



**State and Local Workforce Development Board
Contracting Conflict of Interest Policy Q & A**

1. Does this policy apply if the Local Workforce Development Board (LWDB) is contracting with an entity whereby the LWDB provides services and receives money?

If the contract directly or indirectly allows for a board member to benefit, then that member should abstain from voting or influencing the decision to contract in any way.

2. Or does this policy apply only when procurement by the LWDB is done for goods or services and money is paid out?

Both.

3. Does this policy apply to Board Members employed by educational institutions who provide participant selected training? We do not have contracts with any educational entities. Participant select programs and educational entities.

If there is no contract and the board member is not benefiting from the transaction, then there is no reason for a board member to abstain from voting on an issue related to the educational entity.

4. Would we need CSF approval of a contract between a LWDB and an educational institution that received any State or federal funding, where we receive funding for case management services (over \$25,000) and where we have a Board Member who is employed by the educational institution?

The board may receive funding from the educational institution. It is the vote of the member on matters pertaining to contracting with the educational institution. However, the member should abstain from Board discussions or voting related to the educational institution.

The member of the Board should not participate in establishing and/or voting on contractual relationships in which the member, the member's employer, or the member's family could benefit from the contractual relationship. This also applies to situations in which a conflict of interest could be perceived by the public.

