



Neighborhood Initiative Program

NIP-17 Ethics, Fraud, Conflict of Interest, and Privacy - Annual Certification Form
Revised 2/10/17

As a participant working with the Neighborhood Initiative Program, I understand it is my responsibility to be aware of and comprehend the policies and information described in this certification and also contained in the Neighborhood Initiative Program Guidelines, Implementation Manual, and Award Agreement for Ethics, Fraud, Conflict of Interest, and Privacy Policy.

Ethics & Fraud: Fraudulent activity is intentional or deliberate actions taken to gain an unfair benefit. All participants involved with NIP regardless of their role or responsibility have a duty to immediately disclose any suspected fraudulent activity to SC Housing's Internal Audit Division. Anyone aware of fraudulent activity that fails to report the fraud may be considered an accessory to the fraudulent activity. Those who participate in fraudulent activity may be subject to disciplinary action, criminal charges and/or civil action. Examples of fraudulent activity include, but are not limited to, the following:

1. Theft of money, property, and information
2. Embezzlement
3. Acceptance of bribes or kickbacks
4. Misrepresentation or concealment of facts
5. Falsifying, altering, destroying or unauthorized sharing of paper or electronic documents
6. Submission of false claims for unfair benefit
7. Soliciting or accepting anything to influence a decision or other outcome

Conflict of Interest: The following conflicts of interest that may arise in connection with the administration and execution of the NIP program are prohibited:

1. Conflicts arising in the selection or hiring of contractors or advisors, including asset managers
2. The purchase of assets
3. The management of assets held
4. Post-employment restrictions on employees
5. Other potential conflicts of interest, as deemed necessary or appropriate in the public interest

Lead Entities and Partners must maintain in their procurement and selection procedures a written code of conduct to govern the performance of their officers, employees or agents in contracting with and expending NIP funds. Written procurement and selection procedures must contain the following regarding conflicts of interest:

1. **Applicability:** In the procurement of property and services and the purchase of assets by the Lead Entities or Partners, the provisions of this section apply.
2. **Conflicts Prohibited:** Personal conflicts are prohibited. No persons or entities described in this section who exercise or have exercised any functions or responsibilities with respect to activities assisted with NIP funds, or who are in a position to participate in a decision-making process or gain inside information with regard to these activities, may obtain a financial interest or benefit from a NIP-assisted activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties. Lead Entities or Partners engaging in a prohibited activity may be subject to disciplinary action.
3. **Persons Covered:** The conflict of interest provisions apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official, or owner of a project assisted with NIP funds.

4. **Disclosure Requirements:** Persons/Entities performing services for NIP activities have an affirmative duty to immediately disclose any existing or potential conflicts of interest and/or prohibited activities concerning themselves or any other person performing services related to NIP.
5. **Certification Requirements:** NIP participants awarding contracts and/or purchasing properties are required to execute the ***NIP-9 Conflict of Interest Certification Form***.

The Lead Entity and Partner are obligated to report any credible evidence of fraud, misuse of funds, or any other wrong doing to either SC Housing or SIGTARP at the following addresses:

Internal Audit Division – SC Housing
300-C Outlet Pointe Blvd.
Columbia, SC 29210
<http://schelp.gov>
(Select “Fraud Alert” from the “About” drop down box.)
(803) 896-9001

SIGTARP
TOLL FREE HOTLINE (877) SIG-2009

Privacy Policy: SCHC’s policy governing the security and confidentiality of personal information applies to all forms of collection of personal information. The purpose of this policy is to ensure that persons/entities performing services for SCHC know and understand the proper procedures for the collection, use and destruction of personal information. Nothing in this policy should be construed to create any new or different rights other than those available under existing State and Federal laws.

COLLECTION OF PERSONAL INFORMATION

Personal Information is information about an individual that could reasonably be used to identify or describe that specific individual. This may include but is not limited to the following:

- Name
- Photograph or Digitized Image
- Social Security Number
- Date of Birth
- Driver’s License Number
- Home Address or Telephone number
- Medical or Disability Information
- Education Level
- Financial Status
- Bank Account Numbers
- Credit or Debit Card Numbers
- Employment History
- Credit Records or Reports

DISCLOSURE OF PERSONAL INFORMATION

Persons/Entities performing services for SCHC shall not disclose personal information except under the following circumstances:

- When such disclosure is necessary for the receiving entity to perform its duties or responsibilities
- On a document recorded in the official records of the county or filed with the courts
- Where disclosure is required by court order, warrant or subpoena
- Where disclosure is required by State or Federal law

SECURITY OF PERSONAL INFORMATION

It is the intent of SCHC to provide consistent, proper and secure management of personal information. The following rules help prevent the loss or misuse of personal information.

- Access to personal information is limited to persons/entities that require access in order to perform their assigned duties.
- Staff members of Lead Entities and Partners performing services for NIP are required to sign a **NIP-13 Confidentiality Agreement**. The confidentiality agreement covers information that is considered confidential by SCHC, including but not limited to personal and financial information.
- SCHC is committed to data security and the data quality.
- Any third party vendors with access to NIP data systems and networks are committed to the same principles and are required by contract to follow the same policies and guidelines as SCHC in protecting this information.

If any person/entity performing services for SCHC reasonably believes that personal information has been compromised, NIP staff must be notified as soon as possible. If it is determined that personal information has been compromised and it is believed that illegal use may occur, immediate steps will be taken to identify and notify the individual whose personal information has been compromised.

DISPOSAL OF PERSONAL INFORMATION

Before disposing of business records containing personal information, persons performing services for SCHC will make such records unreadable or undecipherable. SCHC may contract with a person engaged in the business of disposing of records to ensure that business records containing personal information are made unreadable or undecipherable. Before disposing of information technology hardware, copiers or storage media, all personal and confidential information will be removed and the hardware, copiers or storage media will be sanitized.

I hereby certify that I have read and that I understand the requirements for the Neighborhood Initiative Program regarding Ethics, Fraud, Conflict of Interest, and Privacy.

Name of NIP Participant

Date:

Signature of Participant

Title

Organization