

Sub-Recipient Name: Youth Alliance
Programs Monitored: Equal Opportunity – Maryville, St. Joseph, Chillicothe Job Centers, YA Site
Monitor: Jeanie Griffin, Equal Opportunity Officer/Fiscal Manager
Dates: On-site visits: November – March, 2025; Desktop: May 5, 2025

I. Executive Summary and Scope of the Equal Opportunity Monitoring

The WDB conducted a monitoring review of Youth Alliance, for Program Year 2024 for compliance with the requirements set forth by Section 188 of WIOA, the Missouri Nondiscrimination Plan Section 29 CFR 38, OWD and WDB Policies for Sub-State Monitoring.

Equal Opportunity monitoring is not an audit and due to the limited scope of the monitoring, may not disclose all systems' weaknesses. The results presented in this report are based on the areas reviewed by WDB staff. The United States Department of Labor, the Missouri Office of Workforce Development, or any other applicable federal or state body may conduct reviews and have different conclusions, opinions, and/or results.

The scope of the monitoring utilized guidelines established by Section 188 of WIOA, the State of Missouri Nondiscrimination Plan Section 29 CFR 38, the Office of Workforce Development's (OWD) Sub-state Monitoring Issuance and Workforce Development Board of North Missouri's Sub-State Monitoring Policy.

The monitoring utilized a self-monitoring worksheet completed by Youth Alliance as well as on-site visits to the YA administrative office, the Marville, St. Joseph and Chillicothe Job Centers during which the facility and its practices were reviewed for compliance. The following items were reviewed:

- the "Equal Opportunity is the Law" poster was properly posted in physical locations as well as the organizations website;
- a complete accessibility workstation for job center customers is provided in comprehensive sites and as complete as possible for affiliate and Admin Office;
- Signed acknowledgement from the employees that notification of complaint and grievance rights and procedures was received;
- Employees' signed Confidentiality Agreement;
- Notice of availability of translation services and other accommodations is posted;
- Accessibility of the facility;
- The organization's policies relating to non-discrimination, complaint process and accessibility;
- Application for employment;
- Any agreements/contracts with other individuals, organizations – if applicable;
- the organization's website;
- any items, brochures, flyers promoting program services;
- organizational practices relating to the notification of the non-discrimination and filing complaints, collecting of demographic data on applicants for employment and employees;
- Storage of participant, applicant, and employee records;
- Affirmative Outreach efforts;
- Staff and Customer Interviews

II. Results of the Equal Opportunity Monitoring Review

The WDB rates issues discovered during monitoring review at two levels of severity: compliance findings and areas of concern, as defined below. In addition, opportunities have been identified and are also included below.

Compliance Findings - Compliance findings (findings) are items that disclose areas of significant non-compliance with WIOA, federal regulations, the state's nondiscrimination plan, workforce development issuances or guidance, and material weaknesses in internal controls. Findings require written corrective action plans by either accepting the WDB's recommendation or proposing and receiving approval for an alternate course of action. Regulatory compliance monitors will provide citations from WIOA, federal regulations, the state's nondiscrimination plan, or OWD issuances and procedures to identify specific areas of non-compliance and will explain the corrective measures necessary for resolution.

The results of our monitoring did not disclose any compliance findings.

Areas of Concern - Areas of concern (concerns) are items that may or may not be compliance-based but may identify practices that could leave the organization vulnerable to a discrimination complaint. Concerns are suggestions to management and do not generally require a response unless specifically indicated. Resolved findings and accompanying corrective actions may be included in this category. Concerns, although resolved, may rise to a level of severity that is subject to follow-up during subsequent review. Regulatory compliance monitors may offer suggestions or guidance to assist the entity in making improvements or may make a referral for further technical assistance.

The results of our monitoring disclosed 4 Areas of Concern.

Area of Concern – 1 (Section 1: Assurances)

Youth Alliance's non-discrimination policy as outlined on page 3 of the YA Employee Handbook does not contain the correct EO is the law language per Section III of the State's NDP and 29 CFR 38.35.

Corrective Action: Please update the handbook to reflect the correct language.

Area of Concern – 2 (Section 1: Assurances)

The voluntary demographic form included with YA's employment application does not include all the required classes as listed on the EO is the Law poster in the opening paragraph.

Corrective Action: Please update the Voluntary Demographic Form.

Area of Concern – 3: (Section 3: Notice and Communication)

YA's Youth Employment Program Flyer does not include the required tag line. The OJT flyer being used in the Maryville Job Center does not include the current staff contact information. The MJC Complaint Flyer in Spanish at the St. Joseph Job Center does not include the updated local EO contact information. The EO is the Law posters displayed at the YA Admin building do not have the correct local EO contact information.

Corrective Action: Please update the above listed brochures, flyers and outreach items as indicated.

Area of Concern – 4: (Section 6: Complaint Processing Procedures)

The YEP handbook refers to the Vice President, Compliance Officer, and Board of Director's Ethics and Compliance Committee as those individuals to handle complaints, grievances or appeals. YA's Organizational Chart does not identify any of these individuals within their organization.

Corrective Action: Please update the handbook to identify the corrective individual within YA's organization responsible fielding complaints, grievances or appeals. In addition, for youth (participants) served through WIOA, the EO is the Law procedures that need to be incorporated for the filing of any WIOA complaints or grievances.

Opportunities - Opportunities are items the WDB has suggested for revision to indicate to all participants, applicants, and employees that the organization has a strong commitment to provide equal access to all programs, services, and employment. These do not necessarily require a written response.

During the monitoring, the WDB identified 4 opportunities for consideration.

Opportunity – 1: (Section 1: Assurances)

The YA Employment Application has a typo "I certify, I certify".

Corrective Action: Please correct.

Opportunity – 2 (Section 3 Notice and Communication): YA should consider adding the tagline to the bottom of each landing page on their website to provide more visibility that YA is an equal opportunity employer/program.

Opportunity – 3 (Affirmative Outreach):

Although the YA Admin office is just a specialized center and not required to have all the ADA equipment required like the Comprehensive centers, YA does serve many youth at the Mitchell location and should consider having an ADA area equipped with items to assist individuals needing accommodations other than the adjustable lift table.

III. Prior Year Corrective Action Status

The monitoring report for PY2023 contained 5 Compliance Finding and 4 Area of Concern. The Compliance Findings included non-compliance with section 29 CFR 38.9 in that YA did not have the EO is the Law Poster in two other languages other than English; non-compliance with 29 CFR 38.36 in that YA did not have the EO is the Law posters displayed on their website with the correct EO contact information; non-compliance with 29 CFR Part 38.4 in that YA's website did not have the required Babel notice present; non-compliance with 29 CFR part 38.34 in that YA did not provide the EO notice to applicants for employment. Areas of concern included incorrect contact for designated individual to receive complaints; accessibility issues with the restrooms at the Maryville and Youth Alliance Admin facilities; Right to an Interpreter poster not visible; and the EO is the Law poster not displayed at the Maryville Job Center.

Follow-up: YA provided a response and corrected the deficiencies noted above with the exception of the facility improvements for Maryville and the YA Admin building. Since two sites are not comprehensive sites, those improvements were recommendations that YA will take into consideration with any future facility improvements.