

# THE CLARKSVILLE HOUSING AUTHORITY

P.O. BOX 603

CLARKSVILLE, TENNESSEE 37041-0603

PHONE / TDD 931-647-2303

WANDA B. MILLS  
EXECUTIVE DIRECTOR

COMMISSIONERS

W. L., BURNETT, CHAIRMAN,  
BRADLEY A. MARTIN, III, VICE-CHAIRMAN  
MARY F. ELLIOTT  
DORIS MABRY  
EDWARD LARSON

July 6, 2007

Bruce Androphy, Executive Director  
Tennessee Ethics Commission  
Suntrust Bank Bldg.  
201 4<sup>th</sup> Ave. N., Suite 1820  
Nashville, TN 37243

Dear Mr. Androphy:

Please find enclosed a copy of The Clarksville Housing Authority's approved Code of Ethics Policy.

Should additional information be needed, please advise.

Sincerely,

The Clarksville Housing Authority



Wanda B. Mills  
Executive Director

Enclosure

WBM/cjs

RECEIVED  
2007 JUL 11 AM 10:03  
TENNESSEE  
ETHICS COMMISSION

# THE CLARKSVILLE HOUSING AUTHORITY

## CODE OF ETHICS

### **Preface**

The Clarksville Housing Authority (Authority) Code of Ethics (Code) is intended to ensure that each employee and Commissioner adheres to the high standards of honesty, integrity, impartiality and conduct in carrying out his/her duties to the organization and those we serve. This Code is designed to assure the utmost in public trust and confidence in the policies and practices of the Authority. Because of its status as an independent public corporation, the Authority recognizes its responsibility to conduct all business in a manner above reproach or censure. This Code will describe in detail the standards by which members of the Board of Commissioners and employees are to be held accountable.

This Code recognizes those sections of federal, state and local law, which govern the conduct of public employees, and in no way supplants those provisions of law.

The Code shall be generally applied to avoid the appearance, or actual occurrence of, any favoritism or special treatment towards any applicant, resident, or vendor having business, or dealings of any kind, with the Authority. No Commissioner or employee shall use or cause or allow to be used his/her position to secure any personal privileges for himself/herself, or others, or to influence the activities, actions, or proceeds of the Authority.

The Clarksville Housing Authority, in establishing ethical standards for its employees and Commissioners, recognizes the importance of establishing standards of conduct for vendors and suppliers of products and/or services to the Authority. While the Authority cannot mandate the internal conduct or policies of vendors, it nevertheless requires that vendors and suppliers adhere to certain basic principles in conducting business with the Authority. Specifically, these principles include:

There shall be no direct or indirect inducement of employees or members of the Board of Commissioners including the giving of gifts, money, tickets, meals, or any other items or service having value in excess of \$50.00. It is recognized that in the course of business dealings, there may be times when meals may be arranged as a part of a business meeting. In such cases, such events should be reported to the Executive Director or the Chairman of the Board, as appropriate, with the nature of the meeting explained when it is anticipated that the value of the meal will exceed \$50.00.

It is expected that vendors or suppliers of professional services to the Authority will be governed by the Code to which their particular profession prescribes.

Approved: 7/3/07

Any vendor or supplier found in violation of Authority policy shall be barred from future business dealings with the Authority. The Authority reserves the right to have vendors and suppliers sign a statement of compliance with the standards of conduct of the Authority.

