

**BALTIMORE COUNTY PUBLIC SCHOOLS**

**DATE:** October 25, 2011  
**TO:** **BOARD OF EDUCATION**  
**FROM:** Dr. Joe A. Hairston, Superintendent  
**SUBJECT:** **REPORT ON THE PROPOSED CHANGES TO BOARD OF  
EDUCATION POLICY 8364 - FINANCIAL DISCLOSURE  
STATEMENTS**

**ORIGINATOR:** Margaret-Ann F. Howie, Esquire, General Counsel

**RESOURCE  
PERSON(S):** Patricia Clark, Policy and Compliance Officer  
Andrew W. Nussbaum, Esquire, Counsel to the Board of Education

**RECOMMENDATION**

That the Board of Education reviews the proposed changes to Policy 8364.  
This is the first reading.

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Attachment I – Policy Analysis  
Attachment II – Policy 8364

**POLICY ANALYSIS FOR  
REVISIONS TO THE BOARD OF EDUCATION’S ETHICS CODE POLICIES  
POLICY 8360, *APPLICABILITY AND DEFINITIONS*  
POLICY 8361, *STATEMENT OF PURPOSE AND POLICY*  
POLICY 8362, *GIFTS*  
POLICY 8363, *CONFLICT OF INTEREST – PROHIBITED CONDUCT*  
POLICY 8364, *FINANCIAL DISCLOSURE STATEMENTS*  
POLICY 8365, *LOBBYING*  
POLICY 8366, *ETHICS REVIEW PANEL***

**Statement of Issues or Questions Addressed**

In 2010, the General Assembly enacted legislation designed to subject members of county boards of education to conflict of interest standards and financial disclosure requirements that are at least equivalent to the State’s requirements for State officials and public officials. The State Ethics Commission issued revised Board of Education Ethics regulations that became effective on April 18, 2011. All county boards of education are required to bring their ethics codes into compliance with the new law and to provide notice to the State Ethics Commission of their progress towards enactment by October 1, 2011.

All policies were edited to conform with the State Ethics Commission’s MODEL BOARD OF EDUCATION ETHICS REGULATIONS and the Policy Review Committee’s editing conventions.

Some of the required changes include: additional reporting requirements for board members and board employees; more stringent lobbying guidelines; defining financial interests; clarifying post-Board service employment restrictions.

The Policy Review Committee is submitting the Ethics Code policies to the full Board for its consideration and action.

**Cost Analysis and Fiscal Impact on School System**

Because of the comprehensive nature of these revisions, the staff anticipates that education and training of employees, volunteers and consultants will be necessary to ensure compliance.

**Relationship to Other Board of Education Policies**

These policies form the basis of the Board’s expectations for employee ethical behavior and conduct.

**Legal Requirements**

1. *Annotated Code of Maryland, State Government Article §15-101, Legislative Findings; Policy; Liberal Construction*
2. *Annotated Code of Maryland, State Government Article §§15-811 to 15-815, Local Boards of Education*
3. *COMAR 19A.05, Board of Education Regulations*

### **Similar Policies Adopted by Other Local School Systems**

1. CALVERT COUNTY BOARD OF EDUCATION  
Policy Number 1740, *Ethics*  
Policy Number 1740.1, *Definitions*  
Policy Number 1740.2, *Ethics Panel*  
Policy Number 1740.3, *Conflict of Interest and Outside Employment*  
Policy Number 1740.4, *Gifts*  
Policy Number 1740.5, *Lobbying Disclosure*  
<http://www.calvertnet.k12.md.us/departments/administration/policies/policies.asp>
2. CARROLL COUNTY BOARD OF EDUCATION  
Policy Number BC, *Ethics*  
<http://www.boarddocs.com/mabe/ccps/Board.nsf/Public>
3. FREDERICK COUNTY BOARD OF EDUCATION  
Policy Number 109, *Ethics*  
Policy Number 109.1, *Definitions*  
Policy Number 109.3, *Prohibited Conduct and Interest*  
Policy Number 109.4, *Financial Disclosure*  
Policy Number 109.5, *Lobbying Disclosure*  
<http://fcps.schoolwires.com/152910821132356427/site/default.asp>
4. HOWARD COUNTY BOARD OF EDUCATION  
Policy Number 2070, *Ethics*  
<http://www.hcpss.org/board/policies/>
5. MONTGOMERY COUNTY BOARD OF EDUCATION  
Policy Number BBB, *Ethics*  
<http://www.mcps.k12.md.us/departments/policy/>
6. PRINCE GEORGE'S COUNTY BOARD OF EDUCATION  
Board Policy 0107, *Ethics*  
Board Policy 0107.1, *Ethics - Definitions*  
Board Policy 0108, *Ethics Panel*  
Board Policy 0109, *Conflict of Interest*  
Board Policy 0111, *Board Financial Disclosure*  
Board Policy 0112, *Lobbying Disclosure*  
<http://www1.pgcps.org/generalcounsel/boardpolicies/bp0000.aspx>
7. WASHINGTON COUNTY BOARD OF EDUCATION  
Policy Number BBF-E, *Code of Ethics for School Board Members*  
Policy BDF-E, *Ethics Advisory Panel*  
<http://www.boarddocs.com/mabe/wcps/Board.ns>

