

Missouri Department of Higher Education and Workforce Development: Your Organization's Obligation to Section 188 of WIOA

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Agenda

- Background on WIOA
- Role of the US Dept. of Labor
 - Employment and Training Administration
 - Civil Rights Center
- Service Provider's(Recipients) obligations under Section 188 of WIOA
 - Requirements of Section 188 of WIOA
 - Monitoring Requirements of Section 188 of WIOA
 - Discrimination Complaint Procedures
- Questions/Comments

Key Words/Acronyms for this Training

- Department of Labor (DOL)
- Civil Rights Center (CRC)
- Workforce Innovation and Opportunity Act (WIOA)
- Section 188 of WIOA and 29 CFR 38
- Local Workforce Development Boards (LWDBs)
- Missouri Nondiscrimination Plan (NDP)
- Eligible Training Providers (ETPs)
- Programs, Services, and Activities
- Recipients

What is WIOA?



Workforce Innovation and Opportunity Act 2014(WIOA) is landmark legislation that is designed to strengthen and improve our nation's public workforce system and help get Americans, including youth and those with significant barriers to employment, into high-quality jobs and careers and help employers hire and retain skilled workers.

U.S. Department of Labor Jurisdiction

The Workforce Innovation and Opportunity Act (WIOA) has two Labor Department agencies with jurisdiction over workforce programs, services and activities.

- **Employment and Training Administration (ETA)**

- The mission of the Employment and Training Administration is to contribute to the more efficient functioning of the U.S. labor market by providing high quality job training, employment, labor market information, and income maintenance services primarily through state and local workforce development systems.

- **Civil Rights Center (CRC)**

- The mission of the Civil Rights Center (CRC) is to promote justice and equal opportunity by acting with impartiality and integrity in administering and enforcing various civil rights laws.

ETA and CRC: A difference in focus



ETA is going to follow your dollars and ensure that dollars are spent in accordance with program requirements. They will check the essential eligibility requirements of your programs or activities to ensure alignment with federal requirements.



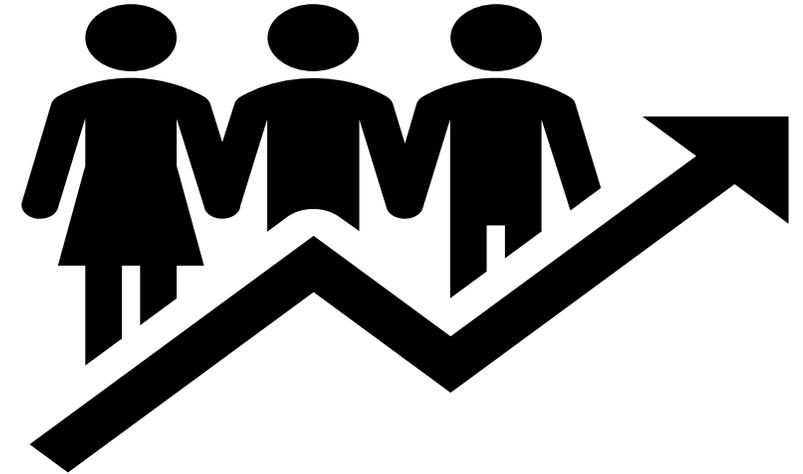
CRC is going to follow the delivery process (policies and procedures) of your U.S. Department of Labor funded services, activities, training, aid, and benefits under WIOA.

What is Section 188 of WIOA?

- Section 188 of WIOA is the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA), which are contained in 29 CFR 38.
- Section 188 of WIOA prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I-financially assisted program or activity.
- Section 188 of WIOA clarifies the application of the nondiscrimination and equal opportunity provisions of WIOA and provides uniform procedures for implementing them.

