**HORRY COUNTY**

**HOME CONSORTIUM**

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**COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO)
CERTIFICATION APPLICATION**

**Effective July 12, 2024**

**DUE August 12, 2024**



# Overview

These guidelines serve as a reference for organizations submitting an application for certification as a Community Housing Development Organization (CHDO) through Horry County HOME Consortium. The HOME program was created under Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990. The Federal implementing regulations for the HOME program are located at 24 CFR Part 92, which is also referred to as the HOME Final Rule. The HOME Program provides formula grants to states and local jurisdictions to provide decent affordable housing to lower-income households, expand the capacity of nonprofit housing providers, strengthen the ability of state and local governments to provide housing, and to leverage private sector participation in the creation and retention of affordable housing. A wide range of activities are funded through the HOME program, including new construction and rehabilitation of rental units, new construction and rehabilitation of homeownership units, down payment assistance, owner-occupied rehabilitation, and tenant based rental assistance.

The Horry County HOME Consortium (HCHC) was established to promote partnerships among HUD and other federal entities, county/local governments, and those in the nonprofit and for-profit sectors who build, own, manage, finance, and support affordable housing initiatives. A consortium is a group of local governments that partner together to receive HOME funds as a single HUD entitlement grantee. Member jurisdictions of HCHC include Georgetown, Horry, and Williamsburg Counties, as well as the municipalities of Myrtle Beach, Conway, Atlantic Beach, Aynor, Loris, Georgetown, Andrews, Kingstree, Hemingway, Stuckey, Lane, and Greeleyville. Horry County serves as the Participating Jurisdiction for the Consortium, administering the program on behalf of its member jurisdictions.

A CHDO is a private nonprofit, community-based, service organization that has, or intends to obtain, staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, capacity, and experience. A CHDO serves as an owner, developer, or sponsor of affordable housing. A Participating Jurisdiction is required to reserve a minimum of 15% of each annual funding allocation received for CHDO-eligible projects. This CHDO set-aside may be used to fund homeownership new construction and rehabilitation projects, as well as rental new construction and rehabilitation projects, undertaken by certified CHDOs.

# ***CHDO Eligibility***

The following sections provide basic instructions to complete the application for certification as a CHDO for the Horry County HOME Consortium. Before completing an application, it is recommended that you review guidelines to determine whether your associated project is eligible for funding through the CHDO set aside and meets an identified need. For purposes of the current solicitation, Horry County is seeking shovel-ready homeownership projects that can begin construction quickly.

Applicant Criteria

Eligible applicants for CHDO certification include non-profit organizations meeting the following criteria:

1. Organized under State or local laws
2. Has no part of its net earnings inuring to the benefit of any member, founder, contributor, or individual
3. Is not controlled by, nor under the direction of individuals or entities seeking to derive profit from or gain from the organization
4. Has a tax exempt ruling from the Internal Revenue Service under section 501(c)(3) or 501(c)(4) of the Internal Revenue Code of 1986
5. Is not a governmental entity or controlled by a governmental entity
6. Has standards of accounting that conform to 24 CFR 84.21, “Standards for Financial Management Systems”
7. Has among its purposes the provision of decent housing for that is affordable to low-income and moderate-income persons
8. Maintains accountability to low-income community residents through low-income representation on its governing board and through a formal process for low-income input regarding the design, siting, development, and management of affordable housing
9. Has a demonstrated capacity carrying out housing projects assisted with HOME funds
10. Has a history of serving the community within which housing to be assisted with HOME funds is to be located

Organizations desiring to be funded through the CHDO set aside must be certified or recertified with each eligible CHDO project submission. A CHDO must satisfy one of three roles to utilize CHDO set-aside funds: owner, developer, or sponsor of affordable housing.

