



FRATERNIZATION POLICY

B-513

Purpose.

The Southwest Wisconsin Workforce Development Board (SWWDB) has established Policy B-510, Standards of Conduct, which provides the minimum expectations required of employees. This policy further expands upon appropriate staff/customer relationships by implementing the Wisconsin's Department Corrections (DOC) Executive Directive 16, which prohibits certain relationships and conduct between its employees, (and by extension, contracted staff) and adult and juvenile offenders. DOC also requires employees, including contracted staff, to report certain relationships, including when family members are offenders.

SWWDB staff working with this population are to adhere to this policy, which is designed to eliminate any potential conflict of interest or impairment of the services provided to offenders by SWWDB employees, and to ensure the humane and respectful treatment of offenders.

Definitions.

1.0 Definitions.

“Adult or juvenile offender” or “offender” means an adult or juvenile under the legal custody or supervision of the DOC, the Department of Health and Family Services, or a federal, state or local law enforcement or correctional agency contracting with DOC. “Adult or juvenile offender” or “offender” includes individuals on adult probation or parole or juvenile aftercare, and adults and juveniles committed to state correctional institutions, including Wisconsin Resource Center, Mendota Juvenile Treatment Center, and Emergency Detention with the Department of Health and Family Services. “Employee” is any person employed by DOC, including limited term, project, and permanent employees, students, volunteers, and those persons under a contractual relationship with DOC or SWWDB under a services agreement/contract. “Relationship” means a personal association between an employee and an individual listed under the supervision of DOC, the Department of Health and Family Services, or a federal, state or local law enforcement or correctional agency contracting with DOC.

2.0 Policy.

A. Employees may not have relationships prohibited under Section **3.0** of this policy with:

1. An adult or juvenile offender; or
2. The spouse of an adult or juvenile offender.

This includes any offender under the supervision of the Department of Corrections and/or any offender within two years following discharge from incarceration or community supervision (whichever is last).

B. Employees shall not engage in sexual conduct prohibited under Section **4.0** of this policy with an adult or juvenile offender.

C. Consistent with Section **5.0** of this policy, employees must report relationships involving:

1. An adult or juvenile offender;
2. The spouse of an adult or juvenile offender;
3. The children or legal guardian of an adult or juvenile offender;
4. Other persons who reside in the same household as an offender, or the spouse, children, or legal

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- guardian of an offender; or
- 5. Any relative of the adult or juvenile offender when the employee knows that the individual is related to the offender.

- D. This policy does not include employer-directed contacts or those contact that are part of the employee's job duties.

- E. Employees may request exemptions from the policy by following the procedures outlined in Section 6.0.

- 3.0 Prohibited Relationships.
 - A. Relationships prohibited under this policy include, but are not limited, to:
 - 1. Having personal contacts or being in a social or physical relationship with an individual listed in Section 2.A. This policy does not prohibit personal contacts that are required for employees to perform their duties. It also does not prohibit incidental personal contacts in group activities, such as church-related or sporting events.
 - 2. This policy prohibits personal contacts that are usually one-to-one such as dating, knowingly forming close relationships, corresponding or communicating without an exemption being granted, and visiting that is not job-related or without an exemption being granted.

 - B. Living in the same household as individuals listed under Section 2.A. Living in the same apartment building or complex is permitted.

 - C. Working for an individual listed under Section 2.A.

 - D. Employing an individual under Section 2.A, with or without pay.

 - E. Giving special consideration or treatment to an individual listed under Section 2.A.

 - F. Providing or receiving good and services to or from an individual listed under 2.A.

- 4.0 Prohibited Sexual Contact.
 - A. Employees are prohibited from engaging in sexual conduct of any kind with offenders, including, but not limited to:
 - 1. Having sexual contact or intercourse with an offender. (See Executive Directive 16-A)
 - 2. Engaging in sexual misconduct with an offender. Sexual misconduct is any behavior or act of sexual nature directed toward an offender by an employee. This includes, but is not limited to, acts or attempts to commit acts of sexual assault, sexual abuse, sexual harassment, sexual contact, conduct of sexual nature, sexual gratification of any party, obscenity or unreasonable invasion of privacy.
 - 3. Conversations or correspondence that suggest a romantic or sexual relationship.

- 5.0 Reporting Requirements Regarding Relationships.
 - A. Employees must report to their immediate supervisor in writing any present relationship or any

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relationship being considered which has the potential for violating this policy.

- B. Employees must report to their immediate supervisor any unanticipated, non-employer/program directed contact with individuals listed under Section 2.C.
- C. Consistent with Section 2.C, employees must notify their supervisors when their own relatives or family members are offenders.
- D. Employees will use SWWDB Form B-513-A (DOC Form 2270A) for purposes of reporting under this Section, regardless of whether an exception is being sought.
- E. SWWDB shall inform DOC of employee contacts and requests for exemptions, who will approve or deny requests.

6.0 Exemption Procedures.

- A. Employees seeking exemption from this policy will complete form B-513-A (DOC Form 2270A) and submit to their immediate supervisor. DOC provides approval or denial of all requests.

7.0 Employee Statement.

Given the nature of the programs operated by SWWDB, which primarily assist individuals with barriers, including individuals under the supervision of state and local corrections/law enforcement, all SWWDB and contracted service provider staff will sign and complete SWWDB Form 513-B indicating their receipt and understanding of this policy acknowledging that fraternization is prohibited.

