

CONFLICT OF INTEREST POLICY

Board, committee and staff members of the Spokane City/County CoC (individually and collectively the "Members") must exercise discretion, diligence and prudence when acting on behalf of the CoC. In order to: (i) promote public confidence in the integrity of the CoC and its processes; and (ii) avoid any actual or potential conflicts of interest, Members shall, at all times, abide by 24 CFR §578.95, *Conflicts of Interest*. Failure to adhere to these rules is grounds for removal of the Member from the Board and/or any of its committees.

For purposes of this policy a conflict of interest exists when a Member is unable, or potentially unable, to make an impartial decision on behalf of the CoC due to family or personal relationships, outside business interests, or financial gain, whether direct or indirect. Members with lived homeless experience who receive services from an organization that may directly benefit from a funding decision may vote or make recommendations on funding decisions.

I. General Rules:

1. Members may not participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefit to:
 - (a) Any organization that they or a member of their immediate family represents or has represented during the previous year; or
 - (b) Any organization from which they or a member of their immediate family derives, or has derived, income or anything of value (whether tangible or intangible) during the previous year.
2. Whenever a Member or any of their immediate family members have a financial interest or any other personal interest in a matter coming before the Board or one of its committees, they must:
 - (a) Fully disclose the nature of the interest; and
 - (b) Recuse themselves from discussing, lobbying or voting on the matter.

II. Disclosure:

Board and 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 Board or committee meeting, or as soon as they become aware of any actual or potential conflict of interest.

III. Abstention from Decision Making:

Any matter in which a Member has disclosed an actual or potential conflict of interest will be decided only by a vote of the disinterested Members. The minutes

of any meeting at which such a vote is conducted must reflect the disclosure of interested Member's actual or potential conflict of interest and their abstention.

IV. Annual Conflict of Interest Acknowledgement Form:

All Members must sign this Conflict of Interest Policy form annually, affirming that they have: (i) reviewed the conflict of interest policy; and (ii) disclosed any actual or potential conflicts of interest that they face or are likely to face in fulfillment of their duties as Members. Members will not be permitted to participate in any CoC meetings until their signed Conflict of Interest Policy is on file with the CoC Lead organization.

V. Conflict of Interest for the CoC Evaluation/Procurement Committee:

No Member with an actual or potential conflict of interest may serve on the CoC Evaluation Committee. For purposes of this Section V, a conflict of interest exists if:

1. The Member currently, or within the last 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 to the CoC for an award of a grant or other provision of financial benefit; or
2. The Member's employer or an organization on whose Board of Directors the person sits has now, or within the last year has had, a contractual relationship with an organization making a proposal for any award of a grant or other provision of financial benefit. However, if the Member's employer, or the organization on whose Board of Directors the person sits, is a funding entity or organization whose mission includes providing services an/or funding to other service providers, under this definition of "conflict of interest," no conflict exists; or
3. Any other circumstance exists which impeded the Member's ability to objectively, fairly and impartially review and rank proposals for funding.

VI. Exceptions:

Exceptions to any of the foregoing may only be granted by HUD in accordance with 24 CFR §578.95(d)(2), *Exceptions*.

AFFIRMATION:

By my signature below I hereby affirm that I have reviewed, understand and agree to comply with this Continuum of Care Conflict of Interest Policy:

Printed Name: _____

Signature: _____

Date: _____