WORKFORCE INNOVATION AND OPPORTUNITY ACT

One-Stop Operator Conflict of Interest Policy

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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

Equal Opportunity Programs/Employer
Auxiliary aids and services available upon request for individuals with disabilities.
South Central Oklahoma Workforce Board's Workforce Innovation and Opportunity Act Title I program funding statement can be found at https://scowib.info/funding

OKLAHOMA WORKS
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ONE-STOP OPERATOR CONFLICT OF INTEREST POLICY

PURPOSE: To establish a written Conflict of Interest — One Stop Operator Policy that complies with Oklahoma State and Federal regulations for the Workforce Innovation and Opportunity Act (WIOA) Title I One-Stop Operator, Adult, Dislocated Worker, and Youth Programs:

AUTHORITY: This Conflict of Interest — One-Stop Operator complies with the following State and Federal Regulations

- WIOA CFR 20 679.430
- Relevant Office of Management and Budget (OMB) circulars
- Uniform Guidance
- State of Oklahoma Conflict of Interest Policy

POLICY: The One Stop Operator demonstrates compliance with WIOA CFR 29 679.430 as outlined below in the delegation and separation of duties to ensure there is no conflict of interest, risk management, or oversight. The statements below further clarify how the One-Stop Operator will serve in multiple functions and outlines the internal controls to prevent conflict of interest as follows:

At a minimum, the one-stop operator must coordinate the service delivery of required one-stop partners and service providers. The geographical coverage area for the South-Central Workforce Board is comprised of eight counties with three Centers located in Lawton, Duncan, and Chickasha.

The local board may establish additional roles of the one-stop operator, including, but not limited to:

- Coordinating service providers within the Center and across the one-stop system;
- Being the primary provider of services within the Center;
- Providing some of the services within the Center; or
- Coordinating service delivery in a Multi-Center area;

The One-Stop Operator coordinates, facilitates, promotes, designs, and expedites services for the workforce boards in designated Workforce Centers. The scope of operations involves the delivery of the full array of Workforce Innovation and Opportunity Act (WIOA) services, including WIOA-mandated and non-mandated partner organizations to all interested job seekers and employers in the Workforce Centers. In addition, the One-Stop Operator provides management and oversight of the partnership of agencies that complies with the Workforce Center system. The primary goal of the Operator is to create a seamless system of partners among workforce development, economic development, business, and community agencies in order to meet the needs of employers and job seekers in the South-Central region. The Operator will oversee the development of a workforce that meets the employers' needs in the region. The One-Stop Operator will work closely with workforce board staff to effectively implement an integrated system for employers and job seekers. The Operator shall insure that Oklahoma Works partners, on an ongoing basis, deliver quality and timely career services;

- The Operator shall insure that Oklahoma Works partners, on an ongoing basis, deliver quality and timely career services;
- The Operator shall provide information and access to training services, including serving as the point of access to training services for participants under WIOA;
- The Operator shall provide access to labor market data, information, and analysis, and all job search, placement, recruitment, and other labor exchange services authorized by Wagner-Peyser services are mandated to co-locate within the Oklahoma Works Centers; and
- The Operator shall ensure that all Center services and outreach materials are Americans with Disabilities Act (ADA) and Equal Opportunity Employment Act (EOE) compliant.
- The Operator will work in close partnership with board staff to provide guidance and leadership in the Oklahoma Works system to achieve the following outcomes:
    - Deliver a high-quality, consistent set of services to job seekers and employer customers.
    - Ensure a mixture of services that allows the system to serve a diverse customer base.
    - Coordinate services and funding to support customer access to and success in postsecondary education.
    - Support job seekers and workers progress toward economic self-sufficiency.
    - Promote business and industry sector and employer-driven skill development strategies.
    - Maintain and consistently improve the integration of services and service providers within Oklahoma Works.
    - Ensure high levels of accountability, cost-efficiency, and innovation to maximize resources and customer satisfaction.

The Operator is responsible for implementing and managing the Oklahoma Works system under policies and guidelines established by the Workforce Boards, the State, and the Department of Labor. Under this component, the Operator is responsible for coordinating with the Workforce Boards to ensure system-wide standards are achieved and to utilize continuous quality improvement assessment tools to document positive change and to systemize standards and their usage across the system.

The Operator is responsible for promoting and facilitating the integration of service delivery in the Oklahoma Works system. Examples of services to be provided under this component include:

- Work with Workforce Board staff to manage resource sharing and allocation in Oklahoma Works sites;
- Management of universal core services;
- Coordinating with the state on local rapid response teams and activities;
- Supporting system communications;
- Coordinating staff competency training.

The Operator must coordinate services to employers and develop strategies to improve and increase services to employers based on best practices, including but not limited to:

- Providing quality services to businesses;
- Identifying and integrating business services best practices into Oklahoma Works;
- Coordinating events based on local labor market needs and job seeker assessments;
- Participating in statewide planning activities related to business services.

One-Stop Operator Prohibited Duties

- Convene system stakeholders to help develop the local plan or prepare and submit local plans (as required under sec. 107 of WIOA);
- Be responsible for oversight of itself;
- Manage or significantly participate in the competitive selection process for one-stop operators;
- Select or terminate one-stop operators, career services, and youth providers;
- Negotiate local performance accountability measures; or
- Develop and submit the local WDB budget for activities of the Local WDB in the local area.
- Directly or indirectly involved in the financials of the WDB/State contract.

ACTION REQUIRED: SCOWB will disseminate the One-Stop Operator 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.

ATTACHMENTS:

Attachment A- One-Stop Operator Rules and Responsibilities

APPROVED: 1/12/2016

ONE-STOP OPERATOR RULES AND RESPONSIBILITIES

OVERSITE AND STRUCTURE
The One-Stop Operator will attach their company organizational chart to show separation.

FISCAL/ PROGRAMMATIC RISK
The One-Stop Operator will not have any responsibility for fiscal activity regarding the service of the one-stop customers. The One-Stop Operator will not have any responsibility for oversight of itself. The program will be monitored in accordance with One Stop Operators' Quality and Assurance policy.

SUMMARY OF THE SOUTH-CENTRAL OKLAHOMA WORKFORCE BOARDS ONE-STOP OPERATOR'S ROLE *(See Conflict of Interest Policy)*

Program and Training Services
Ensure compliance with WIOA, WIOA regulations, state and local policies, and the U. S. Department of Labor Statement 29 CFR 38 Implementation of Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act; Final Rule.

Community/ Partner Relations
Establish and maintain key relationships with workforce system partners.

Business Services
Develop, offer, and deliver quality business services that assist specific businesses and industry sectors in overcoming the challenges of recruiting, retaining, and developing talent for the regional economy.

Jobseeker Services
Ensure job-seeking customers are served through an integrated, seamless process related to the various services/functions offered in order to reduce duplication of resources, minimize the number of contacts, and streamline processes.

Youth Services
Ensure delivery of services in a creative, flexible, effective, age and culturally-appropriate manner for youth that is compliant with the 14 Elements of the WIOA Youth program.

In the event of a conflict between such laws and regulations and the terms of this agreement, precedence will be given to the laws and regulations.

I have received a copy of the South Central Oklahoma Workforce Board One-Stop Operator's Conflict of Interest Policy and agree to the procedures listed above.

_____ _____

One Stop Operator Signature Date