

The Workforce Connection, Inc. (TWC)

Policy Title: Equal Opportunity

Modification Approved: December 5, 2023

Policy Number: 2017-200-02, change 1

Status: Active

Effective: 12/05/2017

Purpose:

To implement the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA).

References:

- Section 504 29 CFR part 38, Workforce Innovation and Opportunity Act (WIOA) and Sec. 188;
- Section 504, as implemented by Title 29 Part 32 of the Code of Federal Regulations
- State of Illinois Public Act 101-0654, Education and Workforce Equity Act.
- Americans with Disabilities Act of 1990, as Amended
<https://www.dol.gov/general/topic/disability/ada#:~:text=The%20Americans%20with%20Disabilities%20Act,local%20government'%20programs%20and%20services>
- Rehabilitation Act of 1973, as Amended - <https://www.eeoc.gov/statutes/rehabilitation-act-1973>
- Illinois workNet ePolicy Chapter 10 and all Sections 10.1 -10.9 – including all attachments to those sections - <https://apps.illinoisworknet.com/WIOAPolicy/Policy/Index/291>
- Methods of Administration - <https://www.theworkforceconnection.org/plans-and-policies/>
- Illinois workNet WIOA ePolicy Chapter 10 Sections 1-9 and all of its attachments.
<https://apps.illinoisworknet.com/WIOAPolicy/Policy/Index/291>
- State of Illinois Nondiscrimination Plan 2023
<https://dceo.illinois.gov/content/dam/soi/en/web/dceo/aboutdceo/equalopportunity/state-of-illinois-nondiscrimination-plan-2023.pdf>

Background:

Section 188 of WIOA prohibits discrimination against individuals in any Title I—financially assisted program or activity, which includes job training for adults and youth and programs or activities provided by recipients at American Job Centers (one-stop centers). The rule applies to recipients of WIOA Title I financial assistance and to programs and activities that are operated by American Job Center partners (one-stop partners) as part of the American Job Center system (one-stop delivery system), such as Unemployment Insurance, Temporary Assistance for Needy Families, Adult Education and Literacy, Trade Adjustment Assistance, and others. Methods of Administration are in place to guide local policies and procedures for the implementation of Equal Opportunity and Nondiscrimination rules.

IDES employs its own Equal Opportunity Officer:

Ms. Anna L. D’Ascenzo, Equal Opportunity Officer
Office of Equal Opportunity/Affirmative Action
Disability and Language Access Coordinator

Illinois Department of Employment Security
33 South State St., 10th Floor, Chicago, Illinois
60603
(312) 793-9290 (Voice)
(888) 340-1007 (TTY) / (312) 793-0302 (Fax)
E-Mail: Anna.DAscenzo@illinois.gov

Responsible Parties:

TWC WIOA One-Stop Operator and all WIOA program directors/staff, partner agencies, program providers, sub-awardees and contractors shall not discriminate on the basis of race, color, religion, sexual orientation, gender identity, transgender or gender non-conforming people, national origin, age, disability, political affiliation/ belief or if they are pregnant.

Local Policy:

TWC will follow the State of Illinois policy as outlined in Chapter 10 of the WIOA ePolicy.

- Designation of EO Officer – TWC will designate an EO Officer for their area to comply with 20CFR Part 38.28 – 38.33. The EO Officer will have sufficient authority, resources, and leadership support to conduct monitoring, investigations, review written policies, and all functions of an EO per the job description.
- Notice and Communication – The “Equal Opportunity (EO) is the Law” notice in multiple languages will be posted in a conspicuous area in the One-Stop Center
- Contract/Assurances Clauses - **Written Assurances** – Reinforcement of this commitment by all program providers requires that each provide written assurance in their agreements, grants, and contracts that they are committed to and will comply with the requirements of the Workforce Innovation & Opportunity Act (WIOA), ADA, Rehabilitation Act, and with 29 CFR part 38, WIOA Section 188.
- **Protection from Discrimination** – These programs or activities may not refuse to offer or provide services to individuals because of their race, color, religion, gender identity, transgender or gender non-conforming people, national origin, age, disability, political affiliation/belief, or if they are pregnant. Beneficiaries, applicants, and participants cannot be denied covered services because of their citizenship status and cannot be denied their rights because of participation in a WIOA Title I–financially assisted program or activity. The policy includes enforcement of rules from the Department of Labor Civil Rights Center ensuring protection from discrimination on the basis of sex, including discrimination based on pregnancy, childbirth, and related medical conditions and transgender status, gender identity, and sex stereotyping.
- **Universal Access**--TWC and its contracted partners will take appropriate steps to ensure that the composition of the pool from those considered for participation in their programs and activities is diverse and representative of the population groups they serve.
- **Access to Services** - TWC and its contracted partners are required to take reasonable steps to ensure that individuals with limited English proficiency have meaningful access to services and training and ensure full access to the workforce system for individuals with disabilities. Translation services are available.
- **Reasonable Accommodations** – TWC ensures reasonable accommodations are provided to

qualified individuals with disabilities in all aspects of its programs, services, and activities unless providing the accommodation would cause undue hardship. Accommodations may include but are not limited to, qualified sign language interpreters, readers, auxiliary aids, and alternate formats. Reasonable modifications in policies, practices, or procedures are made, when necessary, to avoid discrimination based on disability, unless making the modifications would fundamentally alter the nature of the service, program, or activity.

The Illinois Environmental Barriers Act ensures Illinois citizens with disabilities are treated fairly and equally. that certain newly constructed or renovated buildings must comply with accessibility standards that guarantee they are safe and readily accessible to persons with disabilities. These standards are known as the Illinois Accessibility Code.

- **Compliance** – TWC has procedures in place to ensure compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) and the State of Illinois Nondiscrimination Plan.

Reporting Non-compliance:

Any non-compliance of the Equal Opportunity requirements must be reported to the Equal Opportunity Officer in writing.

Action Required:

This information must be disseminated to TWC WIOA One-Stop Operator and all WIOA program directors/staff, partner agencies, sub-awardees, and contractors. All must be fully in compliance with this policy.

Inquiries:

Questions regarding this policy should be directed to TWC Board Staff Equal Opportunity Officer.

Contact Information: Cathy Cornelius, WIOA Compliance Manager

The Workforce Connection

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Effective Date:

Immediately