

## OFFICE OF JOB TRAINING PROGRAMS JEFFERSON/FRANKLIN COUNTIES, INC

### CONFLICT OF INTEREST POLICY

Referencing Workforce Innovation and Opportunity Act, Section 188, Department of Labor Employment & Training Administration requires the Chief Elected Officials, and the Local Workforce Development Board of Jefferson and Franklin Counties adopt a Code of Conduct. The Chief Elected Officials and the Local Workforce Development Board, in carrying out this code, has adopted the following resolution:

1. Each subrecipient shall ensure that no individual in a decision-making capacity including WDB members (whether compensated or not) shall engage in any activity, including participation in the selection, award, or administration of a contract supported by WIOA funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

- a) The individual,
- b) Any member of the individual's immediate family,
- c) The individual's partner, or
- d) An organization which employs, or is about to employ, any of the above has a financial or other interest in the firm or organization selected for award.

2. The officers, employees, or agents of the agency making the award will neither solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements. States and subrecipients may set minimum rules where the financial interest is not substantial, or the gift is an unsolicited item of nominal intrinsic value.

3. WDB conflict of interest:

- a) A WDB member shall not cast a vote on, nor participate in, any decision-making capacity on the provision of services by such member (or any organization which that member directly represents), nor on any matter which would provide any direct financial benefit to that member.
- b) Neither membership on the WDB nor the receipt of WIOA funds to provide training and related services shall be construed, by themselves, to violate provisions of the Act training and related services shall be construed, by themselves, to violate provisions of the Act.

4. To the extent permitted by State or local law or regulation, such standards of conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the awarding agency's officers, employees, or agents, or by contractors or their agents.