

1300POL Conflict of Interest (Rev2~~1~~)

Effective Date: July 2015

Last Modified: ~~November 2023~~ March 2024

This conflict-of-interest policy is to ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award, administration, or expenditure of such funds.

A "Conflict of Interest" means the conflict between the official responsibilities and the private interests of a person or entity that is in a position of trust. A conflict of interest would arise when an individual or organization has a financial or other interest in or participates in the selection or award of funding for an organization. Financial or other interests can be established either through ownership or employment.

The conflict-of-interest policy for the Olympic Consortium consists of the following elements:

- a. 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 subgrants.
- b. No individual in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a subgrant or contract supported by WIOA funds if a conflict of interest - real, implied, or apparent- would be involved.
- c. No Workforce Development Council member shall engage in any activity, including participation in the selection, award, or administration of a grant or contract supported by WIOA funds if a conflict of interest, real or apparent, is involved. Such a conflict would arise when:
 1. The individual
 2. Any member of the individual's immediate family
 3. The individual's partner.
 4. An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm or organization selected for the award.
- d. No member shall cast a vote on, nor participate in, any decision-making capacity on the provision of services by such member (or any organization which that member directly represents), nor on any matter, which would provide any direct financial benefit to that member. If a matter arises which places a member in a conflict-of-interest situation or potential conflict of interest situation, that member will notify the chair and abstain from voting.
- e. Olympic Workforce Development Council officers, employees, or agents of the agencies and members of the Council standing committee making awards cannot solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.

- f. Penalties, sanctions, or other disciplinary actions for violations of these conflict-of-interest provisions will be in accordance with local and state laws and procedures.

If the administrative entity has been selected as the One-Stop Operator in accordance with the WIOA, a separate written plan will be promulgated that clarifies how the administrative entity will carry out its multiple responsibilities while demonstrating compliance with WIOA, corresponding regulations, relevant Office of Management and Budget circulars, and the state and local WIOA policies on conflict of interest. The written plan will limit conflict of interest or the appearance of conflict of interest, minimize fiscal risk, and develop appropriate firewalls within the administrative entity if performing multiple functions. This plan will be agreed upon by the Olympic Workforce Development Council and the Olympic Consortium Board.

As administrative employees and employees of [Kitsap County](#), the [Conflict-of-Interest provision of the Kitsap County Code](#) applies. It states:

~~Kitsap County Code 4.116.120, Conflicts of interest~~ — Kitsap County Personnel Manual, Chapter 9 Employee Relations: Section D: Conflict of Interest & Employee Ethics (pg. 53). To be Approved by OWDC May 17th Meeting. **To be Approved by OWDC May 17th Meeting.** *All persons involved in county purchasing are required to follow the rules regarding conflicts of interest as set forth in Chapter 42.23 RCW as now or hereafter amended and, in addition thereto, are expressly prohibited from accepting, directly or indirectly, from any person, company, firm, or corporation to which any procurement contract is or might be awarded, any rebate, gift, money or anything of value whatsoever, except where given for the use and benefit of the county.*

References

Code of Ethics for Municipal Officers, [Washington State Legislature Revised Code of Washington \(RCW\) 42.23](#)
Conflict of Interest, Workforce Innovation and Opportunity Act Final Law H.R. 803 (113-128) [§184 & §107\(h\)](#)
Conflicts of Interest, [Workforce Innovation and Opportunity Act Policy 5405 \(Rev2\)](#)
[Kitsap County Personnel Manual, Chapter 9 Employee Relations: Section D: Conflict of Interest & Employee Ethics \(pg. 53\).](#)