



<b>Title:</b> Conflict of Interest	<b>Policy #</b> 28
<b>Effective Date:</b> 10/22/2019	<b>Revised Date:</b> 10/22/2019

**Purpose:**

To ensure staff & members of the Piedmont Workforce Development Board (PWDB) and WIOA Title I providers of Adult, Dislocated Worker, Youth and One-Stop Operator programs (“employees”) as well as all sub-grantees and contractors will comply with the standards of conduct, hereinafter specified, for maintaining the integrity of PWDB programming and avoiding any conflict of interest. Hereinafter, all staff & members referenced above will be referred to as “employees” for the purpose of this policy.

**References:**

- 2 CFR 200.318 (c)(1)
- 2 CFR 200.112

**Code of Virginia Title 2.2, Subtitle I, Part E, Chapter 31, Article 1 State and Local Government Conflict of Interests Act**

**Definitions:**

**Immediate family** means (1) a spouse and (2) any other person residing in the same household who is a dependent, or as such definition may be amended from time to time by applicable federal and/or state law and regulation.

**Dependent** means any person, whether or not related by blood or marriage, who receives from or provides to the employee more than one-half of his/her financial support.

**Policy:**

Every reasonable course of action will be taken to maintain the integrity of the expenditure of public funds and to avoid any favoritism or questionable or improper conduct. Funds received by the PWDB will be awarded in an impartial manner, free from personal, financial, or political gain. Employees will avoid situations which give rise to a suggestion that any decision was influenced by prejudice, bias, special interest and/or personal gain. Employees will be particularly aware of the varying degrees of influence that may arise and will exercise due diligence to avoid situations which may give rise to an assertion that favorable treatment is being granted. Employees will follow standards and regulations as specified in the Code of Virginia State and Local Government Conflict of Interests Act.

No individual in a decision-making capacity shall engage in any activity if a conflict of interest (real, implied, apparent or potential) is involved. This includes decisions involving the selection, award or administrative of a sub grant or contract supported with WIOA funds. Furthermore, One Stop Operators must disclose any potential conflicts of interest arising from relationships with training providers and other service providers.

Immediate family of employees will not receive favorable treatment for enrollment into services provided or employment with the PWDB or a PWDB funded contractor. Employees also will avoid entering into any agreements for services with immediate family.



When it is in the public interest for employees to conduct business (only for the purpose of services to be provided) with a relative, the employees will obtain approval from the PWDB and VCW-Piedmont Council before entering into an agreement. All correspondence will be kept on file and available for monitoring and audit reviews.

Employees will not solicit or accept money or any other consideration from a third person or entity for the performance of an act reimbursed. Supplies, materials, equipment, or services purchased with funds allocated to the PWDB will be used solely for purposes of the organization.

Any contract, transaction or business conducted by employees in violation of this policy or related applicable federal and/or state law and regulation is subject to dismissal by the PWDB and/or VCW-Piedmont Council in addition to any other fines. In the event a contract or transaction is rescinded or invalidated, compensation or payment due to PWDB, VCW-Piedmont Council and/or the Contractor shall be determined in accordance with applicable law.

All PWDB Staff, Board and Council members, and local staff of the WIOA Title I Programs and One-Stop Operator Contractor will complete the Conflict of Interest form. The forms will be updated annually & kept on file at the PWDB office and retained for a period of 5 years.

**Related Forms:**

Conflict of Interest Form



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**Piedmont Workforce Development Board (PWDB)  
Program Year (PY) 20xx Conflict of Interest Disclosure/Statement of Economic Interest**

Members of the Piedmont Workforce Development Board (“Board”) shall disclose any real or apparent Conflict of Interest, whether individual or organizational per the Workforce Innovation and Opportunity Act (WIOA) Section 107(h). Board members who have a conflict of interest (see below), that may have an impact on Piedmont Workforce Development Board’s business or policy shall immediately reveal conflicts of interest and potential or perceived conflicts of interest to the Chair(s) of the Board, and shall withdraw from making any decisions or voting on any issues involving Piedmont Workforce Development Board’s business or policy when confronted with a conflict of interest concerning the matter at issue in the decision or vote.

***All members of either the Board or standing committee must yearly submit to PWDB either a completed copy of this Statement or a copy of the Commonwealth of Virginia Statement of Economic Interests (Form #10.01.01)***

A Board member or standing committee member may not -

1. Vote on a matter under consideration by the PWDB
  - a) Regarding the provision of services by such member (or by an entity that such member represents); or
  - b) That would provide direct financial benefit to such member or the immediate family of such member; or
  
2. Engage in any other activity determined by the State to constitute a conflict of interest as specified in the State plan.

**Conflict of Interest Disclosure Statement**

     ***I have no conflicts of interest in relation to the above definitions.***

     ***I have a conflict of interest, as described below, in relation to the above definitions.***

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**Statement of Economic Interest**

List all businesses, organizations, boards, or other groups with which you and/or members of your immediate family are affiliated with or have any economic interest in (i.e. employer, corporate officer, board member, stockholder, member, etc.) that are currently involved with or may have the potential of being involved with any aspect of the Workforce Innovation and Opportunity Act and/or its One-Stop Delivery System.

NAME OF BUSINESS, ORGANIZATION, ETC.	AFFILIATION/ECONOMIC INTEREST

Determination by the Chair(s) of the Board or a designee as to the existence of a conflict of interest shall be final.

I agree that I shall adhere to the above-stated policy throughout my term as a member of the Board and/or standing committee and will submit updated conflicts of interest disclosure statements as necessary.

I CERTIFY THAT THE ABOVE INFORMATION IS TRUE, CORRECT AND COMPLETE TO THE BEST OF MY KNOWLEDGE. I ACKNOWLEDGE RECEIPT OF THE PWN BYLAWS AND HAVE READ AND AGREE TO COMPLY WITH ALL CONFLICT OF INTEREST PROVISIONS CONTAINED THEREIN.

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Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature of Witness

\_\_\_\_\_  
Date