

Local Workforce Area #10 Policy 10-03.01
on
Serving Immediate Family Members, Close Acquaintances and Other Stakeholders
in WIOA Training Programs

Purpose: The purpose of this policy is to outline requirements and procedures that ensure all individuals enrolled in the Workforce Innovation and Opportunity Act (WIOA) program have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest.

Background: The WIOA program, while not an entitlement, should be accessible to any individual who is eligible and suitable for services available in the local area, subject to local workforce development board (WDB) policies and procedures. However, when applicants have a close relationship to the WIOA staff, management, and other specific stakeholders of the workforce development system, attention must be given to ensure access to program services is not based upon this relationship or political influence. It is possible that even without an intention to misuse WIOA funds, the decision to enroll an individual in the program could be perceived as improper and cause potential non-compliance with state and/or federal law.

Action: The following procedure will be used when determining eligibility for training services:

1. All customers interested in WIOA training Services must complete a WIOA Intake Form. The WIOA Intake form asks the individual to disclose if a relationship exists with any of the following parties/stakeholders of the workforce development board system: identify if he/she is related to, or is a close acquaintance of: a WDB executive staff member or supervisor, WIOA employee, WDB member, WDB committee and/or subcommittee member, OhioMeansJobs Center partner, WIOA sub-recipient and/or contractor, local elected official, county employee, and other community stakeholders.
2. The form is forwarded to the WIOA/OhioMeansJobs Supervisor or an Administrator for review and to be forwarded as appropriate for the third party review.

Conflict of Interest Assurance Process:

- If the applicant has identified a relationship with one of the above mentioned parties/stakeholders, the intake is routed to a confidential case worker to be processed.
- Processed cases will then be referred to Ashland County or Marion County for eligibility and suitability review, and returned to Local Area #10 to provide services.
- Training and supportive service decisions are made following local policy and will be signed off on by the Local Area #10 WDB Director or designee.
- Individuals subject to this policy are tracked by the WIOA Supervisor on an Excel spread sheet.
- The Local Area #10 WDB Director or designee will monitor compliance with this policy by reviewing the hard copy case and OWCMS record on a semi-annual basis. This will be included in the local area monitoring reports submitted to the Office of Workforce Development.

Continuing Ethics Training

WIOA Area staff members attend yearly ethics training.

Effective Date: Immediately (07.19.11)

Rescinds Local Area #10 Policy Letter 07.03 Internal Control

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