

# Defining Roles When a One-Stop Operator Entity also Serves a Different Role in the One-Stop Delivery System

What you need to know.

Oversight Services

January 18, 2024



# Training Objectives

In this training, you will learn:

Purpose: One-Stop Operator Firewall and Conflict of Interest

Definitions

- Roles of the One-Stop Operator
- Policy Citations

Required Action and Deadline for Submission





## **Purpose:**

To ensure local areas implement policies when a one-stop operator also serves a different role in the one-stop system establishing sufficient firewalls and conflict of interest policies and procedures.





# Definitions

## Role of the One-Stop Operator

Coordinate the delivery of partner program services within the local American Job Center/One-Stop system

## Who is the One-Stop Operator?

The One-Stop Operator (OSO) shall be an entity (public, private, or nonprofit meeting the requirements of 20 CFR 678.600), or consortium of entities that, at a minimum, must include three or more of the one-stop partners.



# 20 CFR § 678.620 Limitations to the One-Stop Operator's Role

- (b)
- (1) Subject to paragraph (b)(2) of this section, a one-stop operator may not perform the following functions: 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; manage or significantly participate in the competitive selection process for one-stop operators; select or terminate one-stop operators, career services, and youth providers; negotiate local performance accountability measures; or develop and submit budget for activities of the Local WDB in the local area.
  - (2) An entity serving as a one-stop operator, that also serves a different role within the one-stop delivery system, may perform some or all of these functions when it is acting in its other role, if it has established sufficient firewalls and conflict of interest policies and procedures. The policies and procedures must conform to the specifications in § 679.430 of this chapter for demonstrating internal controls and preventing conflict of interest.



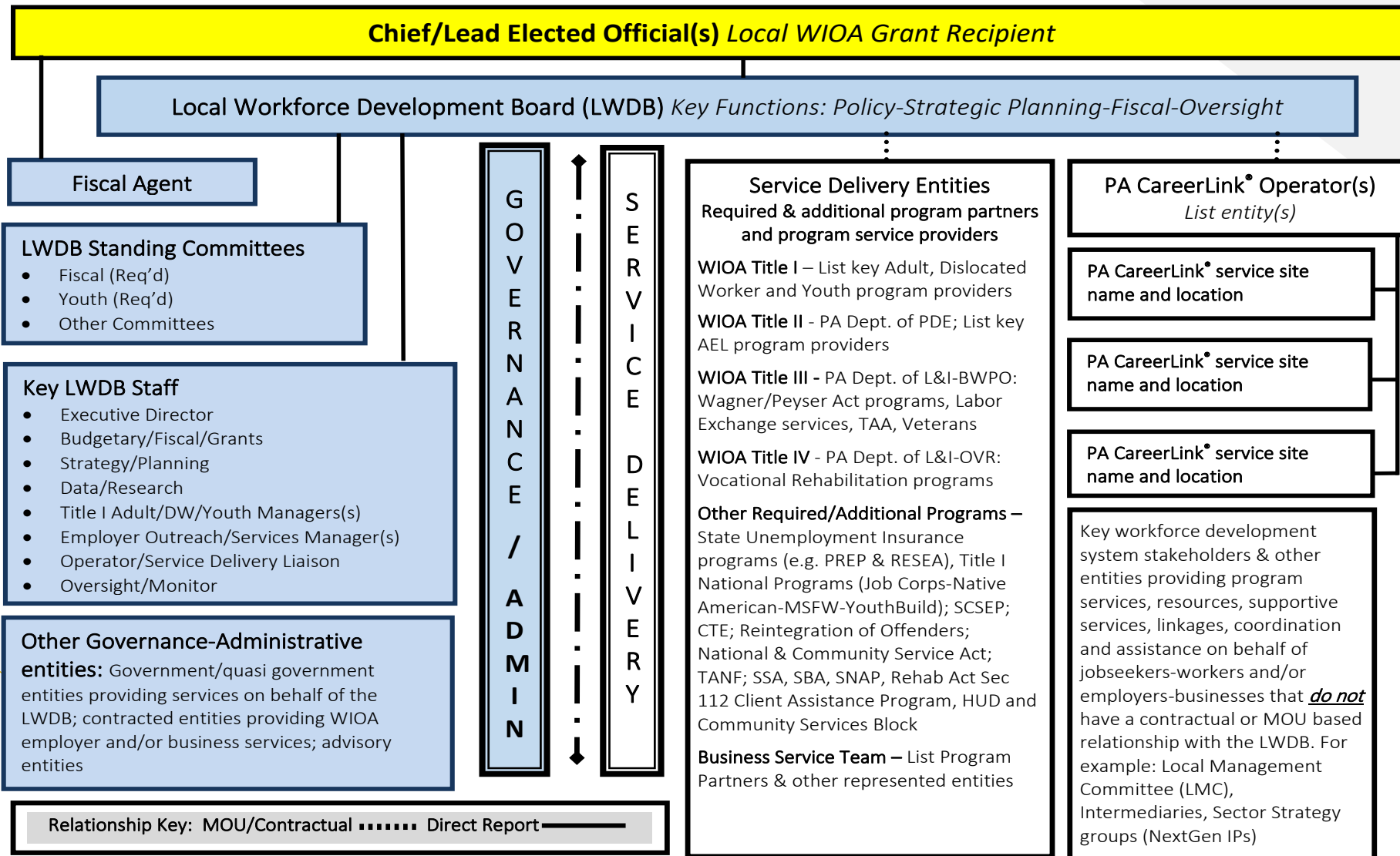


## **20 CFR § 679.430 How do entities performing multiple functions in a local area demonstrate internal controls and prevent conflict of interest?**

Local organizations often function simultaneously in a variety of roles, including local fiscal agent, Local WDB staff, one-stop operator, and direct provider of services. Any organization that has been selected or otherwise designated to perform more than one of these functions must develop a written agreement with the Local WDB and CEO to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State's conflict of interest policy.



# Sample Organization Chart





# Required Action and Deadline for Submission

- If the LWDB intends for the operator to also serve in a different role in the one-stop delivery system, the LWDB must first enact a policy that establishes sufficient firewalls and conflict of interest policies and procedures.
- The policies and procedures must conform to the specifications found in 20 CFR § 679.430 demonstrating internal controls and preventing conflict of interest.
- If a LWDB already has a one-stop operator that is also serving in a different role within the one-stop service delivery system, the LWDB must submit evidence of a policy by 4:00pm on Wednesday, May 1, 2024.
- Please submit the required information through MOVEit or via the BWDA Oversight Services resource account ([RA-LI-BWDA-OS@pa.gov](mailto:RA-LI-BWDA-OS@pa.gov)) with a Cc: to Greg Hart, the Oversight Services supervisor ([ghart@pa.gov](mailto:ghart@pa.gov)), and the Oversight analyst assigned to the LWDB. If you have questions or need technical assistance, you may also use these same contact methods.







# Thank you!



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