

COLLEGE of CHARLESTON

OFFICIAL POLICY

9.1.9

Ethics Policy

10/5/2020

Policy Statement

It is the Policy of the College that all members of the College Community act in a manner that, at a minimum, is consistent with all controlling laws and to otherwise conduct themselves with honesty, fairness, transparency, and respect for the rights of others.

Policy Manager and Responsible Department or Office

Human Resources

Policy

1.0 PREFACE

It is the intent of this Ethics Policy to state those standards of ethical conduct that are expected of all members of the College Community. These standards must be observed when conducting the affairs of the College and when dealing with the government, members of the public, and with all other persons who govern, work at, attend or visit the College of Charleston. This Policy affirms the College's commitment to integrity and fairness and the faithful observance of the law while in pursuit of its academic mission. Some of the provisions contained in this Policy exceed the minimum standards of ethical conduct that are required by South Carolina law and reflect the aspirations of the College to adhere to the highest standards of ethical conduct that are generally regarded as best practices

2.0 STATEMENT OF POLICY

It is the Policy of the College that all members of the College Community act in a manner that, at a minimum, is consistent with all controlling laws and to otherwise conduct themselves with honesty, fairness, transparency, and respect for the rights of others.

3.0 DEFINITIONS

Except as otherwise specified in this Policy, a capitalized term in **bold print** used in the following sections of this Policy has the meaning given to that term in the *Glossary*, included as Attachment A to this Policy.

4.0 POLICY COVERAGE

This Policy is applicable to the College Board of Trustees, faculty and staff of the College, whether part-time, full time or temporary, students while employed by the College, visiting faculty, contractors and consultants performing work or providing services on College owned or leased property, and all other invitees of the College. The term “**Covered Person**” shall be deemed to include all persons described in this Section

5.0 GENERAL PRINCIPLES

5.1 Generally

The College of Charleston takes its reputation for integrity very seriously. Board members, faculty, staff, students, and even vendors have a responsibility to maintain the highest legal and ethical standards. **Covered Persons** shall treat each other with civility and respect. Honest discourse, fair comment and tolerance for the views of others are expected in a community of scholars and are integral to the proper functioning of an institution of higher education.

5.2 Transactions

The College’s transactions are to be conducted with transparency, fairness, and in compliance with controlling law. Members of the College Community must act in the best interest of the College and should not engage in self-dealing for personal gain. We should try to avoid the *appearance* of self-dealing, even if such self-dealing does not actually exist.

5.3 College Contracting

College contracts shall not be awarded on the basis of personal favoritism, nepotism, political considerations or based on any other consideration that is extraneous to the merits of the contemplated transaction. It shall be a violation of this Policy for a **Covered Person** to award, recommend the award or facilitate the award of a College contract to a **Family Member** or a **Business with which the Covered Person or a Family Member is Associated**.

5.4 Conflicts of Commitment

College employees also employed outside of the College shall not permit their outside employment to interfere with their respective College duties, responsibilities and time commitments. Nor should any College employee undertake any commercial activity or accept outside employment in a position that is directly competing with a College program

or activity and that could potentially result in a loss of revenue to the College.

5.5 Compliance with Professional Codes of Conduct and Code of Ethics

Many professional associations have developed codes of conduct or codes of ethics for their members. Employees of the College are expected to follow the codes of conduct and codes of ethics for their area of professional expertise.

5.6 Dealings with the Neighboring Community

The College will not do anything or refrain from doing anything within the scope of its responsibility that would be responsible for causing damage to our neighboring communities. The College will respect the rights of its neighbors to privacy and to enjoy the benefits of their property. We shall consult with the greater community when considering substantial construction and renovation projects and will periodically meet with community neighborhood groups to discuss issues of mutual concern.

6.0 LAWS, RULES AND REGULATIONS

6.1 Generally

Covered Persons must obey all laws, rules and regulations including the *South Carolina Rules of Conduct* (summarized in Attachment B to this Policy). In the event that a provision of this Policy should be more restrictive than a *Rule of Conduct* or any other provision of law, the more restrictive provision shall apply.

6.2 Receipt of Gifts

It is wrong for a **Covered Person** to accept a **Gift** or **Anything of Value** from someone who intends the **Gift** or **Anything of Value** to influence their business relationship with the College of Charleston. **Covered Persons** should seek the guidance of the Office of Legal Affairs if they have any reason to suspect a **Gift** or **Anything of Value** is being offered for such a purpose.

