

Policies and Procedures for Subrecipient Conflict of Interest Rebuilding Lives Funder Collaborative

Policy:

All subrecipients shall establish safeguards to prohibit, and shall prohibit, its employees, agents, consultants, officers and board members from using their positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business or other ties.

Administrative Procedure (Contracting):

As part of the annual contracting process between Community Shelter Board and its partner agencies (or subrecipients), Community Shelter Board will require all partner agencies to agree to the following conflict of interest policy, included in the Master Provider Agreement contract as Section 13:

Section 13. Prohibition of Conflict of Interest. The Provider shall establish safeguards to prohibit, and shall prohibit, its employees, agents, consultants, officers and board members from using their positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business or other ties.

Refusal to conform to the language as specified in the contract will result in an inability to fully execute the contract for the upcoming fiscal year. Agencies without fully executed contracts are not eligible to receive funding and/or access Columbus ServicePoint HMIS services through Community Shelter Board.

Administrative Procedure (Determining Compliance):

As part of the full program review and certification process (detailed in the Monitoring Guide for Subrecipients), a Community Shelter Board reviewer will determine compliance with the following standard:

Standard C6: The agency has a policy that prohibits conflict of interest and nepotism for staff and volunteers.

The CSB reviewer monitors each partner agency's conflict of interest policy to ensure compliance with Section 13 of the Master Provider Agreement (detailed above). If the conflict of interest policy does not ensure compliance with the partner agency's contractual obligation, the partner agency will be found non-compliant and asked to submit a revised conflict of interest policy.

If during the program review and certification process the reviewer determines that the conflict of interest policy is not being followed, the agency will be evaluated to ensure that disbursed funds were not misused. Financial reports are reviewed on an ongoing basis to ensure continued compliance with the conflict of interest policy, to the extent possible.

Funding will cease if it is determined that funds are being misused, until such time that CSB determines that the conflict no longer exists, the misused funds were repaid and the agency is deemed to be in compliance with the conflict of interest policy. HUD will be notified immediately of any misuse of federal funds.

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CSB's Board of Trustees, Rebuilding Lives Funder Collaborative Board and the Rebuilding Lives Funder Collaborative will be informed immediately of any findings and steps taken for compliance. Final decisions regarding the agency's future funding will be made by the RLFC and CSB Board of Trustees.