



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Local Complaint and Grievance Process & Policy

According to [29 CFR 38.35](#), it is against the law for WIOA Title I recipients 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 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. WIOA recipients 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; or
- 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.

The South Central Workforce Investment Board (SCWIB) has established and maintains an administrative procedure for processing and resolving complaints or grievances, connected with Equal Opportunity (EO) discrimination complaints, general WIOA program complaints and grievances, labor standards violations when collective bargaining agreements are in place, and WIOA complaints of criminal, illegal or improper activities. SCWIB will post the Missouri [“EO is the Law” notice/poster](#), in reasonable numbers and places, in available and conspicuous physical locations and on the local website.

The “EO is the Law” notice/poster will be provided in appropriate formats to registrants, applicants, eligible applicants/registrants, applicants for employment and employees and participants with visual impairments. Where notice has been given in an alternate format to registrants, applicants, eligible applicants/registrants, participants, applicants for employment and employees with a visual impairment, a record that such notice has been given must be made a part of the employee's or participant's file.

The “EO is the Law” notice/poster will be provided to participants in appropriate languages other than English as required. The “EO is the Law” notice/poster is in multiple languages on the OWD Equal Opportunity & Disability Accommodations Resources website found here. If a language is needed for a customer and it is not available on the website, please contact the Local or State EO Officer.

Program operators, contractors, grantees, sub-grantees, sub-recipients, sub-contractors, and any other interested parties will be informed of their right to file complaints or grievances and of the procedures to follow in filing a complaint or grievance under WIOA. All subrecipients and employers of WIOA participants are required to maintain complaint and grievance procedures.

The Local EO Officer is responsible for ensuring compliance at the Local Workforce Development Area for all recipients of WIOA Title I financial assistance including One-Stop Career Centers and service providers. The duties of the Local EO Officer are as follows: serve as the local liaison to the State EO Officer and to the U.S. Department of Labor's (USDOL) Civil Rights Center, reporting to the appropriate official about equal opportunity matters, facilitate onsite EO reviews conducted by OWD or USDOL staff, monitoring the region's service delivery system to ensure compliance with the State's Nondiscrimination Plan and with the equal opportunity and nondiscrimination provisions of the WIOA, 29 CFR Part 38, review all local plans, contracts and agreements to ensure they are nondiscriminatory, participate in training that will enhance and maintain the competencies required of a local-level EO Officer, develop and publish OWD's process for discrimination complaints and making sure those procedures are followed.

The procedure includes the following components which are discussed separately for clarity and understanding:

1. WIOA Discrimination Complaints; and
2. WIOA Program Complaints and Grievances; and
3. WIOA Complaints of Criminal, Illegal, or Improper Activities. WIOA
Discrimination Complaints

Individuals who feel they have been subjected to discrimination under a WIOA Title I – financially assisted program or activity, may file a complaint within 180 days from the date of the alleged violation. Complaints alleging discrimination 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 may file with a state or local administrative entity, service provider, One-Stop operator or:

Lisa Engelhardt
Local Equal Opportunity Officer Phone: 417-
257-2630
Email: lengelhardt@scwib.org

or

Danielle Smith
State Equal Opportunity Officer/Complaint and Grievance Officer Department of Higher
Education & Workforce Development
PO Box 1087
Jefferson City, MO 65102
E-mail: danielle.smith@dhewd.mo.gov Phone: (573)
751-2428

The Director, Civil Rights Center (CRC)
U. S. Department of Labor
200 Constitution Avenue NW, Room N-4123 Washington, D. C.
20210

The Missouri Nondiscrimination Plan provides procedures on processing discrimination complaints aligned with Section 188 of WIOA. All WIOA discrimination complaints must be submitted and processed through the State Equal Opportunity Officer.

Local Discrimination Compliant Procedure

1. Complainants may use the WIOA Discrimination Complaint Form or submit their complaint in writing to the appropriate entity for processing. The complaint must include:
 - a. the complainant's name and address; and
 - b. the identity of the individual or entity that complainant alleges is responsible for the discrimination; and
 - c. a description of the complainant's allegations in enough detail to allow an initial determination of jurisdiction, timeliness, and the apparent merit of the complaint and the complainant's signature of the complainant's authorized representative.
2. The Local EO Officer will acknowledge receipt of the complaint in writing.
3. The Local EO Officer will send the discrimination complaint to the State EO Officer within 48 business hours after receiving the initial written complaint.

If you file your complaint with the State or Local EO Officer 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

WIOA Program Complaints and Grievances

Any applicant, employee, participant, service provider, recipient, or other interested party may file a complaint alleging a violation of local or state WIOA policies, programs, activities or agreements.

Complaints may be filed with the Local EO officer or the State EO Officer within one (1) year from the date of the event or condition alleged to be a violation of WIOA. The OWD General Complaint Form may be used as a complaint intake tool. Any complaint received in writing will be accepted and handled in the same manner as if it were made on the General WIOA Complaint Form.

Local General Complaint and Grievance Procedure

The Missouri Nondiscrimination Plan provides procedures on processing general WIOA complaints. The Local EO Officer will ensure those procedures are followed when addressing all formal WIOA complaints.

Initial Review (Step 1): Once the Local EO Officer receives the complaint they will log the complaint on the required form and establish a complaint file containing the required information.

- Completed General WIOA Complaint Form; and
- Chronological log of events or conditions alleged to be a violation of WIOA; and
- Any relevant correspondence; and
- Record of the attempted informal resolution

The purpose of the initial review will be to determine whether or not there appears to be a basis for the complaint and to gather more information from all concerned parties. The findings of the review will be used to assist in an informal resolution of the complaint and be made a part of the complaint file.

Informal Resolution (Step 2): The complaint may be resolved informally to the satisfaction of all parties with the process being completed within ten (10) business days from the date the complaint is filed. Once the complaint is resolved, the terms and conditions of the resolution is documented in the complainant's file.

Formal Resolution (Step 3): If the complaint is not informally resolved, the Local EO Officer shall review the complaint and will issue a determination within twenty (20) business days from the date the complaint was filed. The complainant shall have the right to request an appeal of the determination. If an appeal is not filed by the complainant within seven (7) business days, the complaint will be considered resolved and is documented in the complainant's file.

Hearing (Step 4): If the decision does not satisfactorily resolve the complaint, the complainant has seven (7) business days from the receipt of the decision to present a written request for a hearing and review of the decision. A hearing must be conducted by a qualified hearing officer within forty- five (45) business days of the original receipt of the written grievance.

A formal hearing is scheduled, and written notice is mailed to the complainant, the respondent, and any other interested party at least seven (7) business days prior to the hearing. The hearing notice will include the date, time, and place. As this is a formal hearing, parties may present witness and documentary evidence, and question others who present evidence and witnesses. The complainant may request the production of records and documents. Attorneys or other designated representative(s) may represent each party.

A complainant may amend or withdraw a complaint at any time prior to the scheduled hearing.

Final Decision (Step 5): A written decision from the hearing officer must be presented to the Local EO Officer, within sixty (60) business days of its original receipt of the written complaint. If the decision fails to satisfactorily resolve the complaint, the hearing officer will request a state review for resolution.

Appeal to State EO Officer (Step 6): If no decision is reached within sixty (60) business days or any party is dissatisfied with the local hearing decision an appeal may be made to the OWD State EO Officer (see contact information above). All requests for appeals must be filed within ninety (90) business days from the filing of the complaint. OWD will review the complaint file, the hearing record, and all applicable documents and issue a final decision on the appeal within thirty (30) business days from the date the appeal was received.

Appeals to the U.S. Department of Labor (USDOL)

A complainant who receives an adverse final or appeal decision from the State may appeal that decision to USDOL within sixty (60) days of the receipt of the decision being appealed. Parties have one hundred and twenty (120) from the date of filing, or filing of the appeal of a local grievance with the State to file an appeal via certified mail, return receipt requested, to the:

Secretary, U.S. Department of Labor, Washington, DC
20210

Attention: ASET. The Employment and Training Administration (ETA) Regional Administrator
AND

the opposing party must receive copies of the appeal.

Complaints Alleging Labor Standard Violations

An individual alleging a labor stands violation may submit a grievance to a binding arbitration, if a collective bargaining agreement covering the parties to the grievance so provides. The individual may submit an OWD General Complaint Form to the Local EO Officer. Any complaint received in writing will be accepted and handled in the same manner as if it were made on the General WIOA Complaint Form.

The Local EO Officer will log the complaint and establish a complaint file containing the required information:

- Completed General WIOA Complaint Form; and
- Chronological log of events or conditions alleged to be a violation of WIOA; and
- Any relevant correspondence.

The Local EO Officer would arrange mediation between all concerned parties within 10 (ten) business days. The following mediation options could be considered:

- Local Workforce Board Committee;
- An EO Officer from a different region;
- The Association of Missouri Mediators; or
- Mediator selected by the Board.

The most appropriate mediation method shall be selected to ensure a fair method to settle the complaint.

WIOA Complaints of Criminal, Illegal, or Improper Activities

Information and complaints involving criminal fraud, waste, abuse or other criminal activity must be reported immediately through OWD's Incident Reporting System to the United States Department of Labor Office of Inspector General, Office of Investigations, Room S5514, 200 Constitution Avenue NW, Washington, DC 20210

OR

The corresponding Regional Inspector General for Investigations, with a copy simultaneously provided to the Employment and Training Administration. The Hotline number is 1-800-347-3756. The Web site is <http://www.oig.dol.gov/contact.htm>. Complaints of a non-criminal nature may be handled under the procedures set forth in §683.600 or through the OWD's Incident Reporting System.

OWD Equal Opportunity Hotline

The purpose of the OWD Equal Opportunity Hotline is to identify any issues, concerns, and or discrimination occurring within the Missouri workforce system confidentially. Toll-Free Complaint Hotline: 866-753-5554.

For more information about the discrimination complaint procedures and program complaints and grievance, are found in most current Missouri Nondiscrimination Plan under Section VI: Complaint Processing Procedures.



South Central **WORKFORCE** *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Local Sub-State Monitoring Plan & Procedures Policy

Oversight Responsibilities:

The South Central Workforce Investment Board (SCWIB), in partnership with the Chief Local Elected Officials (CLEO) is responsible for oversight for local employment and training activities, and the one-stop delivery system in the local area.

SCWIB staff performs the monitoring functions and are identified below. The One-Stop Coordinator may appoint other staff for selected monitoring responsibilities. SCWIB staff maintain a separation of duties and are independent from the duties or systems being monitored. Programs are subcontracted and therefore duties are inherently separated.

Risk Assessments:

Prior to issuing or renewing any award under Workforce Innovation and Opportunity Act (WIOA) Title I, SCWIB staff will conduct a risk assessment to assess the subrecipient's overall ability to administer federal funds as required. Risk Assessments will be conducted annually to coincide with contract renewals/extension.

As part of this assessment, the SCWIB must consider the subrecipient's:

1. history with regard to management of other grants;
2. financial stability;
3. quality of management systems and standards;
4. history of performance;
5. timeliness of compliance;
6. conformance to terms and conditions of previous awards;
7. reports and findings from audits; and
8. ability to effectively implement statutory, regulatory, or other requirements.

One-Stop Operator:

The Local compliance officer will conduct an annual review of its one-stop operator to ensure compliance with the requirements outlined in 20 CFR 678.620, as well as responsibilities outlined in the current MOU/RFP/Contract. If it is determined that the one-stop operator is not meeting expectations, corrective action will be taken, which can include contract termination.

Programmatic Monitoring:

The Local compliance monitor will conduct quarterly Programmatic Monitoring Reviews (PMR) each program year to evaluate federal, state, and local compliance for every funding stream for which the SCWIB has a

contract with Missouri's Office of Workforce Development (OWD). These quarterly reviews will monitor for the requirements set forth in the current subrecipient MOU/RFP/Contract for carrying out programmatic duties.

A combination of state and locally developed monitoring tools will be used to identify and track issues for those records enrolled in the current program year; however, the Compliance Monitor may pull sample records from prior quarters, as needed.

Sample Size

Sample size will be adjusted upwards, as necessary, based on the results of risk assessments, prior monitoring efforts, performance obligations, and other identified issues.

All Workforce Innovation and Opportunity Act (WIOA) enrollments will be monitored for adherence to WIOA eligibility requirements. If there is an issue with eligibility, subrecipient will be notified immediately.

The Local Compliance Monitor will use random-sampling techniques generated by the reports feature in the electronic statewide case management system to obtain samples. The subrecipient will receive a written word/pdf document restating issues identified on the monitoring tool via email with a clearly stated due date which will be no more than 30 days. Communication to resolve issues may be in-person, email, or via phone.

WIOA Adult and Dislocated Worker records will be combined and then a sample will be generated by service/activity ensuring a statistically valid sample of both funding streams.

A sample of a minimum of three records (if there are less than three records are generated, then all applicable records will be reviewed), will be generated quarterly for the following activities:

1. ABC Enrollments;
2. Classroom Training;
3. On-the-Job Training;
4. Work experience/Internship/Apprenticeship
5. Pre-Vocational, Entrepreneurial, Incumbent Worker
6. Supportive Services/Needs-related payments; and
7. Any other services that result in a direct payment to, or on behalf of, a participant.

*If no sample is available for the activity/service during the quarter, this will be noted on the monitoring tool.

WIOA In-School (ISY) and Out-of-School Youth (OSY) will be combined into one monitoring tool but will be sampled by each program to ensure both ISY and OSY reviews have a statistically valid sample.

A sample of a minimum of three records (if there are less than three records generated, then all applicable records will be reviewed), will be generated quarterly for the following activities:

1. Work Experiences (each category);
2. Classroom Training;
3. On-the-Job Training;
4. Follow up;
5. Supportive Services and Incentives; and
6. Entrepreneurial.

*If no sample is available for the activity/service during the quarter, this will be noted on the monitoring tool.

The participant records will be monitored for, at a minimum:

1. Documentation of participant and training eligibility and/or priority for services received;
2. Orientation to services;
3. EO complaint & grievance rights and procedures;
4. Justification for the provision of Individualized Career/Training Service;
5. Method of assessment;
6. Employment planning;
7. Individual Training Accounts & applicable paperwork/documentation;
8. Work Based Learning, including all applicable paperwork/documentation;
9. Appropriateness and accuracy of participant payments;
10. Appropriate data entry;
11. Appropriate and accurate performance reporting requirements;
12. Documentation uploading requirements;
13. Examination of historical change requests;
14. Compliance issues cited in prior federal, State, and local reviews;
15. Determination if prior corrective measures have proven effective;
16. 5% over-income exception; and
17. 5% limit on ISY enrolled with the "Requires additional assistance" barrier.

Repeat Issues:

The Local compliance monitor will identify Area(s) of Concern and/or Finding(s) that appear in two or more consecutive annual monitoring reports for the subrecipient and no improvement can be determined.

These issues may result in one or more of the following:

- Areas of Concern that are escalated to Findings;
- Requirement of additional corrective actions;
- Direct notification of specific issues provided to the Chief Elected Official for the LWDA, or other sub-recipient management;
- Implementation of more frequent monitoring of sub-recipient activities;
- Mandatory on-site training or technical assistance (provided by OWD) for subrecipient staff;
- Development of a performance improvement plan;
- Development of a modified local plan; and/or
- Prohibiting the use of eligible providers and one-stop partners who have failed to take appropriate corrective actions.

Data Element Validation

The Local compliance monitor will conduct quarterly Data Element Validation (DEV) reviews to ensure the integrity of performance outcomes following the procedures outlined in OWD's most current issuance on DEV. This review is to verify that performance data elements reported by Missouri are valid, accurate, reliable, and comparable across programs. The review is to identify anomalies in the data or missing data, to resolve issues that may cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts.

Equal Opportunity Monitoring

The Local Equal Opportunity (EO) officer will adhere to the EO requirements set forth in OWD's most current Sub-State Monitoring policy including monitoring small service providers (ETPS, OJTs, Work Experience) defined under 29 CFR 38.4(hhh), which includes monitoring the small service provider for adopting and publishing complaint procedures and processing complaints, in accordance with Section 188 of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan.

The Local EO officer will conduct quarterly monitoring which includes, but is not limited to:

1. 1st Quarter monitoring will include reviewing service provider's websites, facilities, and reviewing policies and procedures.
2. 2nd Quarter monitoring will include a statistical or other quantifiable analysis of employment practices (staffing analysis) records and data kept by the LWDB and service providers in accordance with 29 CFR 38.41.
3. 3rd Quarter monitoring will include a review of any On-the-Job Training Employers, Work Experience Employers, and any special projects compliance with Section 188 of WIOA, 29 CFR 38, and the Missouri Nondiscrimination Plan.
4. 4th Quarter monitoring will include a statistical or quantifiable analysis of the programs, services, and activities offered by the LWDB and service providers.

Each quarter, the Local EO officer will submit complaint logs by the 5th day after each quarter.

An overall report of all EO monitoring reviews will be submitted on June 30th of each program year indicating if the SCWIB and its service providers complied with the EO monitoring requirements and if any corrective actions and sanctions have been enforced.