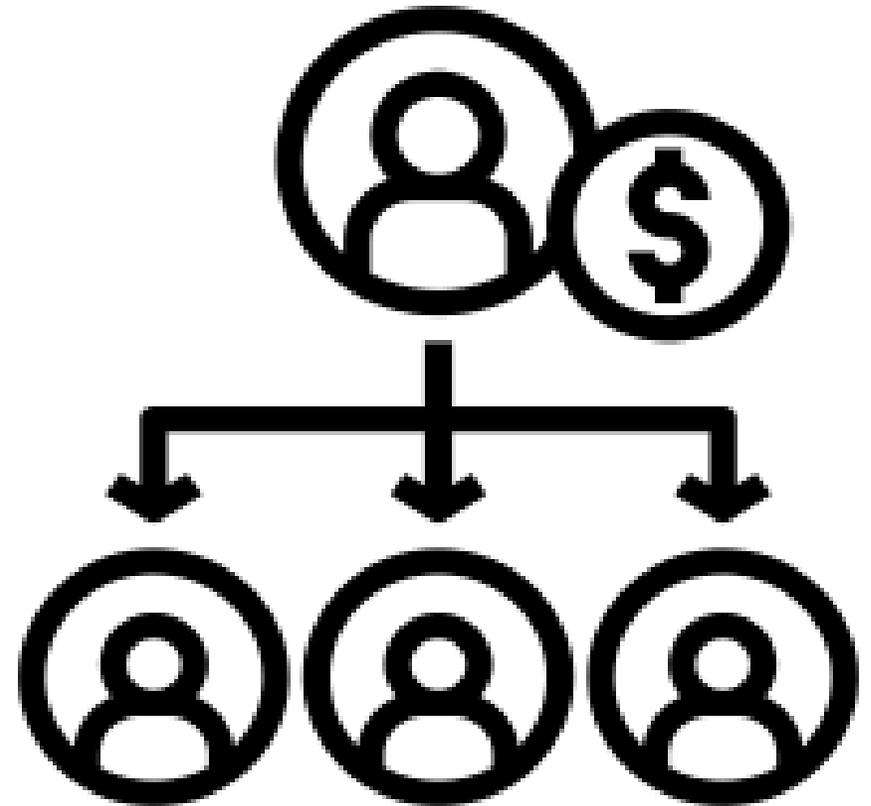
US DOL Grant Recipients

- Because Missouri is a USDOL grant recipient, the Governor has agreed that DHEWD and partners will take specific steps to ensure nondiscrimination in the delivery of programs and services.
- Federal and state laws prohibit discrimination in both service delivery and employment.



Recipient Meaning under Section 188 of WIOA

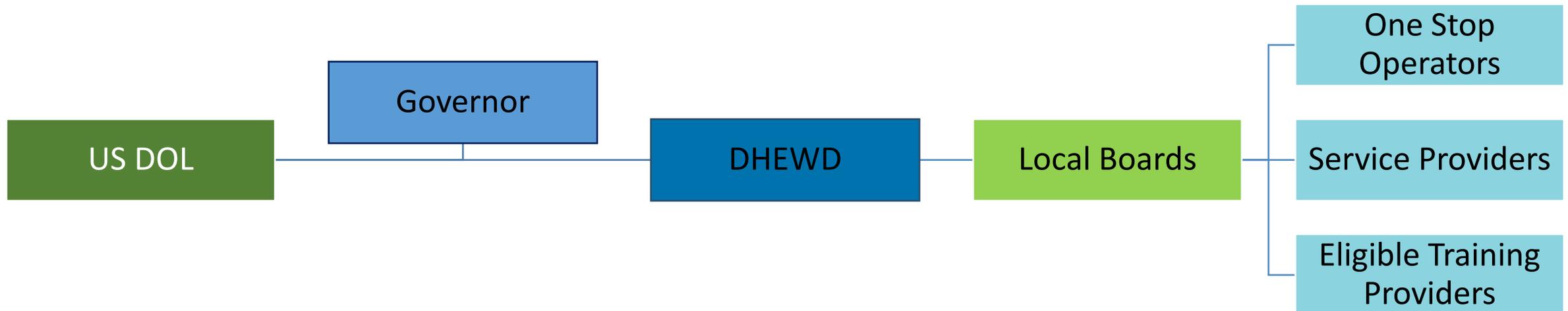
Any entity to which financial assistance under WIOA Title I is extended, either directly from the USDOL or through the Governor or another recipient; excluding the ultimate beneficiaries of the WIOA Title I funded programs or activities.



