MARICOPA REGIONAL CONTINUUM OF CARE (COC)
CONFLICT OF INTEREST POLICY

The purpose of this Conflict of Interest Policy is to protect the integrity and decision-making processes of the Maricopa Regional Continuum of Care (CoC), including its Board, Committees, Collaborative Applicant, designated Leads, and any individuals or organizations involved in the governance, planning, funding allocation, monitoring, or administration of CoC programs. This policy is intended to ensure transparent, fair, and objective decision-making and to prevent actual, potential, or perceived conflicts of interest that could undermine public trust in the CoC's work.

This policy supplements, but does not replace, all applicable federal, state, and local laws, regulations, and guidance governing conflicts of interest, including but not limited to:

- 24 CFR § 578.95 (CoC Program)
- 24 CFR § 576.404 (ESG Program)
- 2 CFR § 200.318(c)(1) (Procurement Standards)

All individuals covered under this policy are expected to use good judgment, maintain high ethical standards, and conduct their responsibilities in a manner that avoids any actual, potential, or perceived conflicts between personal or organizational interests and the interests of the CoC.

2. DEFINITIONS

A. Conflict of Interest.
A conflict of interest occurs when personal, financial, professional, or organizational interests could compromise, or appear to compromise, an individual's ability to make decisions in the best interest of the CoC. Conflicts may be actual or perceived.

B. Interested Person.
Any CoC Board member, committee member, staff of the Collaborative Applicant or designated system Lead(s), consultant, volunteer, funding recipient or subrecipient, or any person participating in decision-making authority on behalf of the CoC.

C. Financial Interest.
A person has a financial interest if they or a family member:

- Hold a position of authority or ownership in an entity receiving or seeking CoC or ESG funds, or
- Receive compensation from any entity involved in acquiring CoC or ESG funds or contracts.

3. ACTIVITIES THAT CONSTITUTE A CONFLICT OF INTEREST

HUD's CoC Interim Rule Section §578.95 identifies four types of conflicts of interest:

- Individual conflicts of interest regarding provision of services, which occur when interested parties indirectly benefit financially or otherwise by the activities carried out using CoC grant funds. This includes any decision or activity made by a recipient or subrecipient that gives the appearance of impropriety;

- Organizational conflicts of interest regarding provision of services, which occur when interested parties are unable, or potentially unable, to render impartial assistance or perform objectively;

- Conflicts of interest related to the procurement process, which occur when interested parties violate the code of conduct or conflict of interest rules of 2 C.F.R. §200.112 during the procurement of goods, supplies, equipment, or services; and

- Conflicts of interest related to CoC Board decision-making, which occur when CoC Board members or officers participate in or influence discussions or decisions concerning the award of a grant or other financial benefits to organizations that the member or officer represents.

4. CONFLICT OF INTEREST PROCEDURES

A. DUTY TO DISCLOSE

Each CoC board member, committee/workgroup member, staffing entity representative, consultant, volunteer, or funding recipient or subrecipient has a duty to disclose any actual, possible, or perceived conflict of interest. They must disclose the existence of a financial interest and be given the opportunity to disclose all material facts to the Board and/or Committee to which the Board has delegated power.

B. DISCLOSURE

1. ANNUAL DISCLOSURE

A Conflict of Interest Disclosure Form must be signed annually, or upon a change in employment, by:

- CoC Board members;
- Committee and Workgroup Members;
- Collaborative Applicant, HMIS, and CES staff involved in CoC governance, funding competitions, eligibility determinations, and/or referral functions;
- Consultants working with the CoC; and
- Recipients/subrecipients of CoC and ESG funding.

The annual disclosure shall:

1. Affirm the individual has received a copy of the Conflict of Interest Policy;
2. Affirm the individual has read and understands the policy;
3. Affirm the individual agrees to comply with the policy; and

4. Gather information about potential conflicts related to the individual's relationships and organizational affiliations.

The forms shall be returned to the Collaborative Applicant and remain on file with the Collaborative Applicant for at least three years.

2. VERBAL DISCLOSURE

CoC Board members, committee and workgroup members, consultants, representatives of CoC staffing entities, and all CoC-funded recipient/subrecipient entities must verbally disclose any actual, potential, or perceived conflict of interest before participating in any related discussion or decision-making. If a potential conflict becomes apparent during discussion, disclosure must occur immediately upon recognition of the conflict.

C. RECUSAL, DETERMINATION, AND RESOLUTION

Any individual with a conflict of interest shall:

- Refrain from participating in discussion, deliberation, scoring, ranking, accessing related material, or voting on the matter; and
- Physically leave the room (or virtual meeting space) during relevant discussion and voting.

After disclosure of the financial interest and all material facts, the remaining members of the CoC Board or relevant committee/workgroup will determine whether a conflict of interest exists. If a conflict is confirmed, the Board or committee will implement measures to ensure decisions remain fair, objective, and in the best interest of the CoC.

The individual's recusal and conflict, as well as the Board/Committee's determination, must be documented in meeting minutes.

5. COLLABORATIVE APPLICANT RESPONSIBILITIES

The Collaborative Applicant is responsible for administering and maintaining the conflict of interest compliance process on behalf of the Maricopa Regional CoC. These responsibilities are outlined in the following sections.

- Collection and Maintenance of Disclosure Forms

The Collaborative Applicant shall:

1. Circulate the Conflict of Interest Acknowledgement & Disclosure Form to existing members, staff, and partners who are subject to the policy at least annually;
2. Provide the Conflict of Interest Acknowledgement & Disclosure Form to new members during onboarding;
3. Collect completed forms; and
4. Maintain completed forms in compliance with federal record retention requirements (minimum of three years, or longer if associated with an active procurement, audit, or monitoring cycle).

B. MEETING-LEVEL CONFLICT OF INTEREST DOCUMENTATION

The Collaborative Applicant shall support the Chair or facilitator to:

1. Ensure verbal requests for disclosures and recusals occur at the start of meetings and prior to any decision-making action.
2. Document disclosures and recusals in meeting minutes, including:
    - Name of the individual;
    - Nature of the conflict (general description only; personal details not required); and
    - Action taken (recusal, departure from room/virtual space).

C. SUPPORT FOR RECUSAL PROCEDURES

The Collaborative Applicant shall ensure that:

1. Individuals who disclose conflicts are removed from the discussion space (virtual breakout or physical room) for the duration of the relevant item.
2. Materials, scoring forms, or deliberation notes related to the recused item are not shared with the recused individual.

6. VIOLATIONS

Failure to disclose a conflict of interest or failure to comply with this policy may result in corrective action, which may include removal from the Board, committees, working groups, or other CoC roles.

7. POLICY REVIEW AND AMENDMENTS

This policy shall be reviewed minimally every three years by the Executive Committee and may be amended by the CoC Board as needed.

ATTACHMENT A. DOCUMENT VERSION HISTORY & RATIONALE

This log provides a concise record of changes to the Conflict of Interest Policy, including when updates were made, what was changed, and the rationale behind the revisions. This supports transparency, continuity, and onboarding of new leaders/staff.

VERSION HISTORY TABLE

Version	Date Approved	Section(s) Updated	Summary of Changes	Rationale / Reason for Update	Approved By
1.0	11/17/2025	All	Initial release of COI policy based on update of CoC Governance Charter.	Establish standardized COI policy & procedures.	CoC Board