromise, or appear to compromise, their judgment, decisions, or actions in their official role with Arlington Public Schools. Some examples include, but are not limited to:

- Hiring, supervising, or contracting with a relative.
- Accepting gifts, meals, travel, or favors from vendors or contractors.
- Participating in decisions that benefit personal business interests.
- Using confidential Arlington Public Schools information for personal advantage.
- Engaging in outside employment that interferes with Arlington Public Schools duties or creates competition with Arlington Public Schools, for example contracting with another school district while employed by Arlington Public Schools.
- Failure to advertise Arlington Public Schools employment opportunities according to Equal Employment Opportunity (EEO) standards.
- Seeking or securing employment with another school district or entity during Arlington Public Schools employment, without proper disclosure and approval.

Conflicts of Interest clauses within contracts shall remain as part of Procurement standards.

These rules do not prohibit or apply to the acceptance by an employee of an award or payment in honor of meritorious or exceptional services performed by the employee and made by an organization exempt from federal income taxation pursuant to the provisions of Section 501(c)(3) of the Internal Revenue Code.

Disclosure

All employees occupying positions of trust, as listed in the implementation procedures and in accordance with Code of Virginia §2.2-3115, must submit a Conflict-of-Interest Disclosure Form annually. A new or updated disclosure must be filed within 30 days of any change in circumstances that creates a potential conflict. Disclosure forms for these employees will be maintained by the Office of Human Resources. Failure to disclose will result in disciplinary action, up to and including termination or removal from office.

Review and Resolution

The Arlington Public Schools Conflict of Interests Advisory Committee, made up of a representative group of staff members who are appointed annually by the Superintendent, will review all disclosures. Reviews will occur within 30 working days of receipt with 10 working days to provide a decision. Outcomes may include:

- Approval with no restrictions,
- Recusal from specific decisions or activities, or
- Corrective action or divestment of interest.

Staff members may appeal a decision of the Conflict of Interests Advisory Committee to the Superintendent or designee.

Training

The Finance office will provide training on ethics, conflicts of interest, and reporting requirements. All employees occupying positions of trust, as listed in the implementation procedures, must complete this training annually. Information on these topics will be provided to all Arlington Public Schools employees.

Reporting Violations

Arlington Public Schools maintains the services of an independent third-party vendor to operate the Financial Fraud, Waste, and Abuse Hotline. Employees, board members, vendors, and the community may report suspected violations of this policy, as well as fraud, waste, or abuse in accordance with School Board Policy G-30 Whistleblower Protection.

References

Code of Virginia §2.2-3101 through 2.2-3124
School Board Policy B-2.6.1 Conflict of Interests
School Board Policy G-30 Whistleblower Protection
Policy Implementation Procedure G-1.8 PIP-1 Employees Occupying Positions of Trust

Policy Adoption and Revision History

Adopted March 26, 2026. Effective March 26, 2026

Arlington Public Schools encourages its employees to report financial fraud, waste, and abuse (FFWA) to the Financial Fraud, Waste, and Abuse Hotline. Employees who make such reports are considered whistleblowers and are protected from retaliation in accordance with the Fraud and Abuse Whistle Blower Protection Act (Code of Virginia §2.2-3009 through 2.2-3014).

Reporting

A report of a suspected instance of FFWA made through the methods outlined below may include, but is not limited to:

- A suspected instance of FFWA that has or could have a significant detrimental impact on Arlington Public Schools resources or assets;

Fraud

- Intentional deception or misrepresentation made by an employee with the knowledge that the deception could result in some unauthorized tangible or intangible benefit to themselves or others or could cause significant financial detriment to Arlington Public Schools;
- Conduct prohibited by the State and Local Government Conflict of Interests Act;
- The acceptance or solicitation of bribes, kickbacks, illegal gratuities;
- Taking an external commission or payment for Arlington Public Schools work;
- Assessing or collecting unauthorized user fees or charges;
- Forgery;
- Falsification of applications or records;
- Unauthorized alteration of records (e.g., altering invoices or timekeeping records);

