



Vermilion County Workforce Innovation Board Conflict of Interest Policy

Subject

Conflict of Interest Policy under Workforce Innovation and Opportunity Act (WIOA) government WIOA Program Operators, American Job Centers, Local Workforce Innovation Board/Chief Local Elected Officials, and other elected officials (WIOA Section 107(h)).

Purpose

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 policy is established to provide direction for subrecipients, contractors, staff and board members of the Vermilion County's Local Workforce Innovation Board in order that business can be conducted within guidelines that will prevent actual, potential, or questionable conflicts of interest.

Providing Services to Participants Funded under the WIOA Program

The WIOA Program is not an entitlement program. Still, it should be accessible to any individual who is eligible and suitable for available services subject to VCWIB policies and procedures. However, when applicants have a close relationship with WIOA staff members, management, and other stakeholders in the Workforce Development System, access to program services should not be based on such relationships or based on political influence. It is possible that, even without any intention to misuse WIOA funds, that a decision to enroll an individual in the program could be perceived as improper. Such a perception could cause non-compliance with state and/or federal law.

Funding Integrity

The CEO and VCWIB, DACC, and administrative officials must help meet the objectives of WIOA through effective policies, procedures, and safeguards that ensure the integrity of these public funds. Throughout the local area, safeguards must be in place, ensuring that all those served in the program are not only eligible and suitable but also detached from being part of the perception of impropriety or conflict of interest.

Duties of VCWIB members

A local member may not cast votes or participate in any decision making about providing services by such member (or by any organization which that member directly represents). A local member may not cast votes or participate in any decision making on any matter that would provide any direct financial benefit to that member or to that member's organization.

The board must ensure that its members or its administrative staff members do not directly control the daily activities of its workforce service providers, its workforce system partners, or its contractors.

Effective Date: February 27, 2018

Duration: Indefinite

Jeff Fauver, Chairman of VCWIB