

## Attachment 1a: Conflict of Interest Code Form: Non-Board Members

### CONFLICT OF INTEREST CODE - LOCAL WORKFORCE DEVELOPMENT BOARD

I, \_\_\_\_\_, Lancaster County Workforce Development Board committee or **non-**  
Print Name

**board member**, agree to the terms and conditions contained herein.

Local workforce development boards, committee members staff, and other individuals acting on behalf of the local board in fiscal/procurement matters are to provide responsible stewardship for and oversight of publicly funded workforce programs. The roles and responsibilities of all individuals acting on behalf of or advising the local board must be executed in a manner that demonstrates strong integrity, accountability, and transparency in order to preserve the public trust. All voting and non-voting local board members, committee members, those acting on behalf of the local board and board staff are subject to the provisions of state and local conflict of interest policies.

#### REQUIRED ACTIVITIES

All persons acting on behalf of the local workforce development board in fiscal/procurement matters must:

- Recuse themselves from their official duties if there is a real or perceived conflict of interest;
- Advise the board of any potential or perceived conflicts of interest by disclosing those employers, organizations and/or entities that the individual or immediate family may be associated with in an attachment to this executed form; and
- Ask the local board for guidance if there is any doubt as to whether a specific situation involves or constitutes a real or perceived conflict of interest.

Conflict of Interest includes, but is not limited to:

- A direct or indirect financial interest in the award of the contract to any entity;
- The individual or immediate family member is currently employed by, or is a consultant to or under contract to the entity seeking the award;
- The individual is negotiating or has an arrangement regarding future employment or contracting with any entity seeking the award; and
- The individual has an ownership interest in, or is an officer or director of, any entity seeking the award.

#### RESTRICTED ACTIVITIES

Local workforce development board committee members or other individuals must not:

- Cast a vote on or participate in any decision-making capacity on the provision of services by such individual (or by an organization that such individual directly represents);
- Cast a vote on or participate in any matter that would provide any direct benefit to such individual or the immediate family of such individual;

- Engage directly or indirectly in any business transaction or private arrangement for profit (including any third-party transactions) that develops from or is based upon the individual's status or authority with the board;
- Participate in the negotiation of or decision to award contracts or grants, the certification of any eligible providers, or the selection of any one-stop (PA CareerLink®) operator with or for any entity in which the individual has a financial or personal interest;
- Use board equipment, supplies or properties for the individual's own private gain or for any reason other than official designated purposes; or
- Represent or act as an agent for any private interest, either for compensation or not, in any transaction:
  - In which the board has a direct and substantial interest; or
  - Which could be reasonably expected to result in a conflict between a private interest of the individual and his/her/their official board responsibility

Local workforce development board committee members, staff, or other individuals who participate in the development of contract specifications or standards are prohibited from receiving any direct financial benefit from any resulting contract. In addition, no corporation, partnership, sole proprietorship, firm, enterprise, franchise, association, trust, foundation, or other entity shall receive the contract if it would create a conflict of interest for the individual who participated in this manner.

Note: The local workforce development board shall adopt in its bylaws a conflict of interest policy meeting the minimum standards set forth in the state's conflict of interest document.

I, \_\_\_\_\_, have the following conflict of interest to report:

Self/Family Member Name	Relationship	Organization/company	Position(s) Held

\*Please add separate sheet for additional declarations

#### **VIOLATIONS OF THE CONFLICT OF INTEREST CODE**

- If, after an investigation, the board believes that this code has been violated, it may recommend to the Governor or the Chief Elected Official(s) of the local workforce development area that the individual who has violated the code be removed or prevented from participating in any other fiscal/procurement activity for the local workforce development board.

- If, during oversight by L&I, it is suspected this code has been violated, a recommendation will be made to the LWDB to conduct an investigation. A report of the results of that investigation and any corrective action must be provided to L&I within 10 days.
- The Governor, or the Chief Elected Official(s) of the local workforce development area, has the authority to restrict the involvement of an individual for a violation of this code, even if the board has not made such a recommendation.

Signature \_\_\_\_\_ Date \_\_\_\_\_

**The LWDB must maintain an updated copy of each individual's conflict of interest form for monitoring purposes.**