

Conflict of Interest Disclosure Form
Federal Funds

As the HOME Department administers federal awards from the U.S. Department of Housing and Urban Development (“HUD”), it is required to develop policies ensuring disclosure of any potential conflicts of interest. This disclosure form requires any real or perceived conflicts to be identified, and if necessary; waivers to be requested from HUD for projects or activities where a conflict does not allow any one person to influence, participate in, or make decisions, for more than one organization or beneficiary; and a benefit exists to promote the development of housing for income restricted households.

What is a conflict of interest?

A Conflict of Interest applies to any person who is an employee, family, agent, consultant, officer, board member, committee member, or elected official or appointed official of the organization receiving federal funds:

No employee, officer, board member, committee member, consultant, or agent may participate in the selection, procurement, or award of a contract, loan, or agreement supported by a federal award if they have a real or perceived conflict of interest. This responsibility also applies to the administration of awards, including decision-making processes for project implementation, financial lending, where conflicts are real or perceived; and/or where the gain of inside information could be used to influence any decision for another party, organization, or institution, resulting in the financial interest or benefit from the federal award by a recipient or a third party. Such a conflict of interest would arise when a person is an employee, officer, committee member, agent, family member or partner of any person named in this section, board member, or an organization which employs or is about to employ any party indicated herein, has a financial or other interest in or a tangible personal benefit from a firm, institution, or organization considered for a contract, loan, or agreement completed in partnership with the federal funds recipient. The officers, employees, and agents of any non-Federal entity or partner of the federal funds recipient may neither solicit nor accept gratuities, favors, payment, or anything of monetary value from contractors, parties to subcontracts, organizations, institutions or federal funds recipients. Further, non-Federal entities and partners may not compensate or provide any kind of payment or favors in exchange for referrals or recommendations.

What needs to be disclosed?

This conflict of interest form should indicate whether the potential recipient, or any staff member, board member, committee member, officer, or agent of the potential recipient (through an application for federal funds) has an economic interest in, or acts as an officer, director, owner, etc., from an entity or person whose financial interests would create monetary or tangible benefit from partnership with an organization who has received an award for federal funds. . Personal, business, or volunteer affiliations which may give rise to a real or apparent conflict of interest, need to be disclosed.

How often does disclosure need to occur?

Minimally, at application for any federally funded project or activity. In the event of acceptance of federal funds, if a change occurs during a project or while an activity is active (i.e. CHDO Operating Grant Assistance) where there is a *real or perceived* conflict, the HOME Department must be notified as soon as possible to evaluate if a waiver needs to be requested.

EXHIBIT G

CONFLICT OF INTEREST FORM

Applicant Name: _____

Please describe below any relationships, transactions, positions (volunteer or otherwise), or circumstances which could contribute to a conflict of interest:

_____ As the applicant, the authorized signatory has indicated there is no conflict of interest to report

_____ As the applicant, the authorized signatory has indicated there is a real or perceived conflict to report. *This may include* other nonprofit and for-profit boards the applicant represents, any for-profit businesses for which the applicant or any immediate family member are an officer or director, or a majority shareholder, and any businesses related as part of integration for the development of housing:

1. _____
2. _____
3. _____

I hereby certify to IHFA, the HOME Department, and the U.S. Department of Housing and Urban Development (“HUD”), the information disclosed is accurate to the best of my knowledge. I understand not disclosing relationships (real or perceived), is a direct violation and may result in the termination of an agreement, denial of an application, and/or suspend the ability to apply for funding in the future.

Signature: _____

Date: _____