Financial Monitoring:

The SCWIB will conduct an annual Financial Monitoring Review (FMR) of subrecipients to ensure fiscal integrity. Additional reviews may be warranted, based on the evaluations of risk of noncompliance. The FMR will be performed to comply with WIOA section 184(a)(4) [29 U.S.C. 3244(a)(4)], annual OWD agreements, and 2 CFR Part 200 and Part 2900. The FMR is conducted to ensure the adequacy of internal controls and the reliability of the subrecipient's financial management system as they relate to the administrative subaward. The FMR must ensure the subrecipient meets the terms and conditions of the subaward and the fiscal goal or requirements, and that amounts reported are accurate, allowable, supported by documentation, and properly allocated.

The FMR will include, but is not limited to, reviews of the following process:

1. Audit Resolution/Management Decision;
2. Financial Reports;
3. Internal Controls;
4. Source Documentation;
5. Cost Allocation/Indirect Costs;
6. Cash Management; and
7. Procurement.

The SCWUB will incorporate additional financial and programmatic monitoring policies to ensure funds intended to support stand-alone special initiatives/grants are administered in accordance with the contractual scopes of work. These policies are to supplement existing monitoring duties and must be conducted during program operation to ensure accountability and transparency of expenditures.

Local fiscal staff will monitor WIOA Youth for the following requirements:

1. Out-of-School Youth (OSY) percentage expenditure requirement; and
2. 20% work-based learning with educational component requirement.

Monitoring Reports:

SCWIB staff will submit annual reports to subrecipient(s) for Financial, Programmatic, One-Stop Operator and EO monitoring each Program Year.

The annual reports will be issued by June 30th of each Program Year.

1. The Report(s) cover page will:
 - a. be addressed to the subrecipient;
 - b. include the date issued;
 - c. include the timeframe of monitoring;
 - d. identify all issues;
 - e. identify any corrective action and required resolutions; and
 - f. include a deadline for the corrective action response.
2. The Report(s) will to be presented at a Board meeting and documented in meeting minutes:
 - a. One-Stop Operator monitoring;
 - b. Programmatic monitoring;
 - c. Financial monitoring;
 - d. Equal Opportunity monitoring;
 - e. Performance reviews monitoring; and
 - f. Special initiatives/grants monitoring.
3. The Report(s) will include, but are not limited to, adequacy of assessments, planning of activities and services, coordination with One-Stop Delivery System partners to meet the comprehensive needs of customers, and customer outcomes.
4. The regulations implementing WIOA require that when monitoring identifies issues, those issues must be resolved by prompt and appropriate corrective action. Therefore, Report(s) will identify areas of noncompliance and corrective actions taken or required for improvement.
5. The SCWIB staff will review the corrective action response from the subrecipient(s) and will submit a determination of acceptance or alternative corrective action.
6. The SCWIB staff will provide any technical assistance needs identified through monitoring.

Resolution Process:

If a Finding remains unresolved and the subrecipient wants to appeal the Board's final decision the process outlined below must be followed:

1. The subrecipient shall initiate contact with the Local compliance monitor to discuss the Finding(s).
2. The subrecipient must notify the SCWIB of the appeal in writing within 30 days of the monitoring report issue date.
3. Notification must include the Finding(s), the reason for the appeal, and documentation to support the appeal.
4. The SCWIB will immediately email to acknowledge receipt of the appeal.
5. The SCWIB will provide a determination to the sub-recipient within 60 days of receipt of the appeal. This response will include the outcome of the appeal and supporting rationale for the decision.
6. If a subrecipient fails to comply with the final determination, the SCWIB will place the subrecipient in substantial violation status. Once in substantial violation status, the subrecipient may appeal pursuant to the most current OWD policy on State Monitoring and Resolution Process.

Additional Responsibilities:

The SCWIB staff will ensure business is conducted in an open manner, by making documents available to the public on a regular basis through electronic means and open meetings. The SCWIB must ensure their website contains the following information:

1. Local Plan and modifications;
2. Board members and their affiliations;
3. Selection of one-stop operators;
4. Award of grants or contracts to eligible training providers of workforce investment activities, including providers of youth workforce investment activities;
5. Approved Minutes of formal meetings of the Local WIB; and
6. Board by-laws, consistent with 20 CFR 679.310 (g).

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: Local Supportive Service and Stipend Policy

1. Purpose: This policy is written to provide guidelines on local supportive service limits and requirements. Reference: OWD's most current policy on Statewide Supportive Services.
2. Background: Supportive services are allowed by Federal Law, Federal Rules, and State Issuance.

Supportive services may only be provided to individuals who are:

- Participating in career or training services as defined in WIOA secs. 134(c)(2) and (3); and
- Unable to obtain supportive services through other programs providing such services.
- Supportive services only may be provided when they are necessary to enable individuals to participate in career service or training activities.

This policy is necessary to further define the limits and requirements for supportive services in the South-Central Region. All need for supportive services must be documented in MoJobs and addressed on the Employment Plan. Case Notes must be completed on all services provided.

3. Substance:

There is a \$1,000 maximum allowable limit for supportive services funds per customer, per program year.

Needs-Related and **Stipend** Payments are not provided.

- Transportation allowance
 - \$0.25 per mile is allowed for participants traveling more than 20 miles round trip with a maximum amount of \$50 per day.
 - Transportation allowance will be determined using MapQuest or other standard program from the participants' home address to the activity location.
 - Participants who choose to attend activities outside of the local community when the same activities are provided within the community will not be eligible for a transportation allowance.
 - Documentation of insurance coverage is required prior to transportation allowance payments.
- Childcare assistance
 - Childcare assistance is limited to \$25.00 per child, per day.
 - All participants must first seek assistance from Child Care Services. If the participant is denied by Child Care Services or is responsible for co-pay childcare assistance is allowable up to the limits above.
 - Childcare assistance is paid directly to the provider and is limited to Child Care Services approved providers only.
- Testing and Certification Fees
 - Limited to \$500.00 per program year.

All items listed below must have prior approval from the WIB Executive Director before the service is provided.

- Emergency Aid
 - Vehicle Repair
 - Limited to \$250.00 per program year.
 - Vehicle must be the primary vehicle used by the participant to participate in a WIOA activity.
 - Vehicle Insurance
 - Limited to \$300.00 per program year.
 - Only payable for three months per program year.
 - Vehicle must be the primary vehicle used by the participant to participate in a WIOA activity.
 - Clothing
 - Must be training or work related.
 - Limited to \$200.00 per program year.
 - Temporary Shelter/Housing/Utilities
 - Limited to \$1000.00 per program year.
 - Medical Assistance
 - Limited to \$200.00 per program year.

Exceptions to the allowable amounts above may be approved by the WIB Executive Director.

- Exceptions to this policy must have prior written approval of the WIB Executive Director.
- Staff must provide the WIB Executive Director with justification for exceeding the allowable amount.
- Coordination of payments with other workforce regions must be completed prior to making payment to ensure non-duplication of services. Staff will review the customer's electronic case-management record to determine if Supportive Services were received from other regions. All Supportive Services payments, regardless of the region, will be taken into consideration before issuing additional funding.
- Supportive services are based on individual need and all of the individual's resources must be considered and documented in the statewide case-management system prior to making payment.
- Supportive services are WIOA funded only when these services are not available through other agencies and that the services are necessary for the participant to participate in Title I activities.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



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Effective: July 23, 2024

Subject: Adult Priority of Service Policy

1. Purpose: This policy is to provide direction to the one-stop operators regarding making determinations related to priority.
2. Background: Sec. 134(c)(3)(E) Priority.--With respect to funds allocated to a local area for adult employment and training activities under paragraph (2)(A) or (3) of section 133(b), priority shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career services described in paragraph (2)(A)(xii) and training services. The local board and the Governor shall direct the one-stop operators in the local area regarding making determinations related to such priority. In the South-Central Region, priority is given to WIOA Adults in training or individualized career services who are low-income or have other significant barriers to employment.
3. Substance:
 - 1st priority shall be given to recipients of public assistance.
 - 2nd priority shall be given to low-income individuals as defined in current state 70 Percent Lower Living Standard Income Level or Health and Human Services Poverty Guidelines issuance.
 - 3rd priority shall be given to individuals who are basic skills deficient or an English language learner.
 - 4th priority shall be given to individuals who meet the definition of disabled and counted as a family of one for the purpose of eligibility determination but who are not determined to be low-income.
 - 5th priority shall be given to individuals who meet a yearly family income level of 250% of poverty level (see chart below).
 - Individuals can be served from all 5 priority levels on a first come first serve basis until WIOA Adult funding has been allocated for clients is at least 80% obligated. When client funds have been obligated at or above 80% only the first two priority levels may be served.
 - WIOA Adult enrollments of those individuals who are not low-income must not exceed 50.1% of total WIOA Adult enrollments per Program Year.
 - Once client funds have been obligated at or above 90% only individuals from the first and second priority levels may be served.

- For individuals that need staff assisted services only, staff may complete a basic WIOA enrollment for that purpose without requiring the individual's income. If it is later determined that the individual needs services beyond staff assisted, the individual will need to meet one of the priority levels above and the income must be added to the WIOA application in the statewide case-management system.
- Eligible Veterans and spouses will have priority at all levels for services in the WIOA Adult program. Please refer to the Local Veteran Priority of Service policy; attachment 18 to this Local Plan.

Contact: Please direct comments or questions regarding this policy to info@scwib.org

2024 FEDERAL POVERTY GUIDELINES FOR ADULT PRIORITY LEVEL 5

Household Size	250%
1	\$37,650
2	\$51,100
3	\$64,550
4	\$78,000
5	\$91,450
6	\$104,900
7	\$118,350
8	\$131,800

*For families/households with more than 8 persons add \$13,450 for each additional person

*New figures are released in January of each calendar year.



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Adult & Dislocated Worker Training Criteria Policy

Training services will be made available based on funding availability, training eligibility of participant, and the needs of the participant in accordance other local, state, and federal policies. Those living outside the service area will need Executive Director approval before being enrolled. Training services may be made available to employed and unemployed adults and dislocated workers after an interview, evaluation, a comprehensive assessment, and career planning. Staff must provide a detailed explanation on how the individual meets each of the requirements outlined in WIOA sec. 134(c)(3)(A) in the Training Eligibility Justification Case Note.

To document Training Eligibility Justification, the following **must** be answered in the Training Eligibility Justification Case Note must include: The Participant:

- 1. Is unlikely, or unable, to obtain or retain employment that leads to economic self-sufficiency or wages comparable to-or higher than-wages from previous employment through career services.**
- 2. Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to-or higher than-wages from previous employment.**
- 3. Has the skills and qualifications to participate successfully in training services.**
- 4. Has selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individual is willing to commute or relocate.**
- 5. Is unable to obtain grant assistance from other sources to pay the costs of such training (including such sources as State-funded training funds, Trade Adjustment Assistance, and Federal Pell Grants established under Title IV of the Higher Education Act of 1965) or requires WIOA assistance in addition to other sources of grant assistance (including federal Pell Grants).**

If a case manager cannot answer yes to all the above questions and provide a detailed explanation for each in a case note, then training services are **not allowable**. The case note must explain why and how the individual met each requirement. Training services are not an entitlement of the WIOA program. No training service, obligation of payment, or payment may be made prior to the determination and documentation of training eligibility. Training Eligibility Justification is not based on the participant's goal or desired employment but is based off current skills, education, and work history.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Youth Barriers Eligibility Policy

This policy is written to provide the South Central Workforce Investment Board's (SCWIB) Youth Who Requires Additional Assistance definition and required eligibility documentation and to transmit the SCWIB's eligibility requirements for the WIOA Youth program.

Youth eligibility is determined by Federal Law, Federal Rules, and State Issuance. This policy is necessary to further define the eligibility requirements for youth in the South Central Region.

Those living outside the service area will need Executive Director approval before being enrolled. No more than 5% of In-School Youth enrollments may be made eligible under the "Needs Additional Assistance" criteria.

"Youth Who Require Additional Assistance" shall be defined as an individual who meets any one of these 3 conditions:

- Has failed to secure a job within the past thirty days after employment search. Documentation shall consist of a detailed job search log; or
- Is employed part-time (less than 30 hours per week) and has been unable to obtain full-time employment within the past three months after employment search. Documentation shall consist of at least two or more recent pay stubs within the last thirty days and a detailed job search log; or
- Did not achieve the National Career Readiness Certificate (NCRC). Documentation that the individual did not obtain at least the Bronze NCRC will be required.
- Verification obtained from a professional source (doctor, teacher, vocational evaluator, etc.) stating that the youth requires additional assistance either related to education or employment.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Youth Incentive Policy

This policy is to provide guidelines regarding incentives that inspire Youth participants to successfully complete training and/or work experiences. It will also set limits and requirements for incentive payments.

Youth Incentive payments are allowed by Federal Law, Federal Rules, and State Issuance. This policy is necessary to further define the limits and requirements for Incentive payments in the South-Central Region.

Youth participants receiving an incentive payment must be actively enrolled in WIOA and are either attending or have attended a work experience (WE), on-the-job training (OJT), or educational training program. When establishing an enrollment for the Youth participant, case notes will need to include the discussion and planning of an incentive.

Documentation is required to prove participation and completion for approved activities. These will be uploaded into the participant's MIS account and accompanied by a case note. Please see the following for approved documents:

- Grade cards showing passing grades for the period agreed upon
- Proof of successfully passing the HiSet/GED exam
- High School Diploma or Transcript showing graduation
- Documentation of completion of high school on letterhead signed by a school authority
- Proof of successful completion documents for those in a WE
- Proof of successful mid and end point monitoring for those in an OJT
- Test results for those that are BSD (Basic Skills Deficient) showing Education Functional Level (EFL) gain.

Incentive Payments are allowed for the following activities:

- \$250.00 is payable for Youth who receive their High School diploma, HiSET, post-secondary credential, license, or certification before WIOA Youth program exit.
- \$100.00 is payable to Youth who successfully complete their Work Experience training plan with average or above average evaluation from the employer.
- \$100.00 is payable to Youth who successfully complete On-the-Job training.

- \$50.00 is payable to Youth for successful completion of a semester in training or high school, with academically acceptable all school determined passing grades. Participants are eligible to receive a \$50 incentive for each attainment of a full one-point increase in any subject area previously determined basic skill deficient. Participants enrolled in Adult Education, whose initial testing results demonstrate basic skills deficiency, as defined as an Educational Functional Level of 4.0 or lower (< 9.0 grade level equivalency) in one or more of the three functional areas math, reading or language), are authorized to receive an incentive for increasing one or more EFL in any deficient area.

Participants are eligible to receive a \$50 incentive for each attainment of a full one-point increase in any subject area previously determined basic skill deficient. Participants enrolled in Adult Education, whose initial testing results demonstrate basic skills deficiency, as defined as an Educational Functional Level of 4.0 or lower (< 9.0 grade level equivalency) in one or more of the three functional areas math, reading or language), are authorized to receive an incentive for increasing one or more EFL in any deficient area.

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South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Veteran's Priority of Service Policy

This policy is written to provide direction to the one-stop operators with regard to making determinations related to Veteran's priority of service.

The South Central Region recognizes the preferences allowed to veterans required by Public Law 107-288 and applies those applicable laws according to priority. According to Department of Labor (DOL) TEGL 3-15, veterans and eligible spouses receive priority of service for all DOL-funded job-training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, priority must be provided in the following order:

- 1st priority shall be given to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
 - 2nd priority shall be given to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA Adult formula funds.
 - 3rd priority shall be given to veterans and eligible spouses who are not included in WIOA's priority groups.
 - Last priority shall be given to non-covered persons outside the groups given priority under WIOA
1. **Veterans Qualification:** A veteran is a person who served at least one day in the active military, naval, or air service, and who was discharged or released for conditions other than dishonorable. Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than Federal authorities, such as mobilization in response to events such as natural disasters).

2. Eligible Spouse Qualification (must meet one of the qualifications below):

- A spouse of any veteran who died or has a service-connected disability; or
 - A spouse of any member of the Armed Forces serving on active duty who, at the time of application for priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action; or
 - Captured in the line of duty by a hostile force; or

 - Forcibly detained or interned in the line of duty by a foreign government or power; or
 - A spouse of a veteran who has a total disability resulting from service-connected disability, as evaluated by the Department of Veteran Affairs; or
 - A spouse of any veteran who died while a disability was in existence.
- The processes for identifying covered persons will not require verification of the status of an individual as a covered person at the point of entry unless they immediately undergo eligibility determination and enrollment in a program. A covered person may be enrolled and given immediate priority and then be permitted to follow-up subsequently with any required verification of his/her status as a covered person. If the Local Veterans Employment Representative (LVER) and/or Disabled Veterans Outreach Program (DVOP) staff is available and eligible veteran or eligible spouse requests assistance from the DVOP/LVER, a local process has been developed for notifying the DVOP/LVER that such person has requested assistance.

3. Priority of Service will be ensured by:

- Identifying veterans and other covered persons using the acceptable documentation;
- Coordinating service delivery, outreach, employer and all other related activities with Local Veterans Employment Representative (LVER) and Disabled Veterans Outreach Program (DVOP) staff;
- Identifying employers who are interested in hiring veterans;
- Promoting job fairs for veterans and eligible spouses; and
- Assisting veterans and eligible spouses before other customers.
- MoJobs allows registered Veterans to view job postings 24 hours before the public.

Program operators will work with the Local Veterans Employment Representatives (LVERs) and Disabled Veterans Outreach Program (DVOP) specialists to encourage additional referrals to the WIOA programs for veterans.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Basic Skills Youth Assessment Policy

Local Workforce Development Boards (WDB) are required to assess the basic skills of workforce applicants for Youth eligibility and for an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills.

