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POLICY # 44

Title:	Serving Immediate Family Members, Close Acquaintances and Other Stakeholders	
Program:	Workforce Innovation and Opportunity Act	
Effective:	December 16, 2020	
Revision #:		Original policy date: December 16, 2020

Subject: Policy for Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in the Workforce Innovation and Opportunity Act program

Purpose: To set forth the necessary guidelines and implementation steps for the avoidance of a conflict of interest or the appearance of a conflict of interest by the Region 4 Workforce Development Board (WDBMOV) staff in their official dealings with immediate family, close family members, agency employees' family, elected officials, WDB members, one-stop and WIOA stakeholders. This will ensure all individuals enrolled in the 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: Although WIOA is not an entitlement program, access to needed services by eligible and suitable individuals is essential in order to fulfill the goals and objectives of the legislation. Local elected officials, workforce development boards, designated fiscal agents, and administrative entities meet these objectives through effective policies, procedures, and safeguards that ensure the integrity of these public funds. Safeguards must be in place throughout the State that ensure all individuals served in the program are not only eligible and suitable, but also served in a manner that is free from the perception of any impropriety or conflict of interest.

Action: WDBMOV personnel will avoid a conflict of interest or the appearance of a conflict of interest in conducting their official duties. In no instance shall any person determine eligibility, assess, or directly serve a member of his or her immediate family member or an individual with whom a close personal relationship exists. Likewise, stakeholders identified in this issuance shall not use his or her position to influence a decision to enroll an individual in the WIOA program.

- A. Prior to enrollment in WIOA, case managers will ask all potential WIOA enrollees by questionnaire, whether they have a close relationship with WIOA staff or management, agency employees or other one-stop stakeholders (including WDB members, one stop partners, youth council members, contractors, local elected officials).
- B. Should a potential enrollee disclose a close personal relationship with any of these, this fact will be brought to the attention of the contracted WIOA Program Manager by the WIOA case manager. This information will be entered into the enrollee's case file.

- C. All WDBMOV staff, management, and stakeholders have a duty to inform the contracted WIOA Program Manager when a person with whom they have a close personal relationship is applying for services. This information is to be communicated by the involved staff member or stakeholder in writing to the contracted WIOA Program Manager. The staff member or stakeholder will remove themselves from any involvement in the case and the contracted WIOA Program Manager will ensure that the case will be reassigned to another WIOA case manager.
- D. The contracted WIOA Program Manager will remove the staff member from any assignment involving the customer and will ensure that the customer is assigned to a staff member having no potential conflict of interest. Decisions related to approval of training, supportive services, or other service needs must be made by staff having no potential conflict of interest.
- E. If the contracted WIOA Program Manager is absent or is the subject of the potential conflict of interest, then this responsibility will lie with the Director of the WDBMOV. This process will go up the chain of command as needed to eliminate the potential conflict of interest, and in all cases the action will be noted in the customer's case file.
- F. The contracted WIOA Program Manager will maintain a list of all WIOA customers subject to this policy and will make this list available to WorkForce West Virginia monitors and auditors at the onset of all monitoring visits.
- G. This policy will be distributed to all one-stop staff and partners and will be made available to all interested parties. The WIOA case managers, supervisors and all other related one-stop staff and partners will be trained on this policy.

Definitions:

Close Family Member: Includes parents, children, siblings, spouses and domestic partners.

Immediate Family: Consists of the individual's parents (including stepparents), spouse, domestic partner, children (including stepchildren), foster children, siblings, grandchildren, grandparents, and any relatives by marriage (an 'in-law').

Stakeholders: Individuals not related to WIOA agency staff or management, that have direct or indirect management or responsibility for managing the WIOA workforce system, including managers, supervisors, local elected officials, contractors, WDB and Youth Council members, WDBMOV employees, and one-stop partners.

On the job policy, and contract states the below:

“immediate family” includes a spouse, child, son-in-law, daughter-in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, step-parent, step-child, grandparent, and grandchild”

Expiration Date: This policy shall be in effect until revised or canceled by the Workforce Development Board Mid-Ohio Valley.