



MEMORANDUM

TO: PHDC EMPLOYEES
FROM: DAVID S. THOMAS, PRESIDENT & CEO
DATE: JANUARY 10, 2023
SUBJECT: CONFLICT OF INTEREST POLICY

Pursuant to the contract between the Philadelphia Housing Development Corporation (“PHDC”) and the City of Philadelphia’s Office of Housing and Community Development (“OHDC”), PHDC agrees to abide by various federal laws and regulations issued by the U.S. Department of Housing and Urban Development (“HUD”). HUD’s applicable regulations on the matter of Conflict of Interest are found at 24 C.F.R. § 85.36(b)(3) and 24 C.F.R. § 570.611.

These conflict of interest regulations apply to all of the programs, transactions and expenditures of Community Development Block Grant (“CDBG”) and/or HOME Investment Partnerships Program (“HOME”) funds. The people covered by the conflict of interest regulations include employees, agents, consultants, officers, directors, elected or appointed officials, and any subcontractors or subrecipients of PHDC which receive CDBG and/or HOME funds. The regulations also apply to any immediate family members or partners of the aforementioned, as well as any organization which employs, or is about to employ, any of them.

The general rule is that no person (including, but not limited to, employees, agents, consultants, officers, etc.) who (1) exercises any functions or responsibilities with respect to CDBG and/or HOME activities or (2) is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG- and/or HOME-assisted activity or have a financial interest in any contract, subcontract or agreement with respect to a CDBG- and/or HOME-assisted activity or with respect to the proceeds of the CDBG- and/or HOME-assisted activity, either for themselves or those with whom they have business, partner or immediate family ties, during their tenure or for one year thereafter.

It is the responsibility of each employee, agent, consultant, officer, director and subcontractor or subrecipient of PHDC to disclose any potential conflicts of interest that may occur so that appropriate actions can be taken. When a situation is disclosed, a formal determination of the existence of a conflict will be made. If a conflict is present, the matter needs to be processed so that HUD can make a determination regarding a waiver of the conflict so that the application for services or contract can go forward.

Your signature is needed below to signify that you have received and read this memo and have disclosed already, and will disclose in the future, as applicable, any current and future potential or actual conflict of interest in accordance with the above described regulations.

Printed Name _____

Date _____

Signature _____