

**Alabama Workforce Board
401 Adams Avenue
Montgomery, Alabama 36104**

Alabama Workforce Board Policy PY2024-1

Subject: Alabama Workforce Board Conflict of Interest Policy

Purpose: This Policy states that a member of the Alabama Workforce Board should abstain from any discussion or voting on any item if there is a personal or private interest involved and should avoid even an appearance of a conflict of interest.

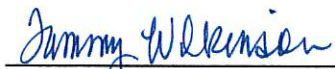
Effective Date: December 11, 2024

References: WIOA Section 101(f)

Discussion: This policy states what an Alabama Workforce Board member may not do, specifies the definition of immediate family member and the code of conduct for the Board members, and provides for sanctions in cases of violations. This policy rescinds the Governor's Workforce Innovation Directive No. PY2015-13, Conflict of Interest.

Action: Each Alabama Workforce Board member must read, agree to and abide by the Conflict-of-Interest policy. A signed copy of the policy will be kept on file for a period of at least three (3) years past the end of the Board member's term.

Contact: Questions regarding this policy should be referred to Margaret Henderson at Margaret.henderson@commerce.alabama.gov or by phone at 334.242.5300.



Tammy Wilkinson, Division Director
Workforce Development Division



Date

ALABAMA WORKFORCE BOARD CONFLICT OF INTEREST POLICY

Alabama Workforce Board Policy PY2024-1

This policy rescinds Governor's Workforce Innovation Directive No. PY2015-13.

I. General Policy Statement

When an appointed member of the Alabama Workforce Board, herein after referred to as "the Board," has a personal or private interest in a proposal or decision pending before the Board, the member must announce and publicly disclose the fact to the Board in an open meeting and abstain from discussions and voting on that item. A member should avoid even the appearance of a conflict of interest.

Specifically, as provided in Section 101(f) of the Workforce Innovation and Opportunity Act (WIOA) of 2014, a member of a State Workforce Development Board may not:

- 1) Cast a vote on, nor participate in any decision-making capacity:
 - A. regarding the provision of services by such member, or by an entity that such member represents; or
 - B. that would provide direct financial benefit to such member, or the immediate family of such member.
- 2) Engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the WIOA Combined State Plan.
- 3) Use, or attempt to use, the appointment to secure benefits, privileges, exemptions or advantages for the member, any member of his or her immediate family, or an organization with which the member is associated that are different from those normally available to a member of their business classification, profession, or organization.

For purposes of this policy, "immediate family member" includes spouse, son, son-in-law, daughter, daughter-in-law, mother, mother-in-law, father, father-in-law, brother, brother-in-law, sister, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.

II. Code of Conduct

This Code of Conduct sets forth standards governing the conduct of board members and any officers, employees, and agents of the Board who significantly participate in the development of contract specifications, standards, and/or award of contracts or procurement of any other goods and services approved by the Board.

- A. **Declaration of possible conflicts** - Any Board member with a potential or actual conflict of interest must disclose that fact to the Board (or the Executive Secretary) as soon as the conflict is discovered, and, to the extent possible, before the meeting involving the issue to be discussed. If it should be determined during the meeting that a conflict of interest exists, the member must verbally declare such conflict of interest, such declarations must be clearly noted in the minutes, and the member must excuse him/herself from the remainder of the discussion and voting.

- B. **Abstention from participation** - No Board member or state employee assigned to administer the Board, officer, or agent including the immediate family thereof, will participate in decisions about contracts with the organization he or she represents or from which they receive direct financial benefit. Participation includes discussion, lobbying, rating, recommending, explaining, or assisting in the design or approval of the procurement process.

- C. **Sanctions** - Violation of this code may be determined by a committee of the Board appointed by the Chair. After a hearing, the committee will recommend appropriate actions.

Willful violations by a Board member may result in removal from the Board, and if the Board decides it is in the best interest of the State of Alabama, termination of the questioned contract.

With my signature below, I indicate receipt of this Conflict-of-Interest Policy and agree to abide by the provisions stated herein.

Signature

Date

Printed Name

Approved 12.11.2024