

Morris County Continuum of Care

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Executive Committee

CHAIR

Allison Delcalzo-Berens
Morristown Medical Center

VICE CHAIR

Kelly Stephens
Morris County Housing Authority

SECRETARY

Karina Calabuig
Catholic Family & Community Services

Alicia Alvarez
Neighbors in Need

Dominique Bordenabe
Nourish NJ

Carmine Deo
Community Hope

Clarence Curry
Human Relations Commission

Katharine Errico
MC Dept. of Human Services

Brian Frommelt
Market Street Mission

Chris Kirk
Trenton Health Team

Raquel Kooper
Monarch Housing Associates

Elorm Ocansey
Community Representative

Rebecca Sherrod
Child & Family Resources

CONFLICT OF INTEREST POLICY

Article 1 – Purpose

1. The name of this body is “The Morris County Continuum of Care” (CoC), hereinafter referred to as the “Company.”
2. The purpose of this policy is to protect the Company interests when it is contemplating entering into a transaction or arrangement that might benefit the private interests of any Company member or might result in a possible excess benefit.
3. This policy is intended to supplement, not replace, any applicable state and federal laws covering conflicts of interest applicable to nonprofit and charitable organizations.
4. This policy is also intended to further identify “independent” parties for the purposes of decision making on matters related to compensation authorized by the CoC.
5. This conflict-of-interest policy applies to all members of the Company both voting members and non-voting members.

Article 2 – Definitions

1. Interested person(s) – Any member who has a direct or indirect financial interest, as defined below, is an interested person.
2. Financial interest – A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:
 - a. an ownership or investment interest in any entity with which the Company has a transaction or arrangement, or
 - b. a compensation arrangement with the Company or with any entity or individual with which the Company has a transaction arrangement, or
 - c. a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Company is negotiating a transaction or arrangement.
3. Independent Party – A committee member shall be considered an “independent” party for the purposes of this policy if the member:
 - a. is not, and has not been for a period of at least one year, an employee of any entity in which the CoC has a financial interest or is considering for a potential financial interest;
 - b. is not, and has not been for a period of the least one year, a board member, volunteer, or advisory member of, or an individual with a professional relationship with any entity in which the CoC has a financial interest or is considering for a potential financial interest; and
 - c. is not employed as an executive of another corporation where any of the corporation’s executive officers or employees serve on the compensation committee for an organization seeking compensation through the CoC.
4. Compensation includes direct and indirect remuneration and gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest.

A person with a financial interest may have a conflict of interest only if the Company decides that a conflict of interest exists in accordance with this policy.

Article 3 – Procedures

1. Statement of Acknowledgement – all members of the Company must sign the conflict-of-interest statement of acknowledgment at the beginning of each year. All members of the Allocation Committee must sign the conflict-of-interest acknowledgement prior to the CoC application review period.
2. Duty to Disclose – in connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Company. Potential conflicts of interest may be disclosed at the beginning of each calendar year or as they arise in relation to specific discussions or votes.
3. Recusal of Self – any member may recuse themselves at any time from involvement in any decision or discussion in which the member believes there is a conflict of interest without going through the process of determining whether a conflict of interest exists.
4. Determining whether a Conflict of Interest exists – after disclosure of the financial interest and all material facts, and after any discussion with the interested person(s), the member in question shall leave the Executive Committee meeting while determining a conflict of interest is discussed and voted upon. The Company will then decide if a conflict of interest exists.
5. Procedures for addressing Conflicts of Interest
 - a. Once an interested person has identified a possible conflict of interest, the Chair of the Morris County Continuum of Care Executive Committee may, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
 - b. After exercising due diligence, the Company shall determine whether it can obtain, with reasonable efforts, a more advantageous transaction or arrangement from a person or entity that would not present a conflict.
 - c. If such an alternative is not feasible, the Company shall determine by a majority vote of the disinterested member(s) whether the transaction or arrangement is in the Company's best interest, for its benefit, and whether it is fair and reasonable. Based on the Company's determination, it shall decide whether to enter the transaction or arrangement.
6. Violation of the Conflicts of Interest Policy
 - a. If any member of the Company has reasonable cause to believe that another member has failed to disclose actual or possible conflicts of interest, that member shall inform the Chair of the Company of the basis of such belief and the Company will discuss with the member in question.
 - b. The member in question will be given an opportunity to explain the alleged failure to disclose to the Company.
 - c. If, after further investigation, the Company determines that the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.
 - d. Records of the Company proceedings shall include the name(s) of the parties involved, the determination of the Company, and the action(s) taken, if any. A full roster of members involved in the proceedings must be maintained.

Article 4 – Compensation

1. A voting member of the Company who receives compensation, directly or indirectly, from the Morris County Continuum of Care for services is precluded from voting on matters pertaining to that member's compensation.
2. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Morris County Continuum of Care for services is precluded from voting on matters pertaining to that member's compensation.

3. Any voting member of the Company or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Morris County Continuum of Care, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Morris County Continuum of Care
Conflict of Interest Statement of Acknowledgement

I, _____, as a member of the Morris County Continuum of Care Executive Committee or subcommittee, have received and reviewed the Morris County Continuum of Care Conflict of Interest Policy dated DATE OF APPROVAL. I understand the conflict-of-interest policy and agree to notify the Morris County Continuum of Care Executive Committee should any conflict of interest related to discussions or voting matters arise.

In the space provided below, please disclose any affiliations that could be perceived as conflicts of interest:

Print Name

Signature

Date