Who is a
recipient?

- **Service Providers**
- **One Stop Operators**
- Eligible Training Providers
- On the Job Trainings
Employers
- Work Experience Employers
- State Workforce Board
- Local Workforce Boards

WIOA Title I Funds Flow Chart



How is the
monitoring
conducted?

DHEWD ensures recipients implement the requirements of Section 188 of WIOA, 29 CFR 38 and the Missouri Nondiscrimination Plan.

What is the
Missouri
Nondiscrimination
Plan (NDP)?

- It's the Governor's nondiscrimination program.
- *The Governor is responsible* for ensuring that all covered State programs comply with Section 188 of WIOA and the regulations.

What are the overall MO NDP requirements?

- Assurances;
- Designating an Equal Opportunity Officer;
- Notice and Communication;
- Affirmative Outreach;
- Data and Information Collection and Maintenance;
- Complaint Processing Procedures;
- Governor's Oversight Responsibilities Regarding Recipients' Recordkeeping;
- Additional Element Sections



DEPARTMENT OF
HIGHER EDUCATION &
WORKFORCE DEVELOPMENT

Assurances

Assurance Requirements for WIOA Applicants

Each grant applicant, & each training provider seeking eligibility for WIOA funding, must:

- Indicate that the required nondiscrimination and equal opportunity language will be included in all grants, cooperative agreements, plans, contracts, and other similar documentation
- Include the exact language found in the regulations or reference the regulations
- Ensure programmatic and architectural accessibility for persons with disabilities

What is covered by the contract?

- Every segment of the delivery of services, aid, training, and benefits from the State through the LWDBs to the service providers, on-the-job trainers, apprenticeship program providers, educational providers (such as colleges, universities, and technical schools), and any other entities receiving WIOA Title I-financial assistance.
- Youth, Adult, and Dislocated Worker programs are covered.
- WIOA Section 188 will cover all programs and activities operated by, or through, Missouri Job Center even if funding for the program or activity comes from another federal agency and/or the specific program or activity is not WIOA Title I-financially assisted. Some examples are:
 - Wagner-Peyser
 - TANF (Temporary Assistance for Needy Families) (see HHS guidance at www.hhs.gov/ocr/civilrights/resources)
 - TAA (Trade Adjustment Assistance)
 - Summer Youth Programs

What is covered by the contract?

- WIOA Section 188 covers delivery of unemployment insurance (UI) programs and activities, even if those programs are operated outside your American Job Network center
 - Section 121(b)(1)(B) of the Workforce Investment Act (a state's UI benefits system is a "required partner")
 - There is a list of other "**required partners.**" Required partners are covered by WIOA Section 188 even if they are not actually operated by, or through, an American Job Network center
- Eligible training providers and eligible service providers for a job center
- Recipients "employment practices" are also covered under Section 188 of WIOA

Assurances indicate the following:

As a condition to the award of financial assistance from the Department of Labor under Title I of WIOA, the grant applicant assures that it can comply with the nondiscrimination and equal opportunity provisions of the following laws and will remain in compliance for the duration of the award of federal financial assistance:

- **Section 188 of the Workforce Innovation and Opportunity Act (WIOA),**
- **Title VI of the Civil Rights Act of 1964,** as amended, which prohibits discrimination on the bases of race, color and national origin;
- **Section 504 of the Rehabilitation Act of 1973,** as amended, which prohibits discrimination against qualified individuals with disabilities;
- **The Age Discrimination Act of 1975,** as amended, which prohibits discrimination on the basis of age; and
- **Title IX of the Education Amendments of 1972,** as amended, which prohibits discrimination on the basis of sex in educational programs.

