

ORANGE COUNTY
OC Community Resources
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OC HOUSING & COMMUNITY
DEVELOPMENT & HOMELESS
SERVICES

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OC COMMUNITY SERVICES


STACY BLACKWOOD
DIRECTOR
OC PARKS

SHERRY TOTH
ACTING COUNTY LIBRARIAN
OC PUBLIC LIBRARIES

April 25, 2019

TO: All Subrecipients of the Orange County Development Board

FROM: Carma Lacy
Director of Workforce Development

SUBJECT: Conflict of Interest
Information Notice No. 18-OCDB-11 

PURPOSE:

To ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award or expenditure of such funds. This policy is established to provide direction for subrecipients, contractors and staff of the Orange County Development Board (OCDB) in order that business can be conducted within guidelines that will prevent actual, potential, or questionable conflicts of interest.

EFFECTIVE DATE:

This policy is effective on the date of issuance.

REFERENCES:

- Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, Pub. L. 113-128;
- 20 CFR 684.630.

BACKGROUND:

A conflict of interest situation arises when an individual or organization has a financial or other personal interest in, and participates in, the selection of awarding of funds and/or services for an organization or an individual. One of the key responsibilities of the OCDB is to ensure that individuals or representatives of organizations, entrusted with public funds, will not personally or professionally benefit from such awards, administration, or expenditures of such funds. Safeguards must be in place, ensuring that all those served in the program are not only eligible and suitable but also protected from being part of the perception of impropriety or conflict of interest.

POLICY AND PROCEDURES:

Providing Services to Participants funded under the WIOA Program
The WIOA program is not an entitlement program. Still, it should be accessible to any individual, in any local area, who is eligible and suitable for available services subject to the OCDB policies and



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procedures. However, when applicants have a close relationship with WIOA staff members, management, and other specific stakeholders of the Workforce Development System, access to program services should not be based on such relationships or based on political influence. It is possible that, even without any intention to misuse WIOA funds, that a decision to enroll an individual in the program could be perceived as improper. Such a perception could cause noncompliance with state and/or federal law.

Program Integrity

All subrecipient staff, contractors and partners shall not provide any WIOA funded services to a family member, friend, current and/or previous co-worker/employee. No workforce staff shall have a personal or business relationship with, or a positive bias for, or a special interest in, that particular applicant.

Any WIOA form that determines applicant eligibility and grants or confers a benefit (training, supportive service) to an applicant assures that the staff member making that determination and signing the form is not related to the applicant or a close personal acquaintance of the applicant.

Any applicant in conflict with the above standards shall be referred to a job center that is not funded by the OCDB. By having a surrounding Local Workforce Development Board in another office conduct determinations and/or assessments of eligibility and appropriateness for service, a Local Workforce Development Board might avoid a situation giving rise to suggestions that certain decisions were influenced by the wrong parties.

ACTION:

Bring this Information Notice to the attention of all staff.

INQUIRIES:

If you have any questions, please contact appropriate contract administration staff at 714-480-6500.