



## **Conflict of Interest Policy**

**Who is covered:** All Butte CoC Council, Committee, and General Members will abide by 24 CFR Part §578.95 (Conflicts of Interest) in the CoC Interim Rule and 24 CFR Part § 576.404 Conflicts of interest in the Emergency Solutions Grant Rule.

**Disclosure:** The CoC Council, all Committee members, and General Membership will disclose potential conflicts when the topics of funding awards, or other financial benefits that could be gained or lost by themselves personally or by an organization they represent as an employee, agent, consultant, board member, or their family member represents, are under consideration.

The Butte CoC Council, Committees, and General Members will be required to review and sign annually the Conflict of Interest Policy and related Conflict of Interest Procedures (see Attachment X). The Butte CoC Council, Committees and General Members will be required to sign annually the Conflict of Interest Disclosure Statement (see Attachment X) and may be required to update their policy should a conflict develop.

**Recusal:** Members will excuse themselves as needed to avoid a conflict of interest. This includes leaving the room for any discussion of a conflicted or potentially conflicted transaction. However, a conflicted member may be present to present for clarifying questions. All Members including conflicted Members may be present for the Council vote.

**Nonconflicted situations:** The BCHCoC desires that it, and those entities to which it has delegated authority, make informed as well as non-conflicted decisions. The annual gaps analysis, eligibility criteria for who gets served by what resources in the Continuum, prioritization of who gets served, performance targets, etc. are best developed and refined with broad stakeholder input. Funded projects and jurisdictions will not be deemed conflicted in discussions on these topics nor in providing input on local priorities for Continuum of Care funding and refinements the scoring criteria for projects or the application process. The Review and Ranking Committee will evaluate the merits of the input and will make the final determination on the scoring criteria and application process; only nonconflicted Members will participate on the Review and Ranking Committee.