

## **Business Services Provision Firewall Policy**

Policy Number: 2210 Effective Date: January 1, 2022

## A. <u>BACKGROUND</u>

On December 15, 2021 the Snohomish County Future Workforce Alliance approved through a vote of the board, an additional role for WFS to provide business services under WIOA Title I, as a direct service in Snohomish County through June 30, 2025. WFS is required to establish a firewall policy to mitigate the risk of the potential conflict of interest that may arise in relation to the provision of direct services for business customers.

## B. POLICY

WFS establishes a separate reporting structure for business services, distinct from the Service Delivery that oversees Youth, Adult Dislocated Worker subrecipients and other LWDB-linked grants. The Service Delivery Department and the Business Services Department will be headed by separate departmental leadership, each of which will report independently up to Executive leadership of the organization. All employees will be required to review and sign the conflict of interest policy annually.

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C. <u>DEFINITIONS:</u>
References:
NA
Supersedes:
NA
Attachments:
none