



CONFLICT OF INTEREST POLICY

Indianapolis Continuum of Care



Conflict of Interest

The Indianapolis Continuum of Care will adhere to the CoC Regulations that govern funding decision, specifically § 578.95 Conflicts of interest.

Continuum of Care Governing Board

- No Continuum of Care Governing 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.

Organizational Conflict

- An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, as in paragraph (d)(1) of this section, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.

Other Conflicts

- For all other transactions and activities, the following restrictions apply: (1) No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him/herself or themselves or for those with whom he/she/they has/have immediate family or business ties, during his/her/their tenure or during the one-year period following his/her/their tenure.

The Continuum of Care will apply the conflict-of-interest policy to all voting decisions that can impact funding decisions, including the priority listing during the CoC NOFO competition, scoring criteria for new and renewal project applications, ranking criteria,



policy amendments and other items that affect procedures undertaken by the Continuum of Care.