

CONFLICT OF INTEREST

Direct Care and Treatment

Executive Board

Issue Date: November 4, 2025 Effective Date: December 2, 2025 Policy Number: 100-1000

POLICY:

All Executive Board members of Direct Care and Treatment (DCT) must act in the best interest of the organization and avoid situations where personal, professional, or financial interests could conflict with those of the organization. Actual, potential, or perceived conflicts of interest must be promptly disclosed and appropriately managed to maintain integrity and public trust.

AUTHORITY:

[Minn. Stat. § 246C.07, subd. 3\(a\)\(2\) \(Powers and Duties of Executive Board\)](#)

[Minn. Stat. § 10A.07, 10A.071 and 10A.09 \(Campaign Finance and Public Disclosure\)](#)

[Minn. Stat. § 43A.38 \(Code of Ethics for Employees in the Executive Branch\)](#)

[Minn. Stat. § 246C \(Direct Care and Treatment\)](#)

[Minn. Stat. § 13D \(Open Meeting Law\)](#)

[DCT Executive Board Bylaws](#)

APPLICABILITY:

DCT Executive Board Members

PURPOSE:

To ensure that Executive Board members act solely in the interest of DCT and that decisions are made without bias, undue influence, or personal gain. To promote transparency, accountability, and trust in Executive Board governance.

DEFINITIONS:

Conflict of Interest – A situation in which an Executive Board member’s personal, professional, or financial interests (or those of a family member or associate) could interfere with their duty to act in the organization’s best interest.

Disclosure – The act of informing the Executive Board or appropriate leadership about a potential or actual conflict of interest.

Family Member – A spouse, domestic partner, parent, child, sibling, or any individual living in the same household.

Recusal – The process by which a conflicted member removes themselves from deliberation and voting on matters where a conflict exists.

PROCEDURES:

A. Scope

1. This policy is intended to guide the conduct of DCT Executive Board with respect to their service for DCT. The DCT Executive Board of Directors and DCT employees are subject to Minnesota state laws regarding conflicts of interest.
2. This policy supplements but does not replace applicable Minnesota state laws governing

conflicts of interest applicable to the DCT Executive Board and employees. In the event of a conflict between a provision of this policy and state law, state law controls.

3. Per Minn. Stat. § 43A.38, subd. 9, with regard to DCT employees, this policy will not be interpreted to apply to any activity which is protected by Minn. Stat. §§ 179A.01 to 179A.25, and collective bargaining agreements and practices thereunder nor to prevent a current or former employee from accepting employment with a labor or employee organization representing employees.

B. Duty to Disclose

Executive Board members must immediately disclose all actual, potential, or perceived conflicts if they arise outside of the annual disclosure period.

C. Determination of Conflict

1. Disclosed conflicts will be reviewed by Executive Board Chair in consultation with the DCT Ethics Officer. If the conflict is with the Executive Board Chair, then the Vice Chair will review in consultation with the DCT Ethics Officer.
2. If a conflict is confirmed, appropriate steps will be taken to manage or eliminate the conflict.

D. Recusal from Participation

An Executive Board member with a conflict must recuse themselves from discussion, decision-making, and voting on the affected matter.

E. Documentation

1. All disclosures, deliberations, recusals, and decisions will be recorded in official meeting minutes.
2. Any information provided will adhere to the Minnesota Government Data Privacy Act and the Minnesota Open Meeting Law.

F. Violations

Failure to disclose a conflict may result in corrective actions.

G. Annual Disclosure and Acknowledgement

All Board members must sign an Annual Disclosure Form confirming receipt, understanding, and agreement to abide by this policy.

REVIEW:

[Biennially](#)

REFERENCES:

None

ATTACHMENTS:

Annual Conflict of Interest Disclosure Form Board of Directors, 100-1000a

SUPERSESSION:

All DCT Executive Board policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

/s/

DCT Executive Board
Executive Board Chair
Direct Care and Treatment