6.3 Political Activity¹

Included below is an illustrative list of restrictions and limitations applicable to all members of the College Community:

(a) The use of College property, personnel, equipment or materials in election campaigns or to influence the outcome of an election is prohibited. College employees are restricted from utilizing College resources in an election campaign effort. The prohibition against the use of College materials to influence the outcome of an election includes the use of College stationary. The College, however, may rent or provide public facilities for political meetings and other campaign-related purposes, if such facilities are available on similar terms to all candidates.

(b) College employees may campaign for public office when done on their own time, without utilizing public materials and equipment, and on non-governmental premises. Therefore, provided that the employee abides by all relevant laws and rules, a College employee may participate in the political process by endorsing candidates, serving on a candidate's campaign committee, soliciting campaign contributions, and writing candidate

support letters.

(c) A person may not use or authorize the use of public funds, property, or time to influence the outcome of an election.

(d) College resources can be used to prepare informational materials, conduct public meetings, or respond to news media or citizens' inquiries concerning a ballot measure affecting the College; however, we may not use College funds, property, or time in an attempt to influence the outcome of a ballot measure. The incidental use of time and materials for preparation of an objective and balanced newsletter or College newspaper article on a political issue is permissible.

(e) A College employee may not use her/his College computer to e-mail campaign literature to others.

(f) All College transactions are to be based on merit and not on the political affiliation of any party to the transaction.

6.4 Research Integrity

Covered Persons who engage in sponsored research shall conduct themselves with the highest degree of integrity and shall avoid any misconduct, including deliberate fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. Research misconduct does not include honest error or differences of opinion. Care shall be exercised in adhering to all applicable laws, rules and regulations regarding the performance and reporting of research results. Suspected instances of misconduct must be promptly reported to the Assistant Vice President for Research or the Provost.

6.5 Data Integrity and Reporting

Certain academic and enrollment data (e.g., student retention rates, college completion rates) are reported by the College of Charleston to federal and state agencies and to media organizations seeking information relevant to the publication of national and international university rankings and/or to quality assessments of the College and its academic programs.

Prior to the reporting of such data to the relevant agency or organization, the data submission shall be reviewed for accuracy and completeness by the Office of Institutional Research, Planning, and Information Management (or by any successor office to which similar data-management and integrity responsibilities are assigned). Further, and prior to data submission, the President and Provost shall attest by signature to the completion of the required review for accuracy and completeness, as described in the preceding sentence.

For submissions to federal or state agencies involving only institutional financial data and where there is no statutory or regulatory obligation for the signature of the President and/or Provost, the Executive Vice President for Business Affairs shall attest by signature to their accuracy and completeness, with such attestation to be completed prior to data

submission.

6.6 Reports of Wrongdoing

The College will not dismiss, suspend from employment, demote, decrease the compensation of, or retaliate against an employee because the employee files a report in good faith with an appropriate authority of wrongdoing by a **Covered Person**.

“Wrongdoing” means an action which results in substantial abuse, misuse, destruction, or loss of substantial public funds or public resources. “Wrongdoing” also includes an allegation that a **Covered Person** has intentionally violated federal or state statutory law or regulations or other political subdivision ordinances or regulations or a code of ethics, which violation is not merely technical or of a minimum nature.

6.7 Misuse of College Resources

Tools, equipment, furniture, fixtures, office supplies and other personal property purchased, leased or otherwise owned/leased by the College may only be used for legitimate College purposes and may not be borrowed by employees or others for any other purpose. When appropriate, however, the College may loan or rent its personal property to another entity pursuant to a written agreement.

7.0 STATEMENTS OF ECONOMIC INTEREST

7.1 Persons Required to Report

Each of the following **Covered Persons** must file a statement of economic interest with the appropriate State Commission on Ethics pursuant to Title 8, Chapter 13 of the South Carolina Code of Laws:

- (a) the President, each Executive Vice President and each General Counsel who reports directly to the President;
- (b) the Treasurer of the College;
- (c) the Controller of the College;
- (d) the Director of Procurement and Supply;
- (e) each Trustee of the College; and
- (f) such other employees of the College with financial responsibilities as the President may notify from time to time, in writing.

