

	POLICY B03: CONFLICT OF INTEREST
	APPROVED: 5/10/2016 – NOW 5/19/2016 – NOWC
	<input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED

PURPOSE

This policy implements and interprets State of Oregon and Federal WIOA requirements governing conflict of interest while conducting the business of the Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW) and the Northwest Oregon Workforce Consortium (NOWC) area.

POLICY

It is the policy of NOW and NOWC to conduct the business of the two organizations in a transparent manner free of conflict of interest or appearance of fairness. This policy applies to NOW board members, staff, the members of the Northwest Oregon Workforce Consortium, all members of board subcommittees, workgroups, consortia, etc., regardless of whether or not the individual is a member. In addition, all partners at all levels of participation in the workforce system funded by the Workforce Innovation and Opportunity Act (WIOA) are expected to comply with these standards.

Members of NOW and NOWC, standing committees, board subcommittees or workgroups, etc., may not:

1. Vote on a matter under consideration by the local board:
 - regarding the procurement or provision of services by such member, or by an entity that such member represents or is affiliated with; or
 - that would provide direct or perceived financial benefit to such member or the immediate family of such member; or
2. Engage in any other activity determined by the Governor to constitute a conflict of interest. Other activities include, but are not limited to:
 - soliciting or accepting gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements; or
3. Vote on, or contribute to, any part of an evaluation process (developing criteria, scoring, reviewing or submitting a response) regarding any procurement matter under

consideration by the local board in which they, or an entity they are affiliated with, have a conflict of interest.

4. WIOA sub-recipients, service providers, staff, board members, partners and other local organizations that receive federal or state funds through grants, or contracts with the NOW are prohibited from using these funds for political activities. These organizations are also prohibited from receiving reimbursements from federal grants or contracts for costs of such activities.

Prohibited political activities include, but are not limited to, the following:

- attempts to influence the outcomes of any federal, state, or local election, referendum, initiative, or similar activity through in-kind or cash contributions, endorsements, or publicity.
- establishing, administering, or contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections.

Unless expressly authorized in federal or state law, organizations or entities receiving federal funds from grants, contracts or cooperative agreements do not lose their rights as organizations to use their own private, non-federal resources for “political” activities just because they also receive these federal funds. These organizations are prohibited, as this policy mandates, from using any federal grant or contract money for such purposes. These organizations must use private or other non-federal or state money, receipts, contributions or dues for such activities

DEFINITION

The term “**immediate family**” means a spouse, parent, in-law, guardian, child, brother, sister, foster child, grandchild, grandparent, or other person to whom the official is not related but who resides in the same household. The relatives listed above need not reside in the same household to be included as immediate family.

Political Activities – lobbying or advocating for legislative programs or changes; campaigning for, endorsing, or contributing to political candidates or parties.