



City of Chicago
Richard M. Daley, Mayor

Chicago Department of
Family and Support Services

Mary Ellen Caron, Ph.D.
Commissioner

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TO: DFSS' Executive/Program Directors
Delegate Agency Program Governance Staff
Citywide Parent Policy Council Members
Delegate Agency Policy Committee Members

FROM: Loukisha Smart-Pennix, Director *LP*
Children Services Division
Systems Unit

DATE: April 1, 2011

SUBJECT: Policy Council/Policy Committee
Conflict-of-Interest/Nepotism Policy

The attached document describes the above referenced policy. Please share this with your respective policy committee members. Place a copy of this policy in the Policy Committee's Program Governance Policy and Procedures binder. If this policy already exists for your respective policy committee, as required by the 2007 Head Start Act, file this memo accordingly in the program governance binder.

If you have any questions regarding the policy group Conflict-of-Interest/Nepotism Policy contact Elaine Millsap-Parker, Supervisor, at 312-743-1926, or email Ms. Millsap-Parker at eparker@cityofchicago.org.

Thank you.



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Chicago Department of Family & Support Services
Office of Children & Youth Services-Children Services Division
Citywide Parent Policy Council/Policy Committee
Conflic-of-Interest/Nepotism Policy

In accordance with the Improving Head Start for School Readiness Act of 2007, *also know as the 2007 Head Start Act*, Section 642 (c)(2)(C)(i & ii) Program Governance – Conflict of Interest, members of the Citywide Parent Policy Council/Committee memberships shall:

- a) not have a conflict of interest with the Department of Family & Support Services or its Head Start/ Early Head Start delegate/partner agencies;
- b) not receive compensation for serving on the policy council/committee; and
- c) not be paid for providing services to the program while serving on the policy council/committee.

Child care reimbursements [1304.50 (f)] are not applicable to this requirement and it is another policy for supporting parent members to participate fully in their group responsibilities 1304.50(f); and furthermore,

In accordance to the Head Start Performance Standard 1304.50 (b) (6)- Policy Council/Committee Composition-*Nepotism*, the Citywide Parent Policy Council/Committee membership shall not have:

- d) any grantee or delegate agency staff (or members of their immediate families) serving on the policy council or committees; except for those who occasional substitute for regular Early Head Start or Head Start Staff.

Each policy council/committee member is responsible for disclosing any potential conflicts of interests or nepotism violations to the grantee/delegate agency for immediate assessment and resolution. If a Policy Council/Committee member gains employment with the grantee's or delegate agency's Head Start/Early Head Start program, the Policy Council member shall notify the appropriate grantee staff within 24 hours after accepting the employment opportunity with the grantee or delegate agency. The grantee/delegate agency will document these instances and file them accordingly in the CPPC Central Office file.

The grantee /delegate agency shall follow its nepotism policy to ensure that no grantee staff or delegate agency staffs are serving on the Policy Council/Policy Committee.

Effective: April 1, 2011