



Benton – Franklin Workforce Development Council

One-Stop Operator (OSO) Firewall Agreement

The Benton-Franklin Workforce Development Council (BFWDC) enters into agreement with Career Path Services (CPS) AND the Benton & Franklin County Chief Local Elected Officials (CLEOs), for the period of July 1, 2021 through June 30, 2024. During this period CPS will act as the OSO fiscal agent, and employ the WorkSource System Coordinator for the Benton-Franklin Workforce Consortium, as well as providing other Workforce Innovation and Opportunity Act (WIOA) Title I services, as outlined in their respective contracts.

This agreement is established to ensure compliance with the BFWDC's Procurement Policy #2015-34. If the OSO selected by the BFWDC is also a provider of other WIOA services, the service provider, in their role as site operator, will enter into a written agreement with BFWDC and the CLEOs to demonstrate appropriate firewalls and internal controls. This requirement is designed to spell out protections against potential conflicts of interest.

The WorkSource System Coordinator will be responsible for:

- Disclosing any potential conflicts of interest arising from relationships with training service providers or other service providers;
- Organizing One-Stop operations as required by the BFWDC, and described in the selection process and any subsequent agreements with the organization;
- Facilitating integrated partnerships that seamlessly incorporate services for the common customers served by multiple program partners of WorkSource Columbia Basin (WSCB);
- Implementing operational processes in alignment with policies that reflect an integrated system;
- Assuring that appropriate referrals are made among required partners;
- Assuring that career services described in WIOA are made available at WSCB;
- Leading One-Stop Site Certification process for WSCB;
- Assuring that WSCB staff are trained, as appropriate, to increase staff knowledge;
- Promoting the services available at WSCB, including development of marketing and outreach materials, with support from the BFWDC;
- Being knowledgeable of the mission and performance standards of all partners and facilitating cross-training among all staff;
- Operationalizing the vision of the BFWDC for WSCB, including high quality customer service, Integrated Service Delivery, and a professional environment with up-to-date technology;
- Evaluating customer needs and satisfaction data to continually refine and improve service strategies;
- Ensuring that the BFWDC's non-program-related policies and procedures are effectively communicated and carried out at WorkSource Columbia Basin; and
- Ensuring Equal Opportunity (EO) requirements are *met*, including coordinating EO staff training, and assuring EO posters and processes are in place.

The WorkSource System Coordinator MAY NOT perform any of the following functions:

- Develop, manage, or conduct the competitive procurement of service providers in which it intends to compete;
- Convene system stakeholders to assist in the development of the local plan;
- Prepare and submit local plans (as required under sec. 107 of WIOA);
- Be responsible for oversight of itself;
- Develop, manage or participate, other than a respondent, in the competitive selection process for One-Stop Operators;
- Select or terminate One-Stop Operators or WIOA Title I service providers;
- Perform monitoring functions of itself or any WIOA partners;
- Evaluate itself as One-Stop Operator;
- Negotiate local performance accountability measures;
- Develop and/or submit a budget for activities of BFWDC; and
- Establish practices that create obstacles in providing services to individuals with barriers to employment who may require longer-term career and training services.

The Benton – Franklin Workforce Development Council shall:

- Continually monitor One-Stop Operator activities and interactions with existing WIOA Title I, Wagner-Peyser and existing One-Stop center staff, to assure appropriate separation of duties; and
- Maintain a current, signed Conflict of Interest Agreement (Attachment A) from the individual acting as the WorkSource System Coordinator.
- Maintain a current, signed Conflict of Interest Agreement (Attachment B, Attachment C, Attachment D, Attachment E) from all Benton-Franklin Workforce Consortium members.

Career Path Services Agrees to:

- Ensure a supervision structure for the WorkSource System Coordinator that is separate from and not influenced by staff who are directly managing WIOA contracts at WorkSource Columbia Basin;
- Support the functional oversight/guidance of the WorkSource System Coordinator by the Benton-Franklin Workforce Consortium through.
- Work under close guidance with BFWDC staff in all quality assurance activities;
- Recognize and support the One-Stop Operator's role in quality oversight of WSCB and the local WorkSource System; and
- Ensure the individual hired to fill the WorkSource System Coordinator role is of high integrity and accountability and has been vetted by the BFWDC.

