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Office of Compliance Issuance

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Family and Workforce Centers of America (FWCA) is the fiscal agent and workforce support organization for Saint Louis County Workforce Development.

SUBJECT:

Nondiscrimination and Equal Opportunity Policy

ATTACHMENTS (if any): (N/A)

This Issuance is an official policy of St. Louis County Workforce Development.

This Issuance Affects:

- Workforce Innovation and Opportunity Act (WIOA) Programs
Title I: Adult
Title I: Dislocated Worker
Title I: Youth

FOR THE ATTENTION OF:

All applicable WIOA staff or subcontractors—Implementation of this policy is immediate and continuous.

RESCISSIONS: N/A

REFERENCES:

29 CFR 38, Section 188
Missouri Nondiscrimination Plan

SUMMARY

St. Louis County Workforce Development (STLCOWD) Nondiscrimination and Equal Opportunity policy clarifies the application of the nondiscrimination and equal opportunity provisions of WIOA and provides uniform procedures for implementing them. STLCOWD implements provisions of nondiscrimination and equal opportunity for the Workforce Innovation and Opportunity Act (WIOA).

BACKGROUND

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

Recipient of WIOA Title I funding includes the following:

- Registrants, applicants, and registrants and applicants for whom an eligibility determination has been made;
- Participants;
- Applicants for employment and employees;
- Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
- Recipients that receive WIOA Title I financial assistance; and
- Members of the public, including those with impaired vision or hearing and those with limited English proficiency.

SUBSTANCE

The recipient must not discriminate in any of the following areas:

- Establishing that discrimination against individuals who are limited English proficient (LEP) is discrimination on the basis of national origin.
- Updates based on disability discrimination jurisprudence, particularly regarding access to programs and activities.
- Expanded requirements to ensure “vital information” about aids, benefits, services, and training is accessible, in print and online, by LEP¹ individuals and individuals with a disability.
 - STLCOWD must record the limited English proficiency and preferred language of each applicant, registrant, individual, and trainee. Such information must be stored in a manner that ensures confidentiality, and must be used only for the purposes of:
 - recordkeeping and reporting

¹ STLCOWD Issuance – Access to Meaningful Services for Individuals with Limited English Proficiency (LEP) Policy

- determining eligibility, where appropriate, for WIOA financially assisted programs or activities
- Establishing that pregnancy discrimination as a type of sex discrimination
- Establishing that discrimination based on sex stereotyping, transgender status, or gender identity is discrimination on the basis of sex. New definitions of “harassment” are given.

The following is STLCOWD’s suggested procedures for filing a discrimination complaint under a WIOA Title I-financially assisted program or activity. A recipient may file a complaint within 180 days from the date of the alleged violation with either:

1. Contact STLCOWD’s Local EO Officer:

- a. Trencé (TJ) James
 Location: Missouri Job Center
 3757 Harry S. Turman Blvd.
 St. Charles, MO 63301
 Phone: 816-804-2956
 Email: trencé.james@dhewd.mo.gov

or

2. Contact the State of Missouri EO Officer or The Director, Civil Rights Center (CRC):

- a. Danielle Smith
 State WIOA Equal Opportunity Officer
 Location: P.O. Box 1087
 Jefferson City, MO 65102-1087
 Phone: 573-751-2428
 TTY: 800-735-2966 (or 711)
 Fax: 573-751-4088
 Email: danielle.smith@dhewd.mo.gov

or

- b. The Director, Civil Rights Center (CRC)
 U.S. Department of Labor
 200 Constitution Avenue NW Room N-4123
 Washington, DC 20210
www.dol.gov/crc (electronic submission)

If an individual files a complaint with the recipient, an individual must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above).

If the recipient does not give an individual a written Notice of Final Action within 90 days of the day on which an individual filed a complaint, an individual may file a complaint with CRC before receiving that Notice. However, an individual must file a CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which an individual filed a complaint with the recipient).

If the recipient does give an individual a written Notice of Final Action on a complaint, but an individual is dissatisfied with the decision or resolution, an individual may file a complaint with CRC. An individual must file their CRC complaint within 30 days of the date on which an individual received the Notice of Final Action.

TIMELINE

Immediate and continuous

INQUIRIES

Please direct all questions or comments regarding this Issuance document to stlcowd@fwca-stl.com. All active, expired, or rescinded Issuances are available upon request.