References: Wisconsin Department of Corrections Executive Directives 16 and 16-A.
Wisconsin Department of Corrections Form 2270A (Fraternization Policy Exemption Request).
Wisconsin Department of Corrections Form 1558 (Receipt / Acknowledgement of Fraternization Policy).

Policy Adopted: June 9, 2021

Policy Revised:



COST ALLOCATION PLAN

C-102

Purpose.

The Southwest Wisconsin Workforce Development Board (SWWDB) is committed to compliance and proper accounting of its workforce development board's funds. Although some costs can be identified specifically with a particular final cost objective relatively easily with a high degree of accuracy, other costs benefit two or more projects or activities. These costs must be allocated to the projects based on the proportional benefit received. This plan defines how SWWDB will allocate expenses to ensure each fund and grant receives its fair share of costs.

This entire cost allocation plan is designed to be in accordance with Uniform Guidance per the Office of Management and Budgets (OMBs) final guidance on Administrative Requirements, Cost Principles, and Audit Requirements, 2 Code of Federal Regulations Part 200, including the Department of Labor exceptions codified at 2 CFR Part 2900, which supersede the requirements from OMB Circulars A-21, A-87, A-110, and A-122; Circulars A-89, A-102, and A-133, 29 CFR Parts 95, 96, 97, and 99, and the guidance in Circular A-50 on Single Audit Act follow-up unless different provisions are required by statute or approved by OMB.

Plan.

Direct Cost Items: Payroll and Accounts Payable Costs shall be directly assigned to a funding source when the individual program and related costs directly impact a sole fund source or are able to be identified specifically with a particular final cost objective relatively easily with a high degree of accuracy. Funding regulations and contract specifications shall be considered when determining the cost categorization and assignment.

Shared Cost Items: Costs which impact more than one fund source shall be allocated based on staff time-charging. The Excel cost allocation tool is updated monthly on direct staff regular, work time from the payroll where all the corresponding dates fall in that same month. SWWDB recognizes five (5) types of shared costs:

1. Payroll Expenses - Costs that are expensed through the Paychex payroll software system based on the actual number of hours worked per payroll/pay period in each funding source. The fringe benefits are processed at the rate billed by the insurance company or set forth in SWWDB policies and in conjunction with employee elections. Included here are, but not limited to:
 - a. Payroll taxes (FICA/Medicare and Wisconsin/state unemployment compensation).
 - b. Employee travel-related and other pre-approved expenses, i.e. cell phone, internet reimbursements at the rates stated in SWWDB policies.
 - c. Employee Fringe (paid time off, health insurance, dental insurance, life/long-term disability insurance, and 401k)
2. Fringe Benefits - Costs that are expensed through the use of a cost allocated Excel spreadsheet based on the actual number of hours worked by SWWDB staff in each funding source and are only applicable if the fringe benefit is applicable to the employee. Included can be, but are not limited to:

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- a. Worker's Compensation and Multi-Peril at the rate billed by the insurance company and applicable directly to staff.
3. Accounts Payable Expenses - Shared cost items that affect multiple fund sources are allocated by use of a cost allocated Excel spreadsheet. The spreadsheet bases fund allocations on actual hours worked by SWWDB staff in individual funding sources for the month. The cost pools are as follows:
- a. Position – Split between Program and Administration costs within each fund source as defined by regulations and funding constraints.
 - b. Location – An allocation per office location (such as Platteville versus Janesville office) costs as defined by grant regulations and funding constraints.
 - c. All Admin – if an allocation is strictly administrative costs only but benefits all programs, this allocation is used in accordance with regulations and funding constraints.
 - d. All Staff/Organization – for a cost that benefits all staff and programs with consideration to both admin and program costs, this allocation is used in accordance with regulations and funding constraints.
4. Job Center Expenses - Costs that are paid in order to facilitate job center activities are pooled first into a Job Center Fund. These costs include the direct staff time and related fringe benefits [or allocations](#) (payroll taxes, travel, health, dental, life, and 401k, [etc.](#)). Once pooled in the Job Center Fund, they are expensed out using the cost allocation at the end of the month over the grants to ensure each funding source receives its fair share of job center expenditures.
5. [Grant Writing / Proposal Expenses - Costs that are paid in order to facilitate prospective new grants/proposals are pooled first into a Grant Writing Fund. These costs include the direct staff time and related fringe benefits or allocations \(payroll taxes, travel, health, dental, life, and 401k\). Once pooled in the Job Center Fund, they are expensed out using the cost allocation at the end of the month over the grants to ensure each funding source receives its fair share of job center expenditures.](#)

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Both administrative and program expenses are allocated based on actual hours administrative and program staff work in specific funding sources. There is a cost pool for each office location where lease is paid for the distribution of general overhead and supplies allocation. Common shared accounts payable expenses include, but are not limited to, internet, telephone, office supplies, postage, etc.

References: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)— 2 CFR 200 (200.405 Allocable costs, 200.413 Direct costs, [200.460 Proposal costs](#), and Appendix IV to Part 200-Indirect (F&A Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations)

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COST ALLOCATION PLAN



Plan Adopted: August 19, 2015 by DWD via email and then "conditionally" approved by DWD as submitted in the local plan
Plan Revised: December 13, 2017; June 12, 2019; September 9, 2020; June 9, 2021