ADMINISTRATIVE POLICIES/PROCEDURES

Reviewed: 6/3/2025

Issuance No: A-24
Issuance Date: 12.3.2024
Subject: Multiple Role Firewall Policy

The purpose of this policy is to establish clear and consistent guidelines for implementing firewalls for subrecipients contracted by the WDB of North Missouri who serve in multiple roles (e.g., as fiscal agent, service provider, and/or One-Stop operator). These firewalls are designed to:

- Prevent conflicts of interest, real or perceived, that may arise from subrecipients serving in multiple roles.
- Ensure fair, objective, and accountable administration of Workforce Innovation and Opportunity Act (WIOA) funds.
- Comply with federal and state regulations on conflict of interest, transparency, and accountability as outlined in WIOA Sections 107(h), 121(d)(4), and 134(c)(3)(G); 20 CFR 679.430 and 20 CFR 678.625.

Definitions

- Subrecipient: An entity that receives WIOA funds from the WDB to carry out a program or project, which may include roles such as fiscal agent, service provider, or One-Stop operator.
- Multiple Roles: Instances where a subrecipient performs more than one role within the WDB-funded programs, such as acting as both a service provider and a One-Stop operator.

Roles Requiring Firewalls

This policy applies to subrecipients that may be contracted to perform two or more of the following roles:

- Fiscal Agent: Manages and monitors WIOA funds allocated to the WDB.
- One-Stop Operator: Oversees the daily operations and coordination of services within the One-Stop center(s) (20 CFR 678.620).
- Service Provider: Delivers WIOA services, including workforce development activities, to participants.

Conflict of Interest and Firewall Requirements

The WDB will document firewalls as part of the contracts to ensure that subrecipients serving in multiple roles do so in a transparent and compliant manner. These firewalls shall include, but are not limited to, the following measures:

- Subrecipient contracts must document procedures for managing any potential conflicts that arise from serving in multiple roles. These procedures should outline how the subrecipient will separate responsibilities, staff, and reporting structures to maintain impartiality.
- Staff assigned to specific roles (e.g., One-Stop operations versus service delivery) should not perform duties outside their designated responsibilities unless approved and documented by the WDB.
- Management involved in decision-making processes must recuse themselves from decisions where there may be a conflict of interest (20 CFR 679.430).

Reporting and Resolution of Conflicts of Interest

Subrecipients must report any potential, perceived, or actual conflicts of interest to the WDB immediately. The WDB will work with the subrecipient to assess and resolve any conflicts following the policy guidelines and will provide guidance to avoid recurrence, as required under 20 CFR 679.430 and the Workforce Development Board Conflict of Interest Policy.

Compliance and Enforcement

Subrecipients are required to comply with this policy as a condition of their contract with the WDB. Non-compliance may result in corrective actions, including contract amendments, reduced funding, or contract termination (WIOA Section 107(h)).

The Workforce Development Board of North Missouri is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri TTY users can dial 711. This information can be translated into another language if requested. Please contact the WDB Office for translation assistance.

Esta información se puede traducir a otro idioma si se solicita. Comuníquese con la Oficina de la Junta de Desarrollo de la Fuerza Laboral para obtener ayuda con la traducción.

Ces informations peuvent être traduites dans une autre langue sur demande. Veuillez contacter le bureau du Conseil de développement de la main-d'œuvre pour obtenir de l'aide en matière de traduction.