

**Flint/Genesee CoC
Policy: Conflict of Interest**

Subject: Conflict of Interest		Policy #: 102
Date Adopted: 5/11/2022	Dates Reviewed:	Dates Revised:
Distribution: All Governance Council Members, General Members, Committee Members, Contracted Entities		Number of Pages: 2

Purpose:

To ensure that each individual and organization participating in the Flint/Genesee County Continuum of Care (CoC) commit to a common code of conduct that guides all behavior and decision making on behalf of the CoC, including the avoidance and disclosure of actual or potential conflicts of interest.

Philosophy:

The Flint/Genesee CoC Charter calls for all participants including Governance Council members, General Members, Independent Review Team members, committee members, advisory council members and staff members of contracted entities to exercise care, diligence and prudence when acting on behalf of the CoC, focusing always on the mission of preventing and ending homelessness. Avoiding conflicts of interest is an essential element to objective decision-making and the disclosure of any real, perceived or potential conflicts is the responsibility of each member, consistent with the guiding principles and values of the CoC.

Policy:

The CoC is entrusted with specific responsibilities as described in local, state and federal statutes, regulations and in this Governance Charter, related to use of public funds which are invested in addressing a serious community concern—homelessness.

Members and staff are expected to observe the highest standards of ethical conduct in the execution of these responsibilities on behalf of the CoC. In the performance of their duties, members are expected to carry out the mandate of the CoC to the best of their ability, and to maintain the highest standards of integrity for actions with other members and representatives, service recipients, service providers, and members of the public. Members are expected to conduct themselves with transparency, disclosing any real, perceived or potential conflicts of interest.

Members should avoid conflicts of interest in decision-making when such conflicts could result in special considerations, including bias or favoritism, and/or decisions that influence the performance of official duties in a manner contrary to the interest of the broader CoC. Members are expected to exercise adequate control and supervision

over matters for which they are individually responsible and as are specified in this Governance Charter. Members must assure that the resources entrusted to them are used for conducting official business only. Members must abide by the Conflict of Interest Policies and other operating and governance policies as established by the CoC.

Whenever Members or any of their immediate family members have a financial interest in a matter coming before the General Membership, Governance Council, or one of the committees, CoC Members must fully disclose the nature of the interest and recuse themselves from lobbying or voting on the matter.

All Members, including committee members, must disclose any actual or potential conflicts of interest regarding any business included in the meeting's agenda at the beginning of each Governance Council, General Membership meetings, and committee meetings in addition to completing the annual Conflict of Interest Disclosure Form.

CoC Members (inclusive of Advisory Council, IRT and committee members) must abide by the following rules in order to avoid conflicts of interest in compliance with 24 CFR § 578.95 (b), (d) and promote public confidence in the integrity of the CoC and its processes. Members may not participate in or influence discussions or decisions concerning the award of a grant, financial or other benefit to:

- Any organization that they or a member of their immediate family represents or has represented in the previous year; or,
- Any organization from which they or a member of their immediate family derives, or has derived, income or anything of value in the previous year.

The minutes of any meeting at which a voice or roll call vote is conducted, must reflect the disclosure of Board and committee members' declared actual or potential conflicts of interest and their abstention. If conflict of interest disclosures are not available at the time of the roll call vote from the Infrastructure Organization (IO), the Chair or presiding Officer must ask for any voting members to declare their conflict of interest and refrain from voting by abstaining.

Having a real, potential or perceived conflict of interest can damage the integrity of the CoC's work which must be transparent and fair, and always in the best interest of the community it serves. Therefore, no person who has a conflict of interest, as described by the bullets below, will serve on the IRT, or any other review panel, which will review a proposal submitted by them and/or their affiliated organization. ^[11]_[SEP]In particular to proposal/funding decisions, a conflict of interest exists if:

- The person currently, or within the last one year has been, or has a current agreement to serve in the future as, a Board member, staff member or paid consultant of an organization making a proposal for funding; or,

- The person's employer or an organization on whose Board of Directors the person sits now has, or within the last one year has had, a contractual relationship with an organization making a proposal for funding. However, if the person's employer, or the organization on whose Board of Directors the person sits, is a funding entity or organization whose mission includes providing services and/or funding to other services providers, under this definition of "conflict of interest," no conflict exists; or,
- Any other circumstance which impedes the person's ability to objectively, fairly and impartially review and rank the proposals for funding. For example, the person is currently enrolled in a program that is administered by an organization making a proposal for funding. Another example may be someone representing, or employed by, an organization that funds projects in the community.

Members will not be permitted to participate or vote until the signed conflict of interest disclosure form is on file with the Infrastructure Organization (IO). Should a conflict arise at some point during the year after which the annual Conflict of Interest Disclosure has been signed and submitted to the Infrastructure Organization (IO), the individual and/or organization with the new conflict of interest must disclose the conflict, or potential conflict, in writing to the IO and the Chairperson of the CoC as soon as reasonably possible.

Failure to adhere to these rules is grounds for removal from the CoC General Membership, Governance Council, IRT and any of the CoC committees.

Governance Charter References:

Article 2: Mission and Vision

Article 3: Guiding Principles

Article 6: Expectations and Code of Conduct

Flint/Genesee CoC
Conflict of Interest Disclosure

Name: _____

Organizational Affiliation (if any): _____

Role in the CoC: _____

I acknowledge that I have received a copy of the Flint/Genesee CoC Conflict of Interest policy, have read and understand it, and agree to abide by the terms therein.

I agree to disclose any conflicts of interest below and to promptly report any changes to this disclosure in writing to the Chair of the CoC and to the Infrastructure Organization.

I understand that no member may participate or influence discussions or decisions concerning the award of a grant or other financial benefits for an organization that the member represents.

Do you have a financial interest, current or potential, including a compensation arrangement with the CoC? No Yes If yes, please explain:

In the past have you had a financial interest, including a compensation arrangement, with the CoC? No Yes If yes, please explain, including when (approximately):

Do you have any other matters to disclose, relative to this policy?
 No Yes If yes, please explain:

Signed: _____

Print: _____

Date: _____