- WIOA Section 3(5) defines a participant who is "basic skills deficient:" means, with respect to an individual-*
- (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or*
 - (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.*

Determining basic skills deficiency during intake assists in qualifying customers for eligibility, allows for quality referrals, and can determine program effectiveness.

Determination of WIOA Youth eligibility based on the BSD barrier: The South Central Workforce Board have approved the below instruments to be valid and reliable to evaluate the basic skills when needed to determine WIOA Youth program eligibility.

- Test of Adult and Basic Education (TABE), ACT, HESI (Health Education Systems, Inc.), Wonderlic, TEAS (Test of Essential Academic Skills), CASAS (Comprehensive Adult Student Assessment System), and the Accuplacer. These assessments may be administered by the region's AEL programs, or the participant's chosen training provider
- WorkKeys National Career Readiness assessment. Youth who have WorkKeys scores below the NCRC Silver category are considered basic skills deficient.
- In-School-Youth, Local WDBs should continue to accept the basic skills assessments provided by the participant's educational institution. If an assessment is unavailable, qualified staff may administer the WorkKeys or TABE to determine BSD.
- Previous basic skills assessments (those listed above) may be used if such previous assessments have been conducted within the past six months.
- Assessment results are utilized to document basic skills deficiencies for an eligibility barrier or to determine the youth's ability to be successful in an academic program. Reasonable accommodation for the testing process will be available, if necessary, for individuals with disabilities. Previous basic skills assessment results may be used if the assessment was conducted within the previous six-month period of the eligibility determination date.

Determination of Basic Skills for the Objective Assessment (OA): WIOA requires that every youth completes an objective assessment to evaluate the basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs of the participant. The objective assessment must identify the career pathway for the youth participant and is used to develop a corresponding Individual Service Strategy (ISS).

The requirement to review basic skills as part of the objective assessment process is not the same as conducting a basic skills assessment for eligibility determination for the basic skills deficient barrier or as conducting a basic skills assessment for determination of an educational functioning level gain within the measurable skill gains indicator. If using the basic skills deficient component of WIOA Youth eligibility in WIOA (3)(5)(A), programs must use a generally accepted standardized test, identified above, to determine WIOA eligibility based on basic skills deficiency/definition.

The South Central Workforce Board has adopted a screening tool to help identify if an individual is basic skills deficient. The Basic Skills Screening Tool is required for all WIOA youth applicants. The Basic Skills Screening Tool below will help assess the youth for the required basic skills section of the OA and help determine if additional testing is needed to determine “basic skills deficient”. The Basic Skills Screening Tool must not be used to determine a youth’s educational needs.

A youth who is unable to complete the screening tool without assistance or answers “No” to one (1) or more questions must automatically be assessed as basic skills deficient using at least one of the approved assessments identified in the previous section. A youth who can complete the screening tool without assistance and answers “Yes” to all the questions has satisfied the basic skills requirement of the OA. However, for youth entering training services additional assessments may be used to determine the appropriateness of the training program.

Attachment: Basic Skills Screening Tool

Contact: Please direct comments or questions regarding this policy to info@scwib.org

Basic Skills Screening Tool

Name: _____

Date of Birth: _____

- 1) Do you have a high school diploma, General Education Development (GED) certificate or High School Equivalency Diploma (HSED)? Yes No Currently in high school (does not include GED or HSED programs)
- 2) Can you follow basic written instructions and diagrams with no help or just a little help? Yes No
- 3) Can you fill out basic medical forms and job applications? Yes No
- 4) Without the aid of a calculator, can you add, subtract, multiply and divide with whole numbers up to 3 digits? Yes No
- 5) Can you do basic tasks on a computer? Yes No
- 6) Do you speak and read English well enough to get and keep a job? Yes No

Signature: _____ Date Signed: _____

For Internal Use Only:

Was the individual able to complete the screening tool without help? Yes No

For the Adult Program Only:

If any question is answered, "No" or the form could not be completed independently, the individual should receive priority.

Does the individual receive priority?

Yes No

For the Youth Program Only:

If any question is answered, "No" or the form could not be completed independently, the individual may have a BSD eligibility barrier.

Does the individual have a BSD eligibility barrier?

Yes No

Name of Career Planner: _____

Career Planner

Signature: _____ Date Signed: _____



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Individual Training Accounts (ITA) Policy

Individual Training Accounts (ITAs) will be the funding mechanism for classroom and occupational skills training services. Considering reasonableness of cost for a selected program of training, the Title I Operators will issue a training voucher up to a prescribed amount, but not to exceed the maximum allowance per person, per year. Such voucher may be used only for tuition and related education costs (books, fees, etc.) for the approved program of training. The voucher amount will be reduced proportionate to other financial resources available to the customer.

ITA guidelines are as follows:

- \$10,000 maximum per participant, per program year;
- Must be a WIOA Adult, Dislocated Worker, or WIOA Out-of-School Youth with a training level enrollment;
- Those living outside the service area will need Executive Director approval before being enrolled and issued an ITA;
- WIOA approved training providers & programs can be found on the Eligible Training Provider System List (ETPL). A printout from the ETPL system showing the approved program is required in the participant's file;
- Training time limitation –maximum two (2) years. The two (2) year time period is designed to enable a participant to acquire an associate degree or finish a bachelor's degree;
- Participants will only receive one (1) ITA funded training service at a time;
- Pre-requisites will be approved on a case-by-case basis by the WIOA Lead; pre-requisites are included in the two (2) year time limitation;
- Participants must provide required course list to the WIOA staff. The WIOA staff member will use this list and class schedule to be sure WIOA is paying for required courses. A class schedule must be provided to the WIOA staff;
- WIOA will not pay for repeated courses;
- Participants must be unable to obtain other grant assistance or require assistance beyond the assistance made available, including Federal Pell Grants; WIOA is funding of last resort;

- If receiving a Federal Pell Grant, the participant must apply 100% of PELL grant to their training costs before WIOA funding is utilized;
- Participants that already have an in-demand degree may not receive an ITA;
- Participants must have the skills and qualifications necessary to successfully participate in the selected program of training. Staff will determine this through participant interviews and discussions. Additionally, staff can use standardized testing to justify the training such as, but not limited to:
 - National Career Readiness Certificate (NCRC) scores must meet or exceed Missouri Economic Research & Information Center (MERIC) recommended scores for chosen training field. If a participant is unable to achieve the required scores, a waiver request must be made to WDB staff for training approval; or
 - TABE or CASAS scores must meet “High Adult Secondary Education” levels and must be administered within 12 months of training activity start date; or
 - Recent college placement test accepted by the approved training provider.
- Training must be in an occupation that leads to economic self-sufficiency or wages comparable to or higher than the wages from previous employment and directly linked to the employment opportunities in the local area (or an area the participant is willing to relocate to), source documentation required, with a rating of “B” or better;
- ITA funded amount is contingent on availability of funds and unmet financial need of the participant;
- Participant must submit passing grades from the previous semester before staff processes next semester’s ITA payment voucher;
- If a participant or a program is not PELL eligible staff must document this in the statewide case-management system;
- Participant and WIOA staff must complete an “ITA Participant Contract Form”; and
- The ITA commitment must be documented in the statewide case-management system. The total cost of training should be documented in the statewide case-management system **after** the ITA is paid.
- Exceptions for the above limits can be made by the SCWIB Executive Director, on a case-by-case basis, at the request of the job center staff with the documentation of participant need.
-

Non-ITA Exception

If a participant is interested in training that is not WIOA approved on Missouri’s ETPL, the SCWIB may pay for services utilizing a contract following the guidelines below **and** the SCWIB’s procurement policy. In order to utilize a contract, the requirements of customer choice outlined in 20 CFR 680.340 must be fulfilled **and** one or more of the following must be met:

(1) When the services provided are on-the-job-training (OJT), customized training, incumbent worker training, or transitional jobs.

(2) When the Local WDB determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment, such as

- Displaced homemakers;
- Low-income individuals;
- Indians, Alaska Natives, and Native Hawaiians;
- Individuals with disabilities;
- Older individuals, *i.e.*, those aged 55 or over;
- Ex-offenders;
- Homeless individuals;
- Youth who are in or have aged out of the foster care system;
- Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
- Eligible migrant and seasonal farmworkers, defined in WIOA sec. 167(i);
- Individuals within 2 years of exhausting lifetime eligibility under TANF (part A of title IV of the Social Security Act);
- Single parents (including single pregnant women);
- Long-term unemployed individuals; or
- Other groups determined by the Governor to have barriers to employment.

(3) When the Local WDB determines that it would be most appropriate to contract with an institution of higher education or other provider of training services to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice.

Selection Process for Non-ITA Funded Training Providers

- The non-ITA training provider must be located in the South-Central Region.
- Staff will research the training provider and/or program to determine prior program success. Research should include:
 - Financial stability of the organization;
 - Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as program completion rate; attainment of the skills, certificates, or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and
 - How the specific program relates to the local workforce investment needs.
- Staff will inform the One-Stop Operator of the participant's desire to attend a non-ITA training and discuss the provider's/program's success rate.
- The One-Stop Operator and the SCWIB Director will collaborate to make the final determination based on the requirements outlined in this policy, consumer choice requirements, and the local procurement policy.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central WORKFORCE Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: WIOA Eligibility Policy (Basic and Individualized Career Services)

Workforce Innovation and Opportunity Act (WIOA) Title I has different service categories, and below are the definitions, examples of each, and applicable eligibility requirements.

Information-only Services – are services that provide readily available information that does not require an assessment by a staff member of the individual's skills, education, or career objectives. Examples include providing labor market information, outreach and intake and orientation to Job Center Services.

Adult Basic Career (ABC) Services – are universally accessible services and must be made available to all individuals seeking employment and training services. Examples include making eligibility determinations and providing career guidance. General eligibility documentation is required before an individual can receive Adult Basic Career Services (*see OWD's most current Adult and Dislocated Worker Programs Eligibility and Documentation [Technical Assistance Guide](#)*).

Documentation is required to prove:

- Social Security Number;
- Date of Birth;
- Eligible to Work in the United States;
- Selective Service Registration, if applicable;
- Eligible Veteran status, if applicable; and
- All individuals must be notified of their Equal Opportunity rights.

Customers do not have to demonstrate low-income status to be enrolled in ABC.

Individualized Career Services – are specific services that an individual requires to obtain or retain employment. Examples include provision of specialized assessments, developing individualized employment plans, and individual counseling.

Full WIOA eligibility documentation, including obtaining proof of low-income/dislocated worker status, is required before an individual can receive Individualized Career Services (*see OWD's most current Adult and Dislocated Worker Programs Eligibility and Documentation [Technical Assistance Guide](#)*).

Documentation is required to prove:

- All the General Eligibility listed above;
- Dislocated Worker Status (WIOA Dislocated Worker); or
- Low-Income (WIOA Adult); or
- Other eligibility as outlined in the Local WDB's priority of service policy.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central WORKFORCE Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Individuals with Disabilities: South Central Region Reasonable Accommodation Plan

The South Central Region Procedures fully comply with the requirements of the Rehabilitation Act of 1973. Under the law, The South Central region must provide reasonable accommodation to qualified program applicants or participants with disabilities, unless to do so would cause undue hardship. The region is committed to providing reasonable accommodations to its applicants for services and participants to ensure that individuals with disabilities enjoy equal access to all program opportunities. The region provides reasonable accommodations:

- when an applicant with a disability needs an accommodation to have an equal opportunity to receive services;
- when a participant with a disability needs an accommodation to participate in services at the Job Center; and
- when a participant with a disability needs an accommodation to enjoy equal access to services and benefits of participation in the Job Center programs.

The South Central region will process requests for reasonable accommodation and will provide reasonable accommodations, where appropriate, in a prompt and efficient manner in accordance with the time frames set forth in this Plan.

A. Requesting Reasonable Accommodation

Generally, a program applicant or participant must let the Job Center know that he needs an adjustment or change concerning some aspect of the application process, the participation in, or a benefit of services for a reason related to a medical condition. A request does not have to include any special words, such as “reasonable accommodation,” “disability,” “medical condition” or “Rehabilitation Act”. A request is any communication in which an individual asks or states that she needs the Job Center to provide or to change something because of a need. Staff do not need to be told what the medical condition is or get proof of that condition before providing a no-cost accommodation. A **program applicant or participant** may request a reasonable accommodation at any time, **orally or in writing**. An individual may request a reasonable accommodation to any staff member in the Job Center. *If the requested accommodation does not cost money to provide, is provided through a statewide contract, or will not disrupt the services at the job center, all staff have the ability to grant the request as soon as it is made.*

For reasonable accommodations that will be provided with local funds, Job Center staff must let the EO Officer know within two business days of the request. The program applicant/participant with the assistance of the Job Center staff, if needed, will complete the SCWIB Accommodation Request Form (Attachment 1)

B. Processing the Request

The South Central Region Equal Opportunity Officer (EO) is responsible for processing requests for reasonable accommodation. The SCWIB Executive Director will designate another SCWIB staff member or board member to act as a back-up for the EO to process requests when the EO is unavailable for any length of time (e.g., the EO is on vacation or out on extended leave). While the EO has responsibility for processing requests for reasonable accommodation, the EO may work closely with Job Center staff and the SCWIB Board of Directors when responding to the request, particularly those involving participation in training programs outside of the Job Center. The EO will need to consult with a program applicant's/participant's case manager/WE supervisor/instructor to gather relevant information necessary to respond to a request and to assess whether a particular accommodation will be effective. No reasonable accommodation involving participation in an intensive or training activity will be provided without first informing the participant's supervisor or instructor, as appropriate.

C. The Interactive Process

1. Generally

After a request for accommodation has been made, the next step is for the parties to begin the interactive process to determine what, if any, accommodation should be provided. This means that the individual requesting the accommodation and the EO must communicate with each other about the request, the precise nature of the problem that is generating the request, how a disability is prompting a need for an accommodation, and alternative accommodations that may be effective in meeting an individual's needs.

The EO will contact the program applicant or participant within 10 business days after the request is made (even if the request is initially made to someone else) to begin discussing the accommodation request. In some instances, the EO may need to get information to determine if an individual's impairment is a "disability" under the Rehabilitation Act or to determine what would be an effective accommodation. Such information may not be necessary if an effective accommodation is obvious, if the disability is obvious (e.g., the requestor is blind or has paraplegia) or if the disability is already known to the Job Center (e.g., the requestor previously asked for an accommodation and information submitted at that time showed a disability existed and that there would be no change in the individual's medical condition).

Communication is a priority throughout the entire process, but particularly where the specific limitation, problem, or barrier is unclear; where an effective accommodation is not obvious; or where the parties are considering different forms of reasonable accommodation. Both the individual making the request and the decision maker should work together to identify effective accommodations.

When a third party, (e.g., an individual's doctor or another program staff person) requests accommodation on behalf of a program applicant or participant, the EO should, if possible, confirm with the program applicant or participant that he wants a reasonable accommodation before proceeding. Where this is not possible, the EO will process the third party's request if it seems appropriate and will consult directly with the individual needing the accommodation as soon as practicable.

D. Requests for Medical Information

If a requestor's disability and/or need for accommodation are not obvious or already known, the South Central region (specifically the EO) is entitled to ask for and receive medical information showing that the requestor has a covered disability that requires accommodation

A disability is obvious or already known when it is clearly visible or the individual previously provided medical information showing that the condition met the Rehabilitation Act definition. It is the responsibility of the program applicant/participant to provide appropriate medical information requested by the region where the disability and/or need for accommodation are not obvious or already known.

Only the EO may determine whether medical information is needed and, if so, may request such information from the requestor and/or the appropriate health professional. Even if medical information is needed to process a request, the EO does not necessarily have to request medical documentation from a health care provider; in many instances the requestor may be able to provide sufficient information that can substantiate the existence of a “disability” and/or need for a reasonable accommodation. If an individual has already submitted medical documentation in connection with a previous request for accommodation, the individual should immediately inform the EO of this fact. The EO will then determine whether additional medical information is needed to process the current request.

If the initial information provided by the health professional or volunteered by the requestor is insufficient to enable the EO to determine whether the individual has a “disability” and/or that an accommodation is needed, the EO will explain what additional information is needed. If necessary, the individual should then ask his/her health care provider or other appropriate professional to provide the missing information. The EO may also give the individual a list of questions to give to the health care provider or other appropriate professional to answer. If sufficient medical information is not provided by the individual after several attempts, the EO may ask the individual requesting accommodation to sign a limited release permitting the EO to contact the provider for additional information. The EO may have the medical information reviewed by a doctor of the agency’s choosing, at the agency’s expense.

In determining whether documentation is necessary to support a request for reasonable accommodation and whether a program applicant or participant has a disability within the meaning of the Rehabilitation Act, the EO will be guided by principles set forth in the ADA Amendments Act of 2008. Specifically, the ADA Amendments Act directs that the definition of “disability” be construed broadly and that the determination of whether an individual has a “disability” generally should not require extensive analysis. Notwithstanding, the EO may require medical information in order to design an appropriate and effective accommodation.

A case manager, WE supervisor or instructor who believes that a participant may no longer need a reasonable accommodation should contact the EO. The EO will decide if there is a reason to contact the participant to discuss whether s/he has a continuing need for reasonable accommodation.

