

Ann Arbor Housing Commission
Code of Ethics/Standards of Conduct

I. PURPOSE

This Code of Ethics establishes standards for employee and Commissioner conduct that will assure the highest level of public service. This Code of Ethics serves to promote the efficient and honest administration of the Ann Arbor Housing Commission, through adherence to the highest degree of personal integrity and professionalism in order to merit the respect of the beneficiaries of programs and the general public. This policy is not intended nor should it be construed as an attempt to unreasonably intrude upon an individual's right to privacy or the right to participate freely in a democratic society and economy. The Code of Ethics and Standards of Conduct attempt to set forth acts or omissions of acts that could be deemed conflicts of interest and therefore be injurious to the mission of the Ann Arbor Housing Commission.

II. POLICY

2.1 Scope

The provisions contained herein apply to all employees and the Board of Commissioners of the Ann Arbor Housing Commission. With respect to contracted professional services of the Commission, it is assumed that these professionals (legal, accounting, architectural, etc.) will abide by the professional ethics of their particular profession.

2.2 Ethical Standards for Employees

2.2.1 General Conduct: Employees will conduct themselves at all times in such a manner as to create respect for themselves, for the Commission, and for the City of Ann Arbor.

2.2.2 Financial Interest: No employee shall have any employment, engage in any business or commercial transaction, engage in professional activity, or incur any obligation in which directly or indirectly s/he would have an interest that would impair his/her independence of judgment or action in his/her performance of official duties.

2.2.3 Preferential Treatment: No employee acting in his/her official capacity shall give preferential treatment to any person, agency or organization. Likewise, no employee shall use his/her position with the Commission for personal gain or advantage to obtain any privilege or preferential treatment not generally available to any resident of the community.

2.2.4 Use of Equipment, Supplies or Services: No employee shall use or permit the use of a Commission-owned vehicle, equipment, materials or property for the convenience or profit of himself, herself or any other person.

2.2.5 Gifts and Gratuities: No employee shall solicit any gift or consideration of any kind, nor shall any employee accept or receive a gift having a value in excess of \$25 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before the Commission. Gifts from "grateful" applicants, participants, or residents should be

discouraged. Donors of gifts are likely to expect or seek preferential treatment; therefore, it is important to avoid situations that might reasonably be interpreted as influencing the impartial discharge of duties.

2.2.6 Confidentiality: No employee shall disclose without proper authorization non-public information or records concerning any aspect of the operation of the Commission. S/he shall not use such information to the advantage or benefit of himself, herself, or any other person. Release of information on applicants, participants, or residents shall be based on a properly executed release of information form kept in the client file, and pursuant to government regulations.

2.2.7 Nepotism: No member of the family of any employee shall be appointed or hired to serve under the direct supervision or authority of that employee and in no event shall any Commission employee participate in the decision-making regarding employment or contract for services of any family member.

2.2.8 Contractual Interest: No employee shall have an interest in a contract between any person and the Commission, except that this provision shall not apply if the contract was entered into prior to the employee's hire by the Commission; the employee discloses his/her interest in the contract prior to employment; and after employment, the employee has no power to authorize or approve payment under the contract or to monitor performance or compliance under the contract. Compensation of the employee will not be affected by the contract.

2.2.9 Disclosure Requirements:

- (1) Names of any business, organization, personal, or professional involvement that might have business with the Commission or its program participants and with which that employee may at some point be required to rule or act on a matter involving said party.
- (2) Each employee shall disclose any current or past (within two (2) years) interest or involvement in Ann Arbor Housing Commission programs or activities, including but not limited to residency in public housing or participation in the Section 8 program run by Ann Arbor Housing Commission, ownership of property under contract with Section 8, and familial relationships who benefit directly or indirectly from the administration of Housing Commission programs. Family member is defined here as spouse, mother, father, grandparent, brother, sister, or child (half, step, or in-law included).

2.2.10 Procedural actions:

- (1) No employee shall handle or take action on his or her own file or any matter of a family member.
- (2) No employee may use his/her position to intimidate, coerce, or otherwise unduly influence any of the activities of other employee/participants.

2.3 Ethical Standards for Commissioners

The Board of Commissioners of the Ann Arbor Housing Commission is the architect of policy governing the operations of the Commission and retains the legal and fiscal responsibility for the

Commission. Recognizing that Commissioners are drawn from a broad range of fields, professions and community interests, it is expected that members of the Board of Commissioners shall follow the standards of conduct as outlined for the employees. Further, it is expected that a Commissioner will voluntarily and fully outline his/her personal interest and potential conflicts of interest upon assuming his/her seat on the Board. Such a statement should be submitted to the Board Chairman within ninety (90) days of his/her appointment. If reappointed to a new term, an updated statement shall be submitted within ninety (90) days of reappointment and annually thereafter.

2.3.1 Disclosure requirements:

- (1) Names of any business, organizational, or professional involvement that might reasonably be inferred as having business with the Commission and for which, at some point, a Commissioner might be expected to vote, legislate, or rule on a matter involving said party.
- (2) Any current or past contract or interest in any activities or programs of the Commission, including but not limited to, any contracts previously bid, personal relationships with any staff or other board members, or any consultative or professional contacts.

2.3.2 Procedural actions:

- (1) No Commissioner shall vote or discuss any matter before the Board if that Commissioner has an interest in the matter, except as follows:
 - (a) a Commissioner with a voluntary association may discuss issues, but not vote;
 - (b) a Commissioner with a former contact prior to Board appointment, or which existed at least two years prior to the current discussion, may act freely.
- (2) No Commissioner may use his/her position on the Board to intimidate, coerce, or otherwise unduly influence any of the activities or employees of the Commission.

2.4 Responsibility: Ethics Review Committee

There shall be an Ethics Review Committee of the Ann Arbor Housing Commission. The purpose of the Committee shall be to review and render decisions on any matters involving ethical conduct or breach of ethical conduct by employees, vendors, or Commissioners. The composition of the Review Committee shall be at the discretion and determination of the Board, reviewing questions of alleged or suspected infractions of the Code of Ethics and making recommendations to the Board of Commissioners or the Executive Director for further or final actions.

2.5 Disciplinary Actions to Remedy Violations

Any employee, officer or agent of the Ann Arbor Housing Commission determined to have committed a violation of this Code of Conduct shall be subject to disciplinary action, up to and including termination.