

EXHIBIT 4

CITY OF KNOXVILLE
Certification of Compliance with the City of Knoxville Conflict of Interest and Procurement Policies for Community Housing Development Organizations

Name of applicant: _____

HEREBY TAKES NOTICE OF AND WARRANTS that it is not in violation of, or has not participated, and will not participate, in the violation of any of the following Conflict of Interest and Procurement Policies for Community Housing Development Organizations:

I. 24 C.F.R. 92.356(f):

(1) No owner, developer or sponsor of a project assisted with HOME funds (or officer, employee, agent, elected or appointed official or consultant of the owner, developer or sponsor) whether private, for-profit or non-profit (including a community housing development organization (CHDO) when acting as an owner, developer or sponsor) may occupy a HOME-assisted affordable housing unit in a project. This provision does not apply to an individual who receives HOME funds to acquire or rehabilitate his or her principal residence or to an employee or agent of the owner or developer of a rental housing project who occupies a housing unit as the project manager or maintenance worker.

(2) Exceptions. Upon written request of a housing owner or developer, the participating jurisdiction (or State recipient, if authorized by the State participating jurisdiction) may grant an exception to the provisions of paragraph (f)(1) of this section on a case-by-case basis when it determines that the exception will serve to further the purposes of the HOME program and the effective and efficient administration of the owner's or developer's HOME-assisted project. In determining whether to grant a requested exception, the participating jurisdiction shall consider the following factors:

- (i) Whether the person receiving the benefit is a member of a group or class of low-income persons intended to be the beneficiaries of the assisted housing, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;
- (ii) Whether the person has withdrawn from his or her functions or responsibilities, or the decisionmaking process with respect to the specific assisted housing in question;
- (iii) Whether the tenant protection requirements of Sec. 92.253 are being observed;
- (iv) Whether the affirmative marketing requirements of Sec. 92.351 are being observed and followed; and
- (v) Any other factor relevant to the participating jurisdiction's determination, including the timing of the requested exception.

II. Expanded CHDO Conflict of Interest Policy:

No employee, agent, consultant, elected official, or appointed official of _____ (the "CHDO") may obtain a financial interest or unit benefits from a HOME-assisted activity, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter. This prohibition includes the following:

Any interest in any contract, subcontract or agreement with respect to a HOME-assisted project or program administered by the CHDO, or the proceeds thereunder; **or**

Any unit benefits or financial assistance associated with HOME projects or programs administered by the CHDO, including:

- Occupancy of a rental housing unit in a HOME-assisted rental project;
- Receipt of HOME tenant-based rental assistance;
- Purchase or occupancy of a homebuyer unit in a HOME-assisted project;
- Receipt of HOME homebuyer acquisition assistance; or
- Receipt of HOME owner-occupied rehabilitation assistance.

This prohibition does not apply to an employee or agent of the CHDO who occupies a HOME-assisted unit as the on-site project manager or maintenance worker. In addition, no member of Congress of the United States, official or employee of HUD, or official or employee of the City of Knoxville shall be permitted to receive or share any financial or unit benefits arising from the HOME-assisted project or program.

Prior to the implementation of the HOME-assisted activity, exceptions to these provisions may be requested by the CHDO in writing to the City of Knoxville Community Development Division. The CHDO must demonstrate and certify that the policies and procedures adopted for the activity will ensure fair treatment of all parties, and that the covered persons referenced in this policy will have no inside information or undue influence regarding the award of contracts or benefits of the HOME assistance.

The City of Knoxville may grant exceptions or forward the requests to HUD as permitted by 24 CFR 92.356, 85.36 and 84.42, as they apply.

III. City of Knoxville Procurement Policies:

The CHDO shall establish procurement procedures to ensure that materials and services are obtained in a cost-effective manner. When procuring for services to be provided under this agreement, the CHDO shall comply at a minimum with the procurement standards at 24 CFR 85.36.

In addition, it is understood that any CHDO that can be considered to be a religious organization shall abide by all portions of 24 CFR 92.257.

Applicant address: _____

Authorized signature: _____

Date signed: _____