



Serving Applicants With A Close Relationship Policy

Approval Date: December 5, 2025

Purpose

To ensure all individuals enrolled in Greater Cleveland Works services have been determined eligible, assessed, and served in an ethical manner that is free from any real or perceived conflict of interest.

The Workforce Investment Opportunity Act (WIOA) program is designed to provide employment and training opportunities to those who can benefit from, and who are most in need of such opportunities. Although not an entitlement program, services provided with WIOA funds should be accessible to any individual who is eligible and suitable for services available through Greater Cleveland Works subject to all policies and procedures. All staff and stakeholders are encouraged to refer individuals for services. However, when applicants have a close relationship to WIOA staff, management, and other stakeholders of the Greater Cleveland Works system, attention will be given to ensure enrollment to program services is not based upon a priority (or the appearance of a priority) for services given because of this relationship. It is possible that even without an intention to misuse WIOA funds, the decision to enroll an individual in a program could be seen as improper and may cause possible non-compliance with State and/or federal law.

Although WIOA is not an entitlement program, enrollment to needed services by eligible and suitable individuals is essential to fulfill the goals and objectives of the legislation. Safeguards must be in place that ensures all individuals served are not only eligible and suitable, but also served in a manner that is free from the perception of any inappropriate conflict of interest.

Definitions

Close relationship: The applicant's prior and/or present social interactions and/or business dealings with stakeholders of the workforce development system gives a reasonable observer cause to believe that the applicant's access to WIOA program services would be based upon this relationship, as opposed to demonstrated need.

Close family member: Parents, stepparents, spouse, domestic partner, children, step-children, foster children, siblings, grandchildren, grandparents, and any immediate relatives by blood or marriage (i.e., in-laws, first cousins, nieces, nephews, aunts, and uncles).

Stakeholders: Individuals not related but have direct or indirect management or responsibility for managing the WIOA workforce system (including WIOA executive staff, supervisors, local elected officials, contractors [e.g., adult, dislocated worker, or youth program vendors]), Greater Cleveland Works board and subcommittee members, WIOA employees, and OhioMeansJobs center partner staff.

Policy

Staff will not directly serve, determine eligible, or assess a member of his or her family or an individual with whom a close relationship (personal or business) exists. Likewise, stakeholders as defined by this policy shall not use their position to influence a decision to enroll an individual into a WIOA program. Furthermore, no stakeholder of Greater Cleveland Works, as defined in the definition section of this policy, shall be permitted to apply for or receive services, including training, through Greater Cleveland Works.



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Applicants must disclose at the time of application for Greater Cleveland Works services any known family or close relationship to any stakeholder or staff as defined in this policy. An applicant must check yes and list the name of the relationship as well as sign the registration form. Once it is documented and signed, a staff that has NO relationship to the individual will be assigned to conduct an arms-length determination of eligibility and assessment. Likewise, decisions related to approving training, supportive services, or other service needs must be made by an authorized manager with NO such relationship to the applicant.

Documentation of the disclosure, including the name of the person and the nature of the relationship, must be maintained in the participant's file. When a relationship exists, it must be disclosed at the time of application to the program. The determination of whether a close relationship exists, and the reason why or why not must be documented in the participant's file.

When an applicant has disclosed a relationship, the staff reviewing the application must notify the One-Stop Manager. The One-Stop Manager will assign staff NOT related to the applicant to determine eligibility, assess and enroll in services. If the applicant has a close relationship to the next level manager NOT related to the applicant must be notified. If an applicant has a relationship between any of the stakeholders in the workforce development system listed below, the stakeholder must recuse themselves of any interaction with the applicant's service strategy.

- Local elected official
- Greater Cleveland Works board members or subcommittee member
- Greater Cleveland Works staff
- WIOA executive staff or supervisor
- WIOA employees;
- OhioMeansJobs center staff including all partner staff
- WIOA sub-recipients and/or contractors
- City of Cleveland or County employees

If a Greater Cleveland Works board member or committee member is a family member of or has a close relationship with an applicant, the CEO must review and approve the request.

All staff and stakeholders have a responsibility to notify the CEO if they discover that any applicants has failed to disclose their close relationships and immediately request that they be removed from any process or contact related to their services at Greater Cleveland Works.

In the rare case that this process will not resolve a real conflict, or the appearance of a conflict, Greater Cleveland Works will negotiate with the closest Workforce Development Board to transfer the applicant and file to a location that is convenient.

All requests for training and supportive services will follow the ITA and Supportive Service Policies.

All applicants indicating a close relationship (family, personal, business) will be tracked by the fiscal staff through their system and monitored by the compliance staff at each stage of funding request and reported to the CEO.

Compliance staff will review the required list of participants who have disclosed that a close relationship exists during the annual monitoring review for compliance. Any issues will be handled through Greater Cleveland Works monitoring resolution process.

Violations of this policy may result in referral, including but not limited to the Ohio Ethics Commission.