### **Draft of Proposed Policy**

Attached

**Other Alternatives Considered by Staff**

No other alternatives were considered.

**Timeline**

First reading – October 25, 2011

Public comment – November 8, 2011

Third reading/vote – December 6, 2011

\*The Ethics Code must be approved by the State Ethics Commission prior to adoption by the Board.

## INTERNAL BOARD OPERATIONS: ETHICS CODE [:]

Financial Disclosure STATEMENTS

- [A. Board members and employees listed below as officials shall file annually no later than April 30 of each calendar year during which they hold office, a statement with the Ethics Review Panel disclosing any gifts exceeding a \$50 market value received during the preceding calendar year from any person under the authority of the school system or having a contract with the school system. The statement shall identify the donor of the gift and its approximate retail value at the time of receipt. A Board of Education member or required employee who has not filed a statement of financial disclosure and who is appointed to fill a vacancy to a position listed under officials required to file shall file a statement covering the calendar year in which the official is appointed within 30 days after appointment.
- B. Officials required to file:]
- I. THIS POLICY APPLIES TO THE FOLLOWING INDIVIDUALS OF THE SCHOOL SYSTEM
- A. [(i)] Board of Education members;
  - B. [(ii)] Superintendent;
  - C. [(iii)] Deputy Superintendent;
  - D. [(iv)] Assistant Superintendents;
  - E. [(v)] Superintendent's Staff members;
  - F. [(vi)] Office heads in the positions of Executive Director, Director, Manager, and Coordinator;
  - G. [(vii)] Principals;
  - H. [(viii)] Purchasing Agents;
  - I. [(ix)] Any other employees who have authority to make the final decision to commit the school system to the expenditure of public funds;
  - J. [(x)] Other employees so designated by the Board [of Education] as periodic review would suggest.
- [C. All specified officials shall file a statement with the Ethics Review Panel disclosing any interest or employment the holding of which would require disqualification from participation pursuant to conflict of interest of the Ethics Code, sufficiently in advance of any anticipated action to allow adequate disclosure to the public.

- (i) All statements filed pursuant to this policy shall be on a form developed by the Ethics Review Panel.
- (ii) Disclosure statements filed pursuant to this policy shall be maintained by the Ethics Review Panel as public records available for public inspection and copying.]

II. EACH INDIVIDUAL LISTED ABOVE SHALL FILE THE FINANCIAL DISCLOSURE STATEMENT REQUIRED BY THIS POLICY ON A FORM PROVIDED BY THE PANEL, UNDER OATH OR AFFIRMATION, WITH THE PANEL OR THE OFFICE DESIGNATED BY THE BOARD.