Waste

- Improper expenditure of funds, or the intentional or unintentional, thoughtless or careless consumption, mismanagement, or squandering of resources owned or operated by Arlington Public Schools to the detriment or potential significant financial detriment of Arlington Public Schools;

Abuse

- Improper use of authority or position for personal financial gain or the personal financial gain of those whom an employee has a personal or professional relationship, including former employers or colleagues;
- Intentional destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources owned or operated by Arlington Public Schools;
- The use of Arlington Public Schools resources so as to abuse an employee's position or authority to the significant financial detriment of Arlington Public Schools;
- Accounting irregularities;
- Irregularities for reimbursements; and
- Failure to make required financial disclosures.

Hotline Report Review Team (HRRT)

The HRRT exists to review any reports filed through the FFWA hotline. These members will be a representative group of staff members who are appointed annually by the Superintendent. The HRRT will meet to discuss the report and the next steps in performing an investigation or resolving a report. The results of investigations will be documented and reported to the Superintendent or designee.

However, if the report relates to financial fraud, waste, or abuse by the Superintendent, the report will go to the Chair of the Arlington School Board's Audit Committee, instead of the HRRT. The Chair will discuss the report with the Committee and determine next steps in investigating or resolving the report. The results will be documented and reported to the School Board.

Information, including reports of systemic issues, will be provided to the School Board for oversight purposes and in a manner that preserves due process and the Board's impartial role in any future proceedings.

Protection from Retaliation

A whistleblower is an employee or resident who witnesses or has evidence of wrongdoing or abuse and who makes or demonstrates by clear and convincing evidence that they are about to make a good faith report of, or testifies or is about to testify to, the wrongdoing or abuse to one of the employee's superiors, an agent of the employer, or an appropriate authority. No person who makes a report in good faith or who cooperates with, gives testimony to, or participates in a review, investigation, proceeding, or hearing related to an FFWA report shall suffer retaliation, including but not limited to:

- Termination, dismissal, suspension, or demotion;
- Harassment, intimidation, or threats;
- Adverse changes in duties, conditions, pay, or benefits; or
- Any other action that would reasonably discourage an employee from making or participating in a good faith report.

Any retaliation by anyone will be treated as a serious disciplinary offense. Retaliation should be reported in a timely manner to either the FFWA Hotline or the Supervisor of Employee Relations.

Confidentiality

All reports will be handled confidentially to the extent possible. The identity of the whistleblower will not be disclosed without their consent, unless required by law.

False Allegations

Deliberately false or malicious reports may result in disciplinary action.

Definitions

Abuse-An employer's or employee's conduct or omissions that result in substantial misuse, destruction, waste, or loss of funds or resources belonging to or derived from federal, state, or local government sources.

Fraud-Intentional deception by an individual (or individuals) that could result in a benefit to themselves or others or could cause detriment to others or Arlington Public Schools, including false representation of fact (whether by words or conduct), making false or misleading statements, or by concealment of something that should have been disclosed, which deceives and is intended to deceive.

Waste-The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of Arlington Public Schools resources to the detriment (or potential detriment) of Arlington Public

Schools, including incurring unnecessary costs resulting from inefficient or ineffective practices, systems, or controls.

Wrongdoing-A violation, which is not of a merely technical or minimal nature, of a federal or state law or regulation, local ordinance, or a formally adopted code of conduct or ethics of a professional organization designed to protect the interests of the public or employee.

References

Code of Virginia §2.2-3009 through 2.2-3014
Code of Virginia §2.2-3101 through 2.2-3124
School Board Policy B-2.6.1 Conflict of Interests
School Board Policy G-1.8 Employee Conflict of Interests

Policy Adoption and Revision History

Adopted March 26, 2026. Effective March 26, 2026

All Arlington Public Schools employees shall comply with the State and Local Government Conflict of Interests Act of the Code of Virginia. All Arlington Public Schools employees, contractors, and vendors shall avoid the appearance of or acts of impropriety.

