

CONFLICT OF INTEREST POLICY

INTRODUCTION:

The Yavapai County Workforce Development Board (WDB) recognizes that, by its very composition, conflicts of interest and issues concerning the appearance of fairness may arise. Therefore, it is essential for the WDB to be sensitive and err on the side of caution when potential or real "conflict" or "fairness" matters occur.

The WDB recognizes that many of its members are selected because of their expertise and involvement in training, employment and job creation. They should have maximum freedom to share their talent, knowledge, and experience, but within the scope of fairness.

The WDB also recognizes that its Members may have professional and/or personal associations which could lead to conflicts of interest or appear to lead to unfairness.

STATEMENT OF PURPOSE:

The WDB wishes to guard against problems arising from real, perceived, or potential conflicts of interest and to maintain fairness in action and appearance. To accomplish these purposes, the WDB establishes the following Conflict of Interest Policy.

POLICY:

This Policy will provide direction for compliance with Chapter 3, Article 8 of the Arizona Revised Statutes (A.R.S. Section 38-501 et. seq.) with respect to the provision of services through the Yavapai County Workforce Innovation and Opportunity Act (hereafter "WIOA"), and the members, officers, staff, or representatives/agents of the Yavapai County Workforce Development Board (hereafter "WDB"). Members, officers, staff, or representatives/agents, shall abide by all provisions of the above-referenced statutes when acting within the scope of their responsibilities on behalf of the WDB.

Pursuant to A.R.S. Subsection 38-503, members, officers, staff, or representatives/agents, who wish to enter into contracts for the provision of services, must not participate in the selection of vendors and must make the interest in the proposed contract known in the official records of the WDB. Any member, officer, staff, or representative/agent wishing to competitively bid on contracts for the procurement of goods and services, of any monetary amount, must annually sign a copy of the affidavit attached hereto as **Exhibit 1**. The signed affidavit will be filed in the official records of the WDB and shall be available for public inspection.

In addition, any member, officer, staff, or representative/agent of the WDB who participates in the expenditure of WIOA funds shall perform his/her duties in a manner consistent with their obligations to the WDB and in accordance with sound business practices. In complying with these requirements, members, officers, staff or representatives/agents shall refrain from:

1. Solicitation or acceptance of gratuities, favors, or anything of monetary value, from contractors, potential contractors, or parties to sub-agreements.
2. Participation in awards or administration of contracts to firms in which the member, officer, staff or representative/agent or his/her immediate family has a financial or other interest.

3. No officer or employee of the WDB shall supply to the WDB any equipment, material, supplies or services, unless pursuant to an award or contract let after public competitive bidding.

In addition, any member, officer, staff, representative/agent who is a paid consultant, or who has a relative who is a paid consultant (as defined in A.R.S. 38-502) for any provider which currently transacts business with the WDB, or which may bid on a future contract for provision of services with the WDB is prohibited from participating in a decision process which may lead to the award of a contract involving such firm.

A copy of this Policy can be found on the NACOG website (www.nacog.org). Each board member shall acknowledge receipt of the Policy by executing a copy of the affidavit below. The signed affidavits shall be retained in the official records of the WDB and shall be available for public inspection.

Any person violating this Policy may be subject to termination, removal or other disciplinary action, including sanctions by the WDB, and may be subject to additional penalties as provided by statute.

AMENDED AND APPROVED BY THE YAVAPAI COUNTY WORKFORCE DEVELOPMENT BOARD AT THEIR MEETING OF AUGUST 11, 2015.

ACKNOWLEDGEMENT OF RECEIPT OF CONFLICT OF INTEREST POLICY

(To be executed by all members, officers, staff, representatives/agents of the Yavapai County Workforce Development Board)

My signature acknowledges that I have received, reviewed and understand the provisions of the Workforce Development Board Conflict of Interest Policy and that I am aware that it contains important information regarding legal obligations arising from my activities of the WDB.

I further understand that any violations of Policy may prohibit my organization access to Yavapai County WIOA service provision.

- I do not have any conflicts of interest to declare
 I do have conflicts of interest to declare (See Exhibit 1)

Printed Name

Date

Signature

**EXHIBIT 1
CONFLICT OF INTEREST**

**AFFIDAVIT REGARDING PROVISION OF SERVICES TO THE YAVAPAI COUNTY
WORKFORCE DEVELOPMENT BOARD VIA THE WORKFORCE INNOVATION AND
OPPORTUNITY ACT OR WORKFORCE INVESTMENT ACT**

I, _____ am currently a member, officer, staff, representative/agent of the Yavapai County Workforce Development Board. During the 2022-2023 fiscal year, I intend to provide program services under the Workforce Innovation and Opportunity Act or Workforce Investment Act. I have read the Workforce Development Board's Conflict of Interest Policy and am familiar with its provisions.