E. Confidentiality Requirements

Under the Rehabilitation Act, medical information obtained in connection with the reasonable accommodation process must be kept confidential. This means that all medical information that the South Central region obtains in connection with a request for reasonable accommodation must be kept in files separate from the individual’s program file. This includes the fact that an accommodation has been requested or approved and information about functional limitations. It also means that any region employee who obtains or receives such information is strictly bound by these confidentiality requirements.

The EO may share certain information with a participant's WE supervisor or instructor(s) as necessary to make appropriate determinations on a reasonable accommodation request. Under these circumstances, the EO will inform the recipients about these confidentiality requirements. The information disclosed will be no more than is necessary to process the request. In certain situations, the EO will not necessarily need to reveal the name of the requestor and/or the office in which the requestor receives service, or even the name of the disability.

EXAMPLE

The IT department generally will be consulted in connection with requests for assistive technology for computers. While IT needs to know the participant's functional limitations, it typically has no need to know the participant's specific disability.

In addition to disclosures of information needed to process a request for accommodation, other disclosures of medical information are permitted as follows:

- case managers/WE supervisors/instructors are entitled to whatever information is necessary to implement restrictions on the work or duties of the participant or to provide a reasonable accommodation;
- first aid and safety personnel may be informed, when appropriate, *if* the disability might require emergency treatment or assistance in evacuation; and
- government officials may be given information necessary to investigate the region's compliance with the Rehabilitation Act.
-

F. Time Frame for Processing Requests and Providing Reasonable Accommodations

1 Generally

The time frame for processing a request (including providing accommodation, if approved) is as soon as possible but no later than **30 business days from the date the request is made**. This 30-day period includes the 10-day time frame in which the EO must contact the requestor after a request for reasonable accommodation is made.

South Central region will process requests and, where appropriate, provide accommodations in as short a period as reasonably possible. The time frame above indicates the maximum amount of time it should generally take to process a request and provide a reasonable accommodation. The EO will strive to process the request and provide an accommodation sooner, if possible. Unnecessary delays can result in a violation of the Rehabilitation Act.

The time frame begins when an oral or written request for reasonable accommodation is made, and not necessarily when it is received by the EO. Therefore, **everyone involved in processing a request should respond as quickly as possible**. This includes referring a request to the EO, contacting a doctor if medical information or documentation is needed, and providing technical assistance to the EO regarding issues raised by a request (e.g., information from a WE supervisor regarding the essential functions of an employee's position, information from IT regarding compatibility of certain adaptive equipment with the region's technology).

If the EO must request medical information or documentation from a requestor's doctor, the time frame will stop on the day that the EO makes a request to the individual to obtain medical information or sends out a request for information/documentation, and will resume on the day that the information/documentation is received by the EO.

If the disability is obvious or already known to the EO, if it is clear why reasonable accommodation is needed, and if an accommodation can be provided quickly, then the EO should not require the full 30 business days to process the request.

2. Expedited Processing of a Request

In certain circumstances, a request for reasonable accommodation requires an expedited review and decision. This includes where a reasonable accommodation is needed:

- **to enable an applicant to apply for a program or a job.** Depending on the timetable for receiving applications, conducting interviews, taking tests, and making hiring decisions, there may be a need to expedite a request for reasonable accommodation to ensure that an applicant with a disability has an equal opportunity to apply for a job or program services.
- **to enable a participant to attend a meeting/class scheduled to occur soon.** For example, a participant may need a sign language interpreter for a meeting/class scheduled to take place in 5 days.

3. Extenuating Circumstances

These are circumstances that **could not reasonably have been anticipated or avoided in advance** of the request for accommodation, **or that are beyond the region's ability to control.** When extenuating circumstances are present, the time for processing a request for reasonable accommodation and providing the accommodation will be extended as reasonably necessary. Extensions will be limited to circumstances where they are absolutely necessary and only for as long as required to deal with the extenuating circumstance.

G. Resolution of the Reasonable Accommodation Request

All decisions regarding a request for reasonable accommodation will be communicated to a program applicant or participant by use of email, regular mail, or phone, as well as orally.

1. If region **grants a request for accommodation**, the EO will give a letter to the requestor, and discuss implementation of the accommodation. The letter will be completed even if the region is granting the request without determining whether the requestor has a "disability" and regardless of what type of change or modification is approved.
 - A decision to provide an accommodation other than the one specifically requested will be considered a decision to grant an accommodation. The letter will explain both the reasons for the denial of the individual's specific requested accommodation and why the region believes that the chosen accommodation will be effective.
 - If the request is approved but the accommodation cannot be provided immediately, the EO will inform the individual in writing of the projected time frame for providing the accommodation.
2. If the region **denies a request for accommodation**, the EO will provide a letter to the requestor and discuss the reason(s) for the denial. When completing the letter, the explanation for the denial will clearly state the specific reason(s) for the denial. This means that the region cannot simply state that a requested accommodation is denied because of "undue hardship" or because it would be "ineffective." Rather, the letter will state and the EO will explain specifically **why** the accommodation would result in undue hardship or why it would be ineffective.

- If there is a legitimate reason to deny the specific reasonable accommodation requested (e.g., the accommodation poses an undue hardship or is not required by the Rehabilitation Act), the EO will explore with the individual whether another accommodation would be possible. The fact that one accommodation proves ineffective or would cause undue hardship does not necessarily mean that this would be true of another accommodation. Similarly, if a program applicant/participant requests removal of an essential program element or some other action that is not required by law, the EO will explore whether there is a reasonable accommodation that will meet the individual's needs.
- If the EO offers an accommodation other than the one requested, but the alternative accommodation is not accepted, the EO will record the individual's rejection of the alternative accommodation in the confidential record.

H. Informal Dispute Resolution

An individual dissatisfied with the resolution of a reasonable accommodation request can ask the Chairman of the SCWIB Board of Directors to reconsider that decision. An individual must request reconsideration within **10 business days** of receiving the letter from the EO.

I. Information Tracking and Reporting

In order for the region to ensure compliance with these Procedures and the Rehabilitation Act, the EO will maintain a "Reasonable Accommodation Information Reporting" excel spreadsheet.

This document will be the basis of an annual report to be issued to the SCWIB Board of Directors that will provide a qualitative assessment of the region's reasonable accommodation program, including any recommendations for improvement of the region's reasonable accommodation policies and these Procedures. This annual report **will not contain confidential information about specific requests for reasonable accommodations, such as the names of individuals that requested accommodations or the accommodations requested by specific individuals.** Rather, this report will provide only general information, such as the total number of requests for accommodations, the types of accommodations requested, and the length of time taken to process requests.

J. INQUIRIES AND DISTRIBUTION

Any Job Center employee wanting further information concerning this Plan may contact the Equal Opportunity Officer (EO) via e-mail at lengelhardt@scwib.org . Program Applicants may contact the EO at the email: lengelhardt@scwib.org or by calling 417-257-2630 or MO Relay 711. This Plan shall be distributed to all Job Center staff upon issuance, and annually thereafter. They also will be posted on SCWIB website www.scwib.org. This Plan will be provided in alternative formats when requested from the EO by, or on behalf of, any program applicant or participant.



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Limited English Proficiency (LEP) Accessibility Policy

This policy to ensure that persons with Limited English Proficiency (LEP) have meaningful access to One-Stop programs and activities. All customers, regardless of their LEP receive, free of charge, the assistance necessary to afford them meaningful access to the programs, services, and can participate, in Missouri Job Center services, effectively regardless of their ability to speak, read, write, or understand English.

In accordance with 29 CFR 38.9 (g)(3), Limited English Proficient (LEP) individuals will receive language assistance in all communications of vital information. Vital information is defined as information whether written, oral or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; necessary for an individual to obtain any aid, benefit, service, and/or training; or required by law. An interpreter, as well as the availability of free language assistance such as rulebooks; written test that do not assess English language competency, but rather assess competency for a particular license, job, or skill for which English proficiency is not required; and letters or notices that require a response from the beneficiary or applicant, participant, or employee will be provided to all LEP individuals at no cost to the individual. (29 CFR § 38.4).

Babel Notice

The South Central Workforce Investment Board (SCWIB) will ensure that a Babel notice is provided in the top languages of the region. This will be provided as a link on the website, will be posted in the Job Center, and will be provided on vital documents.

Reasonable steps may include, but are not limited to, the following:

- Access to over-the-phone language services provided in more than 170 languages
- “I Speak” cards posted in each Job Center
- Providing oral interpretation or written translation of both hard-copy and electronic materials in the appropriate non-English languages to LEP individuals
- Written training materials in appropriate non-English languages by written translation
- Oral training content in appropriate non-English languages through in-person or telephone translation
- Implementation of LEP Outreach Plan
- Coordination of services with AEL and the English Literacy and Civics Education Program

Interpretation & Translation Services

The Office of Workforce Development (OWD) has a uniform language-assistance plan with clear goals for ensuring non-discrimination, management accountability, and opportunities for community input in the areas of Oral Information/Interpretation, Electronic Information of written text, and Signage posted for non-English languages.

Language Interpretation/Translation Services are available in the Arnold and Washington Job Centers through the CTS Language Link. This service provides telephone language interpretation services. Workforce system staff utilizes the "Point to your Language" card to identify the LEP individual's language and obtain the appropriate interpreter services.

The SCWIB identifies the languages that are likely to be encountered in the region annually. When requested or a need is determined, vital written materials will be translated into other languages. Vital documents accessible through the web page may also be available, if needed. OWB makes vital documents and outreach materials available in Spanish. LEP Individuals shall not be required to provide their own interpreter. Job Center staff shall not rely on an LEP Individual's minor child or adult family or friend to interpret or facilitate communication. The only exception to this is if the LEP individual specifically requests that an accompanying adult provide language assistance and they agree to help the individual.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central WORKFORCE *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ Fax 417-257-2633 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Co-Enrollment Policy

In accordance with OWD's most current policy on Statewide Enrollments and Exits, all customers of WIOA partners must be given the availability of services for which they are eligible, or potentially eligible. They must be actively engaged and assisted in co-enrolling in services they choose.

South Central Workforce Investment Board not only encourages and supports, but co-enrollment is required across funding streams when it is available. This offers a variety of services to meet the needs and expectations of its customers, to leverage resources, and to reduce and eliminate duplication of services.

The following is required:

- All Job seekers receiving staff-assisted services in a Missouri Job Center (including Youth) must be enrolled in the Wagner-Peyser (WP) program.
 - Any Missouri Job Center staff can –and should – complete the WP enrollment in the statewide electronic case-management system.
 - Career Services provided by WIOA Title I only funded staff in WP beyond information-only that trigger participation into the WP program require (at a minimum) the completion of a WIOA Adult Basic Career (ABC) enrollment; WIOA Title I staff must complete this enrollment directly after completing a WP enrollment.
 - Please refer to OWD's most recent Participant Activity Codes, Durations and Definitions Issuance for Career Services that trigger participation.
 - If enrolling into Dislocated Worker (DW) program full DW eligibility is required.
 - For ABC and DW enrollment please refer to the most recent Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance for ABC and DW eligibility requirements.

- All Trade Adjustment Assistance (TAA) participants must be co-enrolled in the WIOA Dislocated Worker program, unless the enrollment is waived by the participant.
 - The TAA Code of Federal Regulations dictates that all TAA eligible workers must have employment and case management services available, including placement and referrals to supportive services and follow-up services available through partner programs, to trade-affected workers during training, and after completion of training, and for adversely affected workers on a waiver from training.
 - Co-enrollment will ensure individuals receive the benefits and services they may be eligible for under the TAA and Title I Dislocated Worker programs.

- Coordination of services and non-duplication through co-enrollment helps Federal

resources go further in local areas and provides participants with access to a comprehensive suite of services.

- TAA participants receiving training services that will result in a credential that is not a recognized post-secondary credential (Post-Graduate Degree) by WIOA, are not required to be co-enrolled, as required under this policy. However, if a participant elects for a DW enrollment, the enrollment must occur.
- All National Dislocated Worker Grant participants must be co-enrolled in the WIOA Dislocated Worker program if they meet the eligibility requirements.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Adult Education and Literacy Policy (AEL)

It is the policy of the South Central Workforce Investment Board to partner with the Title II provider of Adult Education & Literacy in our region, Missouri State University – West Plains. AEL partners are active members of the South Central WIB and serve on various Board standing committees.

AEL is available to various locations throughout the region. Job Centers work closely with AEL programs and make referrals when youth, 18 and above, and adults have not obtained their high school diploma or equivalent. While enrolled in AEL a student may also be enrolled in postsecondary education, training and a work experience program that will enable them to become more employable and productive. The services offered are Adult Basic Education, Adult Secondary Education and English Language Acquisition. These activities offered concurrently and contextually with workforce prep and workforce training, will rely on partnerships to provide workforce training for specific occupations. South Central Workforce Investment Board also provides supportive services for eligible individuals, such as transportation and childcare.

Youth, 18 and above, may be co-enrolled in WIOA Adult career services. This provides the opportunity to obtain a NCRC and have access to other services. AEL provides basic skill development, academic education, and secondary skills toward high school equivalency, postsecondary remediation and English language acquisition for those eligible. AEL incorporates employability skills and workforce preparation into its instruction. Career pathways and employment strategies are used for the sector strategies identified in our region. It is the ultimate goal for AEL learners to be placed in unsubsidized employment with in-demand industries and occupations that lead to economic self-sufficiency.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

**Subject: Vocational Rehabilitation (VR) and Rehabilitation Service
for the Blind (RSB) Coordination of Services Policy**

South Central Workforce Investment Board (SCWIB) and the Committee for Inclusion is charged with addressing how services to individuals with disabilities will be delivered. SCWIB is committed to improving the coordination and collaboration to braid services between Vocational Rehabilitation (VR) and Rehabilitation Services for the Blind (RBS). This enhanced coordination will involve employer engagement activities, along with recruiting, hiring, and providing support services to clients seeking employment. A representative from Vocation Rehabilitation is a member of the board and will act as a consultant regarding service needs.

A Memorandum of Understanding with each entity will be included in the Local Plan documents.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: Youth Apprenticeship Policy

South Central Workforce Investment Board (SCWIB) supports Pre-Apprenticeship and Registered Apprenticeship programs for Youth. The SCWIB partners with training providers, apprenticeship providers, employers, and other WIOA partners to develop Youth Pre-Apprenticeship and Registered Apprenticeship activities. Discussions with partners are ongoing to continue moving this policy forward.

Registered Apprenticeship is a model of job preparation that combines paid on-the-job training (OJT) with related instruction to increase workers' skill levels and wages. Registered Apprenticeship is also a business-driven model that provides a way for employers to recruit, train, and retain skilled workers.

The Registered Apprenticeship program consists of the following seven core components:

- **Industry-Led.** Businesses are the foundation of every Registered Apprenticeship program, and the skills needed for workforce success form the core of the model. Businesses must play an active role in building Registered Apprenticeship programs and are involved in every step of their design and execution.
- **On-the-Job Learning/Mentorship.** Every Registered Apprenticeship program includes structured OJT. Companies hire apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge the apprentice must learn over the course of the program to be fully proficient at the job.
- **Supplemental Education.** Apprentices receive related instruction or classroom style training that complements the OJT. This instruction helps refine the technical and academic skills that apply to the job. Related instruction may be provided by a community college, technical school or college, an apprenticeship training school, or by the business itself. This instruction can be provided at school, online, or at the work site.
- **Paid Job.** Apprentices earn wages while learning job skills and they receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate apprentices as they advance through training and become more productive and skilled at their job.
- **National Occupational Credential.** Every graduate of a Registered Apprenticeship program receives a nationally recognized credential, referred to as a Certificate of Completion, which is issued by the U.S. Department of Labor (USDOL) or a federally recognized State Apprenticeship Agency (SAA). This portable credential signifies that the apprentice is fully qualified to successfully perform an occupation. Many Registered Apprenticeship programs particularly in high-growth industries such as health care, advanced manufacturing, and transportation also offer interim credentials as apprentices master skills as part of a career pathway.
- **Diversity.** Apprenticeship is a workforce solution that actively promotes diversity and inclusion in the workplace - including race, gender, sexual orientation, and ability. The Department of Labor is supporting different aspects of diversity in apprenticeship to create more inclusive and equitable workplaces.
- **Quality and Safety.** Apprentices will receive quality training with scheduled milestones at a safe worksite with proper supervision.

Registered Apprenticeship program sponsors are automatically eligible for placement on the Missouri-approved ETPS list.

Pre-apprenticeship is a training model designed to assist individuals who do not currently possess the minimum [academic or skills] requirements for selection into an apprenticeship program to meet the minimum selection criteria established in a program sponsor's apprenticeship standards required under 29 CFR part 29 and which maintains at least one documented partnership with a Registered Apprenticeship program. It involves a form of structured workplace education and training in which an employer, employer group, industry association, labor union, community-based organization, or educational institution collaborate to provide formal instruction that will introduce participants to the competencies, skills, and materials used in one or more apprenticeable occupations.

A pre-apprenticeship program must be included on the ETPS list and includes the following elements:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- Access to educational and career counseling and other supportive services, directly or indirectly;
- Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.

The Region supports apprenticeship as a workforce strategy for youth. WIOA also recognizes apprenticeship as a career pathway for Job Corps students and supports coordination of the Youth Build program with pre-apprenticeship and apprenticeship programs.

