



www.stlcowd.org

Office of Compliance Issuance

42-2026

Release Number-Program Year

Active Date: 04/30/2026
Effective Date: 04/30/2026
Expiration Date: Continuous, until further notice

Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

WIOA Workforce Development Board Conflict of Interest & Code of Conduct Policy

ATTACHMENTS (if any):

(A) - Conflict of Interest and Code of Conduct Signature Form

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
Title I: Adult
Title I: Dislocated Worker
Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this issuance is immediate and continuous.

RESCISSIONS: N/A

REFERENCES: N/A

## **SUMMARY**

St. Louis County Workforce Development Board (STLCOWDB) policy is to provide requirements for code of conduct and conflicts of interest.

## **BACKGROUND**

STLCOWDB policy is to provide board members requirements for code of conduct and conflicts of interest.

## **SUBSTANCE**

### **A. WORKFORCE DEVELOPMENT BOARD CONFLICT OF INTEREST AND CODE OF CONDUCT**

Where this document references “Member” it shall mean any agent, STLCOWDB employee, WIOA sub-recipient, STLCOWD (Saint Louis County Workforce Development) employee, officer, Committee Member, Ex-Officio, and Board Member.

The key responsibilities of STLCOWDB includes broad-based strategic planning, more efficient use of resources, improved service delivery, results-based accountability and increased employer involvement. In order to ensure that the citizens of St. Louis County (Region 13) have complete confidence in those members appointed by the County Executive to serve on the Workforce Development Board, these individuals agree to abide by the following conflict of interest provisions as required by the Workforce Innovation and Opportunity Act (WIOA).

### **B. RESTRICTED ACTIVITIES**

- I. No Member of the Workforce Development Board shall:
  - a. Cast a vote or participate in any decision-making capacity on any matter under consideration:
    - regarding the provision of services by such member (or by an entity that such member represents); or
    - that would provide direct financial benefit to such member or the immediate family of such member.
  - b. Engage directly or indirectly in any business transactions or private arrangement for profit that accrues from or is based upon his or her official position or authority on the Board.
  - c. Participate in the negotiation of or decision to award contracts or grants, the settlement of any claims or charges in any contracts or grants, the certification of any eligible providers or the establishment of any designation of any local workforce investment areas or the establishment of any one stop delivery system, with or for any entity in which he or she has a financial or personal interest.

- d. No individual may be placed in a Workforce Innovation and Opportunity Act employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual.

II. Representation of interests

No Member of the board shall represent or act as agent for any private interest, whether for compensation or not, in any transaction in which the board has a direct and substantial interest and which could be reasonably expected to result in a conflict between a private interest of the board and his official board responsibility. A business sector representative may not be an employee of a public sector organization represented on the local Workforce Development Board, including state and local government agencies.

III. Misuse of information

No Member of the board shall, for his or her own personal gain or for the gain of others, use any information obtained as a result of his or her board membership and not available to the public at large or divulge such information in advance of the time prescribed for its authorized release.

IV. Misuse of board facilities and equipment

No Member of the board shall use any board equipment, supplies or properties for his or her own private gain or for other designated purposes.

V. Prohibition of gratuities or favors

No Member of the board shall solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.

**C. DUTIES OF BOARD MEMBERS**

It shall be the duty of all board members to:

1. Excuse themselves from their official board duties if there is a conflict of interest (real, applied, or apparent).
2. Advise the board of any potential conflict(s) of interest.
3. Ask the board for an opinion if they have any doubts that a specific situation involves a conflict of interest.

**D. VIOLATIONS OF THE CONFLICT OF INTEREST & CODE OF CONDUCT**

If, after a detailed review the board believes that this Code has been violated, it can recommend to the County Executive that the individual who has violated the Code be

removed as a Member of the board for a violation of this Code, even if the board has not made such a recommendation.

## **E. SIGNATURE PAGE**

### **St. Louis County Workforce Development Board (STLCOWDB) Conflict of Interest and Code of Conduct**

The key responsibilities of the Workforce Development Board Members include broad-based strategic planning, more efficient use of resources, improved service delivery, results-based accountability and increased employer involvement. In order to ensure that the citizens of St. Louis County (Region 13) have complete confidence in those individuals appointed by the County Executive to serve on and work under the Workforce Development Board, these individuals agree to abide by the following conflict of interest provisions as required by the Workforce Innovation and Opportunity Act (WIOA).

