

Board of Education

Effective: November 19, 2020

Policy Outline

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I. Policy Value Statement

The Board of Education recognizes that the success of a public school system is dependent upon citizens having the highest trust in their public officials and employees. The Board expects its employees to conduct themselves in a trustworthy and ethical manner at all times in the performance of their duties and responsibilities. Accordingly, citizens have a right to be assured that the Board, the Superintendent, and Howard County Public School System (HCPSS) employees will promote a culture of impartiality, accountability, and integrity in the performance of duties and responsibilities.

Ethics and ethical standards are regulated by this policy, by the Implementation Procedures of the policy, as well as by the Ethics Regulations. The Board's Ethics Regulations establishes required behavior for all instructional and non-instructional personnel, administrative and supervisory personnel, Board of Education members, employees, and advisory committee members. The Ethics Regulations have been issued in accordance with Maryland law, which requires all Boards of Education to adopt the Ethics Regulations. Board members and employees will be subject to the Ethics Regulations, which address the school system's commitment to leading and teaching by example, and to serving as role models for students. Through the Ethics Regulations, the Board sets minimum ethical standards of conduct for itself and school system employees.

II. Purpose

The purpose of this policy is to support the Ethics Regulations by articulating the importance of ethical conduct by Board members, employees, and advisory committee members of the HCPSS, to establish standards of ethical conduct, and to publicize those standards to the school community.

III. Standards

- A. All Board members, employees, and advisory committee members will conduct their duties and responsibilities, while in the employ of the HCPSS, in an ethical manner that reflects and exemplifies their position of public trust.
- B. All Board members, employees, and advisory committee members will promote a culture of impartiality, accountability, and integrity in the performance of duties and responsibilities.
- C. HCPSS Board members, employees, and advisory committee members will endeavor to avoid any actions creating the appearance that they are violating the HCPSS policy, the law, or the ethical standards promulgated in Policy 2070 Ethics or the Ethics Regulations.
- D. All Board members, employees, and advisory committee members will report any violation of Policy 2070 Ethics or the Ethics Regulations to the Ethics Panel.
- E. It is the responsibility of all Board members, employees, and advisory committee members to be alert for any indications of fraud and abuse involving HCPSS funds or property. The following procedures will be followed for all Board members, employees, advisory committee members, and residents reporting fraud and/or abuse:
 - 1. Notification
 - a. Individuals will use the steps below for reporting fraud and/or abuse. However, when anonymity is a priority, individuals may choose to use the Fraud Hotline if available.
 - i. Any individual who has knowledge of an occurrence of fraud and/or abuse, or has reason to suspect that such an event has occurred by an employee, will notify the employee's immediate supervisor. If there is reason to believe that this supervisor may be involved, the employee will instead notify his/her supervisor's supervisor. The supervisor will immediately notify the Board of Education's Internal Auditor. As appropriate, the supervisor will also notify the, division chiefs and the Director of Security, Emergency Preparedness and Response.
 - ii. Any individual who has knowledge of an occurrence of fraud and/or abuse or has reason to suspect that such an event has occurred, by a member of the Board or an advisory committee member, will immediately notify the Board Chair. If the allegation concerns the Board Chair the report will be made to the Vice Chair.
 - b. For ease and/or anonymity, Howard County residents may report fraud and/or abuse to the Fraud Hotline if available.