Apprenticeship programs are promoted through:

- Registered apprenticeships will be promoted as an avenue for employers to recruit and hire lower skilled workers to fill skilled occupation jobs.
- Partnerships with the area Chambers of Commerce are used to promote work-based training programs, particularly registered apprenticeship programs. Monthly announcements promoting services for employers are submitted to the chambers for inclusion in their monthly digital newsletters.
- The region partners with secondary and post-secondary education providers to assist with WIOA eligible job placement of students graduating from educational programs. Paid internships combined with work readiness training promotes the utilization of work-based training to connect participants to high paying, training related job opportunities.
- The region's staff networks with employers from high-demand job clusters to promote the registered apprenticeship program. Members of the same industry clusters are encouraged to support and use the apprenticeship program for hiring new workers.
- Registered apprenticeship and work-based training programs are promoted as an effective source for re-employment of justice-involved individuals and other targeted populations

South Central Workforce Investment Board is an equal opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities.

needing employment and training services for reemployment.

Registered apprenticeship and work-based training are promoted as a way of connecting individuals who recently obtained a HSET through attendance of AEL as a way of increasing job specific skills relating to sustainable employment as noted above, pre-apprenticeship programs align around common fundamental policy aims and scope, informing a quality framework designed to prepare individuals for entry into RAPs.

The following are the five basic elements of a quality pre-apprenticeship program:

1. **Partnership with RAP sponsors.** Quality pre-apprenticeship programs should be designed and delivered, with input from at least one RAP sponsor. A pre-apprenticeship program's educational and pre-vocational services prepare individuals to meet the entry requisites of one or more RAPs and occupations. Examples of partnerships include:
 - a. A written plan developed by the pre-apprenticeship program with training goals to teach participants a defined set of skills required and agreed upon by one or more RAP sponsors for entry into their programs.
 - b. Identified engagement between one or more RAP sponsors and the pre-apprenticeship program, which can include program visits, access to RAP mentors, granting of direct entry, etc.
 - c. The granting of advanced standing/credit from one or more RAP sponsors for pre-apprenticeship program graduates.
 - d. Direct assistance to participants applying to those programs.
2. **Sustainability through partnerships.** To support their ongoing sustainability, quality pre-apprenticeship programs establish partnerships with entities to collaboratively promote the use of RAPs as a preferred means for employers to develop a skilled workforce and to create career opportunities and pathways for individuals. Partnerships may include RAP sponsors, DOL-funded intermediaries who develop programs or provide training to programs, community and faith-based organizations, advocacy organizations that represent underserved populations, labor organizations, joint labor-management organizations, educational institutions (including high schools and community colleges), and the public workforce system.
3. **Meaningful training combined with hands-on experience replicating a workplace that does not displace paid employees.** Quality pre-apprenticeships provide hands-on training to individuals in a workplace, simulated lab experience, or work-based learning environment, which does not supplant a paid employee, but effectively simulates the industry and occupational conditions and standards of the partnering RAPs while observing proper supervision and safety protocols. Pre-apprenticeship programs ideally provide opportunities to obtain an industry-recognized credential, as well as potential stipends or wages when funding allows.
4. **Access to career and supportive services.** Quality pre-apprenticeship programs provide or otherwise ensure access to career and supportive services during the program, which may continue after a pre-apprentice enters a RAP. Services may include both financial and non-financial supports such as stipends, career counseling, career exploration, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, textbooks, tools, emergency grants, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.

5. **Strategies that increase Registered Apprenticeship opportunities for underrepresented or underserved populations facing significant barriers to employment in the Registered Apprenticeship labor force.** Examples include
- a. Thoughtful, dynamic, and documented recruitment strategies focused on outreach to one or more populations underrepresented or underserved in local, State, and national RAPs.
 - b. Educational and pre-vocational services as well as design of instruction and training that reach underrepresented or underserved populations to assist them in overcoming barriers to entering and succeeding in RAPs. These include career and industry awareness workshops, job readiness courses, English for Speakers of Other Languages, Adult Basic Education, financial literacy seminars, and math tutoring.
 - c. Exposing participants to local, State, and national RAPs and providing direct assistance to participants applying to those programs.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central WORKFORCE *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective July 23, 2024

Subject: Local Eligible Training Provider Selection Policy

This policy is written to provide direction to eligible training providers with regard to local eligibility criteria for programs to become or remain eligible to provide training services. Local criteria is established to support informed customer choice and the achievement of local performance indicators except in the case of Registered Apprenticeships.

WIOA assigns local boards the final responsibility for determining which eligible training providers and their corresponding programs receive approval in their local areas as consumer choices for participants. The regulations further require the local board to carry out the procedures assigned to it by the State.

Requirements of Providers:

1. The training program must be listed on the State ETPL.
2. Providers must collect and share data on the outcomes of all students. This data must be available to local WIOA staff. Training related job placements of past graduates must equal or exceed the entered employment retention and wage performance rate required of the South Central region for the current program year. These rates will vary from year to year. Current performance indicator rates can be checked on the SCWIB website, www.scwib.org, or by calling 417-257-2630.
3. Achieve a minimum of 60% completion rate for WIOA participants.
4. Equal Opportunity Requirements:
 - The organization should have an EO Officer or a staff person that deals with nondiscrimination and equal opportunity policies and regulations.
 - The Missouri Office of Workforce Development's "Equal Opportunity is the Law" poster should be posted in the facility.
 - Contract agreements should contain nondiscrimination and equal opportunity provisions.
 - Training provider should advertise to under-served populations.
 - The organization should have an accommodations policy.
 - There should be a process for analyzing equal opportunity demographics for students that attend the institution. The following may be requested during an EO monitoring visit:
 - A copy of all training program applications by demographic
 - A copy of training program selection by demographics
 - A copy of training programs graduation/completed outcomes by demographics
 - A copy of training programs incomplete outcomes by demographics
 - A copy of training programs placement wages outcomes by demographics

- The training provider should have a confidentiality policy including a process for collecting confidential information.
 - The training provider should have a written complaint policy.
 - Additionally, the training provider must allow monitoring visits for EO compliance, WIOA compliance and participant progress.
- 5. Training provider will submit student progress reports. This can be a formal written report or the student's progress can be discussed with local WIOA staff via telephone or email.
- 6. Training provider will allow local WIOA staff to monitor for compliance.
- Procedure for gaining initial approval by training provider
 1. Ensure program has met all requirements listed above.
 2. Contact the SCWIB office and request to be added to the local eligible training provider list. Training providers can wait until an eligible participant selects their program or they can request approval in advance.
 3. Approvals will be on a program year basis (July 1-June 30) for that year only. The board will contact approved programs each subsequent year for re-approval.
 4. The SCWIB will notify the training provider of the programs local approval or advice on the corrective actions needed for approval. Programs denied approval can submit a request for another review at any time.
 5. If, at any time, the local board determines that the provider is no longer adhering to the requirements listed in this document, the approval will be disqualified and the training provider notified. The local area may grant a probationary period for corrective actions before disqualifying the program for local approval.
 6. The SCWIB will keep a list of approved programs on the website, www.scwib.org.
- Additional procedures for initial approval by local WIOA staff
 1. Determine if individuals with similar training/credentials are able to earn a living wage with the training/credential to ensure local funds are not used to train individuals for occupations that do not move them out of poverty.
 2. Ensure the cost to complete the program is not higher than twice the amount of completing the equivalent program at other local training providers on the State ETPS with a reasonable distance.
 3. The cost of supportive services required to complete the training is not prohibitive.
- Procedures for PELL grant reimbursement to WIOA tuition
 1. All participants assessed as appropriate for a classroom training activity will be required to apply for available grants under Title IV, as well as any other financial aid that may be available to them (not including loans).
 2. When a participant is eligible for Pell, it may be used for other Pell eligible expenses with WIOA paying tuition, books and fees as allowed by the most current OWD policy on coordination of funding.
- Exceptions to this local policy must be pre-approved by the SCWIB Executive Committee. No exceptions can be made to the State Eligible Training Provider List.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



Business Services Plan

July 2024

Executive Summary

Under the Workforce Innovation and Opportunity Act (WIOA), One-Stop program partners in the South Central Region have the benefit of a history of working together as a continuous improvement team in the local workforce development system. Our partners and other stakeholders include educational institutions, economic development, social services providers, commerce and community leaders, manufacturers and state agencies.

The business service plan is intended to provide a framework for the South Central Region to more effectively market and deliver services to our business customers. By focusing on building relationships with local businesses we will be better able to know their needs and their unique challenges. We will thereby be better able to recognize our opportunities to assist them with our programs and services. With open communication and a sincere customer focus, we can inspire greater confidence in the services Job Centers and the South Central Workforce Investment Board provide to the business community.

The Business Services Team includes the Office of Workforce Development (OWD) Workforce Coordinator, Employment Transition Team Coordinator, Business Services Representative and local Veterans Employment Representatives, Adult Education and Literacy programs, Vocational Rehabilitation programs and partner staff representing On-the-Job Training programs and representatives from Missouri State University and Three Rivers Community College. Local economic development entities contribute to the coordination of workforce system activities through collaboration with business team members.

The mission of the Job Center model is its focus on connecting employers to a skilled workforce. The local workforce development system consists of interrelated teams, committees, boards and individuals focused on identifying methods to improve service delivery for all concerned. These strategic alliances are focused on the ability to respond to demand-driven needs of area employers and provide job-driven training opportunities to job seekers.

The key goals of the Business Services Team are to:

- Engage employers to determine local and regional hiring needs and design training programs that are responsive to those needs
- Align work-based opportunities with employers including on-the-job training, internships, and pre-apprenticeships and Registered Apprenticeships
- Utilize real time labor data to guide job seekers into training and pathways for employment
- Support the development of career pathway programs and events
- Promote training opportunities that allow individuals credential attainment, good jobs, increased earnings and career advancement
- Support Job Development activities, aligned with employer input, that prepare participants to secure and maintain employment
- Collaborate among job centers, education, labor and nonprofits to deliver the best services possible and to expand services to address the needs of both job seekers and employers

- Maintain links to local and state Economic Development initiatives and programs
- Ensure alignment of Job Centers with business demand in the area
- Contribute to and continuously improve service offerings as business needs determine what services should be offered
- Support the Certified Work Ready Community initiative in our twelve counties to maintain certification and achieve re-certification

Mission Statement

The mission of the South Central Region is to support a system that will provide employers with a skilled workforce and will provide job seekers with access to jobs with increased earnings potential. The Workforce Investment Board will be a leader in community collaboration to promote a dynamic, high skill/high wage economy in South Central Missouri through development of its workforce and workplaces.

Vision Statement

The vision of the South Central Workforce Investment Board is to improve the quality of life in our area. Through partnerships, we will ensure all citizens are afforded an environment that supports a market- driven workforce development system with clear goals and accountability. The board will support a system that will provide employers with a skilled workforce and will provide job seekers with access to in-demand jobs with increased earnings potential. The Workforce Investment Board will be a leader in community collaboration to promote a dynamic, high skill/high wage economy in South Central Missouri through development of a productive workforce and valued employers.

Delivery

The delivery of products and services will be coordinated through the Business Services Team. The Business Services Team will provide comprehensive and integrated workforce system services to businesses with an emphasis on matching businesses with job seekers that have the skills they require. The Business Services Team will meet quarterly to ensure on-going communication in an effort to avoid duplication of services.

The Business Services Team and Job Center team members collaboratively work to match hiring employers with qualified job seekers. They will work together and share information on a regular basis as to who is hiring in the area, what type of experience the employer is looking for, any special hiring criteria and the employer's hiring process. The center staff will use this information to ensure the right job seekers are matched with the employer.

Services

The Business Services Team will support the Job Centers through primary focus on:

- Soliciting and managing exclusive job orders responsive to customers; and
- Promoting and managing customized recruitment events for customers; and
- Promoting Training and Hiring Incentives such as OJT to employers and working with Job Center to recruit talent; and
- Seeking employers who will commit to using the National Career Readiness Certificate (NCRC) in their recruitment process; and supporting the South Central Region's Certified Work Ready Community initiatives.

Describe the strategies and services that will be used to facilitate engagement of employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations.

The Business Services Team will engage local businesses by attending local chamber meetings, economic development meetings, NEXUS meetings, various industry-related meetings/events, and email/social media outreach.

- Job Matching/Job Orders (MoJobs) Job Development
- Job Fairs
- Work Experience On-the-Job Training
- Incumbent Worker Training/Missouri One Start Program Apprenticeships/Pre-Apprenticeship
- WorkKeys/National Career Readiness Certificate (NCRC)
- Certified Work Ready Communities Initiative
- Veterans Programs
- Career Pathways/Industry Sector initiatives
- Employer Input (Job Centers of the Future Initiative)
- Employment Transition Business Consulting
- Work Opportunity Tax Credits (WOTC)

Talent Recruitment Services

Job Matching Services and Job Order Services are provided at no cost to employers in partnership with the Poplar Bluff and West Plains Job Centers. Employers will be provided access to the MoJobs system and additional Job Center services including Job Fairs and other recruitment opportunities.

Work-Based Learning

Work-based learning programs, such as On-the-Job Training (OJT), Work Experience, Internships, Incumbent Worker Training, Transitional Jobs, and Customized Training. Include processes to target and encourage employer participation.

Regional Apprenticeship Plan

A regional apprenticeship plan has been developed to support registered apprenticeship/pre-apprenticeship training coordination in partnership with Missouri State University – West Plains.

WorkKeys/NCRC/WorkReady Communities

The South Central Region Workforce Investment Board supports the designation of this initiative. Ripley County has been a leader in the state of Missouri regarding the development and utilization of the Curriculum and the promotion of the National Career Readiness Certificate (NCRC) designed to strengthen the foundational skills of job seekers to promote employment and workplace success. The Job Centers, local schools and local businesses have an established process for allowing all workforce system customers every opportunity to attain the NCRC.

The Business Services Team will emphasize and promote the National Career Readiness Certificate (NCRC) as a value-added product/service for job seekers and business customers in Missouri's Job Centers. Job Center staff will provide information about the NCRC to individual job seekers and initiate the process for testing.

Veteran's Services

Workforce staff are available in Missouri Job Centers statewide to provide a full array of employment services to assist veterans and employers including the following programs: such as Missouri Heroes Connect and On-the-Job Training.

Career Pathways/Industry Sector initiatives

The Business Services Team supports the development of career pathway exploration/navigation programs and events that provide industry sector talent recruitment and development. Job Fairs provide opportunities to connect employers with job seekers focused on career pathways and sustained talent development.

Job Centers Connect Initiative

In addition to employer outreach and engagement, the Business Services Team encourages employer input to continuously improve and enhance service capability. The Business Services Team supports the Job Centers Connect initiative and actively seeks participation and input from area employers that are transformed into strategic goals/actions designed to provide increased value and service quality for employers and job seekers.

Effectiveness in Serving Employers Performance Measures

The South Central Region will address the WIOA Effectiveness in Serving Employer performance measure by engaging new employers, connecting employers with skilled workers, building ongoing, productive relationships with employers and industry sectors, and by providing employers with quality Job Center services. Business Service staff will ensure that appropriate employer services are posted in the Statewide case-management system. Staff will refer to the State's most current policy on services and definitions.

Business Services Team:

Heather Wolfe, Office of Workforce Development

Erin Hand, OWD

Steve McCann, OWD

Joan Wright, Adult Education & Literacy

Robin Thomas, Vocational Rehabilitation

Trevor Cressman, Missouri State University

Leann Clark, Three Rivers Community College

Vickey Bonney, Business Support Unit

Glen Farrow, Business Support Unit

Phyllis Guthrie, South Central Workforce Investment Board

Scott Davis, South Central Workforce Investment Board



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Employment Transition Team Policy

Employment Transition Team (ETT) activities will be coordinated with the statewide ETT team. The main objective will be to market the services available at the Job Centers. Staff will initiate contact with the company to explain Job Center services and schedule ETT activities that may include employer consultations and employee meetings.

In response to notification of a layoff or closure, the state ETT Coordinator will provide the above agencies with information regarding services the ETT Unit, the Job Center and other state agencies can provide. Job Center staff will establish contact with community agencies, employers, chambers of commerce and other social services organizations in the LWIA. The Job Center staff may coordinate with the state ETT Coordinator to make presentations to local organizations and chamber of commerce on programs and services available. The Job Center staff will also suggest ways in which local community agencies can provide assistance for affected workers and the community. In the event of a mass layoff, the Job Center staff will assist the state ETT Unit in coordination of community services.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central WORKFORCE *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Incumbent Worker Training (IWT) Program

Incumbent Worker Training is a work based training strategy that ensures employees of a company are able to gain the skills necessary to retain employment or avert layoff. This policy is written to provide direction to the program operators with regard to allowable funding expenditures for work based training and establishes guidelines and requirements to prevent duplication of training funds. The local board has established this policy and definitions to determine which workers, or groups of workers, and which employers are eligible for incumbent worker services. Under section 134(d)(4) of WIOA and 20 CFR 680.800, twenty (20) percent of Adult and Dislocated Worker Funds may be used to provide IWT training activities.