III. DEADLINES FOR FILING STATEMENTS

- A. AN INCUMBENT OFFICIAL SHALL FILE A FINANCIAL DISCLOSURE STATEMENT ANNUALLY BY NO LATER THAN APRIL 30 OF EACH YEAR FOR THE PRECEDING CALENDAR YEAR.
- B. AN OFFICIAL WHO IS APPOINTED TO FILL A VACANCY IN AN OFFICE FOR WHICH A FINANCIAL DISCLOSURE STATEMENT IS REQUIRED AND WHO HAS NOT ALREADY FILED A FINANCIAL DISCLOSURE STATEMENT SHALL FILE A STATEMENT FOR THE PRECEDING CALENDAR YEAR WITHIN 30 DAYS AFTER APPOINTMENT.
- C. AN INDIVIDUAL WHO, OTHER THAN BY REASON OF DEATH, LEAVES AN OFFICE FOR WHICH A STATEMENT IS REQUIRED SHALL FILE A STATEMENT WITHIN 60 DAYS AFTER LEAVING THE OFFICE. THE STATEMENT SHALL COVER THE CALENDAR YEAR IMMEDIATELY PRECEDING THE YEAR IN WHICH THE INDIVIDUAL LEFT OFFICE, UNLESS A STATEMENT COVERING THE YEAR HAS ALREADY BEEN FILED BY THE INDIVIDUAL; AND THE PORTION OF THE CURRENT CALENDAR YEAR DURING WHICH THE INDIVIDUAL HELD THE OFFICE.

IV. PUBLIC RECORD

- A. THE PANEL OR OFFICE DESIGNATED BY THE BOARD SHALL MAINTAIN ALL FINANCIAL DISCLOSURE STATEMENTS FILED UNDER THIS POLICY.

- B. THE PANEL OR OFFICE DESIGNATED BY THE BOARD SHALL MAKE FINANCIAL DISCLOSURE STATEMENTS AVAILABLE DURING NORMAL OFFICE HOURS, FOR EXAMINATION AND COPYING BY THE PUBLIC SUBJECT TO REASONABLE FEES AND ADMINISTRATIVE PROCEDURES ESTABLISHED BY THE SCHOOL SYSTEM. (*SEE, SUPERINTENDENT'S RULE 2373, PUBLIC INFORMATION ACT REQUESTS: SCHEDULE OF FEES*)
- C. IF AN INDIVIDUAL EXAMINES OR COPIES A FINANCIAL DISCLOSURE STATEMENT, THE PANEL OR THE OFFICE DESIGNATED BY THE BOARD SHALL RECORD THE NAME AND HOME ADDRESS OF THE INDIVIDUAL REVIEWING OR COPYING THE STATEMENT AND THE NAME OF THE PERSON WHOSE FINANCIAL DISCLOSURE STATEMENT WAS EXAMINED OR COPIED.
- D. UPON REQUEST BY THE INDIVIDUAL WHOSE FINANCIAL DISCLOSURE STATEMENT WAS EXAMINED OR COPIED, THE PANEL OR THE OFFICE DESIGNATED BY THE BOARD SHALL PROVIDE THE INDIVIDUAL WITH A COPY OF THE NAME AND HOME ADDRESS OF THE PERSON WHO REVIEWED THE INDIVIDUAL'S FINANCIAL DISCLOSURE STATEMENT.

V. RETENTION REQUIREMENTS

THE PANEL OR THE OFFICE DESIGNATED BY THE BOARD SHALL RETAIN FINANCIAL DISCLOSURE STATEMENTS FOR FOUR (4) YEARS FROM THE DATE OF RECEIPT.

VI. CONTENTS OF THE FINANCIAL DISCLOSURE STATEMENT

- A. INTERESTS IN REAL PROPERTY
  - 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF ALL INTERESTS IN REAL PROPERTY WHEREVER LOCATED.
  - 2. FOR EACH INTEREST IN REAL PROPERTY, THE SCHEDULE SHALL INCLUDE:
    - a. THE NATURE OF THE PROPERTY AND THE LOCATION BY STREET ADDRESS, MAILING ADDRESS, OR LEGAL DESCRIPTION OF THE PROPERTY;

- b. THE NATURE AND EXTENT OF THE INTEREST HELD, INCLUDING ANY CONDITIONS AND ENCUMBRANCES ON THE INTEREST;
- c. THE DATE WHEN, THE MANNER IN WHICH, AND THE IDENTITY OF THE PERSON FROM WHOM THE INTEREST WAS ACQUIRED;
- d. THE NATURE AND AMOUNT OF THE CONSIDERATION GIVEN IN EXCHANGE FOR THE INTEREST OR, IF ACQUIRED OTHER THAN BY PURCHASE, THE FAIR MARKET VALUE OF THE INTEREST AT THE TIME ACQUIRED;
- e. IF ANY INTEREST WAS TRANSFERRED, IN WHOLE OR IN PART, AT ANY TIME DURING THE REPORTING PERIOD, A DESCRIPTION OF THE INTEREST TRANSFERRED, THE NATURE AND AMOUNT OF THE CONSIDERATION RECEIVED FOR THE INTEREST, AND THE IDENTITY OF THE PERSON TO WHOM THE INTEREST WAS TRANSFERRED; AND
- f. THE IDENTITY OF ANY OTHER PERSON WITH AN INTEREST IN THE PROPERTY.