2. Investigation

- a. Employees: Fraud and abuse investigations involving employees will follow the procedures identified in Policy 7030 Employee Conduct and Discipline. Per Policy 7030, investigations are usually conducted by the employee's immediate supervisor; however, an administrator with superseding authority may assume investigatory responsibilities or assign other Department of Education personnel to pursue the investigation. The investigation will ensure that due process is provided to the employee. After the investigation, the supervisor will determine whether disciplinary action is warranted. Any disciplinary action will be issued in accordance with Policy 7030.
 - b. Board members and advisory committee members: The Board will conduct an investigation into matters involving Board members and advisory committee members. Any Board member(s) alleged to be involved in the reported fraud and/or abuse will recuse him or herself from the investigation process. The Board will notify the Board of Education's Internal Auditor, Attorney, and Administrator to support the facilitation of the investigation. If the Board's Attorney, Internal Auditor, or Administrator is alleged to be involved in the reported fraud and/or abuse, he or she will recuse himself from supporting the investigation efforts. The investigation will ensure that due process is provided.
3. Confidentiality: Any information reported will be considered confidential and every effort will be made to protect the identity of the person reporting, unless the information is needed for law enforcement or other purposes. The Board will ensure that employees reporting such allegations will be protected from any retaliatory acts for doing so.
 4. Protection against retaliation: No action or reprisals may be taken against an individual reporting a suspected violation in good faith.
- F. Board members and candidates, the Superintendent, and designated employees listed in the Ethics Regulations Section IX.A., must disclose certain financial interests to guard against improper influence.
 - G. Advisory committee members will complete a Board approved statement of financial interest form and file it with the ethics panel within 30 days of appointment to the committee.
 - H. A Board member providing testimony to another entity represents only the individual views of that Board member and does not speak on behalf of the entire Board unless the Board member has been previously designated by the Board to be its representative.
 - I. All Board members and employees have the right to participate in political and governmental affairs in the manner afforded all other citizens: the right to vote, the

right to be an active member of a political party, the right to campaign for election to public office, and the right to seek and serve in public office.

1. The following activities are specifically prohibited on HCPSS property, except by guidelines established by the Board, Superintendent, Board of Elections, bargaining units, and Policy 2010 Student Representation governing the Student Member of the Board and candidates for Student Member of the Board:
 - a. Posting of political circulars or petitions.
 - b. The use of any school or office help, telephones, supplies, or equipment.
 2. All Board members and employees, excluding the Student Member of the Board or students running for the Student Member of the Board, who are seeking or holding public office or campaigning for a political candidate:
 - a. Must not conduct campaign activities within the staff workplace or while staff is engaged in HCPSS business.
 - b. May not associate their HCPSS position with the endorsement of any candidate.
 - c. May not require any HCPSS student to participate in political campaigns for the employee or for any specific political party, candidate, or political issue which the employee is promoting.
- J. Board members are not eligible for employment with HCPSS until at least one year after they leave office.
- K. If a conflict arises between a provision in Policy 2070 Ethics and the terms of the Ethics Regulations, the provisions of the Ethics Regulations will supersede and be applied.
- L. Detailed and/or specific information regarding any of the standards can be obtained from the Ethics Regulations.
- M. All opinions, findings and recommendations by the Ethics Panel will be provided to the Board.
- N. An annual report on the activities of the Ethics Panel will be provided for the Board.
- O. In the event of receipt of a complaint of an ethics violation, the Ethics Panel will consider the complaint in accordance with this policy and with the Ethics Regulations.
- P. If a situation arises in which any individual is concerned that his/her actions may be a violation, they should contact general counsel, who will advise the employee of an

advisory opinion. If the question is clearly allowed by Policy 2070 Ethics or the Ethics Regulations or prior rulings by the Ethics Panel, the general counsel may share those standards and rulings with the individual.

- Q. All Board members and employees may seek an advisory opinion from the Ethics Panel.
1. The Board encourages employees to be proactive in seeking assistance from the Ethics Panel to determine an appropriate course of action to resolve potential ethical issues because, by their nature, some ethical issues and conflicts of interest are difficult to discern.
 2. The Board has established a process which enables employees to seek an advisory opinion from the Ethics Panel when the employee is uncertain if activities, or planned activities, comply with the Ethics Regulations. Employees are encouraged to use this process, especially prior to committing to any action if an ethical issue is present. Employees acting in accordance with an Ethics Panel advisory opinion, with full disclosure of relevant information, will not be subject to disciplinary action if that opinion is later found to be in violation of Policy 2070 Ethics.
- R. The Ethics Panel will publicly report annually on all Ethics Panel Advisory Opinions on the HCPSS website for the purpose of education.
- S. Violations will result in consequences in accordance with this policy and with the Ethics Regulations.
- T. Violations of this policy or the Ethics Regulations can include, but not be limited to:
1. Engaging in outside employment or activities that conflicts with one's HCPSS official job duties such as, tutoring a current student of the employee for private compensation.
 2. Soliciting gifts of any value.
 3. Accepting a gift in violation of Section VII.C. of the Ethics Regulations. An unsolicited gift of \$20.00 or less in cost is not a violation, unless the gift would tend to impair the impartiality and independence of judgment of the person receiving the gift.
 4. Holding outside employment in an area of responsibility that would impair their impartiality or independence of judgment.
 5. Intentionally disclosing confidential information to an unauthorized recipient or using confidential information for one's own benefit or that of another.

6. Participating in a matter which would have a financial impact on them or their immediate family.
7. Intentionally using one's prestige of office or position for one's own private gain or that of another.
8. Manipulating student records.
9. Using school system resources, materials, or time for personal benefit.

Board members, employees, and advisory committee members are encouraged to ask questions about potential ethics violations by completing an Ethics Panel Application to Provide an Advisory Opinion.

- U. All bidders and potential vendors doing business with the HCPSS will be notified in writing of section VII.C. of the Ethics Regulations and will be advised that giving or offering a gift or series of gifts to a Board official or employee who is subject to these regulations is improper and may result in disqualification from future work on the grounds that the donor/offeror is no longer a responsible bidder or vendor.

IV. Responsibilities

- A. Legal counsel will serve as liaison to the HCPSS Ethics Panel and ensure that the appropriate reports, opinions, findings and recommendations are provided to the Board in a timely manner.
- B. Members of the Ethics Panel will abide by the duties, responsibilities, and rules of the Ethics Regulations.
- C. The Office of Human Resources will ensure that all new Board members and employees receive a copy of Policy 2070 Ethics and the Ethics Regulations.

V. Delegation of Authority

The Superintendent is authorized to develop procedures for the implementation of this policy.

VI. Definitions

Within the context of this policy, the following definitions apply:

- A. Abuse – The use of one's status as a HCPSS employee, Board Member, or advisory committee member for private gain, or the private gain of another.
- B. Advisory Committee Members – Individuals participating in committees chartered by the Board, in accordance with public school laws of Maryland, with the goal of providing broad input into the policies and operation of the HCPSS.

- C. Advisory Opinion – An opinion rendered by the Ethics Panel as to the applicability of the Ethics Regulations to conduct or actions by those persons as set forth in the Ethics Regulations, Section I. An advisory opinion may include cautionary advice regarding situations which by their nature require only a minor change of circumstances to become an actual conflict.
- D. Compensation – Any money or thing of value, regardless of form, received or to be received by any individual covered by the Ethics Regulations from an employer for services rendered. If lobbying is only a portion of a person's employment, compensation means a prorated amount based upon the time devoted to lobbying compared to the time devoted to other employment duties. For reporting purposes, a prorated amount will be labeled as such.
- E. Complaint – Written assertion of an alleged violation of Policy 2070 Ethics and/or the Ethics Regulations of the HCPSS on the part of anyone covered by the Ethics Regulations; may be filed by any person or persons.
- F. Confidential Information includes the following:
1. Records protected against release or distribution by a federal, state, or controlling law;
 2. Attorney-client privileged material and attorney work product, unless legally waived by the party controlling the privilege;
 3. Identifying information concerning the Requestor of an Advisory Opinion from the Ethics Panel;
 4. All information regarding a complaint filed with the Ethics Panel unless otherwise authorized for release by the Board of Education.
- G. Employee – An individual, regardless of their temporary or permanent status, whose compensation is paid in whole or part by the Board and/or an individual who is a student teacher, an intern, consultant, or an independent contractor for the school system.
- H. Ethics – The principles and standards of personal accountability and professional conduct.
- I. Ethics Panel – A five member committee established by the Ethics Regulations in compliance with Maryland state law and approved by the Board.

