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Lansing Housing Commission  
Policy No. 2012-2  
Conflict of Interest

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1. No LHC employee, Commissioner, officer or their Relative shall:
  - a. Enter, into any contract, subcontract or arrangement relating to any LHC project or activity involving the expenditure of public funds, in which any employee, officer or member of LHC or their Relative during his or her tenure, or for one (1) year thereafter, has any direct or indirect financial or other interest.
  - b. Solicit or accept employment with any LHC Contractor, Subcontractor or Supplier or with any potential LHC Contractor, Subcontractor, or Supplier during the employee, officer or member's tenure with LHC or for one (1) year thereafter.
  - c. Engage in a business or other employment related to the housing industry without the prior, written approval of LHC.

If a LHC employee is approved to engage in a business or other employment related to the housing industry, the employee shall not process any Housing Assistance Payment contracts for or refer LHC customers to any properties which the employee may be associated through the business or the employment.

If an LHC officer is engaged in a business or employment related to the housing industry, the officer shall not vote or participate in discussions on any policy and/or proposal where he/she might benefit financially.

2. No LHC employee, officer or member or their Relative shall be (i) a present or former LHC Commissioner, (ii) a present or former LHC employee who assists (assisted) in the formulation of policy or who influences (influenced) decisions on projects or contracts within the last twelve (12) months, or (iii) a Prohibited Person.
3. No LHC employee, officer or member or their Relative or a company in which the LHC employee, officer or member or their Relative has a direct or indirect financial or other interest shall have a direct or indirect financial or other interest in any housing assistance contract, i.e., Housing Choice Voucher ("HCV") HAP contract or otherwise, with LHC during the employee, officer or member's tenure or for one (1) year thereafter.

No LHC officer, employee or commissioner may lease a unit to a HCV participant unless that voucher is ported to another agency.

If a HCV is ported to another agency as discussed above, the action must be reported at the next subsequent LHC board meeting.

4. For purposes of this policy, the following definitions apply:

Relative

Means parents, siblings, children, grandparents, grandchildren, uncles, aunts, first cousins, nieces, nephews, spouses, in-laws, i.e., father, mother, son, daughter, brother, sister-in-law, step-parents, step-children, step-siblings, half-siblings.

LHC Contractors, Subcontractors or Suppliers

Means any business or person who submitted, or participated in, a bid in response to a LHC procurement of goods or services or otherwise has participated directly or indirectly in supplying goods and services to LHC.

Prohibited Person

Means any public official, member of the Lansing City Council or a Michigan legislator who exercises functions or responsibilities with respect to LHC.

5. LHC expressly reserves the right to waive the prohibitions of this policy where the Commission reasonably determines the interest in or benefit to be derived by the LHC employee, officer or member is de minimus or is vastly outweighed by the benefit to be derived by LHC. However, no waiver shall be granted if it would violate any applicable federal, state or local regulation or law, or the terms and conditions of the Annual Contributions Contract entered into between the LHC and HUD, as amended ("ACC") from time to time.
6. The standard of conduct here imposed upon the LHC, its employees, officers and members in implementing this policy shall not be merely to avoid the conduct prohibited herein (subject to the Commission's right of waiver) or under any applicable law, regulation or the ACC, but to avoid even the appearance of improper conduct.
7. All LHC officers and employees shall annually complete a Conflict of Interest Disclosure Form to enable LHC to monitor compliance with this policy.
8. This policy adopted by Resolution No. 1077, on November 16, 2009 and revised on January 24, 2012 and by this reference, any applicable federal, state or local regulation or law shall constitute LHC's Conflict of Interest Policy.