

## GRWDB Code of Conduct and Conflict of Interest Policy

**Purpose:** A Code of Conduct and Conflict of Interest Policy, as required under Workforce Innovation and Opportunity Act (WIOA), was approved by the Greater Raritan Workforce Development Board (GRWDB) at its Oct. 6, 2022, meeting. This policy was updated to include a conflict-of-interest statement when participating in the review and evaluation of proposals, and was approved by the full board on April 9, 2026.

**Background:** Grantees, subrecipients and contractors funded under WIOA, per Section 102(b)(2)(E), and Section 107(h), must implement codes of conduct and conflict of interest policies and procedures as stipulated in WIOA law, regulations and guidance; Office of Management and Budget (OMB) Circulars; State regulations; and State WIOA policies. A Conflict of Interest Policy is required to ensure that individuals or representatives of organizations entrusted with public funds will not personally or professionally benefit from the award, administration, or expenditure of such funds.

The GRWDB also recognizes that by its very composition, conflicts of interest and issues concerning the appearance of fairness may arise. Therefore, it is essential for the members to be sensitive and err on the side of caution when potential or real conflict or fairness matters occur.

**Policy:** To accomplish these purposes, the GRWDB establishes the following definitions, actions, and guidelines for its Code of Conduct and Conflict of Interest Policy.

**Code of Conduct:** All GRWDB and committee members, including subrecipients, contractors and workforce system partners, act in a courteous, friendly, helpful and prompt manner in dealing with the public, customers, officials and one another.

**Ethical Principles:** It is the GRWDB's policy to be knowledgeable of and comply with all applicable laws and regulations of the United States and the State of New Jersey in a manner that will reflect a high standard of ethics. All GRWDB representatives and partners should be knowledgeable of emerging issues and professional standards in the field and conduct themselves with professional competence, fairness, efficiency and effectiveness.

Areas of concern are those actions or lack of actions which may lead to conflict of interest or the appearance of conflict of interest or to a perception of unfairness related to GRWDB business outside Board and Committee meetings. Specific include but are not limited to:

- **Comments Made in Public:** GRWDB staff, Board and Committee members and partners are encouraged to act in a public relations capacity for the GRWDB. This includes public speaking engagements and comments in a public forum. Because there is interest in GRWDB actions, members should differentiate

between descriptive comments, which relate to actions already taken by the GRWDB, and statements, which imply future GRWDB decision-making, or the ability to influence decision-making.

- **Information Sharing:** GRWDB staff, Board and committee members are encouraged to share information with the community about GRWDB activities. Access to information regarding procurement of services should be available at the same time and under the same circumstances to all parties. Such information includes, but is not limited to, the Operations Plan, request for proposals, notice of meetings, meeting minutes, and policies, which will be easily available and kept up to date on the GRWDB website, [www.thegrwdb.org](http://www.thegrwdb.org).
- **Disclosure of Associations:** GRWDB staff, Board and Committee members and partners have professional and personal associations throughout the community. Such associations have been and will continue to be of significant benefit to the GRWDB. Where a direct or indirect financial conflict of interest exists, a GRWDB staff member, board or committee member and partners may not vote or serve on a rating team. When associations raise appearance of fairness as an issue, GRWDB staff, Board and Committee members and partners should qualify statements in public by disclosing the association and minutes of the meeting will reflect the disclosure.

For further details on GRWDB Board and Committee membership expectations, refer to the [GRWDB bylaws](#).

**Conflict of Interest:** Conflict of Interest is defined as being between the official responsibilities and the private interests of a person or entity that is in a position of trust. A conflict of interest would arise when an individual or organization has a financial or other interest in or participates in the selection or award of funding for an organization. Financial or other interest can be established either through ownership or employment.

- Each grant recipient and subrecipient must maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of GRWDB contracts and sub grants.
- No individual in a decision-making capacity shall engage in any activity if a conflict of interest (real, implied, apparent, or potential) is involved. This includes decisions involving the selection, award, or administration of a sub grant or contract supported by WIOA or any other federal or state funds.
- A GRWDB Board member or a Committee member cannot cast a vote or participate in any decision-making about providing services by such member (or by any organization that member directly represents) or on any matter that would provide any direct financial benefit to the member or to the member's organization or family.
- Before any public discussions regarding the release of a Request for Proposal, or any matter regarding the release of funding or the provision of services, a GRWDB Board member Committee member must disclose any real, implied, apparent, or potential conflicts of interest before engaging in the discussion. The minutes of the meeting should reflect the disclosure.

- Any individual taking part in the review and evaluation of proposals for GRWDB competitively procured services must assess their own affiliations and financial interest and those of their families that relate to their duties and sign a conflict-of-interest statement. (**See attachment A.**) This signed statement will be kept on file by GRWDB staff and by the Purchasing Department of Somerset County, the county's fiscal agent.
- GRWDB staff members are prohibited from accepting gifts or honorarium.
- Disciplinary actions may be taken up to and including termination of board membership for violation of this policy by any individual. The GRWDB Executive Committee may evaluate any violations of these provisions on a case-by-case basis and what penalties, sanctions or other disciplinary action are appropriate.
- Individuals shall not use for their personal gain, for the gain of others, or for other than officially designated purposes, any information obtained as a result of their committee, board or working relationships with the GRWDB where that information is not available to the public at large or divulge such information in advance of the time decided by the GRWDB for its release.
- The GRWDB One-Stop Operator must disclose any potential conflicts of interest arising from relationships with training providers and other service providers. (WIOA Section 121 (d)(4))
- Any organization that has been selected or otherwise designated to perform more than one function related to GRWDB funded services must develop a written plan that clarifies how the organization will carry out its multiple responsibilities while demonstrating compliance with WIOA, corresponding regulations, relevant circulars, and this conflict of interest policy. This plan must be agreed to by the GRWDB.
- WIOA and related workforce programs must accessible to any individual in the GRWDB Local Area who is eligible and suitable for available services. When applicants have a close relationship with GRWDB staff, vendors and system partners, access to program services should not be based on such relationships or based on political influence, to avoid a perception of improper influence. To ensure funding integrity, safeguards must be in place to ensure that all those severed in the program are eligible, suitable and not improperly influence selection. To ensure program integrity, workforce system partners cannot provide direct service during the intake or eligibility determination of a family member (spouse, partner, child or sibling, including step relations and in-laws), a business partner, or close acquaintance.

All GRWDB Local Area partners at all levels of participation funded by WIOA and other federal and state funds are expected to read, understand and apply this policy to ensure system integrity and effective oversight in the local workforce system.

**Attachment A**

Date: XXXXX X, 202X  
Melissa A. Kosensky  
Purchasing Agent

Re: Title of RFP

“I hereby certify that I have reviewed the conflict-of-interest standards of the Local Government Ethics Law or the School Ethics Act, as appropriate, and that I do not have a conflict of interest with respect to the evaluation of this proposal. I further certify that I am not engaged in any negotiations or arrangements for prospective employment or association with any of those submitting proposals or their parent or subsidiary organization.” (NJAC 5:34-4.3)

Signature:

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