### **Definitions**

1. "Claim" shall mean any demand, written or oral, made upon the Authority to fulfill an obligation arising from law or equity.
2. "Commissioner" shall mean one of the persons serving on the Board of Commissioners of the Authority.
3. "Contract" shall mean any obligation to do something arising from an exchange of promises or consideration between persons, regardless of the particular form in which it is stated.
4. "Employee" shall mean any person appointed or hired, whether full or part time, seasonal, temporary, on a fixed or unfixed term, provisional or permanent.
5. "Family" shall mean a parent, spouse, child, sibling or father/mother-in-law, son/daughter-in-law, brother/sister-in-law, stepfather/mother/child/sibling, half brother/sister or a person living in the same household.
6. "Interest" shall mean a benefit or advantage of an economic or tangible nature that a person or a member of his/her family would gain or lose as a result of any decision, or action of omission to decide or act, on the part of the Authority, its Board or employees.
7. "Person" shall mean any individual, corporation, partnership, business entity, association, organization, and may include an Authority employee.

## **ETHICAL STANDARDS FOR EMPLOYEES**

### **Employment, Business and/or Professional Activity**

No employee of the Authority shall have any employment, engage in any business or commercial transaction, engage in any professional activity, incur any obligation, enter into any contract with any person who has or enters into a contract with the Authority, have no interest, direct or indirect, in any property included or planned to be included in any project, or have any financial interest in the business of any individual or business organization in which directly or indirectly he or she would have an interest that would impair his/her independence of judgment or action in the performance of his/her official duties or that would be in conflict with the performance of his/her official duties.

No Authority employee acting individually can bind the Authority by any action or verbal representation.

No current Authority employee shall represent any person, other than him/herself, in business negotiations, judicial or administrative actions or procedures, to which the Authority may be a party.

**Insider Information**

No employee of the Authority shall directly or indirectly, engage in a financial transaction as a result of, or primarily relying upon, information obtained through his/her Authority employment.

**Relatives of the Authority Employees**

All employees shall disclose to the Executive Director the name of any relative, listed in the definitions of "family" who lives in, or applies to live in, any housing operated by the Authority, or who is employed by, or applies to be employed by the Authority, as soon as they have knowledge of this status. The employee involved shall not participate in the decision making process regarding any action affecting the employment of said relative. No employee shall participate in the application and/or leasing process, including but not limited to the execution of a lease, calculation of rent, inspections or the termination process of any relative listed.

**Preferential Treatment**

There shall be no preferential treatment given by an employee of the Authority acting in performance of his/her official duties to any person, agency or organization.

**Authority Owned Equipment**

No Authority employee shall use or permit the use of Authority-owned computer, vehicles, equipment, materials or property for the convenience or profit of him/herself, or any other person. However, this provision shall not apply in the case of usage for "diminutive" purposes, i.e., purposes which in and of themselves should not be construed as abuse of Authority property.

**Gifts**

No Authority employee shall solicit any gift or consideration of any kind, nor shall any Authority employee accept or receive a gift having value in excess of \$50.00 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before the Authority.

**Disclosure of Information**

No Authority employee shall disclose, without proper authorization, information or records concerning any aspects of the operation of the Authority, nor shall he or she use such information to the advantage or benefit of him/herself, or any other person. This shall include records maintained on applicants/residents of the Authority. The release of any information relative to applicants/residents of the Authority shall be done pursuant to government agencies or agencies receiving government subsidy, shall be done following prescribed methods of requesting and transmitting such information and shall be done with full knowledge of the applicant/resident except in those cases where through action of law the applicant's/resident's knowledge is not required.

**Former Employees**

No former employee of the Authority shall personally represent any person in a matter in which the former employee personally participated while employed by the Authority for

one year, if such representation would be adverse to the interest of the Authority. This provision shall not, however, bar the timely filing by a current or former employee of any claim, account, demand, or suit arising out of personal injury, property damage, or any benefit authorized or permitted by law.

**Handling of Authority Funds**

Employees who have access to Authority funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Authority's policies and/or procedures. The Authority imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise the Executive Director so that the Authority can promptly investigate.

When an employee's position requires spending the Authority funds or incurring any reimbursable personal expenses, the employee must use good judgment on the Authority's behalf to ensure that good value is received for every expenditure.

Employees responsible for accounting and recordkeeping must fully disclose and record all Authority assets, liabilities, or both and must exercise diligence in enforcing these requirements.