The grant applicant also assures that, as a recipient of WIOA Title I financial assistance, it will comply with [29 CFR part 38](#) and all other regulations implementing the laws

Assurances: Operation of Law

- The obligations created by the Assurances apply to all grants, cooperative agreements, contracts, or other arrangements for financial assistance under WIOA.
- They may be physically incorporated into contract documents or may be incorporated by reference 29 CFR 38.25.
- Even when the Assurance is not incorporated or referenced in a document, it is considered incorporated by operation of law.



Designating an Equal Opportunity Officer

Equal Opportunity Officer Requirements

- Service providers are **not required** to designate an EO Officer.
- The obligation for ensuring service provider providers compliance with the nondiscrimination and equal opportunity provisions of WIOA rests with the Governor or LWDBs.
- Service providers must designate an individual who will be responsible for working with the Local EO Officer to ensure the WIOA complaint procedures, and other Section 188 requirements are implemented into the organization's operation.

Your obligations to the EO Officer

- Widely-publish and disseminate the EO Officer's contact information (including the TTY or relay number wherever a phone number is listed) on the website, and on all written materials related to WIOA programs and activities.
- Assign sufficient staff and resources to the EO Officer to enable him/her to perform EO duties.
- Ensure the EO Officer and staff are afforded the opportunity to receive training to maintain competency.
- Provide the EO Officer with the necessary support of top management to ensure compliance with the nondiscrimination and equal opportunity mandates of WIOA Section 188.

The EO Officer's obligations

- Serves as the recipient's liaison to State EO Officer and to sub-recipients (*i.e.* eligible service providers and eligible training providers).
- Conducts monitoring and discrimination complaint investigations.
- Reviews the recipient's written policies and procedures to ensure they are nondiscriminatory.
- Develops and publishes discrimination complaint procedures.
- Reports directly to the top official regarding EO matters.
- Undergoes training (at the recipient's expense) to maintain competency.
- When appropriate, the EO Officer oversees development and implementation of the Missouri's Nondiscrimination Plan.



Notice and Communication

Notice and Communication Requirements

- Providing the WIOA “Equal Opportunity Is the Law” Notice/Poster
- Putting “tag lines” and “alternative contact numbers” on covered materials
- Complying with language access requirements
- Discussing nondiscrimination and equal opportunity during orientations

What is the “Equal Opportunity Is the Law” Notice/Poster?

- “Equal Opportunity Is the Law” Notice/Poster
- Please be aware: the WIOA “Equal Opportunity is the Law” Notice/Poster is **NOT THE SAME NOTICE** as the one required by EEOC
- It explains rights under Section 188 of WIOA and its implementing regulations
- **OTHER FEDERAL AGENCIES’ NOTICES DON’T DO THAT**

Equal Opportunity is the LAW

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.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I-financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

Danielle Smith, State Workforce System Equal Opportunity Officer
Department of Economic Development
Division of Workforce Development
P.O. Box 1087
Jefferson City, MO 65102
danielle.smith@dwd.mo.gov
Phone: (573) 751-2428
Relay Missouri: 7-1-1
Fax: (573) 751-4088

or

Director, Civil Rights Center (CRC), U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210
or electronically as directed on the CRC website at www.dol.gov/crc

If you file your complaint with the recipient, you 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 you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

Sub-State Agency/Local Equal Opportunity Officer:
Name: _____
Address: _____
Telephone: _____

To learn more about filing a claim, visit jobs.mo.gov/equalopportunity

Equal Opportunity Employer/Program
Auxiliary aids and services are available upon request to individuals with disabilities.

DWD-102 (01-2017)

Notice and Communication Requirements

Denial of or delay in providing services/information in appropriate languages *may be* discrimination on the basis of national origin.

