

North Central Workforce Development Area

233 N. Chelan • Wenatchee, WA 98801 • (509) 663-3091 • Fax (509) 663-5649 • www.skillsource.org

LOCAL DIRECTIVE

Directive #: <u>23-182</u>	Date: <u>August 1, 2023</u>
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TO: Staff & Service Providers, and WorkSource System Partners

FROM: Lisa Romine, CEO

SUBJECT: Political Activities & Disclosure Requirements

In accordance with [WorkSource Policy 1018](#), the following directive addresses restrictions on political activities paid with federal or state funds and the disclosure requirements for other allowable political activities if paid with private funds. The purpose of this directive is to ensure all SkillSource employees and contractors are aware that these restrictions apply to all political activities.

Numerous federal and state laws, regulations and policies detail the prohibition against using federal or state funds for political activities, including but not limited to lobbying, campaigning on behalf of a candidate, and/or hosting campaign events. These political activities will result in a misapplication of funds (disallowed costs) if paid for or reimbursed by federal funds.

Definitions (from WorkSource Policy 1018)

- Political Activities – lobbying or advocating for legislative programs or changes; and campaigning for, endorsing, or contributing to political candidates or parties.
- Organizations that Receive Federal Funds – entities that receive federal funds by way of grants, contracts, or cooperative agreements. This includes the Employment Security Department, Local Workforce Development Boards (LWDBs), LWDB sub-recipients, and WorkSource Partners.
- Service Delivery Environment – Any location at which WorkSource identified services are delivered. The service delivery environment includes but is not limited to WorkSource centers, affiliate sites, and other locations where services identified as a WorkSource service or paid for, in whole or in part, by federal funding, are provided.

Directions and Prohibitions

1. SkillSource employees and contractors are prohibited from using federal grant or contract money for political activities. Employees and contractors are also prohibited from receiving reimbursements from federal contracts or grants for the costs of such activities.

2. Entities that do not receive federal funds are also prohibited from participating in political activities when these activities take place under the auspices of SkillSource or within its environment (i.e., at a WorkSource Center or Affiliate Site, or in the service delivery environment of SkillSource).

3. As part of its oversight responsibility, SkillSource expects all entities operating or providing services within the local WorkSource system to comply with this policy. SkillSource is not expected to regulate these entities' activities that occur outside of the WorkSource System. Prohibited political activities include, but are not limited to, the following:

- Attempts to influence the outcomes of any federal, state, or local election, referendum, initiative, or similar procedure, through in kind or cash contributions, endorsements, publicity, or similar activity.
- Establishing, administering, contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections.

4. SkillSource will include assurances or certification statements in all grant and contract general conditions to ensure compliance with these requirements concerning the use of federal funds. A disclosure form (Disclosure of Lobbying Activities) must be filed for political activities (allowable within the specific funding source) that have been, or will be, paid for with funds other than state or federal funds. This requirement applies to all subrecipients, and SkillSource will (upon request) provide disclosure forms to ESD on behalf of any disclosures within North Central WDA.