
NORTH CENTRAL
COUNTIES CONSORTIUM

CONFLICT OF INTEREST PROCEDURE

September 2026

Purpose

This policy establishes the standards of conduct for preventing, identifying, disclosing, and resolving actual, potential, and apparent conflicts of interest. This policy establishes requirements governing procurement activities, acceptance of gratuities or other benefits, disclosure and recusal, organizational conflicts of interest, and the use of firewalls when NCCC performs multiple roles or functions that could create a conflict of interest.

The policy is intended to protect the integrity and impartiality of NCCC's decisions and ensure compliance with federal and state conflict of interest requirements.

References

- 2 CFR 200.112
- 2 CFR 200.318(c)(1)
- 2 CFR 200.319(b)
- 20 CFR 679.430
- WSD22-13, Selection of AJCC Operators and Career Services Providers

Background

Federal requirements establish standards of conduct to protect the integrity of activities supported by federal awards. These requirements prohibit individuals with a real or apparent conflict of interest from participating in the selection, award, or administration of federally supported contracts and require disclosure of potential conflicts of interest to the appropriate federal awarding agency or pass-through entity.

Conflicts of interest may also arise when an organization performs multiple functions that create competing responsibilities or could impair the objectivity of its decisions. Within the workforce development system, NCCC may perform multiple roles, including administrative, fiscal, oversight, operational, and service delivery functions. These overlapping responsibilities require appropriate safeguards to ensure decisions are impartial, responsibilities are appropriately separated, and no individual or organizational unit receives an unfair competitive advantage.

NCCC therefore maintains standards of conduct, disclosure and recusal requirements, and organizational firewalls designed to identify, prevent, and mitigate actual, potential, and apparent conflicts of interest.

Definitions

Conflict of Interest: A situation in which an individual's financial, personal, professional, or other interests could impair, influence, or reasonably appear to influence the individual's objectivity or judgment in carrying out responsibilities on behalf of NCCC.

Apparent Conflict of Interest: A situation in which the circumstances could reasonably cause an outside observer to question whether an individual's actions, judgment, or decisions are impartial, regardless of whether an actual conflict exists.

Immediate Family: For purposes of this policy, an individual's spouse or domestic partner, parent, child, sibling, grandparent, grandchild, or corresponding step or in-law relationship.

Organizational Conflict of Interest: A situation in which NCCC's relationships, responsibilities, or performance of multiple functions could impair or reasonably appear to impair its objectivity, create competing responsibilities, or provide NCCC or another party with an unfair competitive advantage.

Firewall: An administrative control that separates responsibilities, personnel, information, decision-making authority, or oversight functions to prevent or mitigate an actual, potential, or apparent conflict of interest.

Local Policy and Procedures

NCCC shall conduct federally funded activities in a manner that protects the integrity and impartiality of its decisions and prevents actual, potential, and apparent conflicts of interest.

Individual Conflicts of Interest

No employee, officer, agent, or board member may participate in the selection, award, or administration of a contract supported by a federal award when a real or apparent conflict of interest exists. A conflict exists when the individual, a member of their immediate family, their partner, or an organization that employs or is about to employ any of these parties has a financial or other interest in, or may receive a tangible personal benefit from, an entity being considered for a contract.

Individuals shall promptly disclose actual, potential, or apparent conflicts of interest and shall not participate in related discussions, evaluations, recommendations, decisions, approvals, or other actions until the conflict has been reviewed and appropriate safeguards have been established.

Disclosure and Recusal

Employees and agents shall disclose conflicts to the Executive Director. Board members shall disclose conflicts to the Executive Director and applicable board leadership. NCCC shall document the disclosure, determination, recusal when required, and any other action taken to mitigate the conflict.

When a potential conflict of interest requires disclosure to a federal awarding agency or pass-through entity, NCCC shall make the disclosure in writing in accordance with the applicable federal agency requirements.

Procurement Integrity

Employees, officers, agents, and board members involved in procurement shall perform their duties impartially and in a manner that protects full and open competition.

A contractor that develops or drafts specifications, requirements, statements of work, invitations for bids, requests for proposals, or similar documents for a procurement shall not compete for the resulting contract.

Gifts and Gratuities

Employees, officers, agents, and board members shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, except for unsolicited items of nominal value as permitted by this policy.

For purposes of this policy, an unsolicited item is considered nominal when its value does not exceed \$20 per occurrence and the total value of all gifts or gratuities received by the individual does not exceed \$100 per calendar year. Gifts and gratuities include anything of value, including meals and entertainment.

Regardless of value, no gift, gratuity, favor, or other benefit may be accepted when it is offered in exchange for, results in, or could reasonably appear to influence preferential treatment or a NCCC decision.

Organizational Conflicts and Firewalls

NCCC shall identify and address organizational conflicts of interest when its performance of multiple roles or functions could impair, or reasonably appear to impair, the objectivity of its decisions or provide an unfair competitive advantage.

When NCCC performs multiple WIOA functions, appropriate firewalls shall separate conflicting responsibilities. Depending on the circumstances, firewalls may include separation of duties, reassignment of decision-making or oversight authority, independent review, restricted access to procurement information, or use of an independent third party.

NCCC shall not oversee or monitor its own performance when independent oversight is required. When NCCC serves as both the AJCC Operator and a Career Services Provider, appropriate separation shall be maintained between staff providing services, staff responsible for oversight and monitoring, and the Workforce Development Board.

Violations

Violations of this policy may result in disciplinary or other corrective action appropriate to the nature and circumstances of the violation and consistent with applicable personnel requirements. Violations involving an agent, board member, contractor, or other individual not subject to employee discipline shall be referred to the appropriate authority for corrective action.

Documentation

NCCC shall maintain documentation sufficient to demonstrate disclosure and resolution of identified conflicts, recusals, firewall arrangements, and other actions taken to prevent or mitigate conflicts of interest.