



## Code of Conduct and Conflict of Interest Policy #P-28-11.22

Re: Guidance to ensure the integrity, effective management, and diligent oversight of the SCPa Works workforce system region.

Updated February 27, 2026

Revision Approved: N/A

Originated: November 29, 2022

Approved: February 9, 2023

References: WIOA Public Law 113-128 § 101(f), 102(b)(2)(E), 107(h), 121(d)(4)  
20 CFR § 679.430, 679.130(f)(1) - (3), 679.410(a)(3) and (c), 679.430, 683.200(c)(5),  
2 CFR Parts 200 and 2900, Uniform Guidance  
Americans with Disabilities Act (ADA)  
Pennsylvania Human Relations Act (PHRA)

Author: Saranne Miller

A handwritten signature in blue ink that reads "S. Miller".

### I. Purpose:

- A. As a commitment to maintaining the highest ethical conduct standards that guard against real, perceived, or potential offenses against human or civil rights, and any conflict of interest, this policy reduces the risk of an offense against an ethical code of conduct or conflict of interest, the appearance of a conflict of interest, and financial risk of any kind concerning conflict of interest.
  - 1. All employees, staff members, team members, leadership roles, partnering entities, and contracted service providers at all levels of participation within the SCPa Works service area and who perform multiple functions related to WIOA/TANF activities and services, will hereby be referred to as Representatives in this policy.
  - 2. All LWDB members, employees, and staff will be referred to as Board Members in this policy.
- B. Within the SCPa Works eight-county service region, all Representatives and Board Members are held accountable for the performance of duties. They will understand that an individual's actions directly reflect on SCPa Works.

### II. Definitions:

- A. The following terms are relevant to the purpose and implementation of this policy:
  - 1. Conflict of Interest: Conflict between the official responsibilities and the private interests of a person or entity in a position of trust.
    - a. A conflict of interest arises when an individual or organization has a financial or other interest in or participates in the selection or award of funding for an organization.

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- b. Financial or other interest is established through ownership or employment.
- 2. **Immediate Family:** Immediate family consists of individuals' parents (including step-parents), spouse, domestic partner, children (including step-children), siblings, grandchildren, grandparents, and any relative by marriage, for example, an "in-law."
- 3. **Individual:** An employee, officer, Representative, Board Member, SCPa Works committee member, subrecipient, subcontractor, program participant, or agent of SCPa Works.
- 4. **Partner:** A business associate of an individual, organization, or agency, whether an equal participant in a business with the individual, a supervisor, or a subordinate.
- 5. **Organization:** A for-profit or not-for-profit entity that employs or has offered a job to an individual defined above. An entity can be a partnership, association, trust, estate, joint stock company, insurance company, corporation, domestic or foreign, or sole proprietor.

### **III. Conflict of Interest Guidelines:**

- A. Areas of concern are scenarios that pose problems or potentially pose problems, leading to a conflict of interest or a perception of unfairness related to SCPa Works administration and operations.
- B. Areas of concern include but are not limited to, comments made by employees or partners in public, sharing information by employees or partners, and disclosing associations.
  - 1. **Comments Made in Public:** SCPa Works and committee members are encouraged to act in a public relations capacity to represent and reflect the SCPa Works service area.
    - a. This includes:
      - i. Public speaking engagements and comments made in a public forum;
      - ii. Descriptive public comments that relate to actions taken by SCPa Works leadership or members of the LWDB; and
      - iii. Statements that imply future SCPa Works decision-making or the ability to influence any SCPa Works decision-making.
  - 2. **Information Sharing:** SCPa Works, employees, and board members are encouraged to share only general information with the community about SCPa Works activities; however, sharing information should be limited to:
    - a. Information regarding the procurement, administration, and delivery of WIOA services.
    - b. Information related to the Operations Plan, the Local Plan, all SCPa Works policies and related documentation, requests for proposals (RFPs), public notice of meetings, meeting minutes, and general practices relevant to WIOA service delivery.
  - 3. **Disclosure of Associations:** SCPa Works LWDB members, staff, subrecipients, and partners openly disclose professional and personal associations throughout the community, including those which pertain to membership in organizations or contractual agreements between partners, stakeholders, or employers/employees, as well as associations which arise out of custom, shared interests, friendships, or other relationships.

### **IV. Conflict of Interest Policy:**

- A. Each grant recipient and subrecipient shall maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of SCPa Works contracts and agreements.
- B. No individual in a decision-making capacity shall engage in any activity if a real, implied, apparent, or potential conflict of interest is involved.
  - 1. This includes decisions involving selecting, awarding, or administering a contract supported by WIOA or any other federal funds.
- C. Before any public discussions regarding the release of a Request for Proposal (RFP), or any matter regarding the release of funding or the provision of services, an SCPa Works Board Member or

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Representative must disclose any real, implied or apparent, or potential conflicts of interest before engaging in the discussion.