IWT guidelines are the following

- Employer guidelines
 - First consideration will be given to employers who have **NOT** used the IWT program the previous three (3) years.
 - If funding is still available for the program the 4th quarter of the program year, employers who have used the IWT program in the previous three (3) years will be eligible to apply.
- Characteristics of the participants in the program
 - An incumbent worker does not have to meet the eligibility requirements for career and training services for Adults or Dislocated Workers.
 - An eligible incumbent worker is an employee working a minimum of an average of 32 hours per week employed at the respective employer for more than six consecutive months.
- Relationship of the training to the competitiveness of a participant
 - Training must assist workers in obtaining skills necessary to either retain employment or avert layoff.
 - Documentation of increased skills must be obtained, such as an industry-recognized credential, or a promotion, that correlates to the job and employer.
- Relationship of the training to the competitiveness of an employer
 - Employer must not be eligible for, or participating in, the State's Missouri works Training.
 - Employers must be established businesses in growth industries.
 - Documentation must demonstrate what has changed within the industry that requires training to stay competitive or avert layoff.
 - Employers cannot be family owned and operated.

- The number of employees trained
 - There is no minimum or maximum on the number of employees trained in a program year.
- Wages and benefits
 - A wage increase of at least 1% or access to company-provided benefits including healthcare for the participant within 60 days of the successful completion of training.
- In-kind matching resources
 - At a minimum, employers are required to provide a cash and/or in-kind contribution equal to 50% of the grant amount.
- Collective Bargaining
 - Union concurrence with the training service is required if the employer is covered by a collective bargaining agreement.
- Reporting
 - Reporting on employee and employer performance is required.
- Application
 - Employers must complete and submit an Incumbent Worker Training Application to Program Operator for approval.
 - All employer applications must be reviewed by the WIB Executive Director prior to approval for training funds.
- Payment/Reimbursement
 - Payment or reimbursement to employer will only be paid after wage increase is met and documented.

Workforce Innovation and Opportunity Act of 2015, Department of Labor Final Rules, OWD Issuance 23-2017, RSMo 620.809.4.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



Effective: April 23, 2024

Subject: Reasonable Accommodation Plan

The South Central Region Procedures fully comply with the requirements of the Rehabilitation Act of 1973. Under the law, The South Central region must provide reasonable accommodation to qualified program applicants or participants with disabilities, unless to do so would cause undue hardship. The region is committed to providing reasonable accommodations to its applicants for services and participants to ensure that individuals with disabilities enjoy equal access to all program opportunities.

The region provides reasonable accommodations:

- when an applicant with a disability needs an accommodation to have an equal opportunity to receive services;
- when a participant with a disability needs an accommodation to participate in services at the Job Center; and
- when a participant with a disability needs an accommodation to enjoy equal access to services and benefits of participation in the Job Center programs.

The South Central region will process requests for reasonable accommodation and will provide reasonable accommodations where appropriate, in a prompt and efficient manner in accordance with the time frames set forth in this Plan.

A. Requesting Reasonable Accommodation

Generally, a program applicant or participant must let the Job Center know that he needs an adjustment or change concerning some aspect of the application process, the participation in, or a benefit of services for a reason related to a medical condition. A request does not have to include any special words, such as "reasonable accommodation," "disability," "medical condition" or "Rehabilitation Act". A request is any communication in which an individual asks or states that she needs the Job Center to provide or to change something because of a need. Staff do not need to be told what the medical condition is or get proof of that condition before providing a no-cost accommodation. A **program applicant or participant** may request a reasonable accommodation at any time, **orally or in writing**. An individual may request a reasonable accommodation to any staff member in the Job Center. *If the requested accommodation does not cost money to provide, is provided through a statewide contract, or will not disrupt the services at the job center, all staff have the ability to grant the request as soon as it is made.*

For reasonable accommodations that will be provided with local funds, Job Center staff must let the EO Officer know within two business days of the request. The program applicant/participant with the assistance of the Job Center staff, if needed, will complete the SCWIB Accommodation Request Form (Attachment 1)



B. Processing the Request

The South Central Region Equal Opportunity Officer (EO) is responsible for processing requests for reasonable accommodation. The SCWIB Executive Director will designate another SCWIB staff member or board member to act as a back-up for the EO to process requests when the EO is unavailable for any length of time (e.g., the EO is on vacation or out on extended leave). While the EO has responsibility for processing requests for reasonable accommodation, the EO may work closely with Job Center staff and the SCWIB Board of Directors when responding to the request, particularly those involving participation in training programs outside of the Job Center. The EO will need to consult with a program applicant's/participant's case manager/WE supervisor/instructor to gather relevant information necessary to respond to a request and to assess whether a particular accommodation will be effective. No reasonable accommodation involving participation in an intensive or training activity will be provided without first informing the participant's supervisor or instructor, as appropriate.

C. The Interactive Process

Generally, after a request for accommodation has been made, the next step is for the parties to begin the interactive process to determine what, if any, accommodation should be provided. This means that the individual requesting the accommodation and the EO must communicate with each other about the request, the precise nature of the problem that is generating the request, how a disability is prompting a need for an accommodation, and alternative accommodations that may be effective in meeting an individual's needs.

The EO will contact the program applicant or participant within 10 business days after the request is made (even if the request is initially made to someone else) to begin discussing the accommodation request. In some instances, the EO may need to get information to determine if an individual's impairment is a "disability" under the Rehabilitation Act or to determine what would be an effective accommodation. Such information may not be necessary if an effective accommodation is obvious, if the disability is obvious (e.g., the requestor is blind or has paraplegia) or if the disability is already known to the Job Center (e.g., the requestor previously asked for an accommodation and information submitted at that time showed a disability existed and that there would be no change in the individual's medical condition).

Communication is a priority throughout the entire process, but particularly where the specific limitation, problem, or barrier is unclear; where an effective accommodation is not obvious; or where the parties are considering different forms of reasonable accommodation. Both the individual making the request and the decision maker should work together to identify effective accommodations.

When a third party, (e.g., an individual's doctor or another program staff person) requests accommodation on behalf of a program applicant or participant, the EO should, if possible, confirm with the program applicant or participant that he wants a reasonable accommodation before proceeding. Where this is not possible, the EO will process the third party's request if it seems appropriate and will consult directly with the individual needing the accommodation as soon as practicable.



D. Requests for Medical Information

If a requestor's disability and/or need for accommodation are not obvious or already known, the South Central region (specifically the EO) is entitled to ask for and receive medical information showing that the requestor has a covered disability that requires accommodation.

A disability is obvious or already known when it is clearly visible or the individual previously provided medical information showing that the condition met the Rehabilitation Act definition. It is the responsibility of the program applicant/participant to provide appropriate medical information requested by the region where the disability and/or need for accommodation are not obvious or already known.

Only the EO may determine whether medical information is needed and, if so, may request such information from the requestor and/or the appropriate health professional. Even if medical information is needed to process a request, the EO does not necessarily have to request medical documentation from a health care provider; in many instances the requestor may be able to provide sufficient information that can substantiate the existence of a "disability" and/or need for a reasonable accommodation. If an individual has already submitted medical documentation in connection with a previous request for accommodation, the individual should immediately inform the EO of this fact. The EO will then determine whether additional medical information is needed to process the current request.

If the initial information provided by the health professional or volunteered by the requestor is insufficient to enable the EO to determine whether the individual has a "disability" and/or that an accommodation is needed, the EO will explain what additional information is needed. If necessary, the individual should then ask his/her health care provider or other appropriate professional to provide the missing information. The EO may also give the individual a list of questions to give to the health care provider or other appropriate professional to answer. If sufficient medical information is not provided by the individual after several attempts, the EO may ask the individual requesting accommodation to sign a limited release permitting the EO to contact the provider for additional information. The EO may have the medical information reviewed by a doctor of the agency's choosing, at the agency's expense.

In determining whether documentation is necessary to support a request for reasonable accommodation and whether a program applicant or participant has a disability within the meaning of the Rehabilitation Act, the EO will be guided by principles set forth in the ADA Amendments Act of 2008. Specifically, the ADA Amendments Act directs that the definition of "disability" be construed broadly and that the determination of whether an individual has a "disability" generally should not require extensive analysis. Notwithstanding, the EO may require medical information in order to design an appropriate and effective accommodation.

A case manager, WE supervisor or instructor who believes that a participant may no longer need a reasonable accommodation should contact the EO. The EO will decide if there is a reason to contact the participant to discuss whether s/he has a continuing need for reasonable accommodation.



E. Confidentiality Requirements

Under the Rehabilitation Act, medical information obtained in connection with the reasonable accommodation process must be kept confidential. This means that all medical information that the South Central region obtains in connection with a request for reasonable accommodation must be kept in files separate from the individual's program file. This includes the fact that an accommodation has been requested or approved and information about functional limitations. It also means that any region employee who obtains or receives such information is strictly bound by these confidentiality requirements.

The EO may share certain information with a participant's WE supervisor or instructor(s) as necessary to make appropriate determinations on a reasonable accommodation request. Under these circumstances, the EO will inform the recipients about these confidentiality requirements. The information disclosed will be no more than is necessary to process the request. In certain situations, the EO will not necessarily need to reveal the name of the requestor and/or the office in which the requestor receives service, or even the name of the disability.

EXAMPLE

The IT department generally will be consulted in connection with requests for assistive technology for computers. While IT needs to know the participant's functional limitations, it typically has no need to know the participant's specific disability.

- In addition to disclosures of information needed to process a request for accommodation, other disclosures of medical information are permitted as follows:
- case managers/WE supervisors/instructors are entitled to whatever information is necessary to implement restrictions on the work or duties of the participant or to provide a reasonable accommodation;
- first aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment or assistance in evacuation; and
- government officials may be given information necessary to investigate the region's compliance with the Rehabilitation Act.

F. Time Frame for Processing Requests and Providing Reasonable Accommodations

1. Generally

The time frame for processing a request (including providing accommodation, if approved) is as soon as possible but no later than 30 business days from the date the request is made. This 30-day period includes the 10-day time frame in which the EO must contact the requestor after a request for reasonable accommodation is made.

South Central region will process requests and, where appropriate, provide accommodations in as short a period as reasonably possible. The time frame above indicates the maximum amount of time it should generally take to process a request and provide a



reasonable accommodation. The EO will strive to process the request and provide an accommodation sooner, if possible. Unnecessary delays can result in a violation of the Rehabilitation Act.

The time frame begins when an oral or written request for reasonable accommodation is made, and not necessarily when it is received by the EO **Therefore, everyone involved in processing a request should respond as quickly as possible.** This includes referring a request to the EO, contacting a doctor if medical information or documentation is needed, and providing technical assistance to the EO regarding issues raised by a request (e.g., information from a WE supervisor regarding the essential functions of an employee's position, information from IT regarding compatibility of certain adaptive equipment with the region's technology).

If the EO must request medical information or documentation from a requestor's doctor, the time frame will stop on the day that the EO makes a request to the individual to obtain medical information or sends out a request for information/documentation, and will resume on the day that the information/documentation is received by the EO.

If the disability is obvious or already known to the EO, if it is clear why reasonable accommodation is needed, and if an accommodation can be provided quickly, then the EO should not require the full 30 business days to process the request.

2. Expedited Processing of a Request

In certain circumstances, a request for reasonable accommodation requires an expedited review and decision. This includes where a reasonable accommodation is needed:

- to enable an applicant to apply for a the program or a job. Depending on the timetable for receiving applications, conducting interviews, taking tests, and making hiring decisions, there may be a need to expedite a request for reasonable accommodation to ensure that an applicant with a disability has an equal opportunity to apply for a job or program services.
- to enable a participant to attend a meeting/class scheduled to occur soon. For example, a participant may need a sign language interpreter for a meeting/class scheduled to take place in 5 days.

3. Extenuating Circumstances

These are circumstances that could not reasonably have been anticipated or avoided in advance of the request for accommodation, or that are beyond the region's ability to control. When extenuating circumstances are present, the time for processing a request for reasonable accommodation and providing the accommodation will be extended as reasonably necessary. Extensions will be limited to circumstances where they are absolutely necessary and only for as long as required to deal with the extenuating circumstance.



G. Resolution of the Reasonable Accommodation Request

All **decisions** regarding a request for reasonable accommodation will be communicated to a program applicant or participant by use of email, regular mail, or phone, as well as orally.

1. If region **grants a request for accommodation**, the EO will give a letter to the requestor, and discuss implementation of the accommodation. The letter will be completed even if the region is granting the request without determining whether the requestor has a “disability” and regardless of what type of change or modification is approved.
 - A decision to provide an accommodation other than the one specifically requested will be considered a decision to grant an accommodation. The letter will explain both the reasons for the denial of the individual’s specific requested accommodation and why the region believes that the chosen accommodation will be effective.
 - If the request is approved but the accommodation cannot be provided immediately, the EO will inform the individual in writing of the projected time frame for providing the accommodation.
2. If the region **denies a request for accommodation**, the EO will provide a letter to the requestor and discuss the reason(s) for the denial. When completing the letter, the explanation for the denial will clearly state the specific reason(s) for the denial. This means that the region cannot simply state that a requested accommodation is denied because of “undue hardship” or because it would be “ineffective.” Rather, the letter will state and the EO will explain specifically **why** the accommodation would result in undue hardship or why it would be ineffective.
 - If there is a legitimate reason to deny the specific reasonable accommodation requested (e.g., the accommodation poses an undue hardship or is not required by the Rehabilitation Act), the EO will explore with the individual whether another accommodation would be possible. The fact that one accommodation proves ineffective or would cause undue hardship does not necessarily mean that this would be true of another accommodation. Similarly, if a program applicant/participant requests removal of an essential program element or some other action that is not required by law, the EO will explore whether there is a reasonable accommodation that will meet the individual’s needs.
 - If the EO offers an accommodation other than the one requested, but the alternative accommodation is not accepted, the EO will record the individual’s rejection of the alternative accommodation in the confidential record.

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H. Informal Dispute Resolution

An individual dissatisfied with the resolution of a reasonable accommodation request can ask the Chairman of the SCWIB Board of Directors to reconsider that decision. An individual must request reconsideration within **10 business days** of receiving the letter from the EO.



I. Information Tracking and Reporting

In order for the region to ensure compliance with these Procedures and the Rehabilitation Act, the EO will maintain a "Reasonable Accommodation Information Reporting" excel spreadsheet.

This document will be the basis of an annual report to be issued to the SCWIB Board of Directors that will provide a qualitative assessment of the region's reasonable accommodation program, including any recommendations for improvement of the region's reasonable accommodation policies and these Procedures. This annual report **will not contain confidential information about specific requests for reasonable accommodations, such as the names of individuals that requested accommodations or the accommodations requested by specific individuals.** Rather, this report will provide only general information, such as the total number of requests for accommodations, the types of accommodations requested, and the length of time taken to process requests.

J. INQUIRIES AND DISTRIBUTION

Anyone wanting further information concerning this Plan may contact the Equal Opportunity Officer (EO) via e-mail at lengelhardt@scwib.org. Program Applicants may contact the EO at lengelhardt@scwib.org or by calling (417) 257-2630 or MO Relay 711.

This Plan shall be distributed to all Job Center staff upon issuance, and annually thereafter. They also will be posted on SCWIB website www.scwib.org. This Plan will be provided in alternative formats when requested from the EO by, or on behalf of, any program applicant or participant.



Effective: April 23, 2024

Subject: Confidentiality Policy

South Central Workforce Investment Board (SCWIB) of Directors members, committees, and individuals or businesses which have entered into information-sharing agreements and/or arrangements are subject to this policy, and are required to sign an acknowledgement and agreement to this policy.

Information obtained in the course of SCWIB's activities, shall be kept in confidence unless

- (1) Written permission to release the information has been received by/from the person(s) involved,
- (2) The information is required by law to be made available to the public upon request, (3) The information is required by law to be disclosed to a third party, or
- (4) The information is relevant to be disclosed according to the applicable provisions of the SCWIB Bylaws and the Division of Workforce Development policies.

Confidential information shall not be used for monetary gain or business advancement.

Nothing in the above statements shall be interpreted in such a way as to impair a member of the Board of Directors in the discharge of the duty to communicate as set forth throughout the Bylaws. It shall be the responsibility of the Executive Director of SCWIB to comply with any federal, state, or provincial written requests for information by an applicable governmental body.

This policy supersedes all previous confidentiality policies.

Agreement and Acknowledgement

I affirm that I shall be bound by the above confidentiality policy of the South Central Workforce Investment Board (SCWIB). I understand that in my official capacity I may not reveal any information I receive to any other person. I recognize that the violation of this agreement by the improper use or disclosure of confidential information may expose me to legal action and the imposition of monetary damage if found liable.

Agreed and acknowledged by:

Name: _____
Please Print

Signature: _____ **Date:** _____

Status: Check all the box(es) applicable to you.

- Board of Directors Member
- Committee Member, Committee Name(s): _____
- Sub-Contractor/Vendor Name(s): _____
- SCWIB Staff



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Adult and Dislocated Worker Follow-Up Policy

The South Central Workforce Investment Board (SCWIB) recognizes the importance of ensuring effective follow-up services to individuals who have participated in programs funded under the Workforce Innovation and Opportunity Act (WIOA). This policy establishes guidelines for tracking participant performance and providing comprehensive services for 12 months after program completion. Guidance from the Department of Labor (DOL) Employment and Training Administration (ETA) defines the “point of exit” for performance reporting. For WIOA Title I Adult and Dislocated Worker, WIOA Title I Youth, WIOA Title III Wagner Peyser (WP), and Trade Adjustment Assistance (TAA) programs, “point of exit” is the last date of service. Participants will exit the program(s) having gone 90 days without receiving a countable service, for performance-accountability purposes this guidance also establishes a policy restricting program operators from controlling the date of exit from the workforce programs included in the Primary Indicators of Performance.

