

Workforce Development Board of Western Missouri, Inc.

Conflict of Interest Statement

A conflict of interest statement is required in order to ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds. This statement is established to provide direction for sub-recipients, contractors, staff and board members of the Workforce Development Board of Western Missouri, Inc. in order that business will be conducted within the guidelines that prevent actual, potential, or questionable conflicts of interest.

No individual shall participate in the selection, award, or administration of a contract supported by any funds where a real or apparent conflict of interest would be involved. Such a conflict would arise when the individual, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other gainful interest in the firm selected for an award. The individual shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements. However, the WDB may set standards for situations in which the gift is an unsolicited item of nominal value and can be shared by the members of the organization as a whole.

Each sub-recipient shall maintain a written code of conduct governing the performance or person engaged in the award and administration of WDB contracts.

Each sub-recipient shall ensure that no person in decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a contract supported by WDB funds if a conflict of interest, real, implied or apparent, would be involved.

An individual of the WDB shall not cast a vote, nor participate in any decision -making capacity on the provision of services by such individual (or any organization which that individual directly represents), nor any matter which would provide any direct financial benefit to the individual, to the individual's immediate family, or to the individual's organization.

Individuals shall not use, for their own private gain, for gain of others, or for other than officially designated purposes, any information obtained as a result of their relationship with the WDB.

Membership on the WDB Board, or being a recipient of WIOA funds to provide training or other services, is not by itself a violation of conflict of interest provisions of WIOA or corresponding regulations. Unless and until a situation arises where there is a conflict of interest. For example, under circumstances where a board member's organization through which s/he volunteers or serves stands to benefit, the board member will recuse him/herself from discussion and decision making.

References:

- WIOA Public Law 113-128 Section 101(f) – State Board Conflict of Interest
- WIOA Public Law 113-128 Section 102(b)(2)(E) – State Plan Conflict of Interest Assurance
- WIOA Public Law 113-128 Section 107(h) – Local Board Conflict of Interest
- WIOA Public Law 113-128 Section 121(d)(4) – One-Stop Operators
- WIOA Proposed 20CFR 697-430
- WIOA Proposed 679.130(f)(1) through (3) – State board must use criteria to certify One Stops to avoid inherent conflict of interest
- WIOA Proposed 20 CFR 679.410 (a)(3) and (3) – Local board must avoid inherent conflict of interest
- WIOA Proposed 20 CFR 679.430 – Entities performing multiple functions
- WIOA Proposed 20 CFR 683.200©(5) – Administrative Rules, Costs, Limitations – Title I WIOA and Wagner-Peyser
- 29 CFR 97.36(3)
- 2 CFR 899 Part 200 and Part 2900 – Office of Management and Budget Uniform Guidance on administrative, cost, and audit provisions for federal grants
- Revised Code of Washington (RCW) 42.20.070 – Misappropriation and falsification of accounts by a public officer
- RCW 42.20.080 – Other violations by officers
- RCW 42.52.160 - Use of persons, money or property for private gain
- Employment Security Department WIOA Policy #5405 Conflict of Interest