I certify that I am not involved, and have not been nor will be involved, in any discussion, participation of vote that would influence the decision regarding the provision of any goods or services that I may furnish to the Workforce Development Board or WIOA Direct Services.

I understand that any false statement on this affidavit or any violation of the WDB's Conflict of Interest Policy may be grounds for termination, removal or other disciplinary action, including sanctions by the WDB, and may also subject me to additional penalties as provided by statute.

Please state conflict below:

Dated this _____ day of _____, 20__

Member Signature

**Yavapai County
Workforce Development Board Budget**

Draft

DATE: 1/12/2023

PROVIDER NACOG-EWD 221 NORTH MARINA STREET SUITE 201 PRESCOTT, ARIZONA 86301	TITLE: <u>WDB Budget</u> PROGRAM CONTRACT TERM: <u>July 1, 2022 - June 30, 2023</u>
TOTAL AMOUNT: \$ 868,767	

1.0 ADMINISTRATION	
1.1 Salaries	<u>\$ 223,982</u>
1.2 Fringe at 40%	<u>\$ 89,928</u>
1.3 Indirect Costs 7.5%	<u>\$ 23,543</u>
1.4 Professional & Outside	<u>\$ 10,000</u>
1.5 Travel	<u>\$ 5,000</u>
1.6 Youth	<u>\$ 471,314</u>
1.7 One Stop Operator	<u>\$ 20,000</u>
1.8 Other	<u>\$ 25,000</u>
1.9 Career Services (Titles I, II, III & IV - \$788,182)	<u>In Kind</u>
TOTAL ADMINISTRATION	<u>\$ 868,767</u>

Funded through WIOA Allocated funds

Title I Partner's Contribution - \$8,533 Salaries, Fringe and Indirect Costs

Title II Partner's Contribution - \$17,061 Cost Reimbursement

Title III Partner's Contribution - \$5,008 Cost Reimbursement

Title IV Partner's Contribution - \$5,009 Cost Reimbursement

Expenses come out of carry-over funds.

WAC Policy #1` Local Governance Policy: "The LWDB Budget is for all of the activities of the LWDB including the Title I budget amounts to be allocated for Youth (Section 133) and adult & Dislocated worker (Section 128) career services. The LWDB determines how much of the budget to allocate to required Partners for these services and how to procure these services."

§678.735(a): Local WDBs must provide to the Governor appropriate and relevant materials and documents used in the negotiations under the local funding mechanism, including but not limited to: The local WIOA plan, the cost allocation method or methods proposed by the partners to be used in determining proportionate share, the proposed amounts or budget to fund infrastructure, the amount of total partner funds included, the type of funds or non-cash contributions, proposed one-stop center budgets, and any agreed upon or proposed MOUs.

WDB Approval YES / NO

Date: _____



DEPARTMENT OF ECONOMIC SECURITY
Your Partner For A Stronger Arizona

Douglas A. Ducey
Governor

Michael Wisehart
Director

November 14, 2022

Yavapai Workforce Development Board
221 N. Marina Ste. 201
Prescott, AZ 86301-3188

RE: WIOA Data Validation Closure Letter

Attached: Data validation monitoring worksheet & summary

Dear Teri Drew,

The Division of Employment and Rehabilitation Services (DERS), Quality Assurance and Integrity Administration (QAIA) has completed the Data Validation Audit for the ARIZONA@WORK Yavapai County Local Workforce Development Area (LWDA) for the Workforce Innovation Opportunity Act (WIOA) Title IB Program for PY22.

Based on the audit conducted, there were no failed data elements. The data validation review for ARIZONA@WORK Yavapai County has achieved an accuracy rate of 100% for the current review period. With the receipt of this letter, please be advised that the audit is considered closed for PY22.

On behalf of the Quality Assurance and Integrity Administration (QAIA) WIOA Section, thank you for the cooperation and assistance provided by yourself and your staff during the review process.

If you have any questions, feel free to contact me directly at (480) 521- 0113 or aiwamoto@azdes.gov.

Sincerely,

Austin Iwamoto
WIOA Program Auditor
Quality Assurance & Integrity Administration

cc: Julie Sawyer (LWDB) Staff
Anita Payne (LWDB) Chair
Stacey Anderson, Audit Manager (QAIA)
Crystal Moody, Audit Supervisor (QAIA)



Yavapai County Finance Department

Connie DeKemper, CPA

FINANCE DIRECTOR

December 9, 2022

Teri Drew
Regional Director
Northern Arizona Council of Governments (NACOG)
P.O. Box 2451
Prescott, AZ 86302

Dear Ms. Drew,

Yavapai County has completed a review on December 9, 2022 of the Workforce Innovation and Opportunity Act (WIOA) program (CFDA #17.258, 17.259, 17.278) administered by NACOG for the period 1/1/2022-3/31/2022 (fiscal year 2021-2022). The objective of this review was to determine compliance with federal rules and regulations applicable to the WIOA program. We reviewed internal controls, expenditures (invoices, timesheets, journal entries, cost allocation), cash draw downs, equipment listing, Single Audit report, and monitoring reports issued by the Department of Economic Security. We noted no material errors as a result of our review.