Owner: the CHDO is the owner in fee simple absolute (or 99-year lease) of multifamily or single family housing for rental to low-income households

Developer: the CHDO is the owner in fee simple absolute (or 99-year lease) of multifamily or single family housing and constructs or rehabilitates said housing for rent or sale to qualifying low-income households

Sponsor: the CHDO is a sponsor of rental housing if the funded units are owned or developed by:

1. A wholly owned non-profit or subsidiary of the CHDO; or
2. A limited partnership of which the CHDO or its wholly owned subsidiary is the sole general partner; or
3. A limited liability company of which the CHDO is the sole managing member

A CHDO may also satisfy the role of sponsor by developing a project that it owns that is transferred to a second non-profit upon completion of development.

Project Criteria

Projects eligible for funding through the CHDO set-aside include rental and homebuyer development projects. For the current solicitation, Horry County is seeking shovel-ready homeownership projects that can begin construction quickly. This includes new construction and rehabilitation of single family residences for homeownership. For homeownership projects funded through the CHDO set-aside, a CHDO may only serve in the developer CHDO role. Tenant Based Rental Assistance (TBRA) and owner-occupied rehabilitation are not eligible for CHDO set aside funding.

# **Submission Instructions**

Applicants for CHDO certification must submit the following items by the application deadline:

1. **one (1) original and two (2) copies** of the CHDO certification application package
2. one electronic copy via email
3. a corresponding CHDO-eligible HOME project application

Applications may be hand delivered or mailed, and must be received by the due date.

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| --- |
| Submit Applications to:  |
| Horry County Community Development100 Elm StreetConway, SC 29526Email Applications to dobson.michael@horrycountysc.gov |
| Attention: Michael Dobson |
| Questions: dobson.michael@horrycountysc.gov |

Questions related to the application should be submitted no later than 5:00 pm on August 2, 2024. All responses will be posted no later than 5:00 pm on August 7, 2024. An application workshop will not be held for this funding round. However, a video recording of an application workshop held for a previous HOME funding round is available on the Community Development website, located at <https://www.horrycountysc.gov/departments/community-development/grants/housing/home/>.

Both electronic and hard copies of the application must be submitted **no later than 5:00 pm, Eastern Standard Time, on Monday, August 12, 2024.** CHDO certification applications received after the deadline will not be considered and will not be returned to the applicant.

Any costs incurred by the applicant in the preparation, transmittal, or presentation of the application packages are the responsibility of the applicant.

Applications will not be considered for the following reasons:

 1) The corresponding HOME project application is not eligible for the CHDO set-aside

2) Incomplete application or late submission

The County reserves the right to:

1. Reject any and all applications received;
2. Waive or modify minor irregularities in applications upon notification to the Applicant;
3. Receive clarification from the Applicant to ensure an understanding of the application submitted;
4. Adopt or utilize all or any part of the application unless covered by legal copyright, patent or property rights in which case the County must be notified;

# **CHDO Certification Documentation Checklist**

[ ]  CHDO Certification Application

[ ]  CHDO-Eligible HOME Project Application

[ ]  Organizational Charter

[ ]  Articles of Incorporation

[ ]  Current Organizational Bylaws

[ ]  501(c)(3) or 501(c)(4) Certificate OR [ ]  Group Exemption Letter Under Section 905

[ ]  Strategic Plan

[ ]  Certification of Board Status

[ ]  Certification of Low Income Board Representation

[ ]  Documentation of Committee Structures/Development Oversight

[ ]  Board Minutes

[ ]  Board Resolutions

[ ]  Community Service Experience Statement

[ ]  Operating Procedures (Program Design)

[ ]  Current Plans & Housing Needs Narrative

[ ]  Profit & Loss Statement

[ ]  Balance Sheet

[ ]  Statement of Cash Flows

[ ]  Financial Narrative

[ ]  Management Narrative

[ ]  Staff Resumes

[ ]  Other Supporting Documentation

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION APPLICATION**

|  |  |
| --- | --- |
| Organization Name |  |
| UEI Number |  |
| DUNS Number |  |
| Tax ID Number |  |
| Contact Name / Title |  |
| Contact Email Address |  |
| Contact Phone Number |  |
| Board President Name |  |
| Board President Email Address |  |
| Board President Phone Number |  |
| Organization Fax Number |  |

Please describe the eligible CHDO activities your organization will undertake as a part of this certification.