This agreement is established to ensure compliance with:

- Training and Employment Guidance Letter (TEGL) WIOA 15-16: Competitive Selection of One-Stop Operators;
- Washington State WIOA Policy 5404: Procurement and Selection of One-Stop Operators and Services Providers; and
- BFWDC Local Policy 2015-34 Procurement and Selection of One-Stop Operators and Service Providers Policy.

One-Stop Operator (OSO) Firewall Agreement – Signature Page

Benton County Chief Elected Official:

Commissioner Will McKay

Name:

Benton County Commissioner

Title:

DocuSigned by:

Commissioner Will McKay

Signature:

FF027BCAB8F84AE...

Date:

7/25/2022

Franklin County Chief Elected Official:

Commissioner Clint Didier

Name:

Title:

Franklin County Commissioner

Signature:

Clint Didier

Date:

07/26/2022

Benton-Franklin Workforce Development Council Chairperson:

Name:

TODD SAMUEL

Title:

CHAIRMAN

Signature:

TODD SAMUEL

Date:

7/21/2022

Benton-Franklin Workforce Development Council Chief Executive Officer:

Name:

Tiffany Alviso

Title:

CEO

DocuSigned by:

Signature:

Tiffany Alviso

A81B904A4247401...

Date:

7/26/2022

Career Path Services:

Name:

Cami Eakins

Title:

CEO

DocuSigned by:

Signature:

Cami Eakins

BB606D88C1A4476...

Date:

7/21/2022

One-Stop Operator (OSO) Conflict of Interest Agreement – Attachment A

WIOA requires that any real or potential conflicts of interest associated with the One-Stop Operator (Benton-Franklin Workforce Consortium members) and subrecipient are disclosed. The Benton-Franklin Workforce Consortium has hired a WorkSource System Coordinator and identified Career Path Services as the fiscal agent. This form provides space for disclosures to be documented. Once complete, this form will be posted on the BFWDC website to ensure public disclosure guidelines in TEGL 15-16 are met.

Disclosure

Name of individual serving as WorkSource System Coordinator: Crystal Bright

Name of employer: Career Path Services

Employment capacity (mark all which apply):

- Employed by agency involved with delivering WIOA services (service provider) x
- Employed by WIOA training provider (instruction of higher education)
- Employed by BFWDC board member organization
- Employed by the BFWDC

Per federal law, it is required that the One-Stop Operator and subrecipient disclose any potential conflict of interest arising from the relationships between one-stop operators and training service providers or other service providers, including but not limited to career service providers. If any boxes are checked above, please explain how the real or potential conflicts of interest are mitigated and how you have worked with the BFWDC to ensure sufficient firewalls exist.


My employer of record is the contractor responsible for providing Title 1b services at WorkSource Columbia Basin (WSCB). As the WorkSource System Coordinator, I am the agent of the Benton Franklin Workforce Consortium, so my role is overseen by four partners, creating a firewall. Additionally, I am not responsible for the direct supervision of any staff member at WSCB.

By signing this disclose, I hereby confirm that:

- I have received a copy of BFWDC Policy 2015-34 and TEGL 15-16;
- I have read and understand the policy and TEGL;
- I agree to comply with the policy and TEGL;
- My responses to the above questions are complete and accurate to the best of my information and belief; and

- If I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the policy or TEGL, I will notify an officer of the BFWDC immediately.

WorkSource Columbia Basin Benton-Franklin Workforce Consortium members (OSO) and subrecipient:

Name:	Crystal Bright
Title:	WorkSource System Coordinator
Signature:	 4614717EF6FE461...
Date:	6/27/2022

One-Stop Operator (OSO) Conflict of Interest Agreement – Attachment B

WIOA requires that any real or potential conflicts of interest associated with the One-Stop Operator (Benton-Franklin Workforce Consortium members) and subrecipient are disclosed. This form provides space for disclosures to be documented. Once complete, this form will be posted on the BFWDC website to ensure public disclosure guidelines in TEGl 15-16 are met.