The review also included NACOG as a One-Stop Operator. We have examined compliance with the requirements of WIOA, the Uniform Guidance at 2 CFR part 200 and 2 CFR part 2900, and the terms and condition of the contract/agreement with the One-Stop Operator. We noted no instances of non-compliance.

The fiscal year 2021-2022 monitoring review is closed.

Sincerely,

A handwritten signature in black ink, appearing to read "Noelle Smith", is written over a light grey circular stamp.

Noelle Smith
Financial Accountant



Yavapai County Eligible Training Provider List Updates

January 12, 2023

Previously Approved/Pending Reauthorization

School: Yavapai College

Programs:

Medical Records Technician

Phlebotomy Technician Certificate

Radiologic Technology, AAS

Assisted Living Facility Caregiver Certificate

Electronics-Industrial Electronics Certificate

Basic Carpentry

CDT Commercial Driver Training Certificate

Viticulture Fundamentals Certificate

Welding-Pipe Welding Certificate

CDL 250 Commercial License Prep

CDT 200 Commercial Driver Extender/Refresher

CDT255 Commercial Behind the Wheel

Electric Utility Lineworker Certificate

Computer Programming Certificate

Industrial Machine Mechanic IMM Certificate

School: Rogers Academy of Beauty

Programs:

Nail Technology

School: Valley Academy for Career and Technology Education

Programs:

Construction Technology

Serving, Solving, Sustaining



**WIOA One Stop Operator Partners Update
Quarter 2 of PY '22-'23**

By: Leah Cickavage, NACOG-EWD Operations Manager

Title I-Prescott								
	<i>Orientation</i>	<i>Career Services</i>	<i>Eligibility Determination</i>	<i>Case Management</i>	<i>Training Placements</i>	<i>Assessments</i>	<i>Referrals</i>	<i>Totals</i>
PY 23	153	1,034	151	1,103	53	140	104	2,738
PY 22	213	747	182	872	49	134	117	2,314
Increase/Decrease	-60	+287	-31	+231	+4	+6	-13	+424
Title I-Cottonwood								
	<i>Orientation</i>	<i>Career Services</i>	<i>Eligibility Determination</i>	<i>Case Management</i>	<i>Training Placements</i>	<i>Assessments</i>	<i>Referrals</i>	<i>Totals</i>
PY 23	30	899	29	387	8	29	120	1,502
PY 22	32	263	28	384	16	30	75	828
Increase/Decrease	-2	+636	+1	+3	-8	-1	+45	+674
Surveys/BAC/Contact Tracing								
	<i>Satisfaction Surveys</i>		<i>BAC</i>		<i>Contact Tracings</i>			
PY 23	99%		177		0			
PY 22	98%		292		118			
Increase/Decrease	+1%		-115		n/a			

Title II-Yavapai College *Quarter 1 22-23								
	<i>Number of participants with 12+ hours of attendance</i>		<i>Number of instructional hours</i>	<i>Percentage of progress tested participants with Measurable Skills Gain</i>	<i>Total number of participants in Integrated Education/Training Program</i>			
PY 23	207		3,504	30%	8			
PY 22	n/a		n/a	n/a	n/a			
Increase/Decrease	n/a		n/a	n/a	n/a			
Title III DES- Prescott								
	<i>Customers Served</i>	<i>Work-shops</i>	<i>Obtains/ Placements</i>	<i>Employer Contacts</i>	<i>UI Assistance</i>	<i>Veterans Served</i>	<i>Job Orders Written</i>	<i>Totals</i>
PY 23	10	0	0	0	3	2	0	15
PY 21	6	0	0	0	0	0	0	6
Increase/Decrease	+4	n/a	n/a	n/a	+3	+2	n/a	+9
Title III DES- Prescott Valley								
	<i>Customers Served</i>	<i>Work-shops</i>	<i>Obtains/ Placements</i>	<i>Employer Contacts</i>	<i>UI Assistance</i>	<i>Veterans Served</i>	<i>Job Orders Written</i>	<i>Totals</i>
PY 23	751	0	114	0	362	78	0	1,305
PY 22	547	0	82	0	362	66	0	1,057
Increase/Decrease	+204	n/a	+32	n/a	No change	+12	n/a	+248
Title III DES- Cottonwood								