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Section 1.0 Introduction

The Princeton Housing Authority (“PHA”) employees and commissioners are required to adhere to the New Jersey Local Government Ethics Law (N.J.S.A. 40A:9-22.1 et seq.) and federal regulations concerning conflict of interest (e.g. 2 C.F.R. 200.112 and 2 C.F.R. 200.318(c)). Accordingly, employees and commissioners must conduct PHA business according to the highest ethical standards of public service and must devote their best efforts to the interests of the PHA.

Section 2.0 Definitions

The term “covered party” shall include the following:

- A. The PHA employee or commissioner;
- B. Any immediate family member of the PHA employee or commissioner;
- C. Any business organization by which the PHA employee or commissioner, or an immediate family member of the PHA employee or commissioner, is employed.
- D. Any business organization in which the PHA employee or commissioner, or an immediate family member of the PHA employee or commissioner, owns or controls more than 10% of the profits, assets, or stock.

The term “immediate family member” as used herein shall include the following:

- A spouse, former spouse, or significant other;
- A child, foster child, adopted child, or step-child;
- A parent or step-parent;
- A grandparent;
- A grandchild;
- A sibling or step-sibling;
- A first cousin;
- An aunt or uncle;
- A niece or nephew;
- A father-in-law or mother-in-law;
- A sister-in-law or brother-in-law;
- A daughter-in-law or sister-in-law; and
- Any other person related by blood or marriage residing in the same household or receiving financial support.

Section 3.0 General Requirements

PHA employees and commissioners are prohibited from engaging in business dealings that appear to create a conflict of interest. A conflict of interest occurs whenever an employee or commissioner is in a position to influence a PHA decision that may result in a personal gain for a covered party. Employees and commissioners

must disclose potential conflicts of interest in writing to the Executive Director and, for commissioners only, to the Chairperson of the Board, within five (5) business days of becoming aware of such potential conflict. Employees and commissioners also must complete the [Annual Conflict of Interest Disclosure Form](#). Should an employee or commissioner have a conflict of interest, they shall, at a minimum, recuse themselves from any discussion of or decision-making process for that matter.

Section 4.0 Ethical Standards

PHA employees and commissioners shall comply with the following standards:

- A. No employee or commissioner, or immediate family member of an employee or commissioner, shall have an interest in a business organization or engage in any business, transaction, or professional activity, which is in substantial conflict with the proper discharge of their duties in the public interest.
- B. No employee or commissioner shall, for a period of one year following the conclusion of their position with the PHA: (1) seek or enter into a contract with the PHA which was not publicly bid; (2) represent, appear for, or negotiate on behalf of any other party before the PHA; or (3) seek or enter into employment with the PHA.
- C. No employee or commissioner shall use or attempt to use their official position to secure unwarranted privileges or advantages for themselves or others.
- D. No employee or commissioner shall act in their official capacity in any matter where a covered party has a direct or indirect financial or personal involvement that might reasonably be expected to impair their objectivity or independence of judgment.
- E. No employee or commissioner shall undertake any employment or service, whether compensated or not, which might reasonably be expected to prejudice their independence of judgment in the exercise of their official duties.
- F. No employee shall undertake outside employment without the prior written approval of the PHA's Executive Director.
- G. No employee shall allow outside employment activities to interfere with their responsibilities to the PHA.
- H. No employee shall use PHA time, supplies, or equipment in outside employment activities.
- I. No employee shall offer or perform personal work for PHA residents, employees, or commissioners.
- J. No employee shall offer or perform personal work for anyone while on duty.
- K. No commissioner shall solicit or accept personal work performed by any PHA employee.
- L. No employee or commissioner, or any other covered party, shall solicit or

accept any gift, favor, loan, political contribution, service, promise of future employment, or other thing of value based upon an understanding that the gift, favor, loan, contribution, service, promise, or other thing of value was given or offered for the purpose of influencing the employee or commissioner, directly or indirectly, in the discharge of their official duties. This provision shall not apply to the solicitation or acceptance of contributions to the campaign of an announced candidate for elective public office, if the employee or commissioner has no knowledge or reason to believe that the campaign contribution, if accepted, was given with the intent to influence the employee or commissioner in the discharge of his official duties.

- M. No employee or commissioner shall accept any thing of value from a vendor seeking or doing business with the PHA or from an individual or firm seeking to influence PHA decisions.
- N. No employee or commissioner shall use, or allow to be used, his public office or employment, or any information, not generally available to the members of the public, which he receives or acquires in the course of and by reason of his office or employment, for the purpose of securing financial gain for themselves, their immediate family member, or a business organization in which they have an interest.
- O. No employee or commissioner, or any other covered party, shall represent any person or party other than the PHA in connection with any cause, proceeding, application or other matter pending before the PHA. This provision shall not be deemed to prohibit one employee from representing another employee where the PHA is the employer and the representation is within the context of official labor union or similar representational responsibilities.
- P. No employee or commissioner shall use their position to obtain information about any person or entity other than in the performance of their official duties.

Section 5.0 Violation of Policy

If you are a PHA commissioner, failure to comply with this Policy may result in removal from the PHA's Board of Commissioners.

If you are a PHA employee, failure to comply with this Policy may result in disciplinary action up to and including termination of employment with the PHA.

Section 6.0 Amendments and Revisions

This Policy may be amended or revised from time to time by the PHA's Board of Commissioners. PHA employees and commissioners will be provided with all amendments and revisions.

Receipt Of Conflict Of Interest Policy

Commissioners

I hereby acknowledge that I have received a copy of the PHA Conflict of Interest Policy. I have read, understand, and agree to comply with the terms of this Policy. I understand that a violation of this Policy may result in my removal from the PHA's Board of Commissioners, as well as civil or criminal liability.

Signature

Date

Printed Name

Employees

I hereby acknowledge that I have received a copy of the PHA Conflict of Interest Policy. I have read, understand, and agree to comply with the terms of this Policy as long as I am employed by the PHA. I understand that a violation of this Policy may result in disciplinary action up to and including termination of my employment with the PHA, as well as civil or criminal liability.

Signature

Date

Printed Name

Annual Conflict Of Interest Disclosure Form

Commissioners

The undersigned, as a commissioner of the PHA, hereby certifies that as of the date that this certification is made (please check only 1):

- I have no potential or actual conflicts of interest to report.
- I have the following potential or actual conflicts of interest to report:

I hereby certify that the information set forth above is true and accurate.

Signature Date

Printed Name