After Exit Follow-Up Requirements for WIOA Adult and Dislocated Worker:

Staff must follow up with WIOA participants, as necessary, to provide accurate reporting on the WIOA indicators of performance measures. Data will be collected through various methods, including participant self-reporting, employer verification, and data sharing agreements with relevant agencies and organizations. Efforts will be made to ensure data accuracy and confidentiality.

Employment/Wage Data

All Adult and Dislocated Worker participants that are not showing on performance rosters as reporting wages must have the follow-up tabs for the 2nd and 4th quarter after exit completed.

1. SCWIB staff will issue a report during the last month of each quarter showing the participants that must be contacted for follow-up.
2. Staff must contact participants if a wage match is not made to obtain documentable supplemental employment information (i.e., paystub or signed statement).
 - a. If the individual is employed and supplemental employment wage information is collected, then staff must enter the appropriate information on the correlating follow-up tab (i.e., 2nd quarter, or 4th quarter after exit) by the due date. Documentation must follow the most current DOL regulations on the subject.
 - b. If the individual is not employed, staff must note this in the follow-up tab and offer follow-up services which may include:
 - i. Comprehensive Case Management: Upon exiting, staff are required to provide ongoing support and guidance for a period of 12 months. Staff will work closely with participants to assess their individual needs and develop personalized career plans.
 - ii. Job Placement Assistance: staff will facilitate job placement services, including job search assistance, resume writing, interview preparation, and job matching. Participants will receive continued support in their efforts to secure and retain employment.

iii. Referral Services: Participants will be connected to WIOA partners for additional services, such as counseling, transportation assistance, childcare, or housing resources, as needed. Referrals will be made to community organizations or agencies specializing in the respective areas of assistance.

3. Staff must attempt to use different avenues to contact the participants. Staff must document each attempt to obtain this information either in the follow-up tab or in Case Notes.

Training Related Employment Data

For participants that received WIOA Title I funded training services:

1. Staff will use statewide case-management system report data to identify the participants that need contacted.
2. Staff must contact the participant to verify if they are working in an occupation related to their WIOA funded training.
3. Staff must complete the follow-up tab for the 2nd quarter after exit.
4. Staff must attempt to use different avenues to contact the participants. Staff must document each attempt to obtain this information either in the follow-up tab or in Case Notes.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Youth Follow-Up Policy

The South Central Workforce Investment Board (SCWIB) recognizes the importance of ensuring effective follow-up services to individuals who have participated in programs funded under the Workforce Innovation and Opportunity Act (WIOA). This policy establishes guidelines for tracking participant performance and providing comprehensive services for 12 months after program completion. Guidance from the Department of Labor (DOL) Employment and Training Administration (ETA) defines the “point of exit” for performance reporting. For WIOA Title I Adult and Dislocated Worker, WIOA Title I Youth, WIOA Title III Wagner Peyser (WP), and Trade Adjustment Assistance (TAA) programs, “point of exit” is the last date of service. Participants will exit the program(s) having gone 90 days without receiving a countable service, for performance-accountability purposes this guidance also establishes a policy restricting program operators from controlling the date of exit from the workforce programs included in the Primary Indicators of Performance.

After Exit Follow-Up Requirements for WIOA Youth:

Staff must follow up with WIOA participants, as necessary, to provide accurate reporting on the WIOA indicators of performance measures. Data will be collected through various methods, including participant self-reporting, employer verification, and data sharing agreements with relevant agencies and organizations. Efforts will be made to ensure data accuracy and confidentiality.

1. Staff will utilize a statewide case-management system report to identify the Youth participants that needed contacted in a particular quarter.
2. Staff must complete the WIOA follow-up tab for all four quarters after exit sections by the due date shown in the statewide case-management system.
 - a. Staff must complete all exit information which includes, but is not limited to:
 - i. Entered employment and wage information;
 - ii. School status;
 - iii. Youth placement; and
 - iv. Credential obtainment.
3. If the youth participant is not employed, staff must note this in the follow-up tab and offer follow-up services which may include:
 - i. Comprehensive Case Management: Upon exiting, staff are required to provide ongoing support and guidance for a period of 12 months. Staff will work closely with participants to assess their individual needs and develop personalized career plans.

- ii. Job Placement Assistance: staff will facilitate job placement services, including job search assistance, resume writing, interview preparation, and job matching. Participants will receive continued support in their efforts to secure and retain employment.
- iii. Referral Services: Participants will be connected to WIOA partners for additional services, such as counseling, transportation assistance, childcare, or housing resources, as needed. Referrals will be made to community organizations or agencies specializing in the respective areas of assistance.
- iv. For Youth participants only, supportive services may be available following the local supportive services policy.

4. Staff must attempt to use different avenues to contact the participants. Staff must document each attempt to obtain this information either in the follow-up tab or in Case Notes.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: Harassment and Discrimination Policy

The South Central Workforce Investment Board (SCWIB) is committed to providing a work environment free of unlawful harassment and discrimination for all employees, subcontractors, partners, and customers. This policy prohibits discrimination, in any fashion, as well as retaliation against harassment and discrimination complaints.

WIOA (29 CFR 38.18) states that harassment of an individual based on race, color, religion, sex, national origin, age, disability, or political affiliation or belief whether actual or perceived, or, for beneficiaries, applicants, and participants only, based on citizenship status or participation in any WIOA Title I- financially assisted program or activity, is a violation of the nondiscrimination provisions of WIOA and this part.

This policy aligns with nondiscrimination and equal opportunity provisions of the following laws for participants, employees, and the general public:

- Section 188 of WIOA (race, color, religion, sex, national, origin, age, disability, or political affiliation or belief, or citizenship (participants only)
- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- The Age Discrimination Act of 1975 (any age)
- Title IX of the Education Amendments of 1972, and (sex)
- Any other nondiscrimination and equal opportunity federal laws

Employees as well as non-employees are prohibited from harassing or discriminating against staff, customers, and partner employees whether or not the incidents of harassment or discrimination occur on employer premises and whether or not the incidents occur during work hours. Behavior covered by this policy may extend beyond the normal work hours and occur at conferences, meetings, or other events and electronic activity including social media. An incident may be considered harassment or discrimination even if the accused party did not intend to be offensive.

This policy does not supersede any subcontractor or partner agency's policy on harassment, discrimination, and retaliation and each agency housed in the Missouri Job Centers shall be expected to have policies and procedures to address harassment, discrimination, and retaliation.

Discriminatory Harassment

Prohibited conduct includes unwelcome conduct, whether verbal, physical, or visual, that is toward another based on a protected category, and 1) has the purpose or effect of creating an intimidating, hostile or offensive working environment; 2) has the purpose or effect of unreasonably interfering with an individual's work performance; or 3) otherwise adversely affects an individual's employment opportunities.

Protected Categories

Categories of individuals protected by law and/or executive order from a form of discrimination such as: age, ancestry, color, disability, genetic information, military/veteran status, national origin, pregnancy, race, religion, or sex (including sexual orientation and gender identity). Under the scope of WIOA there are additional protected categories: Political affiliation or belief, national origin (including limited English proficiency), or against any beneficiary of, applicant to, or participant in programs financially assisted in the Title I of the Workforce Innovation and Opportunity Act, based on the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

The following is a non-exclusive list of examples of prohibited conduct. The following behaviors will not be tolerated under any circumstance, whether or not the behaviors alone constitute discriminatory harassment or create a hostile work environment:

- Epithets, "jokes," or offensive or derogatory comments based upon an individual's sex, race, color, religion, national origin, age, disability, or sexual orientation.
- Ethnic slurs, workplace graffiti, or any offensive conduct directed towards an individual's birthplace, ethnicity, culture, or accent.
- Negatively stereotyping an individual based upon one of the protected categories listed in this policy.
- Making, posting, e-mailing, or circulating written or graphic materials that denigrate or show hostility toward an individual based upon his or her protected status.
- Any other threatening or intimidating act that relates to one (or more) of the protected categories.

Sexual Harassment

Sexual harassment is unwelcome verbal, non-verbal or physical conduct of a sexual nature that affects an employment decision, unreasonably interferes with a individual's work performance or creates an intimidating, hostile, or abusive work environment. Sexual harassment can be physical and/or psychological in nature.

Prohibited behavior includes any unwelcome behavior of a sexual nature such as: sexual advances and propositions; requests for sexual favors; sexual jokes, comments, suggestions, or innuendo; foul or obscene gestures or language; display of foul or obscene or offensive printed or visual material; physical contact such as patting, pinching, hugging, or brushing against another individual's body; and any other unwelcome verbal, physical or visual conduct of a sexual nature where:

1. Submission to such conduct is an explicit or implicit condition of employment; or
2. Submission to or rejection of such conduct is used as a basis for employment-related decisions such as a promotion, discharge, performance evaluation, pay adjustment, discipline, work assignment or any other condition of employment or career development; or

3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, abusive or offensive working environment.

Sexual harassment can involve males or females being harassed by members of either sex. Although sexual harassment typically involves a person in a greater position of authority as the harasser, individuals in positions of lesser or equal authority also can be found responsible for engaging in prohibited harassment.

Sexual harassment based on gender identity; harassment based on failure to comport with sex stereotypes; harassment based on pregnancy, childbirth, and related medical conditions; and sex-based harassment that is not sexual in nature but that is because of sex or where one sex is targeted for the harassment.

Sexual harassment can be physical and/or psychological in nature. An aggregation of a series of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

Individuals who engage in sexual harassment, as defined by this policy, will be subject to disciplinary action.

Reporting Harassment or Discrimination

Individuals who believe they are being subjected to such conduct are encouraged to promptly advise the offender that his or her behavior is unwelcome and to request that it be discontinued. Often, this task alone will stop or prevent the action.

All employees, subcontractors, and partners are encouraged to report all perceived incidents, whether experienced or witnessed, of discrimination, harassment, or retaliation, regardless of the offender's identity or position. Individuals should follow the procedures of reporting such activities according to their employer of record's established procedures. If unsure, the staff member should report it to their supervisor of record, Director, or Human Resources.

The SCWIB, subrecipients, and partners shall be expected to thoroughly investigate all reports of harassment as discreetly and confidentially as reasonably possible. If an incident involves personnel from more than one agency, it shall be the responsibility of the original agency's human resources department to contact the other agency's human resource department.

Individuals who engage in harassment, discrimination and retaliation will be subject to disciplinary action, up to and including termination from employment.

Retaliation

It is against this policy to retaliate against any employee, subcontractor, or partner for filing a complaint of discriminatory harassment or for cooperating in an investigation of a complaint of discriminatory harassment. Retaliation should be reported immediately when an individual believes they have experienced retaliation because of filing an incident of harassment, discrimination or due to participation in a related investigation. Employees who retaliate against another employee for filing a complaint or participating in an investigation of

harassment or discrimination shall be subject to disciplinary action.

Confidentiality

All inquiries, complaints, and investigations are treated confidentially unless legally required to be disclosed. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept confidential and maintained in a secure file.

Alternative Reporting Options

If you think you have been subjected to discrimination or harassment 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 Local or State Equal Opportunity Officer:

**Lisa Engelhardt,
South Central Workforce Investment Board
408 Washington Ave., Suite 210
West Plains, MO 65775
(417) 257-2630 ext. 210
lengelhardt@scwib.org**

If you think 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:

**State WIOA Equal Opportunity Officer:
Danielle Smith
301 W High Street
P.O. Box 1087
Jefferson City, MO 65102
Telephone: (573) 751-2428 or Fax: (573)751-4088
Email : Danielle.smith@dhewd.mo.gov**

OR

**The 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**



South Central **WORKFORCE** *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: Nondiscrimination Policy

The nondiscrimination and equal opportunity provisions of the Section 188 of Workforce Innovation and Opportunity Act (WIOA) prohibit discrimination against applicants, beneficiaries, and employees on the bases of race, color, national origin, age, disability, sex, religion, and political affiliation or belief whether it be actual or perceived; and for beneficiaries only, citizenship or participation in a WIOA Title I-financially assisted program or activity. The regulations that implement these provisions are published at 29 CFR Part 38 and require that each local workforce development area to formulate a standard for corrective and remedial actions to be applied to recipients of WIOA Title I funds when The South Central Workforce Investment Board (SCWIB) is apprised of any violations of WIOA Section 188, 29 CFR Part 39, or the Missouri Nondiscrimination Plan or of any of the implementing plans or policies described herein.

The SCWIB and its subrecipients will adhere to the [Missouri Nondiscrimination Plan](#), which further details the responsibilities of WIOA recipients with respect to equal opportunity and nondiscrimination.

This policy aligns with nondiscrimination and equal opportunity provisions of the following laws for participants, employees, and the general public:

- Section 188 of WIOA (race, color, religion, sex, national, origin, age, disability, or political affiliation or belief, or citizenship (participants only))
- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 504 of the Rehabilitation Act of 1973 (disability)
- The Age Discrimination Act of 1975 (any age)
- Title IX of the Education Amendments of 1972, and (sex)
- Any other nondiscrimination and equal opportunity federal laws

Service Providers

Service Providers, Eligible Training Providers, On-the-Job Training (OJT) providers and other WIOA recipients must comply with the accessibility polices and standards in the Missouri's Nondiscrimination Plan according to 29 CFR 38.3(b), 38.13 and 38.25 and this policy.

Job Training Plans and Contracts

The SCWIB will monitor job training plans, contracts, and any similar agreements to ensure any WIOA recipient's contracts contain the required assurance language according to 29 CFR 38.25.

Equal Opportunity Officer Obligations

The Local Equal Opportunity Officer will:

- Be a senior-level employee reporting directly to the individual in the Local Board Director, the highest-level position of authority for the entity.
- Fulfill the responsibilities of an EO Officer as described in 29 CFR 38.31;
- Publicly post name, position title, work address, and telephone number (voice and TDD/TTY).
- Ensure that the EO Officer's identity and contact information appear on all internal and external communications about the recipient's nondiscrimination and equal opportunity programs;
- Have sufficient authority, staff, and resources to support of top management, to ensure compliance with the nondiscrimination and equal opportunity provisions of WIOA and this part; and
- Have the opportunity to receive training necessary and appropriate to maintain competency.
- Serve as the recipient's liaison with the State EO Officer;
- Develop and publishing procedures for processing discrimination complaints and making sure those procedures are followed;
- Report to the appropriate official about equal opportunity matters;
- Ensure that the roles and duties of the Local EO Officers receive top priority to accomplish all of his/her responsibilities under WIOA Section 188 and 29 CFR 38.
- Monitor and investigate activities of the entities that receive WIOA Title I financial assistance from the recipient, to make sure that the recipient and its sub-recipients are not violating their nondiscrimination and equal opportunity obligations under WIOA Title I and 29 CFR Part 38
- Review written policies to ensure they are nondiscriminatory; and
- Coordinate WIOA EO activities, thus ensuring compliance, implementation, and enforcement of the nondiscrimination and equal opportunity provisions of WIOA.

Local Equal Opportunity Officer: Lisa

**Engelhardt,
South Central Workforce Investment Board 408
Washington Ave., Suite 210
West Plains, MO 65775
(417) 257-2630 ext. 210
lengelhardt@scwib.org**

Confidentiality

All inquiries, complaints, and investigations are treated confidentially unless legally required to be disclosed. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept confidential and maintained in a secure file.

Alternative Reporting Options

If you think 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:

State WIOA Equal Opportunity Officer: Danielle

Smith
301 W High Street
P.O. Box 1087
Jefferson City, MO 65102 Telephone: (573)
751-2428 or Fax: (573)751-4088
Email : Danielle.smith@dhewd.mo.gov OR

The 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

Missouri Commission on Human Rights (MCHR)

Any person claiming to be aggrieved by an unlawful discriminatory practice, as defined in Chapter 213, RSMo, may also file a complaint with the Missouri Commission on Human Rights at (573) 751-3325 within 180 days of the most recent alleged discrimination.

U.S. Equal Employment Opportunity Commission (EEOC)

If you believe that you have been discriminated against at work because of your race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information, you can file a Charge of Discrimination. A charge of discrimination is a signed statement asserting that an employer, union or labor organization engaged in employment discrimination. It requests EEOC to take remedial action. In general, you need to file a charge within 180 days from the day the discrimination took place. The EEOC can be contacted at 1-800-669-4000.

Equal Opportunity Notice/Poster

29 CFR 38.35 requires the Equal Opportunity notice/poster to include the following language:

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); or

The 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 Web site 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.

The Equal Opportunity notice/poster is available in twelve different languages, including English, as required under 29 CFR 38.9(b). The Equal Opportunity notices/posters can be located at <https://jobs.mo.gov/dwdeo>.

The Equal Opportunity notice/poster will be:

- Posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient's Web site pages;
- Disseminated in internal memoranda and other written or electronic communications with staff;
- Included in employee and participant handbooks or manuals regardless of form, including electronic and paper form if both are available; and (Provided to each participant and employee; the notice must be made part of each employee's and participant's file. It must be a part of both paper and electronic files if both are maintained.
- Provided in appropriate formats to registrants, applicants, eligible applicants/registrants, applicants for employment and employees and participants with visual impairments. Where notice has been given in an alternate format to registrants, applicants, eligible applicants/registrants, participants, applicants for employment, and employees with a visual impairment, a record that such notice has been given must be made a part of the employee's or participant's file.
- Provided to participants in appropriate languages other than English as required in § 38.9.

