



Date: 4/27/17

**Roles and responsibilities, and code of conduct of the
Workforce Innovations and Opportunity Act (WIOA) Title I service provider
and One-Stop Operator
for the Northwestern Oklahoma Workforce Area**

Roles and Responsibilities

The One-Stop Operator is employed by Community Development Support Association, Inc. (CDSA), the WIOA Title I service provider under contract with the Northwestern Oklahoma Workforce Board (NOWB). The One-Stop Operator and all WIOA Title I staff work under the authority of the CDSA Executive Director.

The One-Stop Operator is responsible for ensuring smooth operations of the Oklahoma Works Offices in the Area. Since services are provided by several partners, not just WIOA Title I staff, the One-Stop Operator must work to ensure effective collaboration by providing training and support to all Oklahoma Works partners and by identifying barriers and solutions to remove those barriers.

Code of Conduct/Conflict of Interest/Maintaining Firewalls

According to 678.620 of the WIOA Regulations, “At a minimum, the one-stop operator must coordinate the service delivery of required one-stop partners and service providers. ...”. Additional roles may include “being the primary provider of services within the center, providing some of the services within the center, or coordinating service delivery in a multi-center area...”

“An entity serving as a one-stop operator, that also serves a different role within the one-stop delivery system, may perform some or all of these functions when it is acting in its other role, if it has established sufficient firewalls and conflict of interest policies and procedures. The policies and procedures must conform to the specifications in 679.430 ... demonstrating internal controls and preventing conflict of interest.

Specifically, 679.430 requires that any organization that has been selected or otherwise designated to perform more than one of these functions must develop a written agreement with the Local Workforce Development Board and Chief Elected Official to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State’s conflict of interest policy.

Compliance

1. Code of Conduct/Conflict of Interest - Community Development Support Association, Inc. (CDSA) requires all employees to annually affirm adherence to the agency Code of Conduct. This code of conduct includes

prohibition of conflict of interest. The One-Stop Operator signed code of conduct is attached to this agreement.

2. Office of Management and Budget Circulars and internal controls - Community Development Support Association, Inc. (CDSA) complies with Uniform Administrative Regulations, Cost Principles, and Audit Requirements for Federal Awards as described under 2 CFR 200. CDSA has adopted internal control procedures and fiscal policies (including procurement policies) that adequately insure the appropriate use of grant funds and insure the safeguarding of assets, as evidenced in our annual "Independent Auditor's Report. CDSA audits consistently report the accounting practices to be in conformity with generally accepted accounting principles; with adequate internal controls; free of any findings of noncompliance; and free of any questioned costs. These internal controls allow the agency to maintain separation of duties and other firewalls that protect from fraud, waste, and abuse.

In addition, as required in 678.625, firewalls must be maintained so that the service provider and One-Stop Operator are not involved in the competition to award the service provider contract, nor involved in the subsequent oversight, monitoring, and evaluation of the performance of the service provider. To ensure this firewall is maintained, the One-Stop Operator is never included when the service provider is being reviewed by the board for any of these purposes.

The signatures on this date signify our agreement to these terms.

For the Local Elected Officials	Title	Date
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For the NOWB	Title	Date
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For the Service Provider	Title	Date
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