STATE OF LOUISIANA
DEPARTMENT OF STATE CIVIL SERVICE
LOUISIANA BOARD OF ETHICS
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September 18, 2017

Mr. Jedidiah Jackson, Director
Jefferson Parish Community Action Programs
Joseph S. Yenni Building
1221 Elmwood Park Boulevard, Suite 402
Jefferson, Louisiana 70123

Re: **Louisiana Board of Ethics**
Docket No. 2017-764

Dear Mr. Jackson,

The Louisiana Board of Ethics, at its September 15, 2017, meeting, considered your request for an advisory opinion as to whether the Code of Governmental Ethics (Code) would prohibit the child of a Jefferson Community Action Programs (JeffCAP) employee from enrolling in the Jefferson Parish Head Start Program.

The JeffCAP Head Start Birth to Five Program (Program) is a federally funded child care and education program for preschool children from low-income families, with eligibility determined by the federal poverty guidelines. The Program provides all services at no cost to participating families. JeffCAP provides Program services through eight (8) Head Start Centers and four (4) community child care centers. In order to enroll in the Program, an application is made through the Jefferson Parish Public School One App System. The application is then forwarded to JeffCAP administration. Selection of eligible families is made by JeffCAP based on greatest need, which is determined by several socio-economic risk factors including household income, household size/composition, and whether the child is eligible for special education and related services based on disabilities and other special needs. Family names remain anonymous during the selection process. Once selected by JeffCAP, the child is enrolled in the Program and placed by JeffCAP at a Head Start Center or community child care center.

You stated that Brandalyn Hart is employed by JeffCAP as a Family Service Specialist at the Terrytown Gretna Head Start center. Ms. Hart's duties include coordinating the needs of families with other community organizations which promotes self-sufficiency. Ms. Hart does not work in a capacity that is involved with the selection process of the Program. Ms. Hart's 4 year old child has been determined eligible to receive special education and related services under the Individuals with Disabilities Education Act (IDEA) and has been diagnosed by Jefferson Parish Public School with a disability. As a result, Ms. Hart's child is eligible under the guidelines to enroll in the Head Start Program.

The Board concluded, and instructed me to inform you, that Brandalyn Hart would not be prohibited by the Code from enrolling her child in the Head Start Program. La. R.S. 42:1113A prohibits a public servant from entering into any transaction that is under the supervision or jurisdiction of the agency of such public servant. Ms. Hart's agency is the Terrytown Gretna Head Start center. Since the enrollment application is processed by the JeffCAP administration, and Ms. Hart has no supervision over the application, she is not prohibited from enrolling her child in the Head Start Program.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Act, and conflict of interest provisions in the gaming laws. If you have any questions, please contact me at (800)842-6630 or (225)219-5600.

Sincerely,
LOUISIANA BOARD OF ETHICS

David M. Bordelon
For the Board