La Igualdad De Oportunidad es la LEY

La ley prohíbe que este beneficiario de asistencia financiera federal discrimine por los siguientes motivos: contra cualquier individuo en los Estados Unidos por su raza, color, religión, sexo (incluyendo el embarazo, el parto y las condiciones médicas relacionadas), y los estereotipos sexuales, el estatus transgénero y la identidad de género), origen nacional (incluyendo el dominio limitado del inglés), edad, discapacidad, afiliación o creencia política, o contra cualquier beneficiario, solicitante de trabajo o participante en programas de capacitación que reciben apoyo financiero bajo el Título I de la ley de Inversión y Oportunidad en la Fuerza Laboral (WIOA, por sus siglas en inglés), debido a su ciudadanía, o por su participación en un programa o actividad que recibe asistencia financiera bajo el Título I de WIOA.

El beneficiario no deberá discriminar en los siguientes áreas: decidiendo quién será permitido de participar, o tendrá acceso a cualquier programa o actividad que recibe apoyo financiero bajo el Título I de WIOA; proporcionando oportunidades en, o tratar a cualquier persona con respecto a un programa o actividad semejante; o tomar decisiones de empleo en la administración de, o sin conexión a un programa o actividad semejante.

Los beneficiarios de asistencia financiera federal deben tomar medidas razonables para garantizar que las comunicaciones con las personas con discapacidades sean tan efectivas como las comunicaciones con los demás. Esto significa que, a petición y sin costo alguno para el individuo, los recipientes están obligados a proporcionar ayuda auxiliar y servicios para individuos con discapacidades calificadas.

QUE DEBE HACER SI CREE QUE HA SIDO DISCRIMINADO

Si usted piensa que ha sido discriminado en un programa o actividad que recibe apoyo financiero bajo el Título I de WIOA, usted puede presentar una queja no más de 180 días después de la fecha en que ocurrió la presunta violación, ya sea con: El oficial de Igualdad de Oportunidad del recipiente (o la persona que el recipiente haya designado para este propósito);

Danielle Smith, State Workforce System Equal Opportunity Officer
Department of Economic Development
Division of Workforce Development
P.O. Box 1087
Jefferson City, MO 65102
danielle.smith@dod.mo.gov
Teléfono: (573) 751-2428
Relay Missouri: 7-1-1
Fax: (573) 751-4088

o:
Director, Civil Rights Center (CRC), U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210
o electrónicamente como indica el sitio web del CRC www.dol.gov/crc

Si usted presenta una queja con el recipiente, usted debe esperar hasta que el recipiente emita una decisión final escrita o que pasen por lo menos 90 días (lo que ocurra primero), antes de presentar una queja con el Centro de Derechos Civiles (CRC, por sus siglas en inglés) a la dirección mencionada previamente. Si el beneficiario no le entregue una decisión final escrita dentro de 90 días después de la fecha en que presentó su queja, usted puede presentar su queja con el CRC antes que reciba la decisión final. Sin embargo, es necesario presentar su queja con el CRC dentro de 30 días después de la fecha límite de 90 días (en otras palabras, dentro de 120 días después de la fecha en que presentó la queja con el recipiente). Si el recipiente emite una decisión final escrita, pero usted no está satisfecho con el resultado o resolución, usted puede presentar una queja con el CRC. Usted debe presentar su queja con el CRC.

Agencia de Sub-Estado/Oficial de Oportunidades Igualitarias Local:

Nombre: _____
Dirección: _____
Teléfono: _____

Para más información sobre cómo presentar una reclamación, visite jobs.mo.gov/equalopportunity



A proud partner of the [mojobs.com](http://www.mojobs.com) network.

Programa de Empleadores que Brindan Oportunidades Igualitarias

Se ofrece apoyo y servicios auxiliares a las personas con discapacidades que lo solicitan.

DWD-102-8 (01-2017)

Section 188 of WIOA Tagline Requirements

“Tag lines”: must be included on *all materials* that describe:

- *Programs or activities* that receive Federal financial assistance under WIOA Title I, and/or
- *Requirements for participation* in such programs or activities.



Section 188 of WIOA EO Tagline Requirements

Recipients must indicate that the WIOA Title I- financially assisted program or activity in question is an **“equal opportunity employer/program,”** and that **“auxiliary aids and services are available upon request to individuals with disabilities,”** in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially assisted under Title I of WIOA or the requirements for participation by recipients and participants.

