



Ohio Valley Employment Resource

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Proudly serving Monroe, Morgan, Noble & Washington Counties, since 2000

Workforce Innovation and Opportunity Act Policy Letter No. 15-05 (Serving Applicants with a Close Relationship to the Workforce Innovation and Opportunity Act Program)

I. Purpose

The purpose of this policy is to outline requirements and procedures that ensure all individuals enrolled in the Workforce Innovation and Opportunity Act (WIOA) program have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest.

It will be the policy of the Workforce Development Board to follow the most recent State policy 15-05 (Serving Applicants with a Close Relationship to the WIOA Program) with the following additions highlighted in yellow:

II. Effective Date with WDB and COG motion #s

July 1, 2015; COG motion 9-15 on 1/25/16; WDB motion 10-15 on 12/14/15

III. Background

IV. Definitions

V. Requirements

WDB Policy Requirements

All local WDBs must establish policies and procedures for determining eligibility and service needs of close family members, friends, and others with whom there is a close relationship. The local policy and procedures must include, at a minimum, the following requirements:

1. A process for immediate disclosure and documentation of the relationship (e.g., close family members, friends, and others with close relationships) between the applicant and any of the following stakeholders of the workforce development system:
 - a. All four county Local elected officials;
 - b. All local Workforce Development Board(WDB) members;

- c. WDB subcommittee members;
- d. WIOA executive staff and supervisors;
- e. WIOA employees;
- f. OhioMeansJobs center partner staff;
- g. WIOA sub-recipients and/or contractors; and
- h. County employees.

All individuals applying for services in the WIOA program are required to indicate whether or not a relationship exists that is covered by this policy.

It will be the policy of the Workforce Development Board that this documentation of the disclosure, including the name of the person and the nature of the relationship, must be maintained in the participant's file for ALL participants receiving staff assisted services beyond basic career services. Basic career services are explained in State WIOA Policy Letter 15-08 and do not require registration; however when the participant is registered OR receives individualized career services and/or training services, whichever comes first, the participant must be advised of the complaint procedures and sign documentation of relationship forms. These signed forms must be maintained in the participant's file.

If a relationship is documented, the form must include a description of the internal process that will ensure that a transparent and arms-length assessment of the applicant's eligibility and development of the individual employment plan or individual service strategy can be conducted by staff with no personal or business relationship, bias, special interest, or prejudice.

This completed form will be submitted to the Local County Commissioner board and also the OVER Director for authorization of an individual subject to this policy to be served in the local WIOA program. Service will not occur until both parties have acknowledged approval by signing the form. If the related party is a commissioner of that county, another county board will be asked to review. If the related party is staff of OVER, another area's staff to the board will be asked to review.

Individuals subject to this policy will be tracked by the local WDB. Local areas must provide a list of all participants who have disclosed that a close relationship to WIOA staff, management, or other specific stakeholders of the workforce development system exists to ODJFS program monitors and auditors at the onset of all monitoring visits. The local WDB will monitor compliance with this local policy as part of the WIOA program monitoring process.

Local County contractors are required to provide training on the local WDB approved policy to persons directly involved with assessment and determining eligibility of participants. They must also ensure that all new staff members and providers are informed of this policy.

Real or perceived violations of this policy shall result in referral, including but not limited to the Ohio Ethics Commission or prosecuting authority for investigation.

VI. Monitoring

VII. Technical Assistance

At the county level, it is the county's discretion to contact the state directly or to start with the Area Executive Director. However, regardless of choice, the Area Executive Director must be consulted, whether directly or by cc: on email, so that the WDB is informed and engaged in local implementation.