A conflict of interest exists when an individual's personal, financial, or familial interests could compromise, or appear to compromise, their judgment, decisions, or actions in their official role with Arlington Public Schools. Some examples include, but are not limited to:

- Hiring, supervising, or contracting with a relative.
- Accepting gifts, meals, travel, or favors from vendors or contractors.
- Participating in decisions that benefit personal business interests.
- Using confidential Arlington Public Schools information for personal advantage.
- Engaging in outside employment that interferes with Arlington Public Schools duties or creates competition with Arlington Public Schools, for example contracting with another school district while employed by Arlington Public Schools.
- Failure to advertise Arlington Public Schools employment opportunities according to Equal Employment Opportunity (EEO) standards.
- Seeking or securing employment with another school district or entity during Arlington Public Schools employment, without proper disclosure and approval.

Conflicts of Interest clauses within contracts shall remain as part of Procurement standards.

These rules do not prohibit or apply to the acceptance by an employee of an award or payment in honor of meritorious or exceptional services performed by the employee and made by an organization exempt from federal income taxation pursuant to the provisions of Section 501(c)(3) of the Internal Revenue Code.

Disclosure

All employees occupying positions of trust, as listed in the implementation procedures and in accordance with Code of Virginia §2.2-3115, must submit a Conflict-of-Interest Disclosure Form annually. A new or updated disclosure must be filed within 30 days of any change in circumstances that creates a potential conflict. Disclosure forms for ~~Arlington Public Schools~~these ~~E~~employees will be maintained by the Office of Human Resources. Failure to disclose will result in disciplinary action, up to and including termination or removal from office.

Commented [SM1]: Virginia Code requires that we limit the disclosure form requirement to only "persons occupying such positions of trust" and that APS designate those positions. A PIP is being developed that will list these positions.

Review and Resolution

The Arlington Public Schools ~~Ethics~~ Conflict of Interests Advisory Committee, made up of a representative group of staff members who are appointed annually by the Superintendent, will review all disclosures. Reviews will occur within 30 working days of receipt with 10 working days to provide a decision. Outcomes may include:

- Approval with no restrictions,
- Recusal from specific decisions or activities, or
- Corrective action or divestment of interest.

Staff members may appeal a decision of the ~~Ethics~~ Conflict of Interests Advisory Committee to the Superintendent or designee.

Training

~~Arlington Public Schools~~The Finance office will provide training on ethics, conflicts of interest, and reporting requirements. All employees occupying positions of trust, as listed in the implementation procedures, must complete this training annually. Information on these topics will be provided to all Arlington Public Schools employees.

Reporting Violations

Arlington Public Schools maintains the services of an independent third-party vendor to operate the ~~Ethics~~ Financial Fraud, Waste, and Abuse Hotline. Employees, board members, vendors, and the community may report suspected violations of this policy, as well as fraud, waste, or abuse in accordance with School Board Policy G-30 Whistleblower Protection.

References

Code of Virginia §2.2-3101 through 2.2-3124
School Board Policy B-2.6.1 Conflict of Interests
School Board Policy G-30 Whistleblower Protection
Policy Implementation Procedure G-1.8 PIP-1 Employees Occupying Positions of Trust

Policy Adoption and Revision History

Adopted March 26, 2026. Effective March 26, 2026

Arlington Public Schools encourages its employees to report financial fraud, waste, and abuse (FFWA) to the ~~Ethics~~ Financial Fraud, Waste, and Abuse Hotline. Employees who make such reports are considered whistleblowers and are protected from retaliation in accordance with the Fraud and Abuse Whistle Blower Protection Act (Code of Virginia §2.2-3009 through 2.2-3014).

Reporting

A report ~~is a complaint~~ of a suspected instance of FFWA made through the methods outlined below~~. Some examples of what~~ may ~~be reported~~ include, but is~~are~~ not limited to:

- A suspected instance of FFWA that has or could have a significant detrimental impact on Arlington Public Schools resources or assets;

Fraud

- Intentional deception or misrepresentation made by an employee with the knowledge that the deception could result in some unauthorized tangible or intangible benefit to themselves or others or could cause significant financial detriment to Arlington Public Schools;
- Conduct prohibited by the State and Local Government Conflict of Interests Act;
- The acceptance or solicitation of bribes, kickbacks, illegal gratuities;
- Taking an external commission or payment for Arlington Public Schools work;
- Assessing or collecting unauthorized user fees or charges;
- Forgery;
- Falsification of applications or records;
- Unauthorized alteration of records (e.g., altering invoices or timekeeping records);

