

Approved Date:

Effective Date: July 1, 2023

Subject: Firewall Policy

Purpose

The purpose of this policy is to provide guidance in the Iowa Plains Local Workforce Development Area's commitment to guard against problems arising from real, perceived, or potential conflicts of interest not only through sound conflict of interest policies, but also through the establishment of suitable firewalls in the event of such conflicts.

Definitions

- I. *Conflict of Interest:* A conflict 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 interests can be established either through ownership or employment.
- II. *Firewall:* An established policy or procedure that acts as a barrier or protection against an undesirable influence, outcome, or authority. Examples of firewalls include, but are not limited to, organizational arrangements that provide clear separation of duties and responsibilities, reporting hierarchy of managers and staff that provide clear separation between job duties and responsibilities, and conflict of interest/confidentiality/disclosure agreements.

Firewall Guidelines

- I. **Conflict of Interest Policy:** All members of Iowa Plains, its established committees, and the individuals/organizations functioning as staff to Iowa Plains have a continual duty to recognize potential conflict of interest upon the occurrence of any situation that would give rise to a potential or actual conflict of interest
- II. **Multiple Roles:** When a single entity fulfills more than one of the following roles including, but not limited to, Fiscal Agent, Committee Member, OSO or direct service provider, such entity is required to adhere to the guidelines set forth in this Policy.

Control Activities

- I. The organization maintains standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. The standards of conduct provide that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. The standards of conduct state that a conflict of interest would arise when the employee, officer, or agency, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or tangible personal benefit from a firm considered for a contract. Officers, employees, and agents of the non-federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contactors or parties to subcontracts. The standards of conduct provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-federal entity.

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