



CONFLICT OF INTEREST POLICY

A conflict of interest occurs when a CoC Scoring Committee or CoC Board member, a member of his/her immediate family, or his/her business associate has an interest, financial or otherwise, whether as employee, owner, fiduciary, consultant, Board member, or supplier or recipient of goods or services, in any program or agency that receives Continuum of Care funds.

HUD's Conflict of Interest rule does not define "Immediate Family" but the term can be understood to mean, at a minimum, a parent, spouse, domestic partner, child, or sibling. HUD's Conflict of Interest rule prohibits a CoC Board Member or CoC Scoring Committee member from participating in discussions or influencing decisions concerning the award of a grant or other financial benefits to an organization in which he/she member has an interest.¹

Common conflicts of interest may include situations such as the following:

- A CoC Board member is employed by an agency that receives or is seeking to receive CoC funds as a recipient, subrecipient or contractor.
- The spouse of a CoC Scoring Committee member provides consulting services to or is on the Board of an agency that is seeking CoC funds.
- A CoC Board member is employed by an organization that has an investment in one or more CoC funded projects (e.g., a government agency or intermediary organization that provides match, capital funding, or tax credit syndication).
- The child of a CoC Board member is receiving services from a CoC funded project.
- A CoC Board member is receiving housing assistance from a CoC funded project.
- A CoC Scoring Committee member owns property that receives rental payments from a CoC recipient.
- The sibling of a CoC Board member owns a business that provides goods or services to a CoC funded project.

Requirements

- 1)** Each CoC Board member and CoC Scoring Committee member is required to complete the [CoC Conflict of Interest form](#) no less than annually. CoC Scoring Committee members must complete this form prior to performing any work as a member of the committee.
- 2)** Whether or not a CoC Board member or CoC Scoring Committee has a conflict of interest may change over time. If a CoC Board or Scoring Committee member develops a conflict of

¹ CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

interest that has not been previously disclosed, that member must disclose his or her conflict of interest immediately.

3) CoC Board members and CoC Scoring Committee members are prohibited from participating in discussion or voting on matters concerning agencies with which they have a conflict of interest.

4) The CoC Lead Agency is prohibited from participating in discussion or voting on matters directly related to the funding of their CoC projects (CoC Planning, HMIS, Coordinated Entry).