SERVING APPLICANTS WITH A CLOSE RELATIONSHIP

Effective
July 1, 2026

Purpose
The purpose of this policy is to outline requirements and procedures that ensure all individuals enrolled in the Workforce Innovation and Opportunity Act (WIOA) program have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest.

Applies To
1. Stark Tuscarawas Workforce Development Board (STWDB)
2. Workforce Initiative Association (WIA)
3. All Area Subrecipients
4. East Central Ohio Region WDBs (Area 17 and Area 18)

References
1. ODJFS WIOAPL 15-05.1 Serving Applicants with a Close Relationship to the Workforce Innovation and Opportunity Act Program
2. Workforce Innovation and Opportunity Act (WIOA)
3. WIOA Public Law 29 U.S.C. 3101 et seq.
4. Ohio Rev. Code 102
5. Ohio Admin Code 5101:9-31-01
6. USDOL TEGL 35-10, Transparency and Integrity in Workforce Investment Board Decisions

Related Documents
1. East Ohio WIOA Region Referral Form
2. East Ohio WIOA Region Disclosure of Relationship MOU

Background
The WIOA program, while not an entitlement, should be accessible to any individual who is eligible and suitable for services available in the local area. However, when applicants have a close relationship to any WIOA program staff, management, and other specific stakeholders of the workforce development system, attention must 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.

Procedures have been approved and implemented by the Stark Tuscarawas Workforce Development Board that ensure all individuals enrolled in the WIOA program have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest. Under no circumstances should stakeholders use their position to influence decisions regarding an applicant's enrollment or participation in WIOA-funded services.

Definitions
- ***Close relationship:*** The applicant's prior and/or present social interactions and/or business dealings with stakeholders of the workforce development system gives a reasonable observer cause to believe

that the applicant's access to WIOA program services would be based upon this relationship, as opposed to demonstrated need.

- ***Close family member:*** Parents, stepparents, spouse, domestic partner, children, step-children, foster children, siblings, grandchildren, grandparents, and any immediate relatives by blood or marriage (i.e., in- laws, first cousins, nieces, nephews, aunts, and uncles).
- ***Stakeholders:*** Individuals not related but have direct or indirect management or responsibility for managing the WIOA workforce system (including WIOA executive staff, supervisors, local elected officials, contractors [e.g., adult, dislocated worker, or youth program vendors]), WDB and subcommittee members, WIOA employees, and OhioMeansJobs center partner staff.

Policy & Procedure

Procedures have been approved and implemented by the Stark Tuscarawas Workforce Development Board that ensure a consistent equitable assessment toward suitability for WIOA enrollment and/or funding for training.

Prior to enrollment in WIOA, case managers will ask all potential WIOA customers whether they have a close relationship with program staff, agency employees, service provider staff, or other stakeholders.

All stakeholders have a duty to inform the supervisor when a person with whom they have a close personal relationship is applying for services. This information is to be communicated by the involved stakeholder in writing to the WIOA program supervisor. The staff stakeholder will remove themselves from any involvement in the case.

If a close relationship emerges or changes during the program period, the area must take action to ensure that the individual is served without bias.

WIOA service delivery staff will maintain a list of all customers subject to this policy. Any action taken as a result of this policy must be documented within the customer's case file. This list of all participants who have disclosed that a close relationship to WIOA staff, management, or other specific stakeholders of the workforce development system will be prepared and provided to ODJFS program monitors and auditors at the onset of all monitoring visits.

1. Should a potential customer disclose a close personal relationship with service delivery staff:
    a. It will be brought to the attention of the case manager's WIOA program supervisor. Disclosed relationships are documented in the customer's case file.
    b. Appropriate forms must be filled out and signed by the WIOA program supervisor. Copies of the signed form must be kept on file with the WDB and provider supervisor.
    c. The WIOA program supervisor will remove a staff member from any assignment involving a customer with a close relationship and will ensure that the customer is assigned to a staff member having no potential conflict of interest. Decisions related to approval of training, supportive services, or other service needs must be made by staff having no potential conflict of interest.
2. Should a potential customer disclose a close personal relationship with STWDB staff, WIOA service delivery executive staff or supervisors, an elected official, and/or other stakeholders by definition:
    a. It will be brought to the attention of the Stark Tuscarawas Workforce Development Board Executive Director after disclosed relationships are documented in the customer's case file.
    b. Appropriate forms must be filled out and signed by the appropriate service delivery staff and management. Copies of the signed form must be kept on file with the STWDB and provider supervisor.

c. The Stark Tuscarawas Workforce Development Board Executive Director will facilitate the referral request and the outcome of the referral between service delivery staff and the neighboring WDBs.
    i. The Stark Tuscarawas Workforce Development Board maintains agreements or memorandums of understanding with our East Central Ohio Region WDBs (Area 17 and Area 18) to accept referrals for eligibility, assessment, and service delivery when an applicant is a family member of an elected official, WDB member, or WIOA executive staff or supervisor, in order to avoid situations that may give rise to a suggestion that any decision was influenced by these parties.

Responsible Party

Assistant Director, Stark Tuscarawas Workforce Development Board

Approving Authority

Executive Director, Stark Tuscarawas Workforce Development Board

Revision History

07-01-2016 (previously Suitability, Priority & Close Relationships) | 07-01-2025