



## CONFLICT OF INTEREST POLICY

### Determining Conflict of Interest

The Conflict of Interest policy of the Grand Rapids Area Coalition to End Homelessness/Continuum of Care (hereafter the Coalition) is in accordance with standards set by the CoC Program Interim Rule and the US Code of Federal Regulations, included below, to ensure public funds entrusted to the community are used in a transparent and responsible manner.

The CoC Program Interim Rule 578.95(b) states that: “No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.”

The Code of Federal Regulations, Title 24-Housing and Urban Development 583.330 (e) states:

“In addition to the conflict of interest requirements in 24 CFR part 85, no person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, wither for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter. Participation by homeless individuals who also are participants under the program in policy or decision making under CFR 583.330(f) does not constitute a conflict of interest.”

### Application

Therefore, the Coalition will require any Steering Council members, elected or appointed, to abstain from voting on funding allocations for which the organization they represent is considered.

Additionally, all individuals who wish to serve on the Funding Review Committee, of which the purpose is to determine allocations of funds to area service organizations, to complete the Conflict of Interest Disclosure form detailing any possible conflicts of interest as outlined in the above descriptions. Funding Review Committee will review disclosures and vote if they would require an exception or bar the individual from serving on the committee.