

CODE OF CONDUCT FOR HUD GRANT PROGRAMS

Federal regulations (2 CFR part 200) and HUD's Notices of Funding Availability (NOFA) for discretionary funds require non-Federal entities receiving Federal assistance awards, excluding States, to develop and maintain written standards/codes of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest (2 CFR 200.318(c)(1)). HUD grantees are required to submit their code of conduct to HUD.

Codes of Conduct must:

1. Be written covered by a letter on company letterhead that provides the name and title of the responsible official, mailing address, business telephone number and email address;
2. Prohibit real and apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties;
3. If applicable, the standards must also cover organizational conflicts of interest;
4. Prohibit the solicitation and acceptance by employees, of gifts or gratuities in excess of minimum value; and
5. Provide for administrative and disciplinary actions to be applied for violations of such standards.

Failure to provide a copy of the organizations Code of Conduct and/or notify HUD of potential conflicts of interest may prevent applicants from receiving HUD funds.

HUD is comprehensively refreshing and streamlining the library. All paper files over six years old have been deleted so many organizations that have been on the list will need to resubmit an updated document. Select the state in which your organization is located, to see if HUD has your organization's Code of Conduct statement on file.

If your organization is not listed, please forward an electronic copy of the Code of Conduct statement to askGMO@hud.gov. The email should contain:

1. Organization DUNS#
2. Organization Legal Business Name (from SAM.gov)
3. Complete mailing address
4. Name, title, email and phone# for the person with executive authority.
5. Electronic codes of conduct statement (searchable documents preferred)

Suggestions for CODE of Conduct for HUD grant programs design and requirements modifications

Topics to include:

- 1) Gifts, Gratuities, Favors, Meals of Nominal Value & Travel Expenses.
- 2) Acceptance of Awards/honors.

- 3) Political Activities.
- 4) Outside Employment & Other activities.
- 5) Indebtedness.
- 6) Abuse of Alcohol & other substances.
- 7) Disciplinary & other remedial Actions.
- 8) Conflicts Prohibited (no self-interest or immediate family special benefit consideration)
- 9) Use of Authority or Property
- 10) Fraud
- 11) Confidentiality
- 12) General conduct – Non-discrimination, prevention and response to sexual harassment