



ADVISORY OPINION OF THE PRINCE GEORGE'S COUNTY BOARD OF EDUCATION ETHICS PANEL

Background: On September 10, 2025, [REDACTED] submitted a request seeking clarification under Board Policy 0107 (Ethics Regulations) regarding staff attendance at vendor-sponsored conferences. According to the information provided, these conferences are usually hosted by companies with which the school district has existing contracts. The companies usually would cover all registration, travel, lodging, and related expenses for PGCPs staff members to attend their respective conferences.

Issue Presented: Whether attendance at such vendor-sponsored conferences, with all expenses covered by the vendor, is permissible under Board Policy 0107, or whether such participation constitutes a violation of the ethics regulations.

Decision: After review of the request and careful consideration of the provisions of Board Policy 0107, the Ethics Panel finds that **attendance at a vendor-sponsored conference where all travel expenses are fully paid by the vendor is not permissible.**

Rationale and Policy Citations:

1. Gifts Prohibition (Section IV.B.6 of Policy 0107)

- Board Policy 0107 explicitly prohibits officials and employees from knowingly accepting a gift, directly or indirectly, from any person or entity that:
 - *"Is doing business with or seeking to do business with the school system or Board;"*
 - *"Is subject to the authority of the school system or the Board;"*
 - *"Is a regulated lobbyist with respect to matters within the jurisdiction of the official."*
- The definition of "gift" under the policy includes *"the transfer of anything of economic value, regardless of the form, without adequate and lawful consideration."* Travel, lodging, and transportation expenses provided by a vendor fall squarely within this definition.

2. Appearance of Improper Influence (Policy Statement, Section I & Purpose, Section II)

- The policy emphasizes that public confidence is eroded when the conduct of public business is subject to improper influence or even the appearance of improper influence. Accepting full sponsorship of travel from a vendor with whom the district has existing contracts creates both the reality and appearance of a conflict of interest.

3. Permissible Exceptions Not Applicable

- While the policy allows acceptance of certain nominal gifts (e.g., meals consumed in the presence of the donor, unsolicited items under \$20, or ceremonial awards of insignificant value), the full payment of travel, lodging, and transportation expenses by a vendor exceeds these thresholds and is therefore prohibited.
- [REDACTED] has not provided any information that states that the district staff would be participating at the conference as panelists or speakers. Therefore, the gift exception in section IV.B.6.d.ii.d. is not applicable.

Conclusion: Accordingly, the Ethics Panel determines that **district staff may not attend vendor-sponsored conferences where all travel-related expenses are fully paid by the vendor.** Such participation would constitute acceptance of a prohibited gift under **Board Policy 0107, Section IV.B.6**, and would create an impermissible conflict of interest under the standards of conduct outlined in the policy.



ETHICS ADVISORY PANEL
PRINCE GEORGE'S COUNTY BOARD OF EDUCATION

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Date: November 20, 2025
Advisory Opinion 25-03

Sincerely,

v/r Amanda Wallace
Panelist, Ethics Panel