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Office of
Compliance
Issuance

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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:

Multiple Roles

ATTACHMENTS (if any): (N/A)

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 policy is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

20 CFR 679.430,
WIOA Section 107(h)
STLCOWD – WIOA Workforce Development Board Conflict of Interest & Code of Conduct Policy
STLCOWD – Local Fiscal Agent
OWD – Designation of a Local Fiscal Agent

SUMMARY

St. Louis County Workforce Development (STLCOWD) policy is to provide requirements and firewalls for the contracted fiscal agent and subrecipients with STLCOWD.

BACKGROUND

Definitions

- Local Fiscal Agent (LFA) - Designation of a fiscal agent does not relieve the CLEO of liability for the misuse of grant funds. If the CLEO designates a fiscal agent, the CLEO must ensure this agent has clearly defined roles and responsibilities.
- Subrecipient - an entity that receives Workforce Innovation and Opportunity Act (WIOA) funds from STLCOWD to perform a program, service or project, which may include roles such as fiscal agent, service provider, training provider, or One-Stop Operator.
- Multiple Roles - instances where a subrecipient performs more than one role within STLCOWD funded programs, (e.g. subrecipient acts as a service provider and One-Stop Operator).
- Recipient - Recipient of WIOA Title I funding includes the following:
 - Registrants, applicants, and registrants and applicants for whom an eligibility determination has been made;
 - Participants;
 - Applicants for employment and employees;
 - Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
 - Recipients that receive WIOA Title I financial assistance; and
 - Members of the public, including those with impaired vision or hearing and those with limited English proficiency.

SUBSTANCE

The purpose of this policy is to establish clear and consistent guidelines for implementing firewalls for the fiscal agent and subrecipients contracted by STLCOWD who serve in multiple roles (e.g., as fiscal agent, service provider, training provider, and/or One-Stop Operator). These firewalls are designed to:

- Prevent conflicts of interest, real or perceived, that may arise from subrecipients serving in multiple roles.
- Ensure fair, objective, and accountable administration of WIOA funds.
- Comply with federal and state regulations on conflict of interest, transparency, and accountability as outlined by the State of Missouri and WIOA.

A. MULTIPLE ROLES REQUIRING FIREWALLS

Applies to the fiscal agent and subrecipients that may be contracted to perform two or more of the following roles:

- Fiscal Agent - manages and monitors WIOA funds and programming allocated to STLCOWD.
- One-Stop Operator - oversees the daily operations and coordination of services within the One-Stop center(s).
- Service Provider - delivers WIOA services to recipients, including enrollment into adult or youth programming, supportive services, career guidance, employment services, workforce development, OJT, etc.
- Eligible Training Provider - Eligible Training Providers (ETPs) are educational institutions and organizations that offer training programs approved under WIOA. These programs are designed to help individuals gain skills for in-demand occupations. This includes community colleges, technical schools, private training organizations, and other educational institutions that meet state and federal requirements for WIOA funding.

B. CONFLICT OF INTEREST & FIREWALL REQUIREMENTS

STLCOWD will document firewalls as part of the contracts to ensure that the fiscal agent and subrecipients serving in multiple roles do so in a transparent and compliant manner.

These firewalls shall include, but are not limited to, the following measures:

- Fiscal agent and subrecipient contracts must document procedures for managing any potential conflicts that arise from serving in multiple roles. These procedures should outline how the subrecipient will separate responsibilities, staff, and reporting structures to maintain impartiality.
- Staff assigned to specific roles (e.g., service and training providers, One-Stop Operations, or Fiscal Agent) should not perform duties outside their designated responsibilities unless approved and documented by STLCOWD.
- Management involved in decision-making processes must recuse themselves from decisions where there may be a conflict of interest.¹

C. REPORTING & RESOLUTION OF CONFLICTS OF INTEREST

The fiscal agent and subrecipients must report any potential, perceived, or actual conflicts of interest to STLCOWD immediately. STLCOWD will work with the subrecipient to assess and resolve any conflicts according to policy guidelines and will provide guidance to avoid recurrence.

D. COMPLIANCE & ENFORCEMENT

Fiscal agents and subrecipients are required to comply with this policy as a condition of their contract with STLCOWD. Non-compliance may result in corrective actions,

¹ 20 CFR 679.430, WIOA Section 107(h), and STLCOWD – WIOA Workforce Development Board Conflict of Interest & Code of Conduct Policy.

including contract amendments, reduced funding, or contract termination.

TIMELINE

Immediate and continuous.

INQUIRIES

Please direct all questions or comments regarding this issuance to stlcowd@fwca-stl.com.
All active, expired, or rescinded Issuances are available upon request.