THE WAY HOME CONFLICT OF INTEREST POLICY

INTRODUCTION

The Way Home is the name of our local (TX-700) Continuum of Care (CoC), which is the homeless response system in Houston, Pasadena, and Conroe and throughout Harris, Fort Bend, and Montgomery counties in Texas. The Way Home is committed to conducting its business and serving people experiencing homelessness lawfully and ethically. It is critically important that partners of The Way Home and their staff meet the highest standards of legal and ethical conduct.

This policy outlines the guidelines and requirements for partner agencies working within The Way Home to prevent and manage conflicts of interest. Conflicts of interest can undermine the public trust, integrity, and accountability of The Way Home, its partner agencies, and those we serve. This policy is intended to promote transparency, fairness, and impartiality in the administration and delivery of services to individuals experiencing homelessness.

To meet HUD and federal funding requirements as well as follow best practice standards, The Way Home subscribes to a code of conduct and conflict of interest policy which is expected to be adhered to by all partners of The Way Home (including all staff and volunteers). The code guides us in all that we do; And this conflict-of-interest policy does not replace any of the more specific policies, procedures, or practices of The Way Home and each agency. Rather, it is intended to support our mission to end and prevent homelessness, as well as serve and promote a culture of honesty and integrity.

POLICY STATEMENT

Partner agencies working within the homeless response system are required to maintain the highest standards of ethics, integrity, and impartiality in their operations and decision-making processes. Partner agencies must avoid conflicts of interest, or the appearance of conflicts of interest, that could compromise their ability to carry out their responsibilities in a fair, impartial, and transparent manner.

DEFINITIONS:

For the purposes of this policy, a conflict of interest occurs when a partner agency, its employees, or its board members have a financial or personal interest, either real or perceived, that could compromise their ability to carry out their responsibilities in a fair, impartial, and transparent manner. Conflicts of interest may occur in procurement or non-procurement actions. Conflicts of interest can take many forms, including but not limited to:

- Personal financial interests, such as owning or managing property that could benefit from the homeless response system; and
- Personal relationships, such as family, business, or social relationships with individuals or organizations that could benefit from the homeless response system; and
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- Political interests, such as serving as an elected official or working for a political campaign that could benefit from the homeless response system
- Click here to learn more from the U.S. Department of Housing and Urban Development (HUD).

**REQUIREMENTS**

1. Partners are required to follow the Conflict-of-Interest requirements for their funded programs. See [24 CFR 578.95](#) for CoC and [24 CFR Part 576.404](#) for ESG.
2. Disclosure of Conflicts of Interest: Partner agencies are required to disclose any conflicts of interest to the Coalition in writing on an annual basis. Disclosures must be made promptly and updated as circumstances change.
3. Recusal from Decision-Making: Partner agencies and their employees or board members with conflicts of interest must recuse themselves from any decision-making process in which they have a conflict of interest (see definitions above).
4. Prohibition of Use of Confidential Information: Partner agencies and their employees or board members must not use confidential information obtained through their involvement with the homeless response system for personal gain or the benefit of another individual or group through inappropriate association.
5. Sanctions for Non-Compliance: Partner agencies that fail to comply with this policy may face sanctions, including but not limited to: suspension or termination of their partnership with The Way Home, referral to the appropriate authorities, and exclusion from future partnerships and possible funding opportunities with The Way Home.

**IMPLEMENTATION**

1. Training: Partner agencies must provide training on this policy to their employees and board members.
2. Monitoring and Enforcement: The Coalition for the Homeless as Lead Agency to The Way Home, is responsible for monitoring compliance with this policy on a system level and enforcing its provisions accordingly.
3. Annual Review: This policy will be reviewed annually by the Coalition to ensure its relevance and effectiveness.
4. Annual agreement: This policy will be reviewed and signed annually by a senior member of each partner agency’s leadership team (i.e., CEO/ED).

**CONCLUSION**

This conflict-of-interest policy for partner agencies of The Way Home is intended to promote transparency, fairness, and impartiality in the administration and delivery of services to individuals experiencing homelessness. Partner agencies are expected to comply with this policy and uphold the highest standards of ethics, integrity, and impartiality in their operations and decision-making processes.
ACKNOWLEDGEMENT AND DISCLOSURE STATEMENT

This acknowledgment of the CoC’s Conflict of Interest Policy must be signed by the CEO/President/Executive Director of the organization (or if a statewide or national organization, the most senior member of the local office). This Conflict-of-Interest policy shall only be valid throughout the calendar year and must be updated on an annual basis.

The undersigned agrees to take appropriate action with respect thereto, including disclosing all activities, interests, or relationships, wherever an actual or potential conflict of interest may exist, and to otherwise comply with this Conflicts of Interest Policy.

The undersigned makes the following disclosure of all Interests as defined in this Conflicts of Interest Policy, in accordance with applicable reporting responsibilities (if none, please write “NONE”).

| Agency Name: |
| Signature: |
| Printed Name: |
| Title: |
| Date: |

Note: As indicated in The Way Home Partnership Agreement, the Lead Agency reserves the right to revoke the partnership of any entity should there be reasonable evidence that such entity violates the partnership agreement, code of conduct, or does not adhere to The Way Home’s shared values and principles.