**B. INTERESTS IN CORPORATIONS AND PARTNERSHIPS**

- 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF ALL INTERESTS IN ANY CORPORATION, PARTNERSHIP, LIMITED LIABILITY PARTNERSHIP, OR LIMITED LIABILITY CORPORATION, REGARDLESS OF WHETHER THE CORPORATION OR PARTNERSHIP DOES BUSINESS WITH THE BOARD OR THE SCHOOL SYSTEM.
- 2. FOR EACH INTEREST IN CORPORATIONS AND PARTNERSHIPS, THE SCHEDULE SHALL INCLUDE:
  - a. THE NAME AND ADDRESS OF THE PRINCIPAL OFFICE OF THE CORPORATION, PARTNERSHIP, LIMITED LIABILITY PARTNERSHIP, OR LIMITED LIABILITY CORPORATION;
  - b. THE NATURE AND AMOUNT OF THE INTEREST HELD, INCLUDING ANY CONDITIONS AND ENCUMBRANCES ON THE INTEREST;



- c. WITH RESPECT TO ANY INTEREST TRANSFERRED, IN WHOLE OR IN PART, AT ANY TIME DURING THE REPORTING PERIOD, A DESCRIPTION OF THE INTEREST TRANSFERRED, THE NATURE AND AMOUNT OF THE CONSIDERATION RECEIVED FOR THE INTEREST, AND, IF KNOWN, THE IDENTITY OF THE PERSON TO WHOM THE INTEREST WAS TRANSFERRED; AND
    - d. WITH RESPECT TO ANY INTEREST ACQUIRED DURING THE REPORTING PERIOD, THE DATE WHEN, THE MANNER IN WHICH, AND THE IDENTITY OF THE PERSON FROM WHOM THE INTEREST WAS ACQUIRED; AND THE NATURE AND THE AMOUNT OF THE CONSIDERATION GIVEN IN EXCHANGE FOR THE INTEREST OR, IF ACQUIRED OTHER THAN BY PURCHASE THE FAIR MARKET VALUE OF THE INTEREST AT THE TIME ACQUIRED.
  - 3. AN INDIVIDUAL MAY SATISFY THE REQUIREMENTS TO REPORT THE AMOUNT OF THE INTEREST HELD IN THE ENTITIES LISTED ABOVE, BY REPORTING, INSTEAD OF A DOLLAR AMOUNT: FOR AN EQUITY INTEREST IN A CORPORATION, THE NUMBER OF SHARES HELD AND, UNLESS THE CORPORATION'S STOCK IS PUBLICLY TRADED, THE PERCENTAGE OF EQUITY INTEREST HELD; OR FOR AN EQUITY INTEREST IN A PARTNERSHIP, THE PERCENTAGE OF THE EQUITY INTEREST HELD.
- C. INTERESTS IN BUSINESS ENTITIES DOING BUSINESS WITH THE BOARD OR THE SCHOOL SYSTEM
  - 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF ALL INTERESTS IN ANY BUSINESS ENTITY THAT DOES BUSINESS WITH THE BOARD OR THE SCHOOL SYSTEM, OTHER THAN INTERESTS REPORTED UNDER PARAGRAPH B ABOVE.
  - 2. FOR EACH INTEREST REPORTED UNDER THIS PARAGRAPH, THE SCHEDULE SHALL INCLUDE:
    - a. THE NAME AND ADDRESS OF THE PRINCIPAL OFFICE OF THE BUSINESS ENTITY;
    - b. THE NATURE AND AMOUNT OF THE INTEREST HELD, INCLUDING ANY CONDITIONS TO AND ENCUMBRANCES ON THE INTEREST;