A copy of the required statement of economic interest with instructions can be found at <http://ethics.sc.gov/economicinterest/>.

7.2 Consequences For Not Timely Filing An Accurate And Complete Statement

In addition to such other remedial actions as may be available under law (Title 8, Chapter 13), the College may take discipline against those employees listed in Section 7.1 who knowingly and willfully fail to file an accurate and complete statement of economic interest up to and including dismissal from employment for a serious offense.

8.0 ENTREPRENEURIAL ACTIVITY OF FACULTY AND STAFF

8.1 Selling to the College

A **Covered Person** may not have an **Economic Interest** in a contract with the College if the **Covered Person** is authorized to perform an **Official Function** relating to the

contract. **Official Function** means writing or preparing the contract specifications, acceptance of bids, award of the contract, or other action on the preparation or award of the contract. This section is not intended to infringe on or prohibit public employment contracts with the College nor does it prohibit the award of contracts awarded through a process of public notice and competitive bids if the **Covered Person** has not performed an official function regarding the contract.

8.2 Entrepreneurial Activities

The College may participate in commercial activities alone or in concert with outside entities, whether such entities are for-profit, not-for-profit, or units of government at any level, provided that such activities are preapproved in writing by an Executive Vice President or the President and a determination has been made regarding the allocation of revenue and expense. Such participation must be consistent with relevant laws and this Ethics Policy.

9.0 CONFIDENTIALITY

A **Covered Person** may not use or disclose **Confidential Information** gained in the course of or by reason of his/her official responsibilities in a way that would affect an **Economic Interest** held by him/her, a member of his **Immediate Family**, an **individual with whom he is Associated**, or a **Business with which he is Associated**. The Board of Trustees, on its own initiative, may promulgate rules for the confidentiality of all nonpublic information disclosed to its Members during its Executive Sessions.

10.0 ETHICS OPINIONS

10.1 By the Commission on Ethics

As provided for in current law, the South Carolina Commission on Ethics will issue, upon request from a **Covered Person**, and will publish advisory opinions on matters arising under the Ethics Laws of the State based on real or hypothetical sets of circumstances; and the Commission's opinion, until amended or revoked, is binding on the Commission in any subsequent charges concerning the person who requested the opinion and who acted in reliance on it in good faith, unless material facts were omitted or misstated by the person in the request for the opinion. Advisory opinions must be made available to the public unless the Ethics Commission requires an opinion to remain confidential. However, the identities of the parties involved will be withheld upon request.

10.2 By the College's Legal Affairs Office

An opinion may also be requested by a **Covered Person**, in writing, from the College's General Counsel regarding any matter that has or may arise under this Policy. The opinion, until amended or revoked, is binding on the College (but not on the Commission on Ethics) in any subsequent matters arising under this Policy concerning the person who requested the opinion and who acted in reliance on it in good faith, unless material facts were omitted or misstated by the person in the request for the opinion. Advisory opinions will be made available to the public to the extent required under law.

10.3 Optional Registration

A **Covered Person** may provide the Division of Business Affairs an annual list of

Businesses with which he/she is Associated, so that the Office of Procurement and Supply may run potential “conflict of interest checks” on offerors for College contracts. These lists shall only be made available to the Executive Vice President for Business Affairs, the Director of Procurement and Supply, the Internal Auditor, and such other persons as the President of the College may designate. If a potential conflict does exist, the **Covered Person** will be alerted and the Office of Legal Affairs will provide an opinion, if requested, on the appropriateness of the proposed transaction. The public release of such lists shall be considered an unreasonable invasion of personal privacy, within the meaning of the *South Carolina Freedom of Information Act*.

11.0 NOTICE OF POLICY

11.1 Availability

This Policy shall be prominently displayed on the College’s web site and a copy of this Policy shall be provided to all new employees and Trustees of the College. Each Executive Vice President is responsible for disseminating and discussing this Policy within his/her division.

11.2 Training Procedure

The President shall approve a training procedure for the training of managers of the College on the provisions of this Policy.

12.0 INVESTIGATIONS AND DISCIPLINE

Violations of this Policy by College employees will result in disciplinary action; and violations by volunteers may result in dismissal as a volunteer. Investigations of employees shall be conducted in accordance with the *Operating Procedures for Processing Initial Complaints Against Faculty, Administrators and Staff*. Disciplinary actions for violations will be in accordance with the College’s Code of Conduct and Disciplinary Actions Policy.

