



Rural Nevada
CONTINUUM OF CARE

CONFLICT OF INTEREST & ETHICAL CONDUCT

Quick Reference Guide

Overview

This guide outlines the **conflict of interest policies and ethical conduct standards** for staff, board members, and affiliates of **Emergency Solutions Grant (ESG) and Rural Nevada Continuum of Care (RNCoC) programs** to ensure integrity and compliance with HUD regulations.

Conflict of Interest Policies

Conflicts of interest occur when personal, financial, or organizational interests interfere with program integrity.

Organizational Conflict of Interest

- ESG assistance cannot be contingent on accepting or residing in housing owned by the service provider.
- Agencies cannot administer homelessness prevention or rental assistance for properties they own unless an exception is granted by HUD.

Individual Conflict of Interest

- Staff, board members, or contractors cannot receive financial benefit from ESG or RNCoC-funded activities.
- Program decision-makers cannot have personal or financial ties to individuals receiving assistance.

Exceptions & Waivers

- Agencies may request a HUD-approved exception for conflicts of interest if:
 - The individual is the only qualified provider in a rural area.
 - The situation does not compromise program integrity.

Reporting & Compliance

- Agencies must provide annual ethics training for all employees.
- Suspected conflicts or ethical violations must be reported to program administrators.
- Violations can result in corrective action, termination, or funding penalties.

Ethical Conduct Standards

All personnel must adhere to high ethical standards when delivering services.

Key Ethical Guidelines:

Standard	Description
Confidentiality	Client information must be kept private and secure (HMIS policies apply).
Fair & Equal Access	Services must be provided without discrimination or bias.
No Gifts or Personal Gain	Staff cannot accept money, gifts, or favors from clients or vendors.
Professional Boundaries	Staff must maintain clear, professional relationships with participants.
Reporting Misconduct Reports and Complaints	Agencies must have a clear process for reporting ethical violations. Agencies must have a clear process for how they will review, investigate and deal with reports and complaints.

Special Considerations

- **Victim Service Providers:** Must follow additional confidentiality protections under the Violence Against Women Act (VAWA).
- **Faith-Based Organizations:** Cannot require participation in religious activities to receive assistance.
- **Board Members:** At least one homeless or formerly homeless individual should be included in agency governance.

Need Help?

For further details, refer to the **ESG & RNCOC Written Standards** @ <https://ruralnevadacoc.org/resources-page/> or contact your program administrator.