



Policy Memorandum #18:

To: All Mid-Carolina Service Providers

From: Matthew Fowler, Executive Director

Subject: Compliance with Ethical Standards in WIOA Training Programs (Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders)

Purpose:

This policy delineates precise requirements and procedures to ensure the ethical and conflict-free enrollment, assessment, and service provision for all individuals participating in the Workforce Innovation and Opportunity Act (WIOA) program.

Background:

Local Workforce Development Boards (WDBs) and NCWorks Career Center staff are mandated to adhere meticulously to federal, state, and local conflict of interest requirements while delivering services funded by WIOA resources. Maintaining the highest standards of ethical conduct is imperative to prevent issues arising from actual, perceived, or potential conflicts of interest.

Policy:

While the WIOA program is not entitlement-based, accessibility to eligible individuals is paramount. In cases where applicants have close relationships with WIOA staff, management, or other stakeholders, careful attention must be paid to ensure program service access is not influenced by these relationships or political ties. Even in the absence of intentional misuse of WIOA funds, enrollment decisions may be perceived as improper, potentially leading to non-compliance with state and/or federal law.

General authorization for funding participants must adhere to conduct standards, emphasizing program integrity and the prevention of conflicts of interest. CLEOs, WDBs, fiscal agents, and administrative officials are tasked with implementing policies, procedures, and safeguards to uphold the integrity of public funds. Safeguards are crucial to ensure that all program participants are not only eligible and suitable but also insulated from any perception of impropriety or conflict of interest.

In cases where a service provider/contractor is related to a potential or enrolled WIOA participant, WDB staff member, or officer, stringent firewalls must be implemented. These firewalls ensure that staff



members/officers with relationships to participants do not directly serve, monitor, supervise, or provide oversight. Identifying alternate staff members/officers is essential to assume relevant responsibilities.

All local WDB members, WIOA service providers, and Career Center staff must sign and attest to the Mid-Carolina Code of Conduct (Reference Policy #17 - Conflict of Interest Requirements for Workforce Development Boards and Staff).

Attachment: Procedure for Identifying and Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in WIOA Training Program

Creation Date:

December 2023

Revision Date

January 2024



Policy #18: Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in WIOA Training Programs
Attachment A

Procedure for Identifying and Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in WIOA Training Programs

1. All customers interested in WIOA training services must be asked, during the intake process, to disclose if a relationship exists with any parties/stakeholders of the Mid-Carolina Regional Workforce Development system to include local elected officials, Workforce Development Board (WDB) members, WDB committee and/or subcommittee members, WDB staff members, NCWorks Career Center/WIOA employees (to include WIOA service providers and/or contractors), Career Center partners, Mid-Carolina Regional Council employees, and other community stakeholders.
2. If the customer has identified a relationship with one of the aforementioned parties/stakeholders, after eligibility and suitability is determined, the intake is routed to the Mid-Carolina Workforce Development Director for review and approval. If the relationship exists with the Mid-Carolina Workforce Development Director, the intake is routed to the Executive Director of the Mid-Carolina Regional Council for review and approval. The reported relationship must be documented in case notes; applicable approval decisions must also be documented in case notes and supporting documentation of approval uploaded into NCWorks.
3. Training and supportive service decisions are made following local policy. All individual cases determined to have an existing relationship with one of the aforementioned parties/stakeholders may be included in any and all programmatic and financial reviews/monitoring. This includes the annual programmatic and financial monitoring conducted by the North Carolina Department of Workforce Solution