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- J. Financial interest
1. Ownership of any interest as the result of which the owner has received, within the past three years, or is presently receiving, or in the future is entitled to receive more than \$1,000.00 per year.
 2. Ownership, or the ownership of securities of any kind representing or convertible into ownership, of more than three percent of a business entity, whichever is greater.
- K. Fraud – Obtaining property owned by or under the control of the Board by means of false pretenses or representation including, but not limited to, bribery, kickbacks, illegal acts, forgery, theft, or embezzlement.
- L. Gift – The transfer of any service or object of economic value regardless of form without adequate and lawful consideration. The term also includes forgiveness of debts or the waiver or forgiveness of interest on any loan or obligation obtained from those doing business with the Board. The term "gift" does not include the solicitation or receipt of political campaign contributions regulated in accordance with the provisions of Article 33, 26-1 et seq., *Annotated Code of Maryland*, or other items excluded by the HCPSS regulations or any other provision of state or local law regulating the conduct of elections or the receipt of political campaign contributions, as may be amended from time to time.
- M. Immediate Family – means a spouse, domestic partner, and dependent children.
- N. Lobbying
1. Communicating in the presence of a school official or employee with the intent to influence any official action of that official or employee, where more than \$75.00 is spent for food, entertainment, or other gifts during the calendar year to further this activity.
 2. Engaging in activities having the express purpose of soliciting others to communicate with a school official or employee with the intent to influence that official or employee, where more than \$75.00 is spent to further these activities.
- O. Personal Benefit – Anything that promotes or enhances the well-being of an individual or his/her immediate family or that accrues to the personal advantage of that individual or his/her immediate family.
- P. Superintendent – The person in the HCPSS designated as the Superintendent pursuant to Par. 1-101(e) of the Education Article, *Annotated Code of Maryland*.
- Q. Tutoring – Private instruction or services for a student provided by an employee for compensation.

VII. References

- A. Legal
 - Howard County Public School System Ethics Regulations
 - The Maryland Open Meetings Act
 - The Annotated Code of Maryland, Article 33, 26-1 et seq.
 - The Annotated Code of Maryland, Election Law Article, Title 10 Subtitle 1
 - The Annotated Code of Maryland, Election Law Article, Title 13 Subtitle 2
 - The Annotated Code of Maryland, Education Article, Par. 1-101(e)

- B. Other Board Policies
 - Policy 1000 Civility
 - Policy 1040 Safe and Supportive Schools
 - Policy 1060 Bullying, Cyberbullying, Harassment, or Intimidation
 - Policy 2000 School Board Governance
 - Policy 2010 Student Representation
 - Policy 4050 Procurement of Goods and/or Services
 - Policy 7030 Employee Conduct and Discipline
 - Policy 7040 Alcohol and Noncontrolled Substance Abuse by Employees
 - Policy 7050 Drug Use by Employees: Illegal Drugs, Drug Paraphernalia and Controlled Substances

- C. Relevant Data Sources

- D. Other
 - Ethics Panel - Application to Provide an Advisory Opinion
 - Ethics Panel Complaint Form
 - HCPSS Advisory Committee Members Statement of Financial Interest
 - HCPSS Fraud Hotline
 - Superintendent's circular on political activities on school property

VIII. History¹

ADOPTED: November 4, 2010
REVIEWED:
MODIFIED: January 10, 2013
REVISED: October 2, 2018
EFFECTIVE: November 19, 2020

¹ Key: *Adopted*-Original date the Board took action to approve a policy; *Reviewed*-The date the status of a policy was assessed by the Superintendent's Standing Policy Group; *Modified*-The date the Board took action to alter a policy that based on the recommendation of the Superintendent/designee did not require a comprehensive examination; *Revised*-The date the Board took action on a policy that based on the recommendation of the Superintendent/designee needed a comprehensive examination; *Effective*-The date a policy is implemented throughout the HCPSS, typically July 1 following Board action.

Effective: November 19, 2020

I. Rules for the Ethics Panel

A. Ethics Panel Structure

1. A quorum consists of three members present. A majority vote of the Ethics Panel consists of three or more members present.
2. The minutes will be reviewed for each previous meeting.
3. All cases and complaints will be numerically assigned.
4. The proposed agenda for each meeting will be considered for approval with additions and/or deletions.
5. An announcement of each meeting will be posted at the Howard County Department of Education building and online.
6. The Ethics Panel will meet in accordance with the Maryland Open Meetings Act.
7. All opinions and decisions will be in writing.
8. The term of the chairperson of the Ethics Panel will be one year, and the term will run from Spring to Spring.
9. The Ethics Panel reserves the right to hire an attorney in the event that the panel determines that legal counsel is unable to provide impartial legal advice.
10. Lobbying Disclosure
 - a. If any report filed under Section X. of the Ethics Regulations contains the name of a Board member or the Board member's immediate family or an employee or the employee's immediate family, the Ethics Panel will notify the Board member or employee within 30 days.
 - b. The Panel shall keep the report confidential for 60 days following receipt by the Panel.

