



Area 20
Hocking - Fairfield
Pickaway - Ross - Vinton

AREA 20/21

Serving Family, Friends, and Stakeholders Policy

The WIOA program, while not an entitlement, is accessible to any individual who is eligible and suitable for services available. However, when applicants have a close relationship to WIOA staff, management, and other specific stakeholders of the workforce investment system, attention will be given to ensure access to program services is not based upon this relationship or political influence. It is possible that even without an intention to misuse WIOA funds, the decision to enroll an individual in the program could be perceived as improper and cause potential non-compliance with State and/or federal law.

In no instance shall any person determine eligibility, assess, access information, or directly serve a member of his or her immediate family or an individual with whom a close personal relationship exists. Likewise, stakeholders identified in this issuance shall not use their position to influence a decision to enroll an individual in the WIA program.

Real or perceived violations of this policy shall result in referral, including but not limited to the Ohio Ethics Commission or prosecuting authority for investigation.

When a relationship exists, it must be disclosed at the time of application to the program, and documented for the record. Thereafter, the local policy describing how the individual will be determined eligible, assessed, and served (if appropriate) in the WIOA program must be followed.

An arms-length determination of eligibility and assessment must be conducted by a staff member that has no relationship to the individual. Likewise, decisions related to approving training, supportive services, or other service needs must be made by an authorized manager with no such relationship to the applicant.

Area 20/21 established procedures will be followed unless one of the following conflicts exists: Relation to

1. WIOA case manager. Case manager is removed from any involvement or decision making process.

2. WIOA supervisor. Supervisor is removed from any involvement or decision making process. The Administrator or Director will step in to complete the process.
3. WIOA Administrator or Director. The Administrator or Director is removed from any involvement or decision making process. Supervisor will step in to complete the process.

All relatives to the following parties: local elected officials, WIB members, WIB committee or subcommittee members, Youth Council members, WIOA executive staff and supervisors, WIOA employees, One-Stop partners, Contractors, and County employees, will be tracked on a county/Area spread sheet.

B. Definitions

Close Family Member:	Include parents, children, sibling, spouses and domestic partners. (As defined by the State of Ohio Governor's Executive Order 2007-01S)
Immediate and other family:	Consists of the individual's parents (including step-parents), spouse, domestic partner, children (including step-children), foster children, siblings, grandchildren, grandparents, and any immediate relatives by blood or marriage (i.e., in-laws, cousins, nieces, nephews, aunts, and uncles).
Stakeholders:	Individuals not related to WIOA agency staff or management, that have direct or indirect management or responsibility for managing the WIOA workforce system, including WIOA executive staff, supervisors, local elected officials, contractors, WIB and Youth Council members, WIOA employees, and One-Stop partners.
Close Relationship:	An applicant has a "close relationship" to WIOA staff, management or other specified stakeholders of the workforce investment system if and when the applicant's prior and/or present social interactions and/or business dealings with the stakeholder would

give a reasonable observer cause to believe that the applicant's access to program services was based upon this relationship, as opposed to a demonstrable need. Although there is no bright line test for the determination of such a relationship, WIOA staff, management and other workforce investment systems stakeholders are advised to avoid the appearance of impropriety by abstaining from directly assisting and/or influencing the application process of friends, former and/or present colleagues and persons with whom they have an ongoing social or business relationship.