Violations of this Policy by Trustees or the President are subject to such investigation and remedial action as a disinterested majority of the Board of Trustees may deem appropriate.

13.0 DUTY TO REPORT

Any member of the College Community who reasonably believes that s/he has witnessed conduct prohibited by this Policy has a responsibility to report the situation immediately to the Internal Auditor, the appropriate Executive Vice President, the General Counsel, or the President of the College. A member of the College Community who witnesses but fails to report such a situation may be subject to the immediate consideration of disciplinary or other remedial action if the failure to report has placed a member of the College Community at risk of harm or the College at risk of legal liability. The nature and extent of the action taken, if any, will depend on the following factors: (a) the severity of the circumstances observed; (b) the position/status of the person who observed the incident; (c) the position/status of the observed violator; and (d) the consequences of the failure to report or the failure to report in a timely manner.

14.0 SCHOLARSHIPS

Nothing in this Policy prevents a **Covered Person** or a member of his immediate family from being awarded an award, a grant, or scholarship, or negatively reflects on a **Covered Person** because of an award, a grant, or scholarship awarded to the Covered Person or to a member of his immediate family on a competitive, objective basis if the Covered Person has not willfully contacted any person involved in the selection of the recipient, on behalf of the recipient, before the award.

15.0 POLICY MAINTENANCE

The President of the College (or the President's designee) and the Internal Auditor shall be responsible for the maintenance of this Policy and the President shall cause a review of this Policy to be undertaken at least once during each five year period.

16.0 EFFECT ON OTHER COLLEGE POLICIES

This Ethics Policy is not intended to supersede or modify any other official College Policy of specific application to a particular circumstance or situation (e.g. *Prohibition of Discrimination and Harassment, Including Sexual Harassment and Abuse*). In such situations the Policy of specific application will control. In all other situations a violation of this Ethics Policy will be considered the controlling authority upon which remedial action (including discipline) may be based.

17.0 OPERATING PROCEDURES

The President of the College may approve operating procedures to implement this Policy, provided that the Chair of the Board of Trustees is timely informed of such procedures. Such procedures may not be inconsistent with this Policy nor may they eliminate or expand the scope of the prohibitions already described in the Ethics Policy.

18.0 AMENDMENTS

This Policy may be amended by Resolution of the Board of Trustees.

Departments/Offices Affected by the Policy

All College of Charleston Divisions, Offices, Departments, and Programs

Procedures Related to the Policy

Related Policies, Documents or Forms

Faculty/Administration Manual

Policy 9.1.2, "Code of Conduct and Disciplinary Actions"

Policy 9.1.9, "Prohibition of Discrimination and Harassment, Including Sexual Harassment and Abuse"

Other Relevant Policies of Specific Application

Issue Date: 10/13/2011

Dates of Policy Review: 10/5/2020

Next Review Date: 10/12/2025

POLICY APPROVAL

(For use by the Office of the Board of Trustees or the Office of the President)

Policy Number: 9.1.9

President or
Chairman, Board of Trustees



Date: 10/5/2020

ATTACHMENT A GLOSSARY OF TERMS

As used in this Policy, the following terms shall have the meaning ascribed next to each:

(1)(a) “**Anything of Value**” or “**Thing of Value**” means:

- (i) a pecuniary item, including money, a bank bill, or a bank note;
- (ii) a promissory note, bill of exchange, an order, a draft, warrant, check, or bond given for the payment of money;
- (iii) a contract, agreement, promise, or other obligation for an advance, a conveyance, forgiveness of indebtedness, deposit, distribution, loan, payment, gift, pledge, or transfer of money;
- (iv) a stock, bond, note, or other investment interest in an entity;
- (v) a receipt given for the payment of money or other property;
- (vi) a chose-in-action;
- (vii) a gift, tangible good, chattel, or an interest in a gift, tangible good, or chattel;
- (viii) a loan or forgiveness of indebtedness;
- (ix) a work of art, an antique, or a collectible;
- (x) an automobile or other means of personal transportation;
- (xi) real property or an interest in real property, including title to realty, a fee simple or partial interest in realty including present, future, contingent, or vested interests in realty, a leasehold interest, or other beneficial interest in realty;
- (xii) an honorarium or **compensation** for services;
- (xiii) a promise or offer of employment;
- (xiv) any other item that is of pecuniary or compensatory worth to a person.