- c. Within 30 days of the notice required under paragraph (a) of this subsection, the Board member or employee may file a written exception to the inclusion in the report of the name of the Board member or employee or the member of the immediate family.

B. Ethics Panel Responsibilities

1. All advisory opinions and reports on complaints by the Ethics Panel will be copied to the Board.
2. An annual report on the activities of the Ethics Panel will be provided to the Board.

C. Board Appointments to the Ethics Panel

1. Legal counsel will advertise in at least one newspaper of general county circulation, the HCPSS website, and other media providing notice to the community.
2. The Chairman of the Board will appoint two Board members to serve as a screening committee along with legal counsel and a Human Resources staff member.
3. The Board committee will make recommendations to the Board for appointment.
4. The Board will make the appointment in public session.
5. When an Ethics Panel member's term expires, legal counsel will recommend to the Board that the member be reappointed or that the position be advertised.

D. Advisory Opinions by the Ethics Panel

1. The Ethics Panel may require any person requesting an advisory opinion, or any other HCPSS employee deemed relevant to the issue presented in the request, to appear before the Ethics Panel to provide information.
2. Panel members will refrain from making public comments concerning the individual or collective views of the Ethics Panel members, both while an application for an advisory opinion is pending and after a decision has been made. Only the Ethics Panel Chairperson will be authorized to respond to inquiries regarding the Ethics Panel's proceedings.
3. Opinions of the Ethics Panel are advisory and may be reviewed by the Board.

4. Advisory Opinion Review Process
 - a. A Board member, the Superintendent, or the subject of an advisory opinion may request that the Board review an Ethics Panel advisory opinion.
 - b. A request to review an Ethics Panel opinion must be received within 30 calendar days of the date of the Ethics Panel's written decision.
 - c. If the request is approved by a majority of the Board, the Board will review the Ethics Panel's advisory opinion.
 - d. A Board member may not participate in a review if he/she is the subject of the request.
 - e. The Ethics Panel will be informed if the Board decides to review an Ethics Panel opinion. A representative of the Ethics Panel will meet with the Board to explain its rationale.
 - f. Upon Board review, an Ethics Panel opinion may be accepted, revised, or rescinded by the Board.

E. Formal Hearings by the Ethics Panel

1. All complaints presented to the Ethics Panel must be submitted in writing. After receiving a complaint, the Ethics Panel will meet within 15 working days to review the complaint.
2. After a complaint is filed, and until there is a final decision made by the Board, all actions and records regarding a complaint will be treated confidentially.
3. The Ethics Panel, its staff, the complainant, and the respondent will not disclose any information relating to the complaint, including the identity of the complainant and respondent, except that:
 - a. The Ethics Panel may release information at any time if a release has been agreed to in writing by the respondent, and
 - b. The identity of the complainant will be disclosed to the respondent at the request of the respondent at any time.
4. If during a hearing process the Ethics Panel determines that a recommendation should be provided to the Board relative to the matter at hand as it may apply to policy, the Ethics Panel will submit such recommendation in writing to the Board.

II. Rules for Formal Hearings Before the Ethics Panel

The following rules govern formal hearings before the Ethics Panel in cases of complaints filed under the Ethics Regulations:

A. Investigations

The Ethics Panel, legal counsel, or any other person designated by the Ethics Panel, will be responsible for conducting investigations and preliminary inquiries and for presenting findings to the Ethics Panel in connection with complaints being processed in accordance with these Ethics Regulations.

