
Conflict of Interest Policy

This policy provides detailed guidance to ensure no conflict of interest exists in the administering of workforce development projects, services and funding. This policy supplements any applicable state and federal laws governing conflict of interest.

This policy applies to local workforce development board (LWDB) members as outlined in the PA Department of Labor and Industry's Local Governance Policy and other applicable local, state, and federal guidelines and statutes.

LWDB members must adhere to the following regarding conflict of interest:

- A. LWDB members must not vote or participate in any decision-making capacity in any matter that would provide direct financial benefit to the member or the member's immediate family, or on matters of the provision of services by the member or the entity the member represents.
- B. LWDB members must avoid even the appearance of a conflict of interest. LWDB members must sign the PA Department of Labor and Industry's Conflict of Interest Code Form and Statement of Financial Interests Forms prior to serving. The Conflict-of-Interest Form must be signed again prior to reappointment.
- C. The LWDB must appoint an individual to timely review the disclosure information and advise the LWDB Chairperson and appropriate LWDB members of potential conflicts.
 - 1. Signed Conflict of Interest Code Forms must be maintained by the LWDB for monitoring purposes.
 - 2. Members appointed to the LWDB meet the definition of "public official" as outlined in *Commonwealth of Pennsylvania Management Directive 205.10 Amended and Financial Disclosures required by the Public Official and Employee Ethics Act*. Public Officials must complete, and file Statement of Financial Interests Forms each year the position is held and the year following end of service. These forms are due on or before May 1 for the prior calendar year.
- D. Prior to discussion, vote, or decision on any matter before the LWDB, if a member, or a person in the immediate family of such member, has a substantial interest in or relationship to a business entity, organization, or property that would be affected by any official LWDB action, the LWDB member must disclose the nature and extent of the interest or relationship and must abstain from discussion and voting on or in any other way participating in the decision on the matter. All

abstentions must be recorded in the minutes of the LWDB meetings, including subcommittees, and must be maintained as part of the official record. Lack of abstentions must also be noted in the board meeting minutes.

- E. LWDB members must monitor potential conflicts of interest and bring them to the LWDB's attention in the event a LWDB member does not make a self-declaration.
- F. The LWDB must ensure that the LWDB members, LWDB support staff, fiscal agent, and fiscal agent staff do not direct, and are not involved in, the daily activities of its PA CareerLink® One Stop Operator, workforce service providers, workforce system partners or contractors.
- G. LWDB members and their organizations may receive services as a customer of a local workforce service provider or workforce system partner.
- H. LWDB members must not receive compensation for their services on the LWDB. LWDB members may submit a request for reimbursement of reasonable and allowable expenditures for special circumstances in accordance with the Act and applicable federal and state regulations on a case-by-case basis.
- I. Any non-board members participating in an LWDB subcommittee, including standing and ad-hoc, supporting a procurement in any function, must complete the Conflict-of-Interest Non-Board Member Form. The LWDB must maintain the completed copies for monitoring purposes.

REFERENCE

WIOA Section 121(d)(4)

WIOA Section 107(h)

20 CFR 679.430

20 CFR 683.200(c)(5)

Workforce System Policy Local Governance

6/10/2025

HISTORY

Name	Date	Rev Level	Description of change	Effective Date
Deb O'Neil	08/06/2014	A	New Policy per Local Plan	
Deb O'Neil	10/20/2014	B	Revised per Local Plan requirements	12/17/2014
Deb O'Neil	03/15/2017	C	Update language per WIOA	06/09/2017
Susan Richmond		D	Update language per Workforce System Policy Local Governance	10/10/2025