Waste

- Improper expenditure of funds, or the intentional or unintentional, thoughtless or careless consumption, mismanagement, or squandering of resources owned or operated by Arlington Public Schools to the detriment or potential significant financial detriment of Arlington Public Schools;

Abuse

- Improper use of authority or position for personal financial gain or the personal financial gain of those whom an employee has a personal or professional relationship, including former employers or colleagues;
- Intentional destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources owned or operated by Arlington Public Schools;
- The use of Arlington Public Schools resources so as to abuse an employee's position or authority to the significant financial detriment of Arlington Public Schools;
- Accounting irregularities;
- Irregularities for reimbursements; and
- Failure to make required financial disclosures.

Hotline Report Review Team (HRRT)

The HRRT exists to review any reports filed through the FFWA hotline. These members will be a representative group of staff members who are appointed annually by the Superintendent. The HRRT will meet to discuss the report and the next steps in performing an investigation or resolving a ~~complaint~~report. The results of investigations will be documented and reported to the Superintendent or designee.

However, if the report relates to financial fraud, waste, or abuse by the Superintendent, the report will go to the Chair of the Arlington School Board's Audit Committee, instead of the HRRT. The Chair will discuss the report with the Committee and determine next steps in investigating or resolving the ~~complaint~~report. The results will be documented and reported to the School Board.

Information, including reports of systemic issues, will be provided to the School Board for oversight purposes and in a manner that preserves due process and the Board's impartial role in any future proceedings.

Protection from Retaliation

A whistleblower is an employee or resident who witnesses or has evidence of wrongdoing or abuse and who makes or demonstrates by clear and convincing evidence that they are about to make a good faith report of, or testifies or is about to testify to, the wrongdoing or abuse to one of the employee's superiors, an agent of the employer, or an appropriate authority. No person who makes a report in good faith or who cooperates with, gives testimony to, or participates in a review, investigation, proceeding, or hearing related to an FFWA ~~complaint~~ report shall suffer retaliation, including but not limited to:

- Termination, dismissal, suspension, or demotion;
- Harassment, intimidation, or threats;
- Adverse changes in duties, conditions, pay, or benefits; or
- Any other action that would reasonably discourage an employee from making or participating in a good faith report.

Any retaliation by anyone will be treated as a serious disciplinary offense. Retaliation should be reported in a timely manner to either the ~~Ethics~~ FFWA Hotline or the Supervisor of Employee Relations.

Confidentiality

All reports will be handled confidentially to the extent possible. The identity of the whistleblower will not be disclosed without their consent, unless required by law.

False Allegations

Deliberately false or malicious reports may result in disciplinary action.

Definitions

Abuse-An employer's or employee's conduct or omissions that result in substantial misuse, destruction, waste, or loss of funds or resources belonging to or derived from federal, state, or local government sources.

Fraud-Intentional deception by an individual (or individuals) that could result in a benefit to themselves or others or could cause detriment to others or Arlington Public Schools, including false representation of fact (whether by words or conduct), making false or misleading statements, or by concealment of something that should have been disclosed, which deceives and is intended to deceive.

Waste-The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of Arlington Public Schools resources to the detriment (or potential detriment) of Arlington Public

Schools, including incurring unnecessary costs resulting from inefficient or ineffective practices, systems, or controls.

Wrongdoing-A violation, which is not of a merely technical or minimal nature, of a federal or state law or regulation, local ordinance, or a formally adopted code of conduct or ethics of a professional organization designed to protect the interests of the public or employee.

References

Code of Virginia §2.2-3009 through 2.2-3014
Code of Virginia §2.2-3101 through 2.2-3124
School Board Policy B-2.6.1 Conflict of Interests
School Board Policy G-1.8 Employee Conflict of Interests

Policy Adoption and Revision History

Adopted March 26, 2026. Effective March 26, 2026