

ATLANTA COC CONFLICT OF INTEREST POLICY

The Atlanta Continuum of Care (CoC) operates in accordance with policies and procedures that seek to avoid any conflict of interest or the appearance of any conflict of interest on the part of its Governing Council carrying out its purpose and on the part of any CoC Committees tasked with voting on funding.

It is expected that no Council or Committee member shall use his or her position, or knowledge gained therefrom, in such a manner that a conflict arises between the interest of the Atlanta CoC and his or her personal or professional interests. Each Council and Committee member has the duty to place the interests of the Atlanta CoC foremost in any dealings on behalf of the continuum and has a continuing responsibility to comply with this policy.

Funding and Financial Conflict of Interest

It is recognized that Council and Committee members will serve in many capacities in the City of Atlanta including agencies, institutions and programs that are or may be grant applicants with the Atlanta CoC. Such roles give rise to a dual interest, which is permissible and often beneficial to both organizations. For purposes of this policy statement, such roles shall be defined as “a duality of interest or involvement.” Dual roles can be misconstrued, however, and thus sensitivity is desirable to reduce or eliminate perceptions of favoritism.

No Council or Committee member shall have any monetary personal benefit, direct or indirect, in any grant to any grant applicant or recipient organization. A disclosed employment relationship with a grant applicant or recipient shall not constitute a personal benefit within the meaning of the preceding sentence.

During the consideration of any proposed grant to any organization by the Atlanta CoC, any member of the Council or Committee who has a duality of interest or involvement with the prospective recipient shall notify the Council Chair and Collaborative Applicant if such is not otherwise noted in the review. If such person serves on the Council or Committee as an official advisor to the applicant, such person shall refrain from voting on proposed funding. Subject to the discretion and control of the presiding Chair, such a person may be permitted to participate in discussions regarding the applicant’s organization.

No organization with any member of the Council or Committee, or immediate family members of any such person is so affiliated, shall receive special consideration whatsoever by the Atlanta CoC for its application. No variation in the procedures or standards for processing grants shall be permitted and particularly thorough scrutiny, justification and consideration shall be applied to the application of any such organization. Additionally:

- No HUD-funded provider, or affiliate of, may sit on the Rank and Review Committee or any other committee associated with decisions for which the provider, or affiliate of, has any financial interest.
- Business transactions of the Atlanta CoC in which a Council or Committee member has an interest shall be governed by the “disqualified persons” and “self-dealing” prohibitions established in federal and Internal Revenue Service guidelines. To the extent that a business transaction is not prohibited by these regulations, they shall still be subject to scrutiny. Such proposed transactions shall be reviewed carefully to determine that they are in the best interests of the Atlanta CoC and that they will not lead to a conflict of interest.

For the purposes of this policy, a Council or Committee member has an interest in a proposed transaction if he/she:

- Has a substantial financial interest as a result of the transaction.
- Has as a substantial financial interest in any organization involved in the proposed transaction.
- Holds a position as a trustee, director, general manager, or principal officer in any such organization.

A Council or Committee member with a dual interest in a proposed transaction shall not vote on the matter and, depending upon the circumstances, may be excluded from any discussion of the matter.

Atlanta CoC Conflict of Interest Policy

Council and Committee members shall not use inside information of the Atlanta CoC for his/her personal benefit or use such inside information or his/her position to the detriment of the Atlanta CoC. The above business transaction policies will apply to all Atlanta CoC members that serve on committees that vote on funding or financial matters.

Conflict of Interest Implementation

To carry out this policy, Council and Committee members shall notify the Governing Council Chair or Collaborative Applicant of associations with current grantees, prospective grantees, and business vendors of the Atlanta CoC. It is also the responsibility of each Council or Committee member to inform the Governing Council Chair or Collaborative Applicant of any conflicting or dual roles they may have if such are not otherwise made known by the foregoing process.

Understanding and Acknowledgement

By signing below, the respective Council or Committee member hereby acknowledge their understanding of the Atlanta CoC Conflict Interest Policy, as set forth above, and agrees to abide by its provisions.

Please check all that apply:

- I am a member of the Atlanta CoC Governing Council.
- I am a member of an Atlanta CoC Committee that votes on funding or financial matters.

Printed Name and Title

Organization Name

Signature and Date