

# AGENCY'S CODE OF CONDUCT INSTRUCTIONS

Federal regulations (2 CFR part 200) and the U.S. Department of Housing and Urban Development's (HUD's) Notices of Funding Availability (NOFA) for discretionary funds require non-Federal entities receiving Federal assistance awards, excluding States, to develop and maintain written standards/codes of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest (2 CFR 200.318(c)(1)). HUD grantees are required to submit their code of conduct to HUD. HUD is streamlining the process for organizations to verify the collection of their submitted Code of Conduct policy.

## **Compliant Code of Conduct Policies and Instructions**

Codes of Conduct must:

1. Address the "Conducting Business in Accordance with Ethical Standards" requirements included in the Administrative, National & Departmental Policy Requirements and Terms for HUD's Financial Assistance;
2. Include a cover letter on the company letterhead that provides the name and title of the responsible official, mailing address, business telephone number and email address;
3. Prohibit real and apparent conflicts of interest that may arise among officers, employees or agents, or any member of their immediate family, partner or an organization that employs any of the indicated parties;
4. If applicable, the standards must also cover other organizational conflicts of interest;
5. Prohibit the solicitation and acceptance by employees, of gifts or gratuities in excess of minimum value; and
6. Provide for administrative and disciplinary actions to be applied for violations of such standards.

Note: Code of Conduct policies submitted to HUD are no longer valid after seven (7) years. HUD has historically requested Codes of Conduct be submitted to [askGMO@hud.gov](mailto:askGMO@hud.gov) to populate in a Code of Conduct e-library, however, it appears that the e-library has not been updated since September 30, 2024. Because of this, the Office of Care Coordination as the Collaborative Applicant is requesting Attachment 4 be included as part of the Agency Administrative Review.