

NORTH CENTRAL COUNTIES CONSORTIUM

NONDISCRIMINATION AND EQUAL OPPORTUNITY POLICY**I. Purpose**

This policy establishes the North Central Counties Consortium's (NCCC) nondiscrimination and equal opportunity policy for the Workforce Investment Act (WIA) Title I-financially assisted programs or activities and for NCCC Welfare-to-Work (WtW) Grant programs.

II. Scope

This policy applies to all NCCC One Stop Career Centers and all mandated One Stop partners, to the extent that they participate in the One Stop delivery system.

III. References

- WIA Section 188
- WIA Section 181(c)
- Americans with Disabilities Act of 1990, Title II, Subpart A
- 20 CFR Section 645.255
- 20 CFR Section 667.600-630
- 29 CFR Part 37
- WSD10-1, Nondiscrimination and Equal Opportunity Procedures
- WIAD04-20, Limited English Proficiency

IV. Background

WIA Section 188 contains the nondiscrimination and equal opportunity provisions, which prohibit discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in a WIA Title I-financially assisted program or activity. Title 29 CFR Part 37 implements the nondiscrimination and equal opportunity provisions specified in Section 188 of WIA. Title 20 CFR Section 645.255 contains the nondiscrimination protection provisions applicable to participants in the WtW Grant programs.

V. General Provisions

Title 29 CFR Section 37.54(a) requires that each WIA Title I-financially assisted program or activity and each WtW Grant program adhere to a Methods of Administration (MOA). The MOA reflects our Local Workforce Investment Area's (LWIA) commitment to nondiscrimination and equal opportunity. It outlines the activities required to comply with the provisions of WIA, WtW and Title 29 CFR Part 37.

The MOA contains nine distinct elements. This policy outlines these elements and highlights compliance requirements that are significant to NCCC and its One Stop Career Centers and service providers:

- MOA #1 *Designation of Local-Level Equal Opportunity (EO) Officer*
- MOA #2 *Notice and communication requirements that ensure notice and posting of nondiscriminatory practices in prominent locations, available formats to individuals with visual impairments, where appropriate, information and services should be additionally provided in languages other than English and where materials indicate that the NCCC EO Officer may be reached by telephone, the California Relay Service (CRS) telephone number will be indicated.*
- MOA #3 *Ensure that all Job Training Plans, Contracts, and Policies and Procedures contain the nondiscrimination and equal opportunity provisions of WIA or WtW*
- MOA #4 *Ensure universal access to WIA Title I-financially assisted programs and activities and WtW programs*
- MOA #5 *Compliance with Section 504 of the Rehabilitation Act of 1973, as amended and Title 29 CFR Part 37 which include ensuring accessibility to training programs and activities for all individuals*
- MOA #6 *Maintain and collect information and data regarding race/ethnicity, sex, age, and, where known, disability status, of each applicant, registrant, eligible applicant/registant, participant, terminee, applicant for employment, and employee*
- MOA #7 *Monitor recipients for compliance with nondiscrimination and equal Opportunity requirements*
- MOA #8 *Establish Complaint Processing Procedures*
- MOA #9 *Corrective Actions/Sanctions are the responsibility of NCCC*

The above MOAs will be implemented in NCCC's Nondiscrimination/Equal Opportunity and Grievance/Complaint Procedures.