- c. WITH RESPECT TO ANY INTEREST TRANSFERRED, IN WHOLE OR IN PART, AT ANY TIME DURING THE REPORTING PERIOD, A DESCRIPTION OF THE INTEREST TRANSFERRED, THE NATURE AND AMOUNT OF THE CONSIDERATION RECEIVED FOR THE INTEREST, AND, IF KNOWN, THE IDENTITY OF THE PERSON TO WHOM THE INTEREST WAS TRANSFERRED; AND
- d. WITH RESPECT TO ANY INTEREST ACQUIRED DURING THE REPORTING PERIOD, THE DATE WHEN, THE MANNER IN WHICH, AND THE IDENTITY OF THE PERSON FROM WHOM THE INTEREST WAS ACQUIRED; AND THE NATURE AND THE AMOUNT OF THE CONSIDERATION GIVEN IN EXCHANGE FOR THE INTEREST OR, IF ACQUIRED OTHER THAN BY PURCHASE THE FAIR MARKET VALUE OF THE INTEREST AT THE TIME ACQUIRED.

D. GIFTS

- 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF EACH GIFT IN EXCESS OF \$20.00 IN VALUE OR A SERIES OF GIFTS TOTALING \$100.00 OR MORE RECEIVED DURING THE REPORTING PERIOD FROM OR ON BEHALF OF, DIRECTLY OR INDIRECTLY, ANY ONE PERSON WHO DOES BUSINESS WITH THE BOARD OR THE SCHOOL SYSTEM.
- 2. FOR EACH GIFT REPORTED UNDER THIS PARAGRAPH, THE SCHEDULE SHALL INCLUDE:
  - a. A DESCRIPTION OF THE NATURE AND VALUE OF THE GIFT; AND
  - b. THE IDENTITY OF THE PERSON FROM WHOM, OR ON BEHALF OF WHOM, DIRECTLY OR INDIRECTLY, THE GIFT WAS RECEIVED.

E. EMPLOYMENT WITH OR INTEREST IN ENTITIES DOING BUSINESS WITH THE BOARD OR SCHOOL SYSTEM

- 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF ALL OFFICES, DIRECTORSHIPS, AND SALARIED EMPLOYMENT BY THE INDIVIDUAL OR MEMBER OF THE IMMEDIATE FAMILY OF THE INDIVIDUAL HELD AT ANY TIME DURING THE REPORTING PERIOD WITH ENTITIES DOING BUSINESS WITH THE BOARD OR SCHOOL SYSTEM.

2. FOR EACH POSITION REPORTED UNDER THIS PARAGRAPH, THE SCHEDULE SHALL INCLUDE:
    - a. THE NAME AND ADDRESS OF THE PRINCIPAL OFFICE OF THE BUSINESS ENTITY;
    - b. THE TITLE AND NATURE OF THE OFFICE, DIRECTORSHIP, OR SALARIED EMPLOYMENT HELD AND THE DATE IT COMMENCED; AND
    - c. THE NAME OF EACH BOARD OR SCHOOL SYSTEM UNIT WITH WHICH THE ENTITY IS INVOLVED AS INDICATED BY IDENTIFYING ONE OR MORE OF THE THREE CATEGORIES OF "DOING BUSINESS WITH," AS DEFINED IN BOARD OF EDUCATION POLICY 8360, *APPLICABILITY AND DEFINITIONS*.
- F. INDEBTEDNESS TO ENTITIES DOING BUSINESS WITH THE BOARD OR SCHOOL SYSTEM
1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF ALL LIABILITIES, EXCLUDING RETAIL CREDIT ACCOUNTS, TO PERSONS DOING BUSINESS WITH THE BOARD OR SCHOOL SYSTEM OWED AT ANY TIME DURING THE REPORTING PERIOD, BY THE INDIVIDUAL; OR BY A MEMBER OF THE IMMEDIATE FAMILY OF THE INDIVIDUAL, IF THE INDIVIDUAL WAS INVOLVED IN THE TRANSACTION GIVING RISE TO THE LIABILITY.
  2. FOR EACH LIABILITY REPORTED UNDER THIS PARAGRAPH, THE SCHEDULE SHALL INCLUDE:
    - a. THE IDENTITY OF THE PERSON TO WHOM THE LIABILITY WAS OWED AND THE DATE THE LIABILITY WAS INCURRED;
    - b. THE AMOUNT OF THE LIABILITY OWED AS OF THE END OF THE REPORTING PERIOD;
    - c. THE TERMS OF PAYMENT OF THE LIABILITY AND THE EXTENT TO WHICH THE PRINCIPAL AMOUNT OF THE LIABILITY WAS INCREASED OR REDUCED DURING THE YEAR; AND
    - d. THE SECURITY GIVEN, IF ANY, FOR THE LIABILITY.

