



Code of Conduct / 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. Metropolitan Denver Homeless Initiative (MDHI) is the designated Continuum of Care (CoC) for the seven-county metropolitan area consisting of Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson counties.

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 MDHI staff, inform MDHI's constituency, and promote transparency of the continuum's operations and business decisions.

Code of Conduct:

Each and every member of the MDHI staff 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 MDHI. No member of the MDHI staff 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 MDHI for private, professional or humanitarian reasons.

The role of the MDHI staff is to:

1. Address the planning, data collection and service provision of MDHI
2. Perform his or her duties with the highest degree of integrity and professional care in order to merit the respect of the beneficiaries of programs, elected officials and the general public.
3. Avoid using the office to gain advantage for any applicant, resident, vendor, self or any person having business, or dealings of any kind, with MDHI.
4. Maintain the highest standard of personal integrity and conduct in all matters pertaining to the organization.
5. Exercise diligence, objectivity and honesty in all professional activities.
6. Avoid any activity that is in conflict with his or her official duties and not realize undue personal gain from the performance of his or her official duties.
7. Serve the Continuum of Care with dedication, concern, courtesy and responsiveness.
8. Strive for professional excellence.
9. Promote and encourage the highest level of ethics.

Purpose of Conflict of Interest Policy

No MDHI staff member shall use his or her position, or the knowledge gained therefrom, in such a manner that conflict with the interests of MDHI. Each MDHI staff member has the duty to place MDHI's interests first in any dealings with MDHI, and has the ongoing responsibility to comply with the requirements of this policy.

Procedures

Any MDHI staff member who is aware of a potential conflict of interest involving any matter under consideration by the organization, shall indicate the potential conflict to the Executive Director, or in the case of the Executive Director to the Board President.

In order to avoid even the appearance of impropriety, MDHI staff members may not accept any gifts valued at \$50 or more from, or on behalf of a Grantee or potential Grantee, or members of the Board of Directors or committees, if the gift is clearly intended as an enticement to influence the MDHI staff member's behavior or position on an issue. MDHI staff members should immediately report to the Executive Director, or in the case of the Executive Director to the Board President, any threat, bribe, gift, or other enticement.

Situations of Conflict of Interest

The Board of Directors of MDHI shall investigate all allegations of impropriety, oral or written, made openly to any Board Member, Executive Director, or MDHI staff. The Board must thoroughly discuss the matter with the person(s) bringing the complaint and any other parties associated with the complaint.

If an MDHI staff member is found to have violated the letter or intention of this conflict of interest policy, the Board will report those facts to the MDHI Executive Director, who will deal with it as a personnel matter. If the situation involves the Executive Director, it will be put forth to the Executive Committee.

In the event that an MDHI staff member is found to have violated this conflict of interest policy, disciplinary action will be taken. Examples of disciplinary action include being written up and having the write up included in employee's record, demotion, or termination of employment.

Definitions

Board member - includes elected and appointed members of the Board, Committee members, and Staff acting in a Board capacity (i.e., as Board Secretary).

Interest - is a personal or professional connection which may take the form of financial interest in the transaction (grant application, contract, vendor, consulting) itself or in any organization involved in the transaction; a professional position or office in or paid consulting relationship with any organization involved in the transaction; a related party to a person on the staff or Board or who is a paid consultant to the organization involved in the transaction; or any other connection which causes the member to think she or he should abstain.

Material gain- includes indirect or direct financial, personal, or professional gain. For example, financial gain includes but is not limited to salary, payment, consulting fees (other than fees paid to the organization rather than the individual), gifts, loans, grants, or other monetary gain. Professional gain includes but is not limited to prestige, appointment, or career advancement. Indirect gain includes but is not limited to support for/opposition to a grant, or competitive advantage, or avoidance of a loss through use of confidential information.

Related party - means the members of an individual's family, defined as any person who is related by blood or marriage, or whose relationship with the employee is comparable to that of persons who are related by blood or marriage; estates, trusts, and partnerships in which the individual or his/her immediate family have a present or vested future beneficial interest; an organization or entity for which the individual serves as a volunteer, Staff member, Board member, or paid consultant.

Confidential information - includes but is not limited to underwriting information about individual organizations gathered for and presented to the Board or its Committees to support membership, grant or contractual decisions (including Board discussion of proprietary information and the individual votes of Board members), opinions about/interpretations of material, substantive reasons for any vote during a meeting, and information gained in a consulting role. Board members may not disclose confidential information or use it for personal or professional gain.

Inquiries should be directed to:
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711 Park Avenue West, Suite 320
Denver, Colorado 80205
(303) 295-1772
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Staff Conflict of Interest Questionnaire

Background: Each and every member of the MDHI staff 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 MDHI. No member of the MDHI staff 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 MDHI for private, professional or humanitarian reasons.

MDHI Staff – Direct Relationships

1. Are you employed by a company that does business with the Organization?
Yes _____ No _____
2. Are you employed by an agency/business that does business with the Organization?
Yes _____ No _____
3. 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:

MDHI Staff – Family Relationships (For the purpose of these questions, the IRS defines a “family relationship” as an individual’s spouse, ancestors, children, grandchildren, great-grandchildren, siblings -whether by whole or half blood - and the spouses of children, grandchildren, and siblings.)

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:

I have read and understand the requirements of the MDHI Conflict of Interest Policy, and I have completed the Board Member Questionnaire to the best of my knowledge.

Print Name

Signature

Date