
Conflict of Interest Policy

Purpose:

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

Audience:

This policy pertains to the following individuals:

- NWPA Job Connect (Workforce Development Board) members

Background:

WIOA Section 107(h) and 2 CF 200.318 discusses Conflict of Interest. Written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration on contracts are required.

Policy:

NWPA Job Connect Board Members must adhere to the following regarding conflict of interest:

- A. NWPA Job Connect members must not vote or participate in any decision-making capacity on any matter that would provide direct financial benefit to the member of the member's immediate family, or on matters of the provision of services by the member or the entity the member represents.
- B. NWPA Job Connect members must avoid even the appearance of a conflict of interest. NWPA Job Connect members must sign the PA Department of Labor and Industry's Conflict of Interest Form and Statement of Financial Interests Form prior to serving. The Conflict of Interest must be signed again prior to reappointment.
- C. The NWPA Job Connect must appoint an individual to timely review the disclosure information and advised the NWPA Job Connect Chairperson and appropriate board members of potential conflicts.
 1. Signed Conflict of Interest Forms must be maintained by NWPA Job Connect for monitoring purposes.
 2. Members appointed to NWPA Job Connect 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 Interest 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 NWPB Job Connect, if a member, or immediate family member, has a substantial interest in or relationship to a business entity, organization, or property that would be affected by any official NWPB Job Connect action, the board member must abstain from the discussion and voting on the matter. All abstentions must be recorded in the NWPB Job Connect meeting minutes and maintained as part of the official record.
- a. Note: Lack of abstentions must also be noted in the board meeting minutes.
- E. NWPB Job Connect must monitor potential conflicts of interest and notify the board in the event the board member does not self-disclose.
- F. NWPB Job Connect must ensure the board members, board staff, fiscal agent, and fiscal agent staff do not direct and are not involved in the daily PA CareerLink® activities, including the One-Stop Operator, workforce service providers, partners, and contractors.
- G. NWPB Job Connect members and their organizations may receive services as a customer of a local workforce service provider or partner.
- H. NWPB Job Connect members must not receive compensation for their services on the board. Members may submit for reimbursement of reasonable and allowable expenditures for special circumstances in accordance with WIOA and applicable federal and state regulations. These will be reviewed on a case-by-case basis.
- I. Any non-board members participating in NWPB Job Connect subcommittees, including standing and Ad Hoc must complete the Conflict-of-Interest Non-Board Member Form. NWPB Job Connect must maintain completed copies for monitoring purposes.

REFERENCE

WIOA Section 121(d)(4)

WIOA Section 107(h)

2 CFR 200.318

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	6/1/2026	D	Update language per Workforce System Policy Local Governance	07/10/2026