Disclosure

Name of individual serving as Benton-Franklin Workforce Consortium (WIOA Title I) Member:

Cami Eakins

Name of employer: Career Path Services

Employment capacity (mark all which apply):

- Employed by agency involved with delivering WIOA services (service provider) _____
- Employed by WIOA training provider (instruction of higher education) _____
- Employed by BFWDC board member organization _____
- Employed by the BFWDC _____
- Service Provider x

Per federal law, it is required that the One-Stop Operator and subrecipient disclose any potential conflict of interest arising from the relationships between one-stop operators and training service providers or other service providers, including but not limited to career service providers. If any boxes are checked above, please explain how the real or potential conflicts of interest are mitigated and how you have worked with the BFWDC to ensure sufficient firewalls exist.

Career Path Services is also the Title 1 Service Provider for Adult, Dislocated Worker and Youth. Additionally, we are the employer of record for the Workforce Consortium. The Consotum manages the role amd function to ensure no conflict of interest, Additionally there are layers of supervision and responsibility between the CEO and Service Provider management

By signing this disclose, I hereby confirm that:

- I have received a copy of BFWDC Policy 2015-34 and TEGl 15-16;
- I have read and understand the policy and TEGl;
- I agree to comply with the policy and TEGl;
- My responses to the above questions are complete and accurate to the best of my information and belief; and

- If I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the policy or TEGL, I will notify an officer of the BFWDC immediately.

**WorkSource Columbia Basin Benton-Franklin Workforce Consortium (WIOA Title I)
Member and One-Stop Operator Contract Manager:**

Name: Cami Eakins _____
Title: CEO
Signature: *Cami Eakins*
Date: 6/28/2022

One-Stop Operator (OSO) Conflict of Interest Agreement – Attachment C

WIOA requires that any real or potential conflicts of interest associated with the One-Stop Operator (Benton-Franklin Workforce Consortium members) and subrecipient are disclosed. This form provides space for disclosures to be documented. Once complete, this form will be posted on the BFWDC website to ensure public disclosure guidelines in TEGl 15-16 are met.

Disclosure

Name of individual serving as Benton-Franklin Workforce Consortium (WIOA Title II) Member:

Keri Lobdell

Name of employer: Columbia Basin College

Employment capacity (mark all which apply):

- Employed by agency involved with delivering WIOA services (service provider) _____
- Employed by WIOA training provider (instruction of higher education) x
- Employed by BFWDC board member organization _____
- Employed by the BFWDC _____
- Service Provider x

Per federal law, it is required that the One-Stop Operator and subrecipient disclose any potential conflict of interest arising from the relationships between one-stop operators and training service providers or other service providers, including but not limited to career service providers. If any boxes are checked above, please explain how the real or potential conflicts of interest are mitigated and how you have worked with the BFWDC to ensure sufficient firewalls exist.

 There is no conflict of interest.

By signing this disclose, I hereby confirm that:

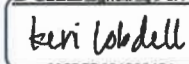
- I have received a copy of BFWDC Policy 2015-34 and TEGl 15-16;
- I have read and understand the policy and TEGl;

- I agree to comply with the policy and TEGL;
- My responses to the above questions are complete and accurate to the best of my information and belief; and
- If I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the policy or TEGL, I will notify an officer of the BFWDC immediately.

**WorkSource Columbia Basin Benton-Franklin Workforce Consortium (WIOA Title II)
Member (OSO):**

Name: Keri Lobdell_____

Title: Dean of Library and Instructional Services

Signature: 
085D7D001300454...

Date: 6/27/2022

One-Stop Operator (OSO) Conflict of Interest Agreement – Attachment D

WIOA requires that any real or potential conflicts of interest associated with the One-Stop Operator (Benton-Franklin Workforce Consortium members) and subrecipient are disclosed. This form provides space for disclosures to be documented. Once complete, this form will be posted on the BFWDC website to ensure public disclosure guidelines in TEGl 15-16 are met.

