

FOOTHILLS HOUSING NETWORK

CONFLICT OF INTEREST POLICY FOR HOMELESS SERVICES

The Foothills Housing Network (FHN) is the Virginia Balance of State Local Planning Group for the counties of Culpeper, Fauquier, Madison, Orange, and Rappahannock, and is responsible for establishing policy and procedures for homeless service and prevention programs funded by the Virginia Department of Housing and Community Development (DHCD) and U.S. Department of Housing and Urban Development (HUD).

An FHN partner organization's employee, volunteer or sub-grantee who participates in decision-making processes related to FHN homeless services grants will be considered to have a conflict of interest if (a) such individual has existing or potential financial or other interests that impair or might reasonably appear to impair his or her independent, unbiased judgment in the discharge of his or her responsibilities to RRRC in any matter related to these grants or programs; or (b) such individual is aware that a member of his or her family (defined to include a spouse or domestic partner, parents, siblings, children and any other relative residing in such individual's household), or any organization in which the individual or a member of her or his family is an officer, employee, director, member, partner, trustee or controlling stockholder has such existing or potential financial or other interests.

The individual must disclose to his or her employer the material facts of a conflict of interest in a transaction related to homeless services grants or programs as soon as he or she becomes aware of such conflict of interest. The Executive Director or other responsible party must, in turn, disclose the material facts to the FHN CoC Program Coordinator. If the Program Coordinator has a conflict of interest, such conflict of interest shall be made known to FHN's Chair or RRRC's Executive Director. Any individual who discloses or is deemed to have a conflict of interest shall refrain from consideration of the proposed transaction(s), which shall be handled from that point on by the Program Coordinator, FHN Chair or his or her designee. The facts that created the conflict of interest, details of the proposed transaction and its disposition shall be documented in writing and maintained with grant administration files.

This policy shall be provided in writing to each covered person.

I have read and accepted the FHN Conflict of Interest Policy.

Signature

Date

Printed Name

Title

Organization