WORKFORCE INNOVATION AND OPPORTUNITY ACT

Conflict of Interest Policy

IMPORTANT! This document contains **important information** about your rights, responsibilities, and/or benefits. It is critical that you understand the information in this document, and we will provide the information in your preferred language at no cost to you. **Call Lafonda Colbert (580) 357-3500** for assistance in the translation and understanding of the information in this document.

¡IMPORTANTE! Este documento contiene **información importante** sobre sus derechos, responsabilidades y/o beneficios. Es importante que usted entienda la información en este documento. Nosotros le podemos ofrecer la información en el idioma de su preferencia sin costo alguno para usted. **Llame al Lafonda Colbert (580) 357-3500** para pedir asistencia en traducir y entender la información en este documento.

Telephone Relay Service is available by dialing 711 or 800-722-0353

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients and sub-recipients/subgrantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

South Central Oklahoma Workforce Board's Workforce Innovation and Opportunity Act Title I program funding statement can be found at https://scowib.info/funding

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area
Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area
Jefferson County, Stephens County, and City of Duncan Labor Market Area

CONFLICT OF INTEREST POLICY

PURPOSE: SCOWB is committed to guarding against problems arising from real, perceived, or potential conflicts of interest. This policy serves as guidance to ensure that WIOA title I workforce development activities are conducted in a manner to prevent conflict of interest in accordance with WSD #36-2024.

BACKGROUND: Grantees, sub-recipients, and contractors funded under WIOA must implement conflict of interest policies and procedures as stipulated in the WIOA law, Code of Federal Regulations and guidance, Office of Management and Budget (OMB) Circulars, State regulations, and State WIOA policies.

DEFINITION:
Firewall: an established policy or procedure that acts as a barrier or protection against an undesirable influence, outcome, or authority. Examples of firewalls include but are not limited to organizational arrangements that provide a clear separation of duties and responsibilities, including confidentiality and disclosure agreements.

POLICY: A conflict of interest policy is required to ensure that those entrusted with public funds will not personally or professionally benefit from the award, administration, or expenditure of public funds.

Safeguards must be in place, ensuring that stewards of the programs and all those served in the programs are not only eligible and suitable but also protected from being part of the perception of impropriety, and conflict of interest.

A local organization that has been selected to perform more than one role including fiscal agent, one-stop operator, and a direct provider of services must develop a written agreement with SCOWB and the Chief Local Elected Official (CLEO) to clarify how the organization will carry out its responsibilities. The agreement must include the terms that demonstrate compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, the organization's conflict of interest policies, and the State's conflict of interest policy.

The State's Conflict of Interest Requirements are as follows:

- Each grant recipient and sub-recipient must maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and sub-grants.

- As specified in 20 CFR § 678.610(c) and in conformity with 20 CFR § 679.430 for demonstrating internal controls and preventing a conflict of interest, the written roles and responsibilities and standards of conduct must include a description of the firewalls used to mitigate conflict of interest in circumstances including, but not limited to, situations where the entity acts in more than one role in the one-stop delivery system or

performs more than one function in the procurement process as well as situations in which the non-Federal entity uses a sole source selection.

- No individual in a decision-making capacity shall engage in any activity if a conflict of interest (real, implied, apparent, or potential) is involved. This includes decisions involving the selection, award, or administration of a sub grant or contract supported by the Workforce Innovation and Opportunity Act (WIOA) or any other federal funds.

- A SCOWB member or a member of a SCOWB committee cannot cast a vote or participate in any decision-making about providing services by such member (or by any organization that member directly represents) or on any matter that would provide any direct financial benefit to the member, the member's organization or a family member.

- Before any public discussions regarding the release of a Request for Proposal or any matter regarding the release of funding or the provision of services, a SCOWB member or a member of a SCOWB committee must disclose any real, implied, apparent, or potential conflicts of interest before engaging in the discussion. The minutes of the meeting should reflect the disclosure.

- SCOWB members or a member of a SCOWB committee or agents of the agencies making awards cannot solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.

ACTION REQUIRED: SCOWB will disseminate the Conflict of Interest Policy to all SCOWB contractors, staff, and board members. All contractors, staff, and board members will be responsible for following this policy.

SCOWB APPROVED DATE: 1/19/2024

I, _____have reviewed the South Central Oklahoma Workforce Board Conflict of Interest Policy.

_____ **_____**

Signature **Date**