Disclosure

Name of individual serving as Benton-Franklin Workforce Consortium (WIOA Title III) Member:

Jennie Weber

Name of employer: Employment Security Department

Employment capacity (mark all which apply):

- Employed by agency involved with delivering WIOA services (service provider) _____
- Employed by WIOA training provider (instruction of higher education) _____
- Employed by BFWDC board member organization X
- Employed by the BFWDC _____
- Service Provider X

Per federal law, it is required that the One-Stop Operator and subrecipient disclose any potential conflict of interest arising from the relationships between one-stop operators and training service providers or other service providers, including but not limited to career service providers. If any boxes are checked above, please explain how the real or potential conflicts of interest are mitigated and how you have worked with the BFWDC to ensure sufficient firewalls exist.

As a partner in the Benton-Franklin WDC service area Employment Security Department shares in system service delivery of basic and individualized services. In addition, agency required program services per WIOA are delivered at WorkSource Columbia Basin. The Benton-Franklin Workforce Consortium includes active membership from 4 WIOA Titles. This composition serves as a firewall with no one organization being a determining party.

Employment Security Department is the designated employment organization on the Benton-Franklin WDC. As the designated representative, any business matter that may present a conflict of interest abstaining from the conversation and/or vote is strictly practiced.


By signing this disclose, I hereby confirm that:

- I have received a copy of BFWDC Policy 2015-34 and TEGL 15-16;
- I have read and understand the policy and TEGL;
- I agree to comply with the policy and TEGL;
- My responses to the above questions are complete and accurate to the best of my information and belief; and
- If I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the policy or TEGL, I will notify an officer of the BFWDC immediately.

WorkSource Columbia Basin Benton-Franklin Workforce Consortium (WIOA Title III) Member (OSO):

Name: Jennie Weber

Title: Eastern Regional Director

Signature: 
445020F7DC0F416...

Date: 7/12/2022

One-Stop Operator (OSO) Conflict of Interest Agreement – Attachment E

WIOA requires that any real or potential conflicts of interest associated with the One-Stop Operator (Benton-Franklin Workforce Consortium members) and subrecipient are disclosed. This form provides space for disclosures to be documented. Once complete, this form will be posted on the BFWDC website to ensure public disclosure guidelines in TEGL 15-16 are met.

Disclosure

Name of individual serving as Benton-Franklin Workforce Consortium (WIOA Title IV) Member:
Pablo Villarreal

Name of employer: Division of Vocational Rehabilitation

Employment capacity (mark all which apply):

- Employed by agency involved with delivering WIOA services (service provider) _____
- Employed by WIOA training provider (instruction of higher education) _____
- Employed by BFWDC board member organization _____
- Employed by the BFWDC _____
- Service Provider _____ X

Per federal law, it is required that the One-Stop Operator and subrecipient disclose any potential conflict of interest arising from the relationships between one-stop operators and training service providers or other service providers, including but not limited to career service providers. If any boxes are checked above, please explain how the real or potential conflicts of interest are mitigated and how you have worked with the BFWDC to ensure sufficient firewalls exist.

____As a partner in the Bento-Franklin WDC, DVR provides delivery of individualized services to job seekers with disabilities who are eligible for services from DVR. As Regional Administrator in Region 1, I oversee service delivery throughout the region and currently am also a WDC representative on the North Central WDC. My position on the North Central WDC has been disclosed to all partners at Benton-Franklin WDC and my term on NCWDC is set to expire in Dec. 2022.

Jamie Rasmussen, a local Vocational Rehabilitation Supervisor serves as the designated representative on the Benton-Franklin WDC board.


By signing this disclose, I hereby confirm that:

- I have received a copy of BFWDC Policy 2015-34 and TEGL 15-16;
- I have read and understand the policy and TEGL;
- I agree to comply with the policy and TEGL;
- My responses to the above questions are complete and accurate to the best of my information and belief; and
- If I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the policy or TEGL, I will notify an officer of the BFWDC immediately.

**WorkSource Columbia Basin Benton-Franklin Workforce Consortium (WIOA Title IV)
Member (OSO):**

Name: Pablo Villarreal

Title: Region 1 Administrator

Signature: 
3CC4273731AEC4F3

Date: 7/5/2022