1. The minutes of the Board meeting should reflect the disclosure.
- D. An individual of the Board shall not cast a vote, nor participate in any decision-making capacity on the provision of services, or any organization which that individual directly represents, nor any matter which would provide any direct financial benefit to the individual, to the individual's immediate family, or the individual's organization.
- E. An individual of the Board or an SCPa Works Representative cannot solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.
- F. These standards of conduct provide for disciplinary action, including termination of employment, board membership, or contract for violations of this policy by any individual.
1. The SCPa Works' Workforce Investment Board (WIB) Executive Committee will evaluate violations of these provisions on a case-by-case basis and recommend to the entire Board if and what penalties and sanctions or other disciplinary actions are appropriate.
- G. Individuals will not use, for their private gain, for the gain of others, or for any reason other than officially designated purposes, any information obtained as a result of their committee, Board, or working relationships with SCPa Works where the information is not available to the public at large, or divulge such information in advance of the time prescribed for its authorized release.
- H. One-Stop operators must disclose all potential conflicts of interest arising from relationships with training providers and other service providers, as specified in this conflict of interest policy.
- I. An organization that has been selected or otherwise designated to perform more than one function related to WIOA or TANF Youth must develop a written plan that clarifies how the organization will carry out its multiple responsibilities while demonstrating compliance with WIOA or TANF Youth, corresponding regulations, relevant Office of Management Budget circulars, and this conflict of interest policy.
1. This plan must limit conflict of interest or the appearance of a conflict of interest, minimize fiscal risk, and develop appropriate firewalls within that single entity performing multiple functions.
- J. Employment with SCPa Works or being a subrecipient of WIOA funds to provide training or other services is not a violation of conflict of interest regulations unless and until a situation arises where there is a conflict of interest.
- K. SCPa Works closely monitors and documents the ethical handling of perceived, potential, and actual conflicts of interest between SCPa Works' interests and the personal and financial interests of SCPa Works Board Members and Representatives.

**V. Code of Conduct Policy Guidelines:**

- A. SCPa Works Board Members and Representatives are required to adhere to the Pennsylvania Human Relations Act (PHRA). They are prohibited from prompting, engaging in, and supporting unlawful workplace discrimination and hostile work environments.
- B. SCPa Works Representatives and Board Members are required to conduct themselves honestly and ethically.
- C. All Representatives and Board Members within the SCPa Works service area are required to act in a courteous, friendly, helpful, prompt, and respectful manner in dealing with the public, customers, employees, colleagues, leadership personnel, officials, and staff members of internal and external partnering organizations within the SCPa Works service area.
1. SCPa Works Board Members and Representatives will always maintain professional language and behavior in the workplace.

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2. SCPa Works Board Members and Representatives will professionally conduct business relationships to avoid conflict, non-customary professional behavior, abusive language and gestures, and hostile working environments.
  3. SCPa Works Board Members and Representatives will not deny a staff member or employee information nor reduce a staff member's or employee's access to information.
  4. SCPa Works Board Members and Representatives will not segregate any staff member or employee from team collaboration, meetings, or decision-making relevant to an individual's professional role.
- D. SCPa Works Board Members and Representatives will maintain the integrity of personally identifiable information (PII) relating to all internal staff members and employees and in alignment with the SCPa Works PII Policy #P-3-2.22.
- E. In direct alignment with the SCPa Works EO & Discrimination Policy #P-13-2.22, SCPa Works Board Members and Representatives will not discriminate against staff members or employees regarding:
1. Race;
  2. Color;
  3. Religion;
  4. Sex;
  5. National origin;
  6. Age;
  7. Disability, including impaired vision or hearing;
  8. Political affiliation or belief;
  9. Gender identity;
  10. Gender expression;
  11. Sexual orientation;
  12. Citizenship/lawful residency/work status; and
  13. Program participation eligibility/status.
- F. In alignment with the Americans with Disabilities Act (ADA) and the Pennsylvania Human Relations Act (PHRA), SCPa Works Board Members and Representatives will not discriminate against staff members and employees based on a disability.
- G. Violations of this Code of Conduct Policy will be considered by the SCPa Works staff and Executive Committee when necessary.
1. Corrective actions will be issued upon violation of this policy and will follow each offense.
  2. SCPa Works Risk Assessment and Corrective Action Policy #P-24-4.22 guide SCPa Works Corrective Action processes and procedures.

**VI. Summary of Changes:** This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
07/18/2023	Saranne Miller 	Reviewed for changes. Completed grammatical edits..	07/18/2023
01/14/2024	Saranne Miller 	Reviewed for edits. No revision necessary. Re-formatted header page and corrected origination date to align with the policy log.	01/14/2024

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2/27/2026	Saranne Miller	Reviewed for updates. No changes made.	2/27/2026

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