Section 188 of WIOA EO Tagline Requirement

Where such materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or equally effective telecommunications system, such as a relay service, videophone, or captioned telephone used by the recipient.

Notice and Communication Requirements

- All orientations for:
 - New employees
 - New participants
 - Members of the public
- Must contain a discussion of:
 - The rights provided/protected by WIOA Section 188 and 29 CFR part 38
 - In particular, the right to file a discrimination complaint



Affirmative Outreach



Affirmative Outreach Requirements

- Recipients must make reasonable efforts to include varying demographic groups in their covered programs and activities, including:
 - Different genders
 - Various racial and ethnic groups
 - Individuals with disabilities
 - Different age groups

Affirmative Outreach Requirements

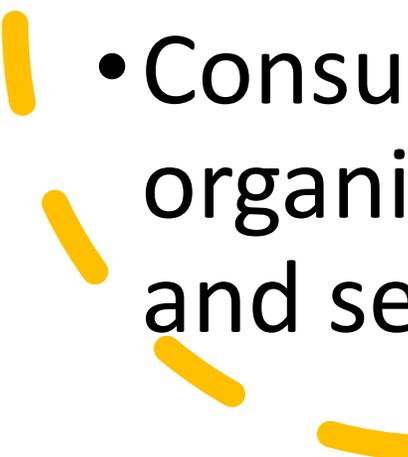
Advertising in media that target specific populations – examples:

- Radio and TV stations that broadcast in specific non-English languages
- Websites and web broadcasts designed to reach specific populations, such as youth, older persons, and people with disabilities





Affirmative Outreach Requirements

- Sending notices about openings in your programs and activities to schools and community service groups that serve various populations
 - Consulting with appropriate community organizations about ways to improve outreach and service to specific populations
- 



Data Collection and Maintenance

What data must be collected and why?

- Ensure that all covered recipients in the State use a system for collecting and maintaining required data
- The data system is for:
 - Monitoring recipient equal opportunity performance
 - Identifying individual instances of discrimination or areas of systemic discrimination
 - Identifying individuals or groups of individuals who have been discriminated against

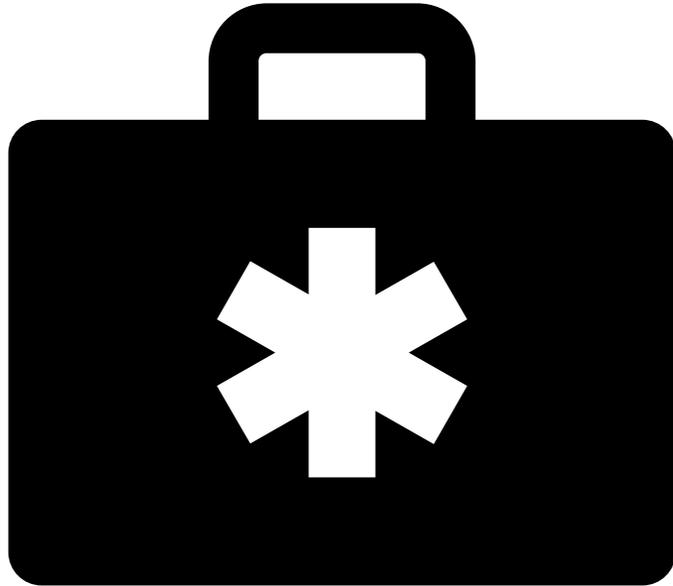
What data must be collected and recorded?

- Section 188 of WIOA demographic information for applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment, must be recorded. This includes recording the:
 - Race/ethnicity
 - Sex
 - Age
 - Disability status(where known)
 - Limited English proficiency(LEP), and preferred *language(for participants only)*
- Data must be *kept confidential*

Collection and Maintenance Requirements

- Each recipient **must** maintain and submit to State EO Officer/Local EO Officer a quarterly log of complaints filed with the recipient that allege discrimination on the basis(es) of **race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin, age, disability, political affiliation or belief, citizenship, and/or participation in a WIOA Title I-financially assisted program or activity.**
- This includes participants and employees.
- Information that could lead to identification of a particular individual as having filed a complaint must be kept confidential.

