



416 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ Fax 417-257-2633 ❖ MO Relay 711

Local Policy 08-2017, Change 1

Approved: October 22, 2019

Effective: October 22, 2019

Subject: One Stop Operator/Service Provider Firewalls and Internal Controls Policy

1. Purpose: This policy is written to provide guidance appropriate firewalls and internal controls in the case that the one stop operator is also the provider of services.
2. Background: Final rule 678.625 allows a one stop operator to also be a provider of service if there are firewalls and internal controls in place regarding the oversight, monitoring and evaluation of performance of the service provider.
3. Substance:
 - At a minimum, the one stop operator must coordinate the service delivery of required one stop partners and service providers within the One Stop Center as described in DWD Issuance 14-2017.
 - The one stop operator may not:
 - Convene system stakeholders to assist in the development of the local plan
 - Prepare and submit the local plan
 - Be responsible for oversight of itself
 - Manage or participate in the competitive selection process of the one stop operator
 - Select or terminate; one stop operators, career service providers, or youth service providers
 - Negotiate local performance measures
 - Prepare or submit the budget of the board in the local area
 - The Board and its staff have the sole authority for the oversight, monitoring and evaluation of the duties performed by the one stop operator and the service provider.
 - The one stop operator/service provider must develop sufficient internal policies and procedures to establish firewalls and prevent conflicts of interest.
 - Following each procurement cycle in which the one stop operator is also the provider of services this policy must be signed and dated by the Board Chair, Chief Local Elected Official and the One Stop Operator/Service Provider.
4. Action: This policy is effective October 22, 2019. Please distribute to appropriate individuals.
5. Contact: Please direct comments or questions regarding this policy to Valarie Haring, Compliance Manager at 417-257-2630 or email vharing@scwib.org.

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6. Reference: Workforce Innovation and Opportunity Act of 2015, Department of Labor Final Rules (678.620, 678.625, 679.430), and DWD Issuance 01-2016.
7. Recessions: None
8. Attachments: None

Board Chair Signature/Date _____

Chief Local Elected Official Signature/Date _____

One Stop Operator/Service Provider Signature/Date _____

One Stop Operator/Service Provider Signature/Date _____