



**WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)  
PROGRAM POLICY NOTICE NO. 2 v.2**

**EFFECTIVE DATE:** March 31, 2026

**SUBJECT:** LOCAL WORKFORCE DEVELOPMENT BOARD CONFLICT OF INTEREST

**I. Purpose**

The purpose of this Conflict-of-Interest Policy is to ensure that decisions, actions, and activities of the Northern Area Local Workforce Development Board (NALWDB), its staff, and its partners are conducted with integrity, impartiality, and transparency, and in compliance with applicable federal, state, and local laws and regulations. This policy establishes standards and procedures for identifying, disclosing, managing, and documenting real, potential, or perceived conflicts of interest in accordance with federal cost principles and workforce regulations.

**II. Authority**

This policy is adopted pursuant to and aligned with the following authorities:

- a) 2 CFR §200.112 (Conflict of Interest)
- b) 2 CFR §200.318(c)(1) (Procurement Standards)
- c) 20 CFR §679.430 (Local Workforce Development Board – Conflict of Interest)
- d) 20 CFR §678.605 (One-Stop Infrastructure Funding and Cost Sharing)
- e) Applicable state ethics laws and local ordinances

**III. Scope and Applicability**

This policy applies to:

- a) All NALWDB members and officers
- b) NALWDB staff and contractors
- c) One-Stop operators and One-Stop partner representatives
- d) Subrecipients, service providers, and vendors funded in whole or in part with WIOA or other federal funds administered by the NALWDB

**IV. Definition of Conflict of Interest**

A conflict of interest exists when an individual's personal, professional, financial, or familial interests could compromise, or appear to compromise, the individual's objectivity, independence, or fiduciary responsibility in carrying out official duties.

Conflicts may be actual, potential, or perceived.

Examples include, but are not limited to:

- a) Financial interest in an entity seeking to do business with the NALWDB
- b) Employment, board service, or consulting arrangements with a funded entity
- c) Immediate family or household member involvement with a contractor or subrecipient
- d) Participation in decisions that could result in personal gain



## **V. Prohibited Activities**

Individuals covered by this policy shall not:

- a) Participate in the selection, award, administration, or oversight of a contract or agreement where a conflict of interest exists
- b) Solicit or accept gratuities, favors, or anything of monetary value from contractors, subrecipients, or parties to sub agreements, except as permitted under state or local law
- c) Use their position for personal benefit or the benefit of an immediate family member or associated organization

## **VI. Disclosure Requirements**

### **A. Annual Disclosure**

All individuals subject to this policy must complete and sign a Conflict-of-Interest Disclosure Statement annually.

### **B. Ongoing Duty to Update**

Disclosures must be updated promptly whenever a new actual, potential, or perceived conflict arises.

Failure to disclose a conflict may result in corrective action, up to and including removal from position or termination of contract.

## **VII. Review, Recusal, and Mitigation**

- a) All disclosed conflicts shall be reviewed by the appropriate authority (Board Chair, Executive Director, or designee).
- b) Individuals with a conflict must recuse themselves from all related discussions, decisions, and votes.
- c) The recusal and mitigation measures must be documented in meeting minutes, procurement files, or personnel records, as applicable.

## **VIII. Waivers**

Blanket or self-approved waivers of conflicts of interest are prohibited.

Any exception to this policy must:

- a) Be permitted under applicable federal and state law
- b) Be documented in writing
- c) Include a justification, mitigation plan, and approval by the NALWDB or other authorized governing body

## **IX. One-Stop Infrastructure and Partner Conflicts**

Conflicts related to One-Stop infrastructure funding, cost sharing, or partner contributions shall be governed by 20 CFR §678.605.

One-Stop partners and operators must disclose conflicts that could affect infrastructure funding agreements, MOUs, or service delivery.

## **X. Recordkeeping**



Conflict of Interest disclosures, recusals, determinations, and related documentation shall be retained in accordance with federal record retention requirements and made available for monitoring, audit, or oversight purposes.

**XI. Enforcement**

Violations of this policy may result in disciplinary action, removal from the Board, termination of employment or contract, repayment of disallowed costs, or other remedies as permitted by law.

**XII. Effective Date and Review**


This policy is effective upon approval by the NALWDB.

The policy shall be reviewed at least every two years and updated as necessary to ensure continued compliance with applicable laws and regulations.

One-Stop partners and operators must disclose conflicts that could affect infrastructure funding agreements, MOUs, or service delivery.

This policy rescinds any previous NALWDB policy regarding subject.

INQUIRIES; Contact WIOA Program Manager at (505) 986-0363.

  
\_\_\_\_\_  
NALWDB CHAIR

3-31-26  
\_\_\_\_\_  
DATE