|  |
| --- |
|  |

Please list the geographic area to be considered for the CHDO certification. Please note that a CHDO’s service area cannot comprise an entire state.

|  |  |
| --- | --- |
| Area Name  | Area Description |
|  |  |
|  |  |
|  |  |

Please list individuals who have been authorized to serve as the primary and secondary contacts for the organization in relation to the CHDO certification program. The primary address listed below will serve as the principal method of contact to which all correspondence and payments to the organization shall be sent.

|  |  |  |
| --- | --- | --- |
| **Category** | **Primary Contact** | **Secondary Contact** |
| Name: |  |  |
| Title: |  |  |
| Address: |  |  |
| Phone: |  |  |
| Email:  |  |  |

Requests for changes to the authorized contact persons or addresses shall be submitted in writing to Horry County Community Development.

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION**

**APPLICATION**

Please submit this CHDO certification compliance checklist with your certification application. Please include the requested documentation indicated in the application checklist to demonstrate compliance with each requirement. You may submit one copy of each documentation source, but please highlight and cite where the reference can be found to facilitate compliance review. Incomplete applications will not be considered.

|  |
| --- |
| **CHDO Compliance Checklist** |
| **Organizational Status and Mission** | **Citation** | **Compliant** | **Deficient** |
| The nonprofit is organized under state or local law, as evidenced by: \_\_\_\_\_ A Charter, OR \_\_\_\_\_ Articles of Incorporation |  |  |  |
| The nonprofit has a tax exemption ruling from the Internal Revenue Service (IRS) under Section 501(c), as evidenced by: \_\_\_\_\_ A 501(c)(3) or (4) Certificate from the IRS, OR \_\_\_\_\_ A group exemption letter under Section 905 from  the IRS that includes the CHDO |  |  |  |
| The nonprofit’s primary purpose is the provision of low and moderate-income housing, as evidenced by:  \_\_\_\_\_ Charter,  \_\_\_\_\_ Articles of Incorporation,  \_\_\_\_\_ By-laws, OR \_\_\_\_\_ Resolutions |  |  |  |
| **Strategic Plan** The organization has produced a strategic plan that specifies an action plan for housing development, as evidenced by: \_\_\_\_\_ Strategic Plan  |  |  |  |
| **Board Composition** | **Citation** | **Compliant** | **Deficient** |
| At least 1/3 of board members consist of residents of low-income neighborhoods, low-income individuals, or elected representatives of low income neighborhood organizations, as evidenced by: \_\_\_\_\_ Certification of Low Income Representation  AND \_\_\_\_\_ Charter,  \_\_\_\_\_ Articles of Incorporation, or \_\_\_\_\_ By-laws |  |  |  |
| A CHDO may be chartered by a State or local government, however the state or local government may not appoint: 1. More than 1/3 of the membership of the organization’s governing body;
2. The board members appointed by the State or local government may not, in turn, appoint the remaining 2/3 of the board members; and
3. No more than 1/3 of the governing board members may be public officials.