EO Notice/Poster Requirement for Service Providers

The SCWIB, service providers, and recipients must adhere to the Missouri Nondiscrimination Plan and the OWD's current policy on Disseminating Notices for Equal Opportunity Complaints and WIOA Complaints & Grievances

Communication of EO Notice/Poster in Orientations

Each orientation to new participants, new employees, and/or the general public to Missouri Job Center program or activity, in person or over the internet or using other technology a recipient must include a discussion of rights and responsibilities under Section 188 of WIOA which includes the right to file a complaint of discrimination with the recipient of the U.S. DOL Civil Rights Center Director according to 29 CFR 38.39. This information must be communicated in appropriate languages as required under 29 CFR 38.9 and in formats accessible for individuals with disabilities as required in 29 CFR 38.15.

Failure to Comply

WIOA recipients who fail to comply with regulations and provisions as described in WIOA Section 188, 29 CFR 38 and the Missouri Nondiscrimination Plan are subject to corrective and remedial actions designed to completely correct each violation. This action is necessary when a violation of the nondiscrimination and equal opportunity provisions of WIOA is identified because of a discrimination complaint, a monitoring review, or both a monitoring review and a discrimination complaint.

The SCWIB is responsible for developing and implementing a corrective action and sanction policy for its WIOA recipients in their service area to adhere to when violations occur with Section 188 of WIOA, 29 CFR 38 and the Missouri Nondiscrimination Plan.

Please refer to the local Corrective Action & Sanction Policy for more details.



South Central WORKFORCE Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: On-the-Job Training Policy

The purpose of this policy is to establish local guidelines for administering federally funded On-the-Job Training (OJT) programs. OJT is a tool to be used to assist in achieving training and placement goals for WIOA Adult, Dislocated Workers, and Youth participants. The South Central Workforce Investment Board (SCWIB) and all Job Center staff will adhere to Missouri's most current policy on WIOA On-the-Job Training located at jobs.mo.gov/owdissuances.

Dispute Resolution

Except in urgent or irreversible circumstances, the OJT participant will not be terminated without prior notice or without notification to the program operator's OJT representative. The employer must have an established informal grievance/complaint process by which the OJT participant can be heard. If the informal process does not settle the dispute, the employer agrees to advise the OJT participant of their rights and responsibilities regarding further dispute resolution options.

Nepotism

No person participating in the OJT program will be "hired by" and/or "supervised" by a relative of that person. For the purpose of this rule, relative is defined to include: mother, father, son, daughter, grandfather, grandmother, grandson, granddaughter, sister, brother, uncle, aunt, niece, nephew, cousin, step-parent, step-child, foster parent, foster-child, mother-in-law, father-in-law, sister-in-law and brother-in-law. An individual who "hires and/or supervises" refers to an individual who exercises authority to hire for the position, provides day-to-day training or direction, or keeps time and attendance records. In addition, owners are included as supervisors/hiring managers since they have general authority to supervise, hire and dismiss.

Agreement Modification

The OJT contract may be modified to adjust training end-date, the number of hours, the contract total amount, or for any other valid changes using the OJT Supplemental Agreement form.

Employed Workers Eligibility

The region does not provide OJT for employed workers at this time.

Registered Apprenticeships

Individual training accounts (ITAs) and OJT may be combined to place participants into a registered apprenticeship program. An ITA will be used to cover the classroom training portion of the apprenticeship, *please refer to the local ITA policy*, and OJT funds will be utilized to support the on-the-job training portion of the registered apprenticeship as described in this OJT policy.

Reimbursement

The SCWIB will utilize the reimbursement rate of 50%.



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: WIOA Adult and Dislocated Worker Experience Policy

Work Experience is a planned, structured learning experience that takes place in a workplace for a limited period and provides opportunities for career exploration and skills development. Work Experience may be paid or unpaid, as appropriate. A work experience workplace may take place in the private for-profit sector, the nonprofit sector, or the public sector. Labor standards apply in any work experience environment where an employee/employer relationship exists (as defined by Fair Labor Standards Act). Work Experience is an activity involving a time limited work assignment designed to develop specific job keeping skills and/or specific job skills. Work assignments shall include an evaluation of the skills developed during the assignment. Work Experience is provided to youth based on needs determined by a case manager's assessment and provided for in the Individual Service Strategy (ISS) and documented in service notes in Missouri's statewide case-management system.

The South Central Workforce Investment Board (SCWIB) and all Job Center staff will adhere to Missouri's most current policy on WIOA Youth Work Experiences located at jobs.mo.gov/owdissuances.

A pre-award evaluation will be conducted by Job Center staff. This evaluation will take place prior to placement and will include the completion of a Worksite Agreement and an acknowledgement of general assurances. Copies of each agreement will be placed in the participant file.

1. A worksite Agreement is required for each individual worksite. The Worksite Agreement must be signed by the Employer/Authorized Representative and Program Operators Authorized Agency staff before it is valid. General Assurances will be reviewed with the Employer prior to signature of the document.
2. Worksites will not use WIOA participants to replace regular unsubsidized employees. The training must not displace current employees (including a partial displacement, such as reduction in the hours of non-overtime work, wages, or employment benefits). A participant in a program or activity may not be employed in or assigned to a job if:
 - Any other individual is on layoff from the same or any substantially equivalent job;
 - The employer has terminated the employment of any regular unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the participant; or
 - The job is created in a promotional line that infringes in some way on the promotional opportunities of currently employed workers.

3. The hourly wage will be no less than the State/Local minimum wage.
4. SCWIB, the employer of record, and will provide worker's compensation coverage to the participant.
5. WIOA participants must complete all required new-hire paperwork prior to the hire/start date.
6. WIOA participants will be E-verified before or within 3 business days of the hire/start date.
7. WIOA participants will be paid only for actual hours worked. No pay will be given for lunch breaks, holidays, or absences. Overtime is prohibited.
8. Timesheets will be utilized by the participant and employer to record and approve time. Job Center staff will provide the Worksite Employer and participant with instructions.
 - A Supervisor must review the timesheet for accuracy.
 - The timesheet must be signed and dated by the participant, worksite supervisor and approved by Job Center staff.
 - Timesheets will be submitted to Job Center staff on a bi-weekly basis.
 - Payroll checks for hours worked will only to be issued from an approved time sheet.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central
WORKFORCE
Investment Board

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: WIOA Youth Work Experience Policy

Work Experience is a planned, structured learning experience that takes place in a workplace for a limited period and provides opportunities for career exploration and skills development. Work Experience may be paid or unpaid, as appropriate. A work experience workplace may take place in the private for-profit sector, the nonprofit sector, or the public sector. Labor standards apply in any work experience environment where an employee/employer relationship exists (as defined by Fair Labor Standards Act). Work Experience is an activity involving a time limited work assignment designed to develop specific job keeping skills and/or specific job skills. Work assignments shall include an evaluation of the skills developed during the assignment. Work Experience is provided to youth based on needs determined by a case manager's assessment and provided for in the Individual Service Strategy (ISS) and documented in service notes in Missouri's statewide case-management system.

The South Central Workforce Investment Board (SCWIB) and all Job Center staff will adhere to Missouri's most current policy on WIOA Youth Work Experiences located at jobs.mo.gov/owdissuances.

A pre-award evaluation will be conducted by Job Center staff. This evaluation will take place prior to placement and will include the completion of a Worksite Agreement and an acknowledgement of general assurances. Copies of each agreement will be placed in the participant file.

1. A worksite Agreements is required for each individual worksite. The Worksite Agreement must be signed by the Employer/Authorized Representative and Program Operators Authorized Agency staff before it is valid. General Assurances will be reviewed with the Employer prior to signature of the document.
2. Worksites will not use WIOA participants to replace regular unsubsidized employees. The training must not displace current employees (including a partial displacement, such as reduction in the hours of non-overtime work, wages, or employment benefits). A participant in a program or activity may not be employed in or assigned to a job if:
 - Any other individual is on layoff from the same or any substantially equivalent job;
 - The employer has terminated the employment of any regular unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the participant; or
 - The job is created in a promotional line that infringes in some way on the promotional opportunities of currently employed workers.

3. The hourly wage will be no less than the State/Local minimum wage.
4. SCWIB, the employer of record, and will provide worker's compensation coverage to the participant.
5. WIOA participants must complete all required new-hire paperwork prior to the hire/start date.
6. WIOA participants will be E-verified before or within 3 business days of the hire/start date.
7. WIOA participants will be paid only for actual hours worked. No pay will be given for lunch breaks, holidays, or absences. Overtime is prohibited.
8. Timesheets will be utilized by the participant and employer to record and approve time. Job Center staff will provide the Worksite Employer and participant with instructions.
 - A Supervisor must review the timesheet for accuracy.
 - The timesheet must be signed and dated by the participant, worksite supervisor and approved by Job Center staff.
 - Timesheets will be submitted to Job Center staff on a bi-weekly basis.
 - Payroll checks for hours worked will only to be issued from an approved time sheet.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



South Central **WORKFORCE** *Investment Board*

408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: July 23, 2024

Subject: Apprenticeship Policy

The South Central Workforce Investment Board will partner with State, Regional and Local partners, as opportunities arise, to meet the apprenticeship needs of local employers, sponsors, and apprentices.

All Registered Apprenticeship programs consist of the following five core components: direct business involvement, OJT, related instruction, rewards for skill gains, and a national occupational credential.

1. **Industry-Led.** Businesses are the foundation of every Registered Apprenticeship program, and the skills needed for workforce success form the core of the model. Businesses must play an active role in building Registered Apprenticeship programs and are involved in every step of their design and execution.
2. **On-the-Job Learning/Mentorship.** Every Registered Apprenticeship program includes structured OJT. Companies hire apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge the apprentice must learn over the course of the program to be fully proficient at the job.
3. **Supplemental Education.** Apprentices receive related instruction or classroom style training that complements the OJT. This instruction helps refine the technical and academic skills that apply to the job. Related instruction may be provided by a community college, technical school or college, an apprenticeship training school, or by the business itself. This instruction can be provided at school, online, or at the work site.
4. **Paid Job.** Apprentices earn wages while learning job skills and they receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate apprentices as they advance through training and become more productive and skilled at their job.
5. **National Occupational Credential.** Every graduate of a Registered Apprenticeship program receives a nationally recognized credential, referred to as a Certificate of Completion, which is issued by the U.S. Department of Labor (USDOL) or a federally recognized State Apprenticeship Agency (SAA). This portable credential signifies that the apprentice is fully qualified to successfully perform an occupation. Many Registered Apprenticeship programs particularly in high-growth industries such as health care, advanced manufacturing, and transportation also offer interim credentials as apprentices master skills as part of a career pathway.
6. **Diversity.** Apprenticeship is a workforce solution that actively promotes diversity and inclusion in the workplace - including race, gender, sexual orientation, and ability. The Department of Labor is supporting different aspects of diversity in apprenticeship to create more inclusive and equitable workplaces.
7. **Quality and Safety.** Apprentices will receive quality training with scheduled milestones at a safe worksite with proper supervision.

South Central Workforce Investment Board is an equal opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities

The length of training and the skills and competencies required for mastery of an occupation are set by industry. Traditional Registered Apprenticeship programs are time-based and require a specific number of hours of OJT and related instruction.

The Registered Apprenticeship system currently approves time-based, competency-based and hybrid time-and- competency-based programs.

The outcomes attained by apprentices and graduates of Registered Apprenticeship programs can lead to strong WIOA performance results.

Registered Apprenticeship programs are automatically included on the Missouri Eligible Training Provider List (ETPL).

Apprenticeship programs are well positioned to impart skills to workers, which would meet the WIOA measurable skills gain performance indicator. Additionally, because Registered Apprenticeship programs include immediate employment for apprentices, they provide an excellent opportunity for dislocated workers, returning military service members, and others needing to transition to new careers.

Registered Apprenticeship contributes to career pathways by building worker skills and establishing well-defined steps along pathways to higher levels of employment and wages. Registered Apprenticeship programs also can be an important part of industry growth strategies where the skills of large segments of the workforce need to be re-tooled.

Registered Apprenticeship programs provide older youth with the opportunity to “earn while they learn,” and obtain portable credentials that can lead to additional positive post-secondary training outcomes.

For younger youth, pre-apprenticeship programs can serve as a gateway to Registered Apprenticeship programs, while providing contextual learning that can promote and enhance high school completion levels. WIOA also requires Local Workforce Development Boards (LWDBs) to utilize at least 20% of their youth funding on paid and unpaid work experiences that have an academic and occupational education component. Such work experiences may include pre- apprenticeship.

Pre-apprenticeship programs provide instruction and/or training to increase math, literacy, and other vocational and pre-vocational skills needed to enter a Registered Apprenticeship program. Implementing Registered Apprenticeship and pre-apprenticeship models that are aligned with the needs of key industry sectors creates opportunities to advance students, job seekers, and workers along the talent pipeline. A pre- apprenticeship program funded with WIOA funding must have at least one Registered Apprenticeship partner; such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre-apprenticeship graduates into a Registered Apprenticeship program. Once the participant is enrolled in the Registered Apprenticeship program, and if his/her funding has not been exhausted, a portion and/or the balance of funding may be used to cover the costs of the Registered Apprenticeship program’s classroom training/related instruction.

Pre-apprenticeship programs generally consist of the following:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- Access to educational and career counseling and other supportive services, directly or indirectly;
- Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more Registered Apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program into a Registered Apprenticeship program.

Only Registered Apprenticeship programs go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with the USDOL or the SAA. Organizations offering pre-apprenticeship training programs that are seeking ETP status are required to go through the same vetting process and performance reporting requirements as all other training providers in the State. If the pre-apprenticeship training program is on the ETPL, WIOA Title I funds may be used to fund that program for eligible individuals.

Contact: Please direct comments or questions regarding this policy to info@scwib.org



408 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ MO Relay 711

Effective: April 23, 2024

Subject: Selective Service Failure to Register Policy

All programs and services established or receiving assistance under Title I of WIOA must comply with the Selective Service registration requirements.

Selective Service Requirements

Men born on or after January 1, 1960, are required to register for Selective Service within thirty (30) days of their 18th birthday (i.e. 30 days before or 30 days after their birthday.) The Selective Services website at www.sss.gov provides more information about registration requirements. The Selective Service system also provides a reference chart showing who must register located at <http://www.sss.gov/PDFs/WhoMustRegisterChart.pdf>.

Requirements for Males under 26 Years

Before being enrolled into WIOA, all males who are not registered with Selective Service and have not reached their 26th birthday must register through the Selective Service website at www.sss.gov. If a male is approaching or has reached their 18th birthday while participating in any WIOA services, registration with Selective Services must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA services. If a male under the age 26 refuses to register, then WIOA services must be suspended until he registers.

Requirements for Males 26 Years and Over

Before enrolling in WIOA Title I funded services, all males ages 26 years and older must provide:

1. Documentation of compliance with Selective Service registration requirements
2. Documentation showing, they were not required to register.
3. If they were required but did not register, documentation establishing their failure to register was not knowing and willful.

The South Central Workforce Investment Board policy for participants who have failed to register for Selective Service is as follows:

1. Staff will request a Status Information letter from Selective Service if the individual believes they were not required to register or did register but cannot provide any kind of documentation.
 - Forms can be found at <http://www.sss.gov/PDFs/infoform.pdf> and instructions for the form can be accessed at <http://www.sss.gov/PDFs/instructions.pdf>.
 - Individuals will need to describe in detail the circumstances that prevented them from registering and provide documentation of those circumstances.

Documentation should be specific regarding the dates of circumstances.

2. If the Status Information Letter indicates the individual was not required to register for Selective Service, then the individual is eligible to be enrolled in WIOA Title I services.
3. If the Status Information Letter indicates that the individual was required to but did not register, individual is presumed to be disqualified from participation in WIOA until it can be determined the failure to register was not knowing and willful.
4. If the individual was required to register but failed to register, the individual may only receive services if the individual can establish that failure to register was not willful.
5. The individual must provide a written explanation and supporting documentation of his circumstances at the time of required registration and the reasons for failure to register the individual should be encouraged to offer as much evidence with as much detail as possible.
 - Examples of Documentation that can assist in making determination:
 - DD 214 form
 - Honorable Discharge Certificate
 - Third Party Affidavits – from teachers, parents, employers, etc. concerning reason for not registering.
6. Once Individual has provided written explanation and supporting documentation, it should submit to Executive Director of the SCWIB.
7. The Executive Director will provide a determination using the written explanation of the supporting documentation along with considering the following:
 - Was the failure knowing?
 - Was the individual aware of the requirement to register?
 - Were they misinformed about the applicability of the requirement to them?
 - On which date did the individual first learn they were required to register?
 - Where did the individual live when they were between the ages of 18 and 26?
 - Does the Status Information Letter indicate the Selective Service sent letters to the individual at the address and did not receive a response?
 - Was the failure willful?
 - Was the failure to register done deliberately and intentionally?
 - Did the individual have the mental capacity to choose whether to register and decide not to register?
 - What actions, if any did the individual take when they learned of the requirement?
8. The Executive Director will provide a determination within five (5) business days.

If it is determined that it was not a knowing and willful failure, the individual is otherwise eligible, services may be provided.

If it is determined that it was knowing and willful failure, the individual will be denied services. Individuals denied services must be advised of WIOA Grievance Procedure. Documentation of Selective Services determinations will be kept by the SCWIB. This includes the determination and related documentation.

Contact: Please direct comments or questions regarding this policy to info@scwib.org