



CONFLICT OF INTEREST AND APPEARANCE OF FAIRNESS POLICY

Policy Number: 1030-1

Effective Date: May 21, 2024

A. BACKGROUND

This policy provides written standards of conduct governing the performance of Workforce Snohomish board members, employees, officers, and agents engaged in the award, administration, and management of contracts. This policy also provides written standards of conduct governing subrecipients. This policy guards against problems arising from real conflicts of interest and potential issues related to the appearance of fairness.

B. POLICY

This policy applies to all Workforce Snohomish board members, employees, officers and agents when engaged in Workforce Snohomish initiatives, and all subrecipients providing services under Workforce Snohomish funds.

Real Conflict of Interest: No member of the Workforce Snohomish Board of Directors or other committee shall cast a vote on the provision of services by that member, by any ***member of her/his family***, or by any organization with which that member is directly affiliated or about to be affiliated or vote on any matter which would provide direct or indirect financial benefit to that member, to any ***member of her/his family***, or to any organization with which that member is affiliated or about to be affiliated. Affiliation refers to a direct tie to an organization as an owner or employee.

No member of the Workforce Snohomish Board of Directors or other committee shall lobby members of Workforce Snohomish Board, the Future Workforce Alliance Board or its members, or any Workforce Snohomish committee, in private or in public, on behalf of any action before the respective Board of Directors or committee that may benefit the member personally, any ***member of her/his family***, or any organization with which that member is directly affiliated or is about to be affiliated.

Perceived Conflict of Interest and Appearance of Fairness: Members of the Workforce Snohomish Board, committees, staff and WorkSource Snohomish partner

staff must act in accordance with standards of appearance of fairness in all matters. Past, present and future memberships on boards of directors, advisory boards, professional and personal associations, and membership-like associations may cause perceived conflicts of interest and appearance of fairness. When associations raise conflict of interest or appearance of fairness as an issue, the member must disclose the association from which the potential problem arises prior to voting on a matter before the relevant body and abstain from voting if directed by the Chair of that body. Whenever a member of the Workforce Snohomish Board of Directors, committees, staff or WorkSource Snohomish partner staff is in doubt about a possible problem with appearance of fairness, s/he will disclose the association from which the potential problem arises. Disclosure of association(s) does not prohibit the member from voting or participating in other Workforce Snohomish business unless specifically prohibited by the Workforce Snohomish Board of Directors, its Executive Committee or the Chair of the body in question.

Subrecipients: Each grant recipient and subrecipient must maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and subawards. Also, each grant recipient and subrecipient must ensure that no individual in a decision-making capacity engages in any activity if a conflict of interest (real, implied, apparent, or potential) is involved. This includes decisions involving the selection, award, or administration of a subaward or contract supported by WIOA funds.

Documentation: Minutes of meetings where a real conflict of interest or perceived conflict of interest is disclosed should reflect the resultant abstention of the appropriate member.

Gratuities: Members of the Workforce Snohomish Board, committees, officers and staff are prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from contractors or parties to subcontracts or prospective contractors/bidders.

Third Party Reports: Workforce Snohomish accepts third party reports of potential conflict of interest and appearance of fairness issues. Workforce Snohomish's goal is to resolve any such potential issues informally whenever possible.

Violations: Any violations of this Code of Conduct will result in disciplinary actions, including removal as a member of the Workforce Snohomish Board, committees, officers or staff.

Additional Workforce Snohomish staff member requirements related to Conflict of Interest may be found in the Workforce Snohomish Personnel Policies and are in addition to the scope of this policy.

C. DEFINITIONS:

NA

References:

[Washington WorkSource System Policy #5405 Revision 2](#)

OMB Circular Uniform Administrative Requirements: 2 CFR 200.112 and 2 CFR 200.303 specifically

[Conflict of Interest Procedures](#)

[Conflict of Interest Annual Report Form](#)

[Conflict of Interest Disclosure for Procurement Action Form](#)

Supersedes:

Policy Number: 2040 Dated July 1, 2015

Policy Number: 1030 Dated May 1, 2017