(b) “**Anything of Value**” or “**Thing of Value**” does not mean:

- (i) printed informational or promotional material, not to exceed ten dollars in monetary value;
- (ii) items of nominal value, not to exceed ten dollars, containing or displaying promotional material;
- (iii) a personalized plaque or trophy with a value that does not exceed one hundred fifty dollars;
- (iv) educational material of a nominal value directly related to the public official’s, public member’s, or public employee’s official responsibilities;
- (v) an honorary degree bestowed upon a public official, public member, or public employee by a public or private university or college;
- (vi) promotional or marketing items offered to the general public on the same terms and conditions without regard to status as a public official or public employee; or
- (vii) a campaign contribution properly received and reported as required under law.

(2) “**Business**” means a corporation, partnership, proprietorship, firm, an enterprise, a franchise, an association, organization, or a self-employed individual.

(3) “**Business with which he is associated**” means a business of which the person or a member of his immediate family is a director, an officer, owner, employee, a compensated agent, or holder of stock worth one hundred thousand dollars or more at fair market value and which constitutes five percent or more of the total outstanding stock of any class.

(4) “**Compensation**” means money, **anything of value**, an in-kind contribution or expenditure, or economic benefit conferred on or received by a person.

(5) “**Confidential Information**” means information, whether transmitted orally or in writing, which is obtained by reason of the public position or office held and is of such nature that it is not, at the time of transmission, a matter of public record or public knowledge.

(6) “**Corporation**” means an entity organized in the corporate form under federal law or the laws of any state.

(7) “**Economic Interest**”

(a) “**Economic Interest**” means an interest distinct from that of the general public in a purchase, sale, lease, contract, option, or other transaction or arrangement involving property or services in which a public official, public member, or public employee may gain an economic benefit of fifty dollars or more.

(b) This definition does not prohibit a public official, public member, or public employee from participating in, voting on, or influencing or attempting to influence an official decision if the only economic interest or reasonably foreseeable benefit that may accrue to the public official, public member, or public employee is incidental to the public official’s, public member’s, or public employee’s position or which accrues to the public official, public member, or public employee as a member of a profession, occupation, or large class to no greater extent than the economic interest or potential benefit could reasonably be foreseen to accrue to all other members of the profession, occupation, or large class.

(8) “**Family Member**” means an individual who is:

(a) the spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, or grandchild;

(b) a member of the individual’s immediate family.

(9) “**Gift**” means **anything of value**, including entertainment, food, beverage, travel, and lodging given or paid to a public official, public member, or public employee to the extent that consideration of equal or greater value is not received. A gift includes a rebate or discount on the price of **anything of value** unless it is made in the ordinary course of business without regard to that person’s status. A gift does not include campaign contributions accepted pursuant to this chapter.

(10) **“Immediate Family”** means:

(a) a child residing in a candidate’s, public official’s, public member’s, or public employee’s household;

(b) a spouse of a candidate, public official, public member, or public employee; or

(c) an individual claimed by the candidate, public official, public member, or public employee or the candidate’s, public official’s, public member’s, or public employee’s spouse as a dependent for income tax purposes.

(11) **“Individual”** means one human being.

(12) **“Individual with whom he is associated”** means an individual with whom the person or a member of his immediate family mutually has an interest in any business of which the person or a member of his immediate family is a director, officer, owner, employee, compensated agent, or holder of stock worth one hundred thousand dollars or more at fair market value and which constitutes five percent or more of the total outstanding stock of any class.

(13) **“Official Responsibility”** means the direct administrative or operating authority, whether intermediate or final and whether exercisable personally or through subordinates, to approve, disapprove, or otherwise direct government action.

(14) **“Person”** means an individual, a proprietorship, firm, partnership, joint venture, joint stock company, syndicate, business trust, an estate, a company, committee, an association, a corporation, club, labor organization, or any other organization or group of persons acting in concert.

(15) **“Public Employee”** means a person employed by the State, a county, a municipality, or a political subdivision thereof.