#### **Restricted Activities:**

1. No Member of the Workforce Development Board shall:
  - a. Cast a vote or participate in any decision-making capacity on any matter under consideration:
    - regarding the provision of services by such member (or by an entity that such member represents); or
    - that would provide direct financial benefit to such member or the immediate family of such member.
  - b. Engage directly or indirectly in any business transactions or private arrangement for profit that accrues from or is based upon his or her official position or authority on the Board.
  - c. Participate in the negotiation of or decision to award contracts or grants, the settlement of any claims or charges in any contracts or grants, the certification of any eligible providers or the establishment of any designation of any local workforce investment areas or the establishment of any one stop delivery system, with or for any entity in which he or she has a financial or personal interest.
  - d. No individual may be placed in a Workforce Innovation and Opportunity Act employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual.
  
2. Representation of interests. No Member of either of the boards shall represent or act as agent for any private interest, whether for compensation or not, in any transaction in which the board has a direct and substantial interest and which could be reasonably expected to result in a conflict between a private interest of the board and his official board responsibility. A business sector representative may not be an employee of a public sector organization represented on the local Workforce Investment Board, including state and local government agencies.

3. Misuse of information. No Member of the board shall, for his or her own personal gain or for the gain of others, use any information obtained as a result of his or her board membership and not available to the public at large or divulge such information in advance of the time prescribed for its authorized release.
4. Misuse of board facilities and equipment. No Member of the board shall use any board equipment, supplies or properties for his or her own private gain or for other designated purposes.
5. Prohibition of gratuities or favors. No Member of the board shall solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements

**Duties of Board Members:**

It shall be the duty of all board members to:

1. Excuse themselves from their official board duties if there is a conflict of interest.
2. Advise the board of any potential conflict(s) of interest.
3. Ask the board for an opinion if they have any doubts that a specific situation involves a conflict of interest.

**Violations of the Conflict of Interest and Code of Conduct:**

If, after a detailed review, the board believes that this Code has been violated, it can recommend to the County Executive that the individual who has violated the Code be removed as a Member of the board for a violation of this Code, even if the board has not made such a recommendation.

**Disclosure:**

If, after reading the above policy and code of conduct, you have determined you have a potential conflict of interest, please use the space below to describe the nature of the conflict of interest or attach a description to this document.

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**Attestation:**

By signing below, you acknowledge that you have reviewed and will adhere to the Conflict of Interest Policy and Code of Conduct outlined in this document.

\_\_\_\_\_  
Signature of Member

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Member

\*This attestation will be completed and submitted annually.

## **TIMELINE**

Immediate and continuous.

## **INQUIRIES**

Please direct all questions or comments regarding this Issuance document to [stlcowd@fwca-stl.com](mailto:stlcowd@fwca-stl.com). All active, expired, or rescinded Issuances are available upon request.

# ATTACHMENT A – Conflict of Interest and Code of Conduct Signature Form



## St. Louis County Workforce Development Board (STLCOWDB) Conflict of Interest and Code of Conduct

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  - d. No individual may be placed in a Workforce Innovation and Opportunity Act employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual.
2. Representation of interests. No Member of either of the boards shall represent or act as agent for any private interest, whether for compensation or not, in any transaction in which the board has a direct and substantial interest and which could be reasonably expected to result in a conflict between a private interest of the board and his official board responsibility. A business sector representative may not be an employee of a public sector organization represented on the local Workforce Investment Board, including state and local government agencies.
3. Misuse of information. No Member of the board shall [DS1.1], for his or her own personal gain or for the gain of others, use any information obtained as a result of his or her board membership and not available to the public at large or divulge such information in advance of the time prescribed for its authorized release.
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### Disclosure:

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### Attestation:

By signing below, you acknowledge that you have reviewed and will adhere to the Conflict of Interest Policy and Code of Conduct outlined in this document.

.....  
Signature of Member

.....  
Date

.....  
Printed Name of Member

314-377-0445

stlcowd@fwca-stl.com

MET Center  
6347 Plymouth Ave.  
St. Louis, MO 63133

STLCOWD  
Active Date: 04/30/2026  
Effective Date: 04/30/2026

*STLCOWD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri Relay Services 711.*