**Falsification of Records**

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to: false expense, attendance, production, financial, or similar reports and statements, false advertising, deceptive marketing practices, or other misleading representations.

**Violation of Law**

No employee will do anything in the conduct of business that would violate any local, state or federal law.

**Action of Findings**

Any matter decided on, contracted, adjudicated, or in any way acted upon by an employee who does not disclose a personal interest either in the matter, or in any person or organization having an interest in the matter, may be considered null and void by the Authority. Such a matter may be referred to the Board of Commissioners to render judgment.

When an employee is found to be in violation of this Code the Executive Director will take corrective action in accordance with the disciplinary actions outlined in the Authority's Personnel Policy.

## **ETHICAL STANDARDS FOR COMMISSIONERS**

The Board of Commissioners of The Clarksville Housing Authority is the architect of policy governing the operations of the Authority and retains legal and fiscal responsibility for the Authority. Recognizing that the Commissioners are chosen from a broad range of fields and professions and community interests renders difficult the circumscription of external interests and activities of the Commissioners. It is the intent that, insofar as is possible, the members of the Board of Commissioners are generally enjoined to follow the standards of conduct, which are outlined in the Code of Ethics for employees. Further, it is expected that a Commissioner will voluntarily and fully outline his/her personal interests and potential conflicts of interest prior to assuming their seat on the board. Such a statement should be submitted to the Board Chairman within sixty (60) days of the Commissioner's appointment and included in the minutes of the next regular Board Meeting. For Commissioners currently serving, such an updated statement shall be developed within sixty (60) days of their re-appointment for a new term. Such statement shall disclose the following:

- A. The names of any business, organizational or professional involvements that might reasonably be inferred as having business with the Authority and for which at some point, a Commissioner might be expected to vote, legislate, or rule on a matter involving said party.
- B. Any current or past contact in, or interest in, activities or programs of the Authority, including, but not limited to, any contracts previously bid and let, familial relationships with any staff or other board members, or any consultative or professional contracts.

No Commissioner shall vote, decide on, or discuss any matter before the Board if that Commissioner has an interest in the matter, except that:

- A. A Commissioner having interest through a voluntary association with the person or organization may be allowed to discuss the matter.
- B. If the matter concerns a person or organization with which the Commissioners had former contact, and that former contact existed either prior to his/her selection, or occurred at least two (2) years prior to the current discussion of the matter, the Commissioner may freely act.

No Commissioner may use his/her position on the Board to intimidate, coerce, persuade or otherwise influence any of the activities or employees of the Authority.

No Commissioner shall solicit any gift or consideration of any kind, nor shall any Commissioner accept or receive a gift having value in excess of \$50.00 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before the Authority.

## **POLICY DISSEMINATION**

New employees will be provided a copy of this policy as a part of their employment packet. Updates or changes will be distributed and discussed with employees.

Commissioners will be provided a copy of this policy at or before their first Board Meeting. Changes to this policy will be reviewed and approved by the Board of Commissioners.

**THE CLARKSVILLE HOUSING AUTHORITY**

**CODE OF ETHICS**

**EMPLOYEE ACKNOWLEDGEMENT STATEMENT**

I, (print full name) \_\_\_\_\_, an employee of The Clarksville Housing Authority, hereby certify that I have received a copy of the policy "Code of Ethics", that I have read or had the policy read to me, and that I agree to abide by the terms of the policy as a condition of employment.

From time to time, this policy may change. When a change occurs, employees will be notified. I understand that when this policy is revised, it is my responsibility to read or have someone read to me this policy so that I can abide by the terms of the policy, which is a condition of employment.

Please check the following:

- Received a copy of the policy \_\_\_\_\_
- Read the policy \_\_\_\_\_
- Had the policy read to me \_\_\_\_\_

As a condition of employment, I agree to abide by the terms of this policy.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date