Policy Letter #18

TO: **All Mid-Carolina Service Providers**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Compliance with Ethical Standards in WIOA Training Programs (Serving Immediate Family Members, Close Acquaintances, and Other Policy**

PURPOSE

This policy establishes clear requirements and procedures to ensure ethical, transparent, and conflict-free enrollment, assessment, and service provision for all individuals participating in Workforce Innovation and Opportunity Act (WIOA) programs administered within the Mid-Carolina Workforce Development Board (Mid-Carolina WDB) local area.

BACKGROUND

Local Workforce Development Boards (WDBs), NCWorks Career Center staff, and WIOA service providers are required to comply with all applicable federal, state, and local conflict-of-interest requirements when delivering services funded by WIOA resources. These requirements are intended to protect the integrity of workforce development programs and ensure that public funds are administered in a fair, impartial, and ethical manner.

Maintaining the highest standards of ethical conduct is essential to prevent issues arising from real, perceived, or potential conflicts of interest. Workforce system partners must ensure that decisions regarding participant enrollment, assessment, and service delivery are based solely on eligibility, suitability, and program requirements rather than personal relationships or external influence.

ACTION

Participant Access and Eligibility

Although the WIOA program is not an entitlement program, services must remain accessible to eligible individuals who meet program requirements and are determined suitable for available services under Mid-Carolina WDB policies and procedures.

When applicants have close relationships with WIOA staff, management personnel, or other stakeholders within the workforce development system, additional care must be taken to ensure that access to program services is not influenced by such relationships or by political considerations.

Even when no intentional misuse of WIOA funds occurs, enrollment decisions involving close relationships may create the perception of impropriety and could lead to non-compliance with state or federal law. Therefore, appropriate safeguards must be implemented to ensure transparency and fairness in all program decisions.

Standards for Authorizing Participant Funding

Authorization of WIOA-funded services must comply with established standards of conduct designed to protect the integrity of the program and prevent conflicts of interest.

Chief Local Elected Officials (CLEOs), WDBs, fiscal agents, and administrative entities must implement policies, procedures, and safeguards that ensure the responsible management of public funds.

All workforce system partners must ensure that program participants are:

- Determined eligible according to WIOA and applicable policies;
- Suitable for the services being provided; and
- Enrolled and served through processes that prevent the appearance or occurrence of impropriety or conflict of interest.

Firewalls and Safeguards

In situations where a service provider, contractor, WDB staff member, or officer has a relationship with a potential or enrolled WIOA participant, appropriate safeguards must be established to maintain program integrity.

These safeguards include implementing firewalls that ensure individuals with such relationships do not directly:

- Provide services to the participant
- Monitor the participant's progress
- Supervise the participant's case
- Provide program oversight related to that participant

When such circumstances arise, an alternate staff member or officer must be assigned to assume responsibility for the participant's case management, monitoring, and oversight.

Code of Conduct Requirement

All Mid-Carolina WDB Members, WIOA service providers, and NCWorks Career Center staff must sign and attest to the *Mid-Carolina WDB Code of Conduct*.

This requirement ensures that all individuals involved in the administration of WIOA programs acknowledge and commit to maintaining ethical standards and complying with conflict-of-interest requirements.

REFERENCES

Mid-Carolina WDB Policy Letter #17: Conflict of Interest

ATTACHMENTS

Attachment A: Procedure for Identifying and Serving Immediate Family Members, Close Acquaintances, and Other Stakeholders in WIOA Training Program

CREATION DATE

December 2023

REVISION DATES

January 2024
December 2024
March 2026