Evidenced by:  By-laws Charter, OR Articles of Incorporation. |  |  |  |
| No more than 1/3 of the governing board members may be public officials (including any employees of Horry County) or appointed by public officials, and government-appointed board members may not, in turn, appoint any of the remaining board members, as evidenced by: By-laws Charter, OR Articles of Incorporation. |  |  |  |
| If the CHDO is sponsored or created by a for-profit entity, the for-profit entity may not appoint more than 1/3 of the membership of the CHDO’s governing body, and the board members appointed by the for-profit entity may not, in turn, appoint the remaining two-thirds of the board members, as evidenced by the CHDO’s: By-laws Charter, OR Articles of Incorporation.*NOTE: Only complete if CHDO is created by a for-profit entity.* |  |  |  |
| There is at least one Board member that resides in each of the organization’s proposed geographic service area(s), as evidenced by: \_\_\_\_\_\_ Completion of the Certification of Board Status Form |  |  |  |
| **Stability**There has been stability/continuity of board members over the last several years, as evidenced by: \_\_\_\_\_\_ Completion of the Certification of Board Status Form |  |  |  |
| **Development Oversight**The board has a committee structure or other means of overseeing planning & development, as evidence by: \_\_\_\_\_\_ Documentation of committee structures or other means of development oversight. |  |  |  |
| **Board Skills**Board members have professional skills directly related to housing development (ex: real estate, legal, architecture, finance, management), as evidenced by:  \_\_\_\_\_\_ Completion of the Certification of Board Status Form |  |  |  |
| **Decision-making**The board has the ability to make timely decisions, as evidenced by: \_\_\_\_\_\_\_ Board minutes from the previous six (6) months |  |  |  |
| **Sponsorship/Independence**  | **Citation** | **Compliant**  | **Deficient** |
| The CHDO is not controlled, nor receives directions from individuals or entities seeking profit from the organization, as evidenced by: \_\_\_\_\_\_\_ By-laws; OR \_\_\_\_\_\_\_ A Memorandum of Understanding |  |  |  |
| Is the CHDO sponsored or created by a for-profit entity? \_\_\_\_\_ yes \_\_\_\_\_ noIf yes, a CHDO may be sponsored or created by a for-profit entity; however, the for-profit entity’s primary purpose may not include the development or management of housing, as evidenced by**:** \_\_\_\_\_\_ By-laws, ANDIf sponsored or created by a for-profit entity, the CHDO is a separate secular entity, the CHDO is free to contract for goods and services from vendors(s) of its own choosing, as evidenced by: \_\_\_\_\_ By-laws, \_\_\_\_\_ Charter, OR \_\_\_\_\_ Articles of Incorporation |  |  |  |
| If sponsored by a religious organization, the CHDO is a separate secular entity from the religious organization with membership available to all persons regardless of religion or membership criteria, as evidenced by: By-laws Charter, OR Articles of Incorporation. |  |  |  |
| **Relationship and Service to the Community**  | **Citation** | **Compliant** | **Deficient** |
| The organization has a history of serving the community within which housing to be assisted with HOME funds is to be located, as evidenced by: \_\_\_\_\_ Statement signed by the Board President that details at least one year of experience in serving each community, OR \_\_\_\_\_ For newly created organizations formed by a local church, service, or community organization, a statement signed by the Board President that details that its parent organization has at least one year of experience in serving each community for which the Certification is sought. |  |  |  |
| The organization provides a formal process for low income program beneficiaries to advise the organization in decisions regarding design, sighting, development, and management of all HOME-assisted affordable housing projects, as evidenced by: \_\_\_\_\_\_ By-laws, OR \_\_\_\_\_\_ Resolutions, AND \_\_\_\_\_\_ A written statement of operating procedures approved  by the governing body. |  |  |  |
| **Needs**Current plans are well grounded in the understanding of current housing conditions, housing needs and need for supportive services, as evidenced by: \_\_\_\_\_ Narrative statement of any current plans with supporting analysis of the local housing market and housing needs of low-income households. |  |  |  |
| **Relations**The organization has a positive reputation and a strong relationship with the community, as evidenced by: \_\_\_\_\_ Supporting documentation  |  |  |  |
| **Financial Management & Capacities** | **Citation** | **Compliant**  | **Deficient** |
| Please submit your organization’s most recent year-to-date interim financial statement providing at a minimum:1. Statement of Revenues & Functional Expenses (P & L)
2. Statement of Net Assets (balance sheet), &
3. Statement of Cash Flows
 |  |  |  |
| No part of its net earnings inure to the benefit any member, founder, contributor, or individual, as evidenced by: \_\_\_\_\_\_ Charter \_\_\_\_\_\_ Articles of Incorporation |  |  |  |
| Please include a Financial Narrative and supporting documentation for the following: | **Citation** | **Compliant** | **Deficient** |
| **Audit**Does the organization have an annual audit? Is the most recent audit current? |  |  |  |
| **Audit Findings**Were there management or compliance findings in the last two years? Are findings resolved? |  |  |  |