Maintenance of Records Requirements

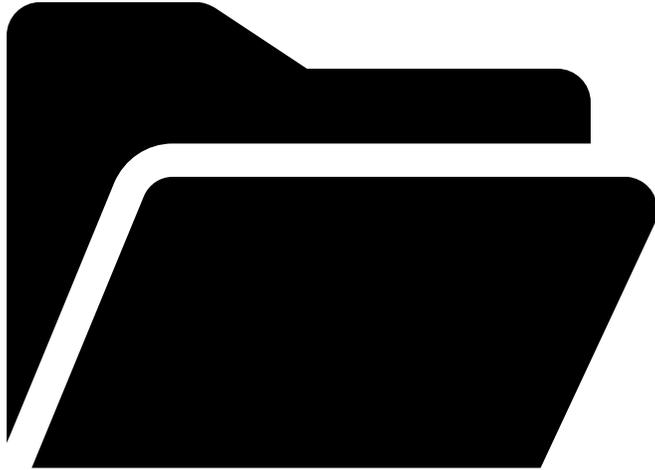


- Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms.
- All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential.
- Whether these files are electronic or hard copy, they must be locked or otherwise secured (for example, through password protection).

Information to be provided to the State EO Officer and the CRC

- Each grant applicant and recipient must promptly notify the State EO Officer and the CRC Director when **any administrative enforcement actions or lawsuits are filed against it alleging discrimination** on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in a WIOA Title I-financially assisted program or activity.
- This notification must include:
 - (1) The names of the parties to the action or lawsuit;
 - (2) The forum in which each case was filed; and
 - (3) The relevant case numbers.

Required Maintenance of Records



Each recipient must maintain the following records, whether they exist in electronic form (including email) or hard copy, for a period of not less than **three (3) years** from the close of the applicable program year:

- The records of applicants,
- registrants,
- eligible applicants/registrants,
- participants,
- terminees,
- employees, and
- applicants for employment.

Required Maintenance of Records

Such information must be stored in a manner that ensures confidentiality, and must be used only for the purposes of

- recordkeeping and reporting;
- determining eligibility, where appropriate,
- for WIOA Title I-financially assisted programs or activities;
- determining the extent to which the recipient is operating its WIOA Title I-financially assisted program or activity in a nondiscriminatory manner;
- or other use authorized by law.



Monitoring for Compliance under Section 188 of WIOA

Governor's Monitoring Responsibilities

- Establish systems to determine:
 - Whether *grant applicants/potential training providers are likely to comply* with WIOA nondiscrimination/EO requirements
 - Whether *recipients are complying* with those requirements
- Monitoring must occur annually

Required Elements of Monitoring Recipients

Each monitoring review must include, *at a minimum*:

- ***Statistical analysis*** of demographic data recipient has collected, by race/ethnicity, sex, age, and disability status(where known), and LEP
- ***Investigation of any significant differences*** identified by statistical analysis, to see if the differences appear to be caused by discrimination
- **Review of recipient's compliance with:**
 - administrative obligations and duties under the MO NDP (*e.g.*, assurances, notice and communication, EO Officers)
- EO monitoring reports are sent to the CRC

Required Elements for Monitoring Recipients

- Statistical analysis must be conducted on the following records:
 - applicants,
 - registrants,
 - eligible applicants/registrants,
 - participants,
 - terminees,
 - employees, and
 - applicants for employment
- By race/ethnicity, sex, age, and where known, disability status(where known), and LEP (Participants only) for each program, service and activity.



Complaint Processing Procedures under WIOA

Complaints Procedures under WIOA

WIOA has two complaint processes

- Discrimination Complaints
- Program Complaints and Grievances

Section 188 of WIOA Prohibits Discrimination on the Basis of:

- Race
- Religion
- Disability
- Age
- Sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity)
- National Origin (including limited English proficient (LEP))
- Color
- Political Affiliation or Belief
- Citizenship (participants only)
- Participation in a WIOA program, service, or activity (participants only)

Who May File a
Discrimination
Complaint
under WIOA?

