

Fresno Regional Workforce Development Board

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Blake Konczal, Executive Director

OPERATIONAL DIRECTIVE

FRWDB OD # 20-21, Revision B

Date Released: September 23, 2021

To: All Fresno Regional Workforce Development Board Providers of Services

From: Blake Konczal, Executive Director

Effective Date: September 23, 2021

Subject: FRWDB Nepotism Policy Acknowledgement

Applicable Program: All

Revision History: Initial Release – 8/26/21

This Revision B corrects when the process is communicated to participants (highlighted in yellow).

This OD references State Directive WSD 17-1, Nondiscrimination and Equal Opportunity Procedures and OD 02-09, Reasonable Accommodation Request Process.

All questions concerning this process are to be directed to the FRWDB's Equal Opportunity (EO) Officer.

Overall Direction

This OD requires the use of the following forms:

- Nepotism Policy Acknowledgement Form# REG-111e
- Provider Statement – EO Summary Statement Alternative Delivery, Form# GEN-004, if needed

At the time of **program eligibility** into any WIOA program, Service Provider (aka, sub-recipient) staff is to review the following documents with the applicant and use the following process:

- Nepotism Policy Acknowledgement (Form REG-111e);
- Provide a copy of the completed document to the participant.
- The signed acknowledgments must be uploaded to CalJOBS in the Document (staff) section and labeled accordingly under the "Document Tags" field in CalJOBS.

When a participant requires a reasonable accommodation due to a disability or limited English proficiency, they are to be provided the Nepotism Policy Acknowledgement form in a format they understand.

To document the provision of the Nepotism Policy Acknowledgement form in an alternate format, Service Provider staff is to follow the process outlined in OD 02-09. The completed form must be uploaded to CalJOBS in the Document (staff) section and labeled accordingly under the "Document Tags" field in CalJOBS.

Nepotism Policy and Procedure

In order to ensure there is no conflict of interest between the FRWDB, its sub-recipients and our participants, it is the policy of the FRWDB that under no circumstance is a participant to be directly or indirectly served by a relative. This includes a relative who is in a position of management or has the ability to approve or disapprove services.

In order to determine if these relationships exist, FRWDB policy requires that each participant acknowledge they either do or do not know of any relatives that are Board members of, or are staff of, the FRWDB, its sub-recipients, or the staff of the County of Fresno or the City of Fresno elected officials.

Acknowledgment of any such relationship will not disqualify an otherwise eligible participant from receiving the services provided by Workforce Connection, FRWDB or its sub-recipients.

If such a relative is a staff member of the sub-recipient at the location the participant applied at, then the participant is to be immediately referred to a different Service Provider for such services. If this is not feasible for the participant, then staff is required to submit a waiver request to serve the participant at the same location as the relative. In the waiver, the staff must document how there will be no conflict of interest or violation of the Nepotism Policy. Under no conditions is a participant to be served by a staff member who is a relative by blood, marriage or law.

For the purpose of this policy, "relative" is defined as: husband, wife, father, mother, brother or step-brother, sister or step-sister, uncle, aunt, grandfather, grandmother, father-in-law, mother-in-law, brother-in-law, sister-in-law, domestic partner (including same-sex or gender-neutral relationships).

The sub-recipient staff is required to have the participant fill out and sign Form #REG-111, "Nepotism Acknowledgment Statement" at the time of application for the WIOA program. If the participant is under the age of 18, the statement requires the signature of a parent or guardian of the participant.

Forms

REG-111e, Nepotism Policy and Acknowledgement
GEN-004, Providers Statement of Alternative Service Delivery Summary