| **Budgeting**Does the organization do annual budgeting of its operations and all activities or programs? Does it track and report budget versus actual income and expenses? |  |  |  |
| **Reporting**Does the organization do annual budgeting of its operations and all activities or programs? Does it track and report budget vs. actual income and expenses? |  |  |  |
| **Cash Flow Management** | **Citation** | **Compliant**  | **Deficient**  |
| Does the organization know its current cash position and maintain controls over expenditures? How regularly does it experience cash flow problems? |  |  |  |
| **Internal Controls**Does the organization have adequate internal controls to ensure separation of duties & safeguarding of corporate assets? Is there sufficient oversight of all financial activities? |  |  |  |
| **Procurement/ Conflict of Interest** Does the organization have a conflict of interest policy governing employees and development activities, particularly in procurement of contract services and the award of housing units for occupancy?   |  |  |  |
| **Insurance**Does the organization maintain adequate insurance – liability, fidelity bond, workers comp, property hazard, & project? |  |  |  |
| **Financial Stability**Does the current balance sheet and budget indicate sufficient funds to support essential operations?To what extent does the organization have a diversified and stable funding base for operations?What revenue sources are predictable year-to-year?Does the CHDO have an established fundraising program for both capital & operational needs? |  |  |  |
| **Portfolio Financial Condition**If the organization has a portfolio of properties, are they in stable physical and financial condition? Does it collect adequate management fees from the properties? |  |  |  |
| **Liquidity**Does the organization have liquid assets available to cover current expenses? Does it have funds available for predevelopment expenses or equity investments required for development? |  |  |  |
| **Development Capacity** | **Citation** | **Compliant**  | **Deficient** |
| The organization has demonstrated capacity for carrying out activities assisted with HOME funds, as evidenced by: \_\_\_\_\_ resumes and/ or statements that describe experience of key staff  members who have successfully completed projects similar to those to be assisted with HOME funds. Please use the attached Experience Certification Form, OR \_\_\_\_\_ Contract(s) with individuals who have housing experience similar to projects to be assisted with HOME funds to train appropriate key staff of the organization. The contract shall include a training plan and activities to be accomplished. Please include the Experience Certification Form and a copy of executed contract. *Only relevant for a CHDO in its first year of operations and if it is using the consultant to train staff.*  |  |  |  |
| Please include a Management Narrative and supporting documentation for the following: | **Citation** | **Compliant** | **Deficient** |
| **Portfolio**Does the organization’s portfolio of projects/properties evidence competent management and oversight? Do the properties have adequate funding? |  |  |  |
| **Previous Performance**Has the organization engaged in CHDO activities previously? Please list other HOME PJs that have certified your organization. |  |  |  |
| **Management Capacity**Does the current management have the ability to manage additional development activities? Does the organization have the capabilities to analyze alternative housing projects? |  |  |  |
| **Procedures**Are the corporate lines of authority for development activities clear? Are policies & procedures in place governing development activities? |  |  |  |
| **Project Management**Does the organization have procedures for monitoring the progress of the project? Does it have the capacity to monitor project level cash-flow and schedule?  |  |  |  |
| **Personnel**Does the organization have staff that are assigned responsibilities for housing development? Are personnel policies and job descriptions clear? |  |  |  |
| **Staff Skills**How strong are the following areas:1. Legal/financial aspects of housing development
2. Management of real estate development oversight of design & construction management
3. Marketing & intake
4. Property management (if applicable)
 |  |  |  |
| **Training**Are staff encouraged to obtain training and develop new skills? What is their potential for learning skills they currently do not have? |  |  |  |
| **Member Involvement**Is the organization’s membership active and in support of housing activities? |  |  |  |
| **Use of Consultants**To what extent does the CHDO have access and make use of qualified development consultants? How well do consultants interact with staff? Is consulting focused on staff training? |  |  |  |
| **Funding Access**Does the organization have funds available as equity in housing development projects? Does the organization have the ability to raise funds for the capital requirements of a project? How strong are relationships with funders of housing? With lenders? |  |  |  |
| **Housing as Primary Purpose** | **Citation** | **Compliant** | **Deficient** |
| Certification is available only to organizations whose primary purpose is to provide and develop affordable housing, as evidenced by:  \_\_\_\_\_ Copy of current fiscal year’s full operating budget categorized by  Program \_\_\_\_\_ Description of current planned affordable housing activities |  |  |  |