- G. EMPLOYMENT WITH THE BOARD OR SCHOOL SYSTEM
  - 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF THE IMMEDIATE FAMILY MEMBERS OF THE INDIVIDUAL EMPLOYED BY THE BOARD OR SCHOOL SYSTEM IN ANY CAPACITY AT ANY TIME DURING THE REPORTING PERIOD.
  
- H. SOURCES OF EARNED INCOME
  - 1. THE STATEMENT SHALL INCLUDE A SCHEDULE OF THE NAME AND ADDRESS OF EACH PLACE OF EMPLOYMENT AND OF EACH BUSINESS ENTITY OF WHICH THE INDIVIDUAL OR A MEMBER OF THE INDIVIDUAL'S IMMEDIATE FAMILY WAS A SOLE OR PARTIAL OWNER AND FROM WHICH THE INDIVIDUAL OR MEMBER OF THE INDIVIDUAL'S IMMEDIATE FAMILY RECEIVED EARNED INCOME AT ANY TIME DURING THE REPORTING PERIOD.
  - 2. A MINOR CHILD'S EMPLOYMENT OR BUSINESS OWNERSHIP NEED NOT BE DISCLOSED IF THE BOARD OR SCHOOL SYSTEM DOES NOT REGULATE, EXERCISE AUTHORITY OVER, OR CONTRACT WITH THE PLACE OF EMPLOYMENT OR BUSINESS ENTITY OF THE MINOR CHILD.
  
- I. THE STATEMENT MAY ALSO INCLUDE A SCHEDULE OF ADDITIONAL INTERESTS OR INFORMATION THAT THE INDIVIDUAL MAKING THE STATEMENT WISHES TO DISCLOSE.

VII. DEFINITION OF "INTEREST"

- A. FOR THE PURPOSES OF SECTIONS A, B, AND C ABOVE (INTERESTS IN REAL PROPERTY, CORPORATIONS AND PARTNERSHIPS, AND BUSINESS ENTITIES DOING BUSINESS WITH THE BOARD AND SCHOOL SYSTEM), THE FOLLOWING INTERESTS ARE CONSIDERED TO BE THE INTERESTS OF THE INDIVIDUAL MAKING THE STATEMENT.
  
- B. AN INTEREST HELD BY A MEMBER OF THE INDIVIDUAL'S IMMEDIATE FAMILY, IF THE INTEREST WAS, AT ANY TIME DURING THE REPORTING PERIOD, DIRECTLY OR INDIRECTLY CONTROLLED BY THE INDIVIDUAL.

- C. AN INTEREST HELD BY A BUSINESS ENTITY IN WHICH THE INDIVIDUAL HELD A 30% OR GREATER INTEREST AT ANY TIME DURING THE REPORTING PERIOD.
- D. AN INTEREST HELD BY A TRUST OR AN ESTATE IN WHICH, AT ANY TIME DURING THE REPORTING PERIOD THE INDIVIDUAL HELD A REVERSIONARY INTEREST OR WAS A BENEFICIARY; OR IF A REVOCABLE TRUST, THE INDIVIDUAL WAS A SETTLOR.

VIII. ETHICS PANEL REVIEW

- A. THE PANEL SHALL REVIEW THE FINANCIAL DISCLOSURE STATEMENTS SUBMITTED UNDER THIS POLICY FOR COMPLIANCE WITH THE PROVISIONS OF THIS POLICY AND SHALL NOTIFY AN INDIVIDUAL SUBMITTING THE STATEMENT OF ANY OMISSIONS OR DEFICIENCIES.
- B. THE BOARD MAY TAKE APPROPRIATE ENFORCEMENT ACTION TO ENSURE COMPLIANCE WITH THIS POLICY.

Legal Reference: *Annotated Code of Maryland*, State Government Article, §15-813, *FINANCIAL DISCLOSURE*

Related RULE [Policies]: Superintendent's Rule 2373, *Public Information ACT Requests: Schedule of Fees*

Policy		Board of Education of Baltimore County
Adopted:	10/18/96	
Revised:	08/12/97	
Revised:	12/02/08	
Approved by SEC:	04/22/09	
REVISED:	_____	