



Applicant Conflict of Interest Disclosure

The purpose of this form is to provide grant applicants a mechanism to disclose any actual, perceived, or potential individual or organizational conflicts of interest, as required by applicable federal regulations, including 2 CFR Part 200, state of Florida ethics laws, and the requirements of the Florida Department of Children and Families (DCF).

A disclosure will not automatically result in removal of the applicant, or grant application, from the review process.

Instructions

Read the descriptions below, mark the appropriate box(es) that pertain to you and your organization as it relates to this specific Request for Proposal (RFP), obtain applicant signature (applicant to determine appropriate signer).

Conflicts of Interest

Conflicts of interest may be actual, potential, or perceived. An actual conflict of interest occurs when an individual uses or attempts to use their position to secure benefits, privileges, or advantages for themselves, relatives, or an organization with which they are associated that are not available to the general public. A potential conflict of interest exists when an individual has relationships, affiliations, or interests that could improperly influence their decision-making. A perceived conflict of interest exists when a reasonable person could conclude that conflicting duties or loyalties are present. A conflict of interest may exist even if no unethical, improper, or illegal act results.

The Escambia and Santa Rosa Counties Continuum of Care (FL-511) recognizes that applicants may maintain relationships with other public and private sector entities as part of normal operations. The existence of such relationships does not, in itself, constitute a disqualifying conflict of interest.

The FL-511 Governance Board, informed by the Rating and Ranking Committee, will evaluate disclosed conflicts of interest and any proposed mitigation strategies. Applicants will not be disqualified solely due to the existence of a relationship; however, applications may be disqualified if a conflict of interest cannot be adequately mitigated.

All parties must comply with applicable federal and state laws and regulations and the requirements of the Florida Department of Children and Families (DCF) regarding conflicts of interest.

Organizational Conflict of Interest

An organizational conflict of interest exists when, because of other activities or relationships, an organization is unable or potentially unable to provide impartial services, its objectivity may be impaired, or it may have an unfair competitive advantage.

Examples of organizational conflicts of interest include, but are not limited to:

- **Unequal Access to Information:** An organization may have access to nonpublic or confidential information that is not available to other applicants, which could provide an unfair competitive advantage. For example, an organization performing work for the CoC or another government entity may gain access to internal plans, policies, or decision-making processes. Such information must not be used to influence or support an application for funding. Appropriate safeguards must be in place to prevent the misuse of nonpublic information.

Individual Conflict of Interest

An individual conflict of interest occurs when an individual associated with an applicant has a financial, personal, or professional interest that could compromise, or appear to compromise, their objectivity in applying for or administering funds.

Examples of individual conflicts of interest include, but are not limited to:

- An employee, board member, or agent of the applicant has a financial interest in, or ownership of, another organization applying for funding under this RFP
- An individual associated with the applicant participates in decision-making processes for this funding opportunity (e.g., development of the RFP, evaluation criteria, or review of applications)
- An individual has a relationship with the Lead Agency, Continuum of Care leadership, or decision-making bodies that could influence, or appear to influence, the outcome of the competition
- An individual receives or expects to receive financial or other benefits from another applicant related to this funding opportunity

Volunteer or prior involvement with the Continuum of Care or Lead Agency does not automatically constitute a conflict of interest; however, such relationships must be disclosed and will be evaluated on a case-by-case basis.

All applicants must disclose any actual, potential, or perceived conflicts of interest and describe any measures in place to mitigate such conflicts.

Certification and signature required on next page.

Certification

Applicant Name: _____

RFP Title: _____

CoC Grant Program Name: _____

Select ONE of the following responses below:

To the best of the Applicant's knowledge and belief, there are no relevant facts or circumstances that could give rise to an actual, potential, or perceived individual or organizational conflict of interest.

The Applicant, or individuals associated with the Applicant, have actual, potential, or perceived conflict(s) of interest, as described below:

Please list any relationships, roles, or financial interests that could present a conflict of interest, including involvement in CoC-funded agencies or governance bodies:

Name	Relationship
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

By signing in the space below, the Applicant certifies the following:

- If a conflict of interest is identified at any time after submission of this form, the Applicant must immediately provide full written disclosure to the Lead Agency.
- If a conflict of interest is determined to exist, the Lead Agency may take appropriate action, including requiring mitigation measures or disqualifying the application.

The Applicant is responsible for obtaining and maintaining conflict of interest disclosures from any subrecipients or subcontractors and must retain such documentation for review, if requested.

Applicant's Signature

Printed Name: _____

Title: _____

Signature: _____

Date: _____

CoC / DCF Program Use Only

This section to be completed by appropriate Program Staff.

- The applicant has no conflict(s) of interest.
- The applicant has disclosed conflict(s) of interest and Opening Doors Program staff have reviewed the conflict(s) in accordance with regulations. Program staff has determined the conflict(s) can be mitigated in the following way(s):

Describe how conflict(s) will be eliminated:

- The applicant has disclosed conflict(s) of interest and Program staff have reviewed the conflict(s) in accordance with regulations. Program staff have determined the conflict(s) cannot be mitigated. As such, the applicant will not move forward in the RFP/NOFO process. Opening Doors will communicate back to the applicant and keep documentation of communication in RFP / NOFO files.

I certify that the conflict(s) have been discussed with this Applicant and the actions above have been taken.

Program Staff Signature

Printed Name: _____

Title: _____

Signature: _____

Date: _____