
WIOA One Stop Operator Firewall & Conflict of Interest Policy

Purpose:

The purpose of this policy is to ensure compliance and system integrity regarding firewalls and conflict of interest requirements for the One Stop Operator.

Audience:

- One Stop Operator
- One Stop Operator staff
- WIOA Title I Program Services Provider

Background:

The NWPA Job Connect Board, in agreement with the Chief Local Elected Officials (CLEOs), competitively bids for and selects the WIOA One Stop Operator as well as the WIOA Title I Program Services Provider. When the same agency holds the contracts for both the One Stop Operator and the Program Services Provider, firewalls and internal controls must be developed and documented within the provider agency.

Policy:

- A written and signed agreement with NWPA Job Connect Board and CLEOs must clarify how the organization will carry out its responsibilities as both the One Stop Operator and the Program Services Provider while maintaining transparency and integrity to ensure no conflict of interest exists.
- They must also demonstrate compliance with WIOA and corresponding regulations, relevant Office of Management and Budget (OMB) circulars, state and local policies, including the Conflict-of-Interest policy.
- The primary role of the One-Stop Operator is to coordinate the delivery of partner program services within the local PA CareerLink[®] system. The Operator also ensures the implementation of responsibilities and contributions agreed upon in the Partner Memorandum of Understanding.
- The One Stop Operator must disclose any potential conflicts of interest with partner or other service providers and will not establish practices that create disincentives to providing services. The One Stop Operator will comply with all federal, state, and local regulations and requirements.

REFERENCE

20 CFR §679.430

Workforce System Policy (WSP) Local Workforce Delivery System-PA CareerLink[®] Operator (February 9, 2021)

HISTORY

Name	Date	Rev. Level	Description of change	Effective Date
Susan Richmond	03/01/2024	A	New Policy	05/10/2024
Susan Richmond	06/09/2026	B	New format	08/01/2026