



2010.08.12.A.1

Policy

Title:	CareerSource Florida Conflict of Interest Contracts -- 2/3 Vote for Approval
Program:	Legal
Adopted:	8/12/2010
Effective:	8/12/2010

I. STATEMENT OF POLICY

CareerSource Florida (CSF) will apply the contract approval requirements of s. 445.007(1), F.S., including the 2/3 vote approval, to any CSF board member-related-contracts which may come for vote before the CSF Board, utilizing the definitions of the CSF contracting policy, subsections I(b-i). This specifically does not require CSF to apply the approval procedures of the CSF Contracting Policy, Sections II-V.

II. PURPOSE AND SCOPE

The purpose of the policy is to prohibit CSF Board members from entering into any contract with CSF, with certain exemptions related to workforce services or workforce programs. For any contract under an exemption, in order to increase transparency for Board actions in which a conflict of interest may exist between the Board and any Board member, the Board adopted the same procedure as applied to regional workforce boards for approving conflict-of-interest contracts. Before the vote, there must be full disclosure of the conflict to all other Board members, the Board member with the conflict must abstain from the vote, and two-thirds of all Board members present after a quorum has been established must approve the action. The scope of the policy applies to all CSF board member-related contracts.

III. INTRODUCTION

At the May 13, 2010, CSF Board of Directors meeting, the Board adopted the CSF Contracting Policy which was mandated by proviso language for Specific Appropriation 2214 of the 2010

General Appropriations Act and the 2010 Appropriations Implementation Bill. The policy required the Department of Economic Opportunity (DEO) to review regional workforce board contracts of \$25,000 or more to assure the statutory mandate established a decade earlier in s. 445.007(1), F.S., had been met. This provision required regional workforce board approval by a 2/3 vote of the entire board, abstention from the approval vote by the regional board member with the potential conflict of interest and disclosure of the regional board member's conflict of interest in a manner consistent with the procedures outlined in s. 112.3143, F.S. At the time of the contracting policy's approval, a motion was made to require the state workforce board to comply with the CSF Contracting Policy, a policy which was mandated by the Legislature to apply uniquely to the regional workforce boards. CSF officially approved the policy that it shall apply the contract approval requirements of s. 445.007(1), F.S., including the 2/3 vote approval, to any CSF board member-related contract, utilizing the definitions of the CSF Contracting Policy, subsections I(b-i). This specifically does not require CSF to apply the approval procedures of the CSF Contracting Policy, sections II-V.

IV. OBJECTIVES

CSF Board of Directors will avoid conflicts of interest by not contracting with CSF Board members, except for contracts providing workforce services or pertaining to workforce programs, and under those contracts, full transparency has been provided to the public through the full disclosure of the conflict and 2/3 vote approval.

V. HISTORY (if applicable)

Date	Description
5/4/2012	Conflict of interest disclosure and supermajority approval applied to CSF conflict of interest contracts.

VI. AUTHORITY

Sections 445.004 and 445.007(1), Florida Statutes

VII. ATTACHMENTS

Policy# 2012.05.04.A.2