Any person, or any specific class of individuals, who believes that they have been or are being subjected to discrimination prohibited under Section 188 of WIOA.

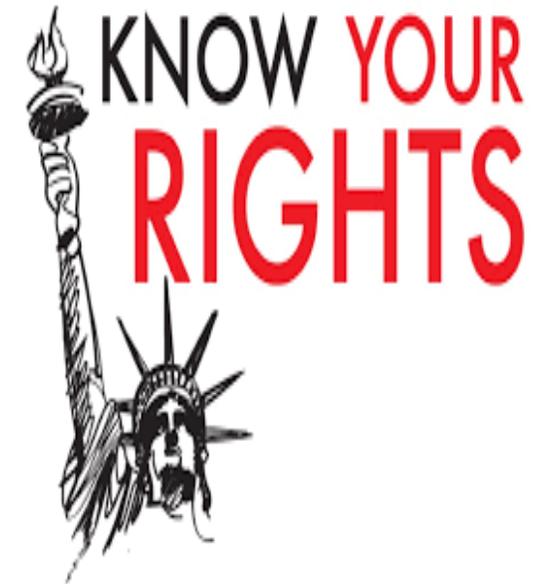
Types of WIOA Discrimination Complaints

- **Individual Complaint:** an individual alleging that they have been subjected to discrimination.
- **Class Action Complaint:** two or more individuals, alleging discrimination occurred against a group or individual.
- **Third Party Complaint:** a complaint filed against a recipient by an individual or organization on behalf of an individual or group of people.

Complainants Options for filing Discrimination Complaints

Complainants have the right to file a discrimination complaint with:

- Employer of record
- DHEWD Human Resources
- Missouri Human Rights Commission
- EEOC
- State Equal Opportunity Officer, or the
- U.S. DOL Civil Rights Center (CRC)



It's the Complainant's choice!

WIOA Program Complaints and Grievances



WIOA Program Complaints and Grievances include any complaints that are not discriminatory



WIOA Program Complaints and Grievances are processed at the Local Workforce Development Board level through the Local EO Officer

The process for WIOA Program Complaints and grievances may differ for each Local Workforce Development Board



WIOA Program Complaints and Grievances must be filed within 365 days from when the alleged complaint/grievance occurred



WIOA Program Complaints and Grievances can be appealed to the State and federal levels



Other Required Elements

Federal Disability Laws that Apply under Section 188 of WIOA



Three relevant laws:

- **WIOA Section 188 and regs (29 CFR part 38)**
- **Section 504 of Rehabilitation Act of 1973 and DOL's implementing regs (29 CFR part 32)**
- **Americans with Disabilities Act of 1990, as amended (known as "the ADA")**
 - ADA Title I: applies to employers, employment agencies, others
 - ADA Title II: applies to State and local public entities, whether or not they receive Federal financial assistance.



Federal Disability Laws

- Don't discriminate based on disability
 - Provide reasonable accommodations/modifications
 - Provide services in integrated settings
 - Communicate as effectively with people with disabilities as with others
 - Provide physical (architectural) and programmatic accessibility
 - Regularly review selection criteria which for programs and employment practices
 - Deal appropriately with medical and disability-related information
- 

Corrective Action and Sanction Requirements

MO Nondiscrimination Plan explains that corrective actions/sanctions:

- Must:
 - completely correct each violation
 - provide for:
 - retroactive relief (back pay, lost benefits) *and*
 - prospective relief (training, policy development, communication) to prevent future violations
- Should include time frames for correction

Questions/Comments?

Danielle Smith, State Equal Opportunity Officer

danielle.smith@dhewd.mo.gov

(573) 751-2428 *Missouri Relay at 711*

Missouri Office of Workforce Development is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri TTY User: 711 for Relay Missouri.