**ATTACHMENT A**

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION APPLICATION**

**Certification of Board Status**

Applicants must complete the following Certification of Board Status and submit as part of the CHDO certification package. Please list each board member by name, indicate the representation that person brings to the board. Please list only current or approved board members. Do not list prospective board members who have not been approved to join the board.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Board Member Name & Residential Address** | **Low-income** | **Public Institution** | **Religious Organization** | **For Profit** | **# Years on Board** | **Occupation and Place of Employment** | **Areas of Expertise/ Experience** |
|  |  |  |  |  |  |  |  |
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**ATTACHMENT B**

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION APPLICATION**

**Experience Assessment Form**

Attach signed copies for each staff whose experience should be considered for meeting the Development Experience/Capacity requirement. Attach one copy for each project. Resumes should be attached.

|  |  |
| --- | --- |
| Category | Description |
| Staff or Consultant Name |  |
| Mailing Address |  |
| Phone Number |  |
| Email |  |
| Project Name |  |
| Project Location |  |
| Project Type (Rental/homeowner/# of units, population served) |  |
| Date of Occupancy  |  |
| Source of Funds |  |
| Description of Role in Project |  |
| Project Reference (Name, Address, & Phone) |  |

**ATTACHMENT C**

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION APPLICATION**

**LMI Compliance Requirement Form**

Each board member representing the interest of low-income families in the Applicant’s target community must complete this certification. Please maintain a copy of this certification in your files and send a copy to Horry County Community Development.

**Board Member Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

I certify that I am a current member in good standing of the governing board for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (name of the applicant organization) and that I represent the interest of low-income families in the target community.

**Please check and complete the following:**

\_\_\_\_\_ I am a low income resident of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the applicant’s target community.

*In order to qualify under this criterion, the board member must be a low-income resident of a community that the CHDO is certified to serve. Low-income is defined as 80% or less of the area median family income.*

\_\_\_\_\_ I am a resident of a low-income neighborhood in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the applicant’s target community.

*In order to qualify under this criterion, the board member must live in a low-income neighborhood where 51% or more of the residents are low-income. The board member does not have to be low-income. Neighborhood means geographic location designated in comprehensive plans, ordinances, or other local documents as a neighborhood, village, or similar geographical designation that is within the boundary but does not encompass the entire area of a local unit of government.*

\_\_\_\_\_ I am an elected representative of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (insert name of neighborhood organization), a low-income neighborhood organization within \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the applicant’s target community.

*In order to qualify under this criterion, the board member must be elected by a low-income neighborhood organization to serve on the CHDO Board. The organization must be composed primarily of residents of the low-income neighborhood and its primary purpose must be to serve the interests of the neighborhood residents. Such organizations might include block groups, neighborhood associations, and neighborhood watch groups.*

*The group must be a neighborhood organization and IT MAY NOT BE THE CHDO ITSELF. If the board member is qualified under this criterion, please attach a copy of the signed resolution from the organization naming the individual as their representative on the CHDO board.*

**Board Member Signature** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**ATTACHMENT D**

**HORRY COUNTY HOME CONSORTIUM**

**CHDO CERTIFICATION APPLICATION**

**Conflict of Interests Form**

All board members will be required to complete the "Conflict of Interests" statement. This policy should be submitted as a part of the application and each form submitted as a part of Attachment S-2 in the application.

I have read and am familiar with the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ board policy concerning conflict of interests, and I have initialed the line opposite the appropriate paragraph below.

\_\_\_\_\_\_ During the past year, neither I, nor to the best of my knowledge, any member of my family has had an interest or taken any action which would contravene the policy of this board.

\_\_\_\_\_\_ During the past year, neither I, nor to the best of my knowledge, any member of my family has had an interest or taken any action which would contravene the policy of this board, except such interest or action fully disclosed below:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Board Member Name** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Board Member Signature** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_