(16) **“Public Member”** means an individual appointed to a noncompensated part-time position on a board, commission, or council. A public member does not lose this status by receiving reimbursement of expenses or a per diem payment for services.

(17) **“Public Official”** means an elected or appointed official of the State, a county, a municipality, or a political subdivision thereof, including candidates for the office. “Public official” does not mean a member of the judiciary except that for the purposes of campaign practices, campaign disclosure, and disclosure of economic interests, a probate judge is considered a public official and must meet the requirements of this chapter.

(18) **“Substantial monetary value”** means a monetary value of five hundred dollars or more.

(19) **“Official Capacity”** means activities which:

(a) arise because of the position held by the public official, public member, or public employee;

(b) involve matters which fall within the official responsibility of the agency, the public official, the public member, or the public employee; and

(c) are services the agency would normally provide and for which the public official, public member, or public employee would be subject to expense reimbursement by the agency with which the public official, public member, or public employee is associated.

**ATTACHMENT B
SUMMARY OF THE SOUTH CAROLINA
RULES OF CONDUCT**

The following is a summary of those *Ethical Rules of Conduct* required under law of all Public Employees, Public Members and Public Officials associated with the College. The term “Public employees” includes all College employees and the term “Public Members and Public Officials” covers all of the College’s Trustees. The statute containing the *Ethical Rules of Conduct* is cited as Title 8, Chapter 13 of the South Carolina Code of Laws. The *Rules of Conduct* are also summarized by the South Carolina Commission of Ethics at:
<http://ethics.sc.gov/RulesofConduct/Pages/index.aspx>.

(1) All **Covered Persons** are expected to adhere to and follow the Rules of Conduct as outlined in the Ethics Reform Act. Anyone who is found guilty of violating these rules is subject to prosecution by the State Ethics Commission and the Attorney General’s Office.

(2) A **Covered Persons** may not knowingly use his official office, membership, or employment to influence a government decision to obtain an economic interest for himself, a member of his immediate family, an individual with whom he is associated, or a business with which he is associated.

(3) A person may not directly or indirectly give, offer, or promise **anything of value** to a **Covered Person** with intent to influence the **Covered Person’s** official responsibilities, nor is the public official, public member, or public employee to ask, demand, solicit, or accept **anything of value** for himself or for another person in return for fulfilling his **official responsibilities** or duties.

(4) A **Covered Person** may not receive **anything of value** for speaking before a public or private group in his/her official capacity. A meal can be accepted if provided in conjunction with the speaking engagement where all participants are entitled to the same meal and the meal is incidental to the speaking engagement. A **Covered Person** may receive payment or reimbursement for actual expenses incurred.

(5) **Covered Persons** may not receive money in addition to that received by the public official, public member, or public employee in his official capacity for advice or assistance given in the course of his employment as a public official, public member, or public employee.

(6) No **Covered Person** may disclose confidential information gained as a result of his responsibility as a public official, public member, or public employee that would affect an economic interest held by himself, a member of his **immediate family, an individual with whom he is associated, or a business with which he is associated.**

(7) A **Covered Person** or an individual **with whom associated, or a business with which associated** may not knowingly represent a person before an entity of the same level of government for which the public employee has official responsibility.

(8) No **Covered Person** may cause the employment, appointment, promotion, transfer, or advancement of a **Family Member** to a state or local office or position in which the **Covered Person** supervises or manages. A **Covered Person** may not participate in an action relating to the discipline of the **Covered Person's** family member.

(9) A former public official, former public member, or former public employee holding office, membership, or employment may not serve as a lobbyist or represent clients before the agency or department on which the public official, public member, or public employee formerly served in a matter in which he directly and substantially participated for one year after terminating his public service or employment.

(10) It is a breach of ethical standards for a **Covered Person** who participates directly in procurement to resign and accept employment with a person contracting with the College if the contract falls or would fall under the **Covered Person's official responsibility**.

(11) No person may use government personnel, equipment, materials, or an office building in an election campaign. A person may use public facilities for a campaign purposes if they are available on similar terms to all candidates and committees. Likewise, government personnel may participate in election campaign on their own time and on non-government premises.

(12) A **Covered Person** may not have an **economic interest** in a contract with the state or it's political subdivisions if the **Covered Person** is authorized to perform an official function (including writing or preparing the contract, accepting bids, and awarding of the contracts) relating to the contract.
