Clear Form

MSHDA
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY

EMERGENCY SOLUTIONS GRANT (ESG)

Conflict of Interest Certification

This form certifies that the applicant (Grantee) complies with all Conflict of Interest and Identity of Interest standards for the ESG program under 24 CFR § 576.404. This form must be submitted by all applicants with the FY2026–2027 ESG Application and signed by an authorized official of the Grantee. Many Conflicts of Interest and Identities of Interest are manageable and will not prohibit administration of the grant, provided they are timely disclosed. Your certified disclosures will help inform next steps in this regard.

Instructions: Review the Conflict of Interest standards and Identity of Interest disclosure below. After reading, complete both disclosure sections and sign the certification at the end. Submit this form with your ESG application.

Conflict of Interest Standards

In connection with the ESG Grant Agreement for the term identified below (the Grant Agreement), and pursuant to applicable MSHDA, state, and federal requirements and regulations, including without limitation the regulations set forth in 24 CFR § 576.404, the Authorized Official of the Grantee states and affirms the following:

1) The provision of any type or amount of ESG assistance shall not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the Grantee, a subgrantee, or a parent or subsidiary of the Grantee; and

2) Grantee may not carry out initial evaluations or administer homelessness prevention assistance with respect to individuals or families occupying housing owned by the Grantee or any parent or subsidiary of the Grantee; and

3) For the procurement of goods and services, the Grantee and its subgrantees shall comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofit organizations).

4) As provided in 24 CFR 576.404, unless granted an exception by HUD on a case-by-case basis, no employee, agent, consultant, officer, contractor or elected or appointed official of the Grantee who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure; and

5) Grantee shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts; and

6) No employee, officer, or agent of Grantee shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the Grantee shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to subgrants.

   However, subject to HUD and/or MSHDA approval, as applicable, Grantee may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient; and

7) Grantee shall keep records to show compliance with the organizational conflicts-of-interest requirements in 24 CFR 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in 24 CFR576.404(b), and records, if any, supporting exceptions to the personal conflicts of interest prohibitions; and

8) If Grantee is operating continuum of care programs it shall. not use leasing funds to lease units or structures owned by the Grantee, its parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause; and

9) Neither Grantee or its contractors may enter into a contract or arrangement in connection with the tenant-based programs in which the following class of persons has any interest, direct or indirect, during tenure or for one year thereafter: any employee of the Grantee or any of its contractors who formulates policy or who influences decisions

with respect to the programs, without those employees disclosing their interest or prospective interest to MSHDA and HUD.

Failure to adhere to these certifications may result in applicable penalties and/or sanctions as prescribed by law.

Conflict of Interest Disclosure

A disclosure of the nature of any conflict of interest with MSHDA is as follows:

☐ Grantee certifies that no conflict of interest exists between MSHDA and Grantee.

☐ Grantee discloses that a conflict of interest exists between MSHDA and Grantee. The nature of the conflict of interest is described below.

Please identify the individual, employment, and the conflict of interest (their affiliation with your organization).

Identity of Interest Disclosure

Grantee affirms to the best of its knowledge, information, and belief that no member of the Grantee's Board of Directors, employees, or staff has an identity of interest with:

a) Any of the staff persons hired by the Grantee to administer the program, or
b) Any of the persons or households to be assisted directly or indirectly with the funds or
c) The persons and/or businesses retained to perform technical services hereunder or with persons or businesses providing supplies or services for which funds are being disbursed under the Grant Agreement.

Please refer to HUD's Integrity Bulletin for additional Conflict of Interest examples.

☐ Grantee certifies that no identity of interest exists.

☐ Grantee discloses that an identity of interest exists. The details of the relationship are described below.

Please identify the individual, their role, and the details of the identity of interest (e.g., relationship to staff, program participants, or service providers).

Grant Term

Start Date:	End Date:

Agency/Staff Certification

Organization Name:

By signing this Conflict of Interest Certification, I hereby certify, under penalty of perjury, that I have read, understand, and will adhere to all the information, requirements and standards provided above as a prerequisite for MSHDA ESG funding.

Authorized Official Name:	Title:
Signature:	Date: