

WIOA EO OFFICER RESPONSIBILITIES

With the exception of [small recipients](#)* and [service providers](#)** , WIOA Title I recipients must designate an Equal Opportunity Officer. This person must be in a role that reports directly to the individual in the highest-level position of authority of their organization. The EO Officer must have sufficient staffing, resources, and training to carry out the following responsibilities:

- Review the organization's written policies to make sure that those policies are non-discriminatory.
- Develop and publish the organization's procedures for processing discrimination complaints, including tracking, investigating, and resolving complaints. See Element 7 in the Vermont WIOA Non-Discrimination Plan for more information on complaint system requirements.
- Conduct outreach and education about equal opportunity and non-discrimination requirements. See Element 5 in the Vermont WIOA Non-Discrimination Plan for more information on outreach requirements.
- Make sure their name, position title, address, and telephone number (voice and TDD/TTY) are public.
- Make sure their identity and contact information appear on all internal and external communications about the organization's non-discrimination and equal opportunity programs.
- Collect and analyze WIOA program demographic data, including race/ethnicity, sex, limited English proficiency, preferred language, age, and disability status, at least annually. If significant differences are found, conduct an investigation to determine if discrimination has occurred. This includes whether or not an individual may have been excluded from participating in, denied benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with the WIOA services. See Element 4 in the Vermont WIOA Non-Discrimination Plan for more information on the required data collection.
- If the organization has WIOA Title I subrecipients, monitor subrecipient compliance with the non-discrimination and equal opportunity provisions of WIOA section 188 and 29 CFR Part 38 on at least an annual basis. See Element 6 in the Vermont WIOA Non-Discrimination Plan for more information on the monitoring requirements.

***Small Recipients**

A small recipient is one who serves a total of fewer than 15 WIOA participants during the entire grