



TUCSON PIMA COLLABORATION TO END HOMELESSNESS CONFLICT OF INTEREST POLICY

The TPCH Conflict of Interest Policy is defined by Article III the TPCH Governance Charter available at www.tpch.net.

Purpose

The purpose of the Conflict of Interest policy and procedures is to ensure that TPCH decisions do not result in organizational, personal financial, professional, or political gain on the part of participants at the expense of the TPCH and its stakeholders.

Policy

Each member and/or member organization shall disclose their relationship to any agenda item of TPCH meetings, Board meetings, or committee meetings requiring a vote during discussion of the agenda item. No member of the TPCH may participate in a vote that could result in financial benefit to them personally or to the organization they represent.

Definition

Conflict of Interest means an actual conflict, or the appearance of a conflict, between the private, professional, political, or financial interests of a participant or the organization that the participant represents while participating in TPCH activities and decision-making. According to 24 CFR 578.95,

- a. *Procurement.* For the procurement of property (goods, supplies, or equipment) and services, the recipient and its subrecipients must comply with the standards of conduct and conflict-of-interest requirements under 2 CFR 200.317 and 200.318. (b).
- b. *Continuum of Care board members.* 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.
- c. *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.

Procedures

- a. At the introduction of each meeting, participants will disclose their name and agency affiliations.
- b. Prior to contributing to a discussion, whether verbal or electronic, each participant will disclose their potential conflicts of interest regarding the discussion topic before commenting.
- c. If one member thinks another member has a conflict of interest, that participant will state the reason for believing so. The other person will have the opportunity to respond. Both statements will be included in the minutes.
- d. The officer presiding over the meeting may require the member to abstain at the officer's discretion.
- e. Any participant who has a conflict of interest based upon the definition here must abstain from voting.