



Conflict of Interest Policy

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act programs administered by HUD that award funds competitively require the development of a Continuum of Care system in the community where assistance is being sought. A continuum of care system is designed to address the critical problem of homelessness through a coordinated community-based process of identifying needs and building a system to address those needs. All Home is the designated Continuum of Care (CoC) for Seattle/King County.

Membership of the All Home Coordinating Board includes individuals from the Seattle/King County area, some of whom represent nonprofit organizations which provide services to persons and families who are homeless or at-risk of becoming homeless. Some of these organizations will also, from time-to-time, be applicants for funds and/or contracts which may be awarded directly by All Home, or at the recommendation of All Home. To prevent an appearance of and address situations of conflict of interest, the following policy has been established to give guidance to currently serving members of the Coordinating Board, inform All Home's constituency, and promote transparency of the continuum's operations and business decisions.

Code of Conduct

Each and every member of the Coordinating Board shall, to the maximum extent possible, serve in a manner so as to avoid the appearance, or actual occurrence of a conflict of interest, any favoritism or any special treatment toward any person, applicant, organization or vendor, having business, or dealings of any kind, with All Home. No member of the Coordinating Board shall use or cause or allow to be used, his or her position to secure any personal privilege for himself, herself, their organization, or others, or to influence, actions, of All Home for private, professional or humanitarian reasons. No Board member shall use his or her position, or the knowledge gained therefrom, in such a manner that conflict with the interests of All Home.

Board members serve without compensation. Board members may not obtain for themselves, their relatives, their organization, their business associates, or any other related party a material gain of any kind from their association with All Home. All Home expects that a Board member's organization or another related party may, from time to time, apply for grants or seek contracts from All Home; it is the Board member's direct participation in decisions about such transactions that constitutes conflict of interest, not the organization's application itself.

If a Board member, or an individual or organization with which she or he is associated, has an interest in a current or proposed transaction, project or grant application, he or she must disclose that interest at the earliest opportunity, prior to any discussion or negotiation of that transaction. Disclosure requirements apply to transactions specifically involving the Board member's individual organization, but not to transactions involving the association's general membership; it is understood and appropriate that Board members have an interest in transactions affecting the membership as a whole.

Any Board or Committee member who is aware of a potential conflict of interest involving any matter under consideration by the Board or Committee, shall not be present for any discussion of the matter and shall not be permitted to vote on any matter in which he/she has an interest. When All Home's staff is aware of a potential conflict of interest affecting a Board or Committee member, that Board or Committee member shall not receive related documents in advance of the discussion, under no circumstances shall a Board or Committee member be present for discussion of or vote on matters directly affecting their own interests, or attempt to advocate in their own behalf

through private contact, communication, or discussion. Such matters of self-interest include but are not limited to grant or contractual arrangements with Board member's own organization or a related party.

Procedure

A Board or Committee member with a conflict of interest is expected to:

- a) Immediately, by written communication, inform Executive Director, and the members of the Board or committee of the Board charged with approving the transaction on behalf of All Home of such person's interest or position;
- b) Disclose any material facts within such person's knowledge that bear on the advisability of such transaction from the standpoint of All Home, any contacts with other Coordinating Board members;
- c) Shall recuse themselves from any discussion of the matter; and,
- d) Not be entitled to vote on the decision to enter into such transaction.

The minutes of the Board or Committee meeting shall reflect that:

- any interested persons fully disclosed potential conflicts of interest;
- the Board or Committee discussed and determined whether an actual conflict of interest exists;
- the interested person(s) abstained from discussion and voting; and,
- the outcome of the Board vote.

The All Home Coordinating Board shall investigate all allegations of impropriety, oral or written, made openly to any Board Member, Executive Director, or All Home staff. The Board must thoroughly discuss the matter with the person(s) bringing the complaint, the Board member involved, and any other parties associated with the complaint. If a Board member is found to have violated the letter or intention of this conflict of interest policy, the Board may levy any of the following penalties, as it deems appropriate:

- A statement of reprimand or censure recorded in the minutes of the Coordinating Board meeting;
- Expulsion from the Coordinating Board; or
- Legal action, including but not limited to civil and/or criminal prosecution.

Annual statements

Each member shall annually complete a questionnaire regarding any potential conflicts and stating they:

- received a copy of the conflict of interest policy;
- read and understand the policy; and,
- agreed to comply with the policy.



Conflict of Interest Questionnaire

Background: Each and every member of the Coordinating Board shall, to the maximum extent possible, serve in a manner so as to avoid the appearance, or actual occurrence of a conflict of interest, any favoritism or any special treatment toward any person, applicant, organization or vendor, having business, or dealings of any kind, with All Home. No member of the Coordinating Board shall use or cause or allow to be used, his or her position to secure any personal privilege for himself, herself, their organization, or others, or to influence, actions, of All Home for private, professional or humanitarian reasons.

Board Members – Direct Relationships:

1. Have you received any payments (other than expense reimbursements) from the Organization?
Yes _____ No _____
2. Are you employed by a company that does business with the Organization?
Yes _____ No _____
3. Are you employed by an agency/business that does business with the Organization?
Yes _____ No _____
4. Are you serving in an advisory capacity to an agency that does business with the Organization?
Yes _____ No _____

If the answer is yes to any of the above questions please explain in the following space:

Board Members – Family Relationships:

5. Are you related to any individuals who are employed by the Organization?
Yes _____ No _____
6. Are you related to any individuals that do business with the Organization, either directly or as employees and/or Advisory Committee/Board members?
Yes _____ No _____

If the answer is yes to any of the above questions please explain in the following space:

AFFIRMATION:

I hereby affirm that I have read and understand the above policy regarding Conflict of Interest, and I have completed the Board Member Questionnaire to the best of my knowledge:

Printed

Signature

Date