



**POLICY #
5060**

Title:	One Stop Operator Conflict of Interest
Programs:	Workforce Innovation and Opportunity Act
Department	Operations
Effective:	10/23/25

I. PURPOSE AND SCOPE

The purpose of this policy is to establish a written conflict of interest one-stop operator policy that complies with Florida State and Federal regulations for CareerSource Palm Beach County.

II. BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) in 2014, requires Local Workforce Development Boards (LWDBs) to select One-Stop Operators. One-Stop Operators, selected by LWDBs assume the unique administrative responsibility within the career center system for coordinating the service delivery of required one-stop partners and service providers. LWDBs can also specify other roles for One-Stop Operators, such as managing the day-to-day operations of their career centers, policy development, or functioning as service providers.

III. AUTHORITY

Workforce Innovation and Opportunity Act of 2014, [Public Law 113-128](#), Sections 107(d)(10)(A), 107(g)(2), and 121(d),

20 CFR parts 678.605-625, [Workforce Innovation and Opportunity Act Final Rule](#), August 19, 2016

2 CFR, Part 2900 [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#), December 19, 2014

Training and Employment Guidance Letter (TEGL) No. 15-16, [Workforce Innovation and Opportunity Act \(WIOA\) Competitive Selection of One-Stop Operators](#), January 17, 2017

[Florida Statutes, 445.007\(6\)](#)

[CareerSource Florida Administrative Policy 097-One-Stop Operator Procurement](#)

IV. POLICIES AND PROCEDURES

A. One-Stop Operator Role

The One-Stop Operator coordinates the provision of services in all designated CSPBC Career Centers. In addition, the One-Stop Operator facilitates the coordination of all required partners as outlined in 20 CFR 678.400. The primary goal of the One-Stop Operator is to create a seamless system of partners among workforce development, economic development, business, and community agencies in order to meet the needs of employers and job seekers in Palm Beach County.

The One-Stop Operator will assist CSPBC in the development of a workforce system that meets the needs of career seekers and employers in the region. The One-Stop Operator will work closely with CareerSource Palm Beach County staff to effectively implement an integrated system as expressed in the responsibilities outlined below.

1. Services Inventory and Gap Analysis

One-stop partners, under the direction of the one-stop operator, must create an inventory of services available through required partners, with an emphasis on support services as communicated in CSPBC Policy 5001: Adult and Dislocated Worker Support Services and Needs Related Payments. The inventory should include all services available in the one-stop delivery system. The inventory should include an analysis of gaps in available services that should be addressed through either WIOA or outside funding sources. The inventory shall be made available to staff through the CSPBC intranet.

2. Referral Processes

One-stop partners, under the direction of the one-stop operator, must develop a written process for referral of individuals served by the one-stop system to services available through all partner programs and other community service providers. The process must include:

- a) a description of services available through each partner program;
- b) eligibility criteria for the services available through each partner program;
- c) a description of the referral mechanism, including a link to or printable copy of any referral or service application forms, and any timeframes associated with the referral process;
- d) identification of a partner referral liaison for each partner program;
- e) a description of the means of providing feedback to referring partners for each referral made;
- f) to the extent available, similar information about referrals to other community service providers; and
- g) a timeline for updating the process with the goals of improved customer service and increased access to services.

3. Cross-Training

One-stop partners, under the direction of the one-stop operator, must develop a plan to cross-train all front-line one-stop partner staff in the referral process to all required partners. Refresher training for existing staff and training for newly hired staff should be included in the training plan. The One-Stop Operator should evaluate the effectiveness of the cross-training program annually and make recommendations for continuous improvement.

4. Policy Development

The One-Stop Operator should review and develop policies related to areas in the organization associated with Human Resources, Communications, and Finance. The One-Stop Operator should ensure appropriate staff are training on policies and make recommendations for continuous improvement.

B. One Stop Operator Prohibited Duties

In accordance with Federal Guidance and Administrative Policy 097: WIOA One-Stop Operator Procurement, the Operator must not:

- a) Convene system stakeholders to assist in the development of the local plan.
- b) Prepare and submit the CSPBC local plan (as required under WIOA sec. 107).
- c) Be responsible for oversight of itself.
- d) Manage or significantly participate in the competitive selection process for one stop operators.
- e) Select or terminate one stop operators, career service providers, and youth providers.
- f) Negotiate local performance accountability measures.
- g) Develop and submit budgets for activities of CSPBC in the local area.

C. One-Stop Operator Procurement

CSPBC will select its one-stop operator through a competitive process at least once every four years, as required by sec. 121(d)(2)(A) of WIOA. CSPBC will conduct competitive procurement based on its local procurement policies and procedures and the competitive procurement requirements in the Uniform Guidance outlined at 2 CFR 200.318 through 200.326. CSPBC will also follow all One-Stop Operator procurement procedures as outlined in CareerSource Florida’s Administrative Policy 097: WIOA One-Stop Operator Procurement.

D. Avoiding Conflicts of Interest

The one-stop operator must disclose potential conflicts of interest arising from the relationships of the operators with particular training service providers or other service providers.

The One-Stop Operator cannot establish practices that create disincentives to providing services to individuals with barriers to employment who may require longer-term services, such as intensive employment, training, and education service. The One-Stop Operator must comply with federal regulations and procurement policies governing calculation and use of profits.

E. Monitoring

In accordance with WIOA, the One-Stop Operator must be monitored. Since CSPBC is the One-Stop Operator, an outside organization or entity will conduct the monitoring and report the results to the CEO.

V. DEFINITIONS

None

VI. REVISION HISTORY

Date	Description
10/23/2025	Approved by the CareerSource Palm Beach County Board of Directors
10/23/2025	Issued to CareerSource Palm Beach County staff
03/29/2023	Approved by CareerSource Palm Beach County President/CEO
03/30/2023	Issued to CareerSource Palm Beach County staff

VII. RESOURCES

None