



CENTRAL REGION

**Workforce Innovation and Opportunity Act (WIOA) Administrative Policy #205**

**Subject: Conflict of Interest for Contractors and Sub-Contractors**

**Date of Issuance: January 8, 2019**

**I. Policy Statement:**

The One Stop Operator, Adult, Dislocated Worker and Youth Service Provider(s) and/or sub-contractor of the operator and/or provider, hereinafter referred to as "Contractor," hereby agrees that in administering Central Virginia Workforce Development Board (CVWDB) grants, along with all of its employees, will comply with the standards of conduct, hereinafter specified, form maintaining the integrity of CVWDB programming and avoiding any conflict of interest in its administration.

**II. Conflict of Interest Provisions:**

- A. General Provisions: Every reasonable course of action will be taken by the Contractor in order to maintain the integrity of this expenditure of public funds and to avoid any favoritism or questionable or improper conduct.

The CVWDB funded grant will be administered in an impartial manner, free from personal, financial or political gain.

The Contractor and its staff, in administering the CVWDB funded grant, will avoid situations which give rise to a suggestion that any decision was influenced by prejudice, bias, special interest and/or personal gain. Contractors will be particularly aware of the varying degrees of influence that may arise in administering the grant and will exercise due diligence to avoid situations which may give rise to an assertion that favorable treatment is being granted.

- B. Conducting Business Involving Relatives: Immediate family of the Contractor will not receive favorable treatment for enrollment into services provided or employment with the Contractor. The Contractor also will avoid entering into any agreements for services with immediate family.

When it is in the public interest for the Contractor to conduct business (only for the purpose of services to be provided) with a relative, the Contractor will obtain approval from the CVWDB

before entering into an agreement. All correspondence will be kept on file and available for monitoring and audit reviews.

- C. Avoidance of Conflict of Economic Interest: An executive or employee of the Contractor will not solicit or accept money or any other consideration from a third person or entity for the performance of an act reimbursed in whole or in part by the Contractor. Supplies, materials, equipment or services purchased with CVWDB grant funds will be used solely for purposes allowed under the grant.

**III. Consequences:**

Any contract, transaction or business conducted by the Contractor in violation of this policy or related applicable federal and/or state law and regulation is subject to recession by the CVWDB in addition to any other fines or penalty that may be imposed or required by law.

In the event a contract or transaction is rescinded or invalidated, compensation or payment due to CVWDB or the Contractor shall be determined in accordance with applicable law.

**Definitions:**

Family member means (1) a relative related by either blood, marriage or adoption and (2) any other person residing in the same household as the member, who is a dependent of the member or of whom the member is a dependent.

Dependent means any person, whether or not related by blood or marriage, which receives from the member, or provides to the member, more than one-half of his financial support.

**Conflict of Interest for Contractor/Subcontractor Staff Signature Form**

**Print Name of Employee:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Print Title of Employee:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Reviewed by Signature of Contracted Employee:**

\_\_\_\_\_ **Date:** \_\_\_\_\_

**Reviewed by CVWDB Executive Director or Board Chair:**

\_\_\_\_\_ **Date:** \_\_\_\_\_