



Response to DE Employee Request for Consent to Sell

Employee Name and Job Title: Richard L. Clark; Rehabilitation Supervisor

Division, Bureau: Division of Vocational Rehabilitation Services

Date of Request: April 16, 2012

Date of Agency Determination: May 1, 2012

Determination¹: Consent granted without condition

Summary of Request and Rationale for Determination:

Richard L. Clark seeks permission to sell the service of teaching graduate classes in counseling and assessment at Drake University (Drake).

As a private postsecondary institution, Drake is not regulated by the Iowa Department of Education (IDE) with the exception of the teacher and administrator preparation programs offered by Drake. Mr. Clark is not a member of IDE staff whose responsibility it is to review, assess, and recommend for approval practitioner preparation programs. He has no duties at IDE that place him in a position of authority over Drake.

Therefore, the sale of the service of teaching the aforementioned courses for Drake will not cause Richard L. Clark to advocate on behalf of any entity, does not benefit or prejudice any regulated person or entity, and does not result in a conflict of interest per section 68B.2A.

¹ If the determination is a denial or a conditional consent, the employee may file an appeal with the Iowa Ethics and Campaign Disclosure Board pursuant to rule 351—IAC 6.11(6).