



RIVERSIDE COUNTY
WORKFORCE INVESTMENT BOARD

**NONDISCRIMINATION AND EQUAL OPPORTUNITY
POLICY**

Date: November 5, 2012

Number: 14-01

PURPOSE: To provide guidance for addressing internal discriminatory practices and criminal complaints occurring in the administration of Youth and Adult Workforce Investment Act (WIA) Title I-funded programs or activities.

EFFECTIVE DATE: July 1, 2012

REFERENCES: Employment Development Department (EDD) Workforce Services Directive [WSD10-1](#) and all references incorporated therein.

LOCALLY IMPOSED REQUIREMENTS: N/A

BACKGROUND: N/A

POLICY:
The Economic Development Agency/Workforce Division (EDA/WD) expressly adopts and implements the non-discrimination and equal opportunity provisions of Title 29 Code of Federal Regulations (CFR) Section 37.5, as referenced in Employment Development Department (EDD) Directive [WSD10-1](#) which stipulates that:

“No individual in the United States may, on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any Workforce Investment Act (WIA) Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIA Title I funded program or activity.”

The EDA/WD, its One-Stop Partners and contracted subrecipients and service providers must comply with the nondiscrimination and equal opportunity provisions of the Workforce Investment Act and notify applicants and participants at the start of services of the complaint procedures available by providing such individuals with the following Notification forms at registration: “WHAT TO DO IF YOU BELIEVE YOU

HAVE EXPERIENCED DISCRIMINATION” and “EQUAL OPPORTUNITY IS THE LAW”, forms SPDU 448-02 and SPDU 448-03.

GENERAL PROVISIONS/COMPLIANCE REQUIREMENTS:

As outlined in EDD Directive [WSD10-1](#), the Riverside County EDA/WD hereby agrees to comply with the following elements of the nondiscrimination and equal opportunity provisions pertinent to One-Stop delivery system programs and activities:

1. Designation of Local-Level Equal Opportunity (EO) Officer

In accordance with State guidelines, the Riverside County EDA/WD has designated the following staff as its EO Officer, responsible for coordinating its obligations for both WIA and Wagner-Peyser (WP)-program specific discrimination complaints:

Edna Vallecillo-Garcia, J.D.
Equal Opportunity Officer
1325 Spruce Street, Suite 110
Riverside, CA 92507
Telephone: 951.955.3100
FAX: 951.955.0808
TDD/TTY: 951.955.9050
E-mail: EVallecillo-Garcia@rivcoeda.org

2. Notice and Communication Requirements

Riverside County EDA/WD and its contracted subrecipients will comply with the notice and communication requirements of the Nondiscrimination and Equal Opportunity provisions, and the right to file a complaint by:

- Posting the notice in prominent locations within each of its full service and satellite One-Stop Center locations.
- Disseminating the notice in internal memoranda and other written or electronic communications.
- Including the notice in handbooks, manuals, brochures, broadcasts and other communications.
- Making the notice available to each participant.

Additionally, where a hard copy case file is maintained, participants shall sign where indicated on the agency’s Workforce Membership Profile form CSU 448-03, thereby acknowledging receipt of the Nondiscrimination and Equal Opportunity forms.

Where an electronic case file is maintained, participants shall sign where indicated on the Workforce Membership Profile form CSU 448-03 to acknowledge receipt of the Nondiscrimination and Equal Opportunity Notification forms. Additionally, staff will record the notification in the agency's established participant tracking database, indicating the date of the notification, and the name of the staff person who provided it.

The notice will be provided in appropriate formats to individuals with visual impairments and a record of such notification shall be documented in the participant's file.

Riverside County EDA/WD adheres to and includes the following tagline in distributed publications, broadcasts, electronic media and other communications that promote WIA programs or activities:

"Equal Opportunity Employer/Program auxiliary aides and services are available upon request to individuals with disabilities."

TDD/TTY and California Relay Service telephone numbers are also included in the above communications.

Riverside County EDA/WD serves a substantial number of persons with Limited English Proficiency (LEP) and therefore employs a sufficient number of qualified bilingual staff in public contact positions to ensure that individuals having LEP receive the language assistance necessary to afford them meaningful access to WIA programs, services, and information.

3. Nondiscrimination Assurances in Job Training Plans, Contracts and Policies and Procedures

As a condition for the award and continuing receipt of WIA Title I financial assistance from the Department of Labor (DOL), Riverside County EDA/WD as a grant applicant and recipient, ensures that all subrecipient and service provider contracts, job training plans and policies and procedures contain the nondiscrimination assurance as outlined in EDD Directive [WSD10-1](#).

4. Universal Access

Riverside County EDA/WD ensures universal access to WIA Title I financially assisted programs and activities in accordance with the methods identified in EDD Directive [WSD10-1](#).

5. Compliance with Section 504 of the Rehabilitation Act of 1972, as Amended, and Title 29 CFR Part 37

In accordance with EDD Directive [WSD10-1](#), Riverside County EDA/WD ensures accessibility to WIA programs and activities to all individuals. Such programs and activities are administered in integrated settings appropriate to the needs of qualified individuals with disabilities.

6. Data and Information Collection and Maintenance

Riverside County EDA/WD and its subrecipients will comply with the data and information collection and maintenance requirements as outlined in EDD Directive [WSD10-1](#).

7. Monitor Recipients for Compliance

Riverside County EDA/WD, as a recipient of financial assistance from the DOL, will comply with the monitoring requirements outlined in EDD Directive [WSD10-1](#) by completing biennial self-evaluations to identify the compliance status of its WIA programs, activities, and areas in which technical assistance may be needed.

8. Complaint Processing Procedures

In accordance with EDD Directive [WSD10-1](#), the Riverside County EDA/WD Equal Opportunity Officer has developed and published complaint processing procedures, and a system is in place to record such complaints.

9. Corrective Actions/Sanctions

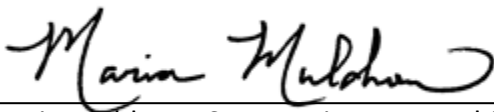
If Riverside County EDA/WD receives a Letter of Findings, Notice to Show Cause, or Initial Determination pursuant to regulations identified in EDD Directive [WSD10-1](#), Riverside County EDA/WD will take the corrective action steps identified in the above-mentioned directive to achieve compliance.

PROCEDURES:

Refer to the Complaint/Grievance - EEO & Nondiscrimination Complaint Resolution link in Knowledge Management on the WDC/Partner Intranet site for procedures related to this policy.

REVISION HISTORY:

Revision Dates: 09/30/10, 06/09/09, 08/18/08
Original Policy Date: 07/31/03



Maria Muldrow, Community Partnerships Manager