



DuPage Workforce Board Conflict of Interest Policy/Standards of Conduct

Subject

The DuPage County Ethics Ordinance is hereby adopted as the Ethics and Conflict of Interest Policy for the DuPage Workforce Board, except as amended below.

Purpose

This policy is established to ensure that serving DuPage County Workforce Board Members will not personally or professionally benefit from the award or expenditure of such funds, and to provide direction of staff and board members of the DuPage Workforce Board in order that business can be conducted within guidelines that will prevent actual, potential, or questionable conflict of interest.

Policy Statement

Members of DuPage Workforce Board may not:

- (1) Vote on any matter under consideration by the local board:
 - (A) Regarding procurement or contract for services by such member, or by any entity or organization, or any person who is one of the member's immediate family, has an ownership interest in, is employed by, represents or serves as an officer, director or agent therewith; or
 - (B) That would provide direct financial benefit to such member, or to any person within the immediate family of such member or;
- (2) Engage in any other activity determined by the Governor to constitute a conflict of interest. (WIOA Chapter 1 Sec. 4.1)
 - other activities include, but are not limited to:
 - (A) Soliciting or accepting gratuities, gifts, favors or anything of monetary value from any party that, at that time, has a contract with the local board or with the County of DuPage; or

- (B) Participating in any procurement or service evaluation process including but not limited to developing evaluation criteria, scoring, reviewing or submitting a response under consideration by the local board in which the member, or any member of his immediate family has a conflict of interest
- (3) As specified in 20 CFR 678.610(c) and in conformity with 20 CFR 679.430 for demonstrating internal controls and preventing conflict of interest, the written standards of conduct must include a description of the use of firewalls to mitigate conflict of interest in circumstances including, but not limited to, situations where an entity acts in more than one role in the one-stop delivery system or performs more than one function in the procurement process, as well as situations where the non-Federal entity uses a sole source selection.
- (4) Information contained in the proposals submitted by offerors/bidders is maintained in a manner that is confidential, to avoid the use of information to another offeror's/bidder's advantage and to prevent collusive bidding.

Disclosure

Members shall publicly disclose (possible, real or apparent) conflict of interest pertaining to any act or transaction of the board prior to the board addressing said act or transaction if possible.

Any conflict disclosed prior to a meeting shall, if possible, be made part of the agenda of the relevant board meeting.

Abstain

If it is determined that a conflict exists, the member must abstain from any involvement, discussion and vote on said issue.

Recusal

Whereas transaction-specific disclosures may lead to a board member abstaining from related activities during a meeting, a board member shall recuse him/herself from any participation in multiple phases of any matter where a conflict of interest exists.

Documentation

The minutes of board and committee meetings shall document compliance with these conflict of interest requirements.

- (1) Detailed minutes will reflect the disclosure of facts and circumstances of conflict of interest, and indicate when the disclosure was made.
- (2) Minutes reflect the discussion of conflict of interest and outcome of discussion and disclosure, including determination of conflict of interest, course of action pursued and the board's rationale for course pursued.

