



<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