B. Procedures

1. Each hearing before the Ethics Panel will be held before a quorum of the Ethics Panel.
2. The presiding officer will have charge of the hearing with full authority to permit or to limit the examination of witnesses, rule on the admissibility of evidence, and adjourn or recess the hearing from time to time. The presiding officer will require that an oath be administered to all witnesses testifying in the proceedings to be administered by a notary public or other officer of the court.
3. Parties may be represented in any hearing by an attorney. However, parties may not refuse to directly respond to requests for information or questions addressed to them by members of the Ethics Panel unless such refusal is based on a recognized provision of law. The Ethics Panel need not accept the statements of the attorney as being the statement of the attorney's client if the Ethics Panel desires direct testimony. The attorney may submit evidence, examine and cross-examine witnesses, and make objections, exceptions, and motions. All testimony will be given under oath.
4. Strict adherence to judicial rules of evidence will not be applicable to evidentiary hearings conducted by the Ethics Panel. In each case, the test of admissibility will be whether or not the evidence is reasonably relevant to a material issue and whether it has substantial value with respect to such material issue. The presiding officer may limit or refuse to admit cumulative or repetitive evidence and may curtail redundant questioning. The presiding officer may encourage, but will in no event coerce, the parties where possible to make stipulations as to matters not reasonably in dispute and to make stipulations in place of cumulative evidence.
5. The presiding officer, or any person designated for this purpose, may examine all witnesses called by any party. The presiding officer may call as a witness any person whose testimony may be relevant and material. Any Ethics Panel member may examine any witness.

6. Parties may submit briefs of the issues of fact and law involved in the hearing in such form as the presiding officer may designate.
7. The presiding officer may limit, in advance, the time allowed for testimony by each party. Testimony by each party before the Ethics Panel will not exceed 30 minutes unless the presiding officer allows additional time for good reason.
8. The Ethics Panel will notify and request that legal counsel be present when testimony is heard by the Ethics Panel.
9. The Ethics Panel will record the proceeding for the purpose of providing the official written transcript of the proceeding. No other recording devices will be permitted.
10. Postponement of a hearing may be granted if there are extenuating circumstances. Requests for postponement must be made in writing. Permission may be given by the presiding officer with the concurrence of the Ethics Panel members. All parties will be advised of the date of the rescheduled hearing.

C. Due Process procedures for the hearing

1. The opening statement by the presiding officer will cite the authority to hear the case and will explain the reason for the hearing.
2. The complaint will be read into the record unless the witness is also a party. The presiding officer, however, may require any party who is also a witness to keep the testimony of other witnesses confidential until the hearing is concluded.
3. Testimony of all parties and witnesses will be sworn or affirmed. All witnesses will be excused from the hearing except while testifying.
4. The parties will be given an opportunity to present evidence and testimony on their behalf and to call witnesses.
5. The parties and their attorneys will be afforded an opportunity to examine and cross-examine all witnesses and other parties.
6. The Ethics Panel members may pose questions at any time during the proceedings.
7. The presiding officer may exclude any question ruled to be irrelevant or argumentative.

8. Each party may make a closing statement. The complainant will make the first closing statement, and the respondent will make the final closing statement.
9. The Ethics Panel will adjourn the hearing.
10. The Ethics Panel will go into executive session to decide the case.

D. Findings

1. After consideration of all the evidence, the Ethics Panel will prepare a written report setting forth findings of facts and conclusions of law with respect to each of the alleged violations.
2. If the Ethics Panel concludes that the respondent has not violated any provisions of the Ethics Regulations, it will forward the recommendation to the Board that the complaint be dismissed, with written notice to the complainant and respondent.
3. If the Ethics Panel concludes that the respondent has violated any of the provisions of the Ethics Regulations, it will forward its recommendations to the Board with written notice to the complainant and respondent.

III. Definitions

Within the context of these procedures, the following definitions apply:

- A. Attorney – Person admitted to practice law before the Maryland Court of Appeals.
- B. Filed – Received by the Ethics Panel.
- C. Party – Any person or persons named or admitted in a complaint, such as complainant or respondent. Any person or persons may be admitted as a party for limited purposes upon satisfactory demonstration to the Ethics Panel of the nature and extent of one’s individual interest.
- D. Presiding Officer – The chairperson of the Ethics Panel or other designated Ethics Panel member who may preside in the absence of the chairperson.
- E. Written Notice – Notification that is completed upon actual delivery or upon deposit of said notice in the United States mail, stamped, and addressed to the addressee(s) at the mailing address(es) provided to or appearing on the records of the Howard County Public School System (HCPSS) or the written documentation submitted.

IV. History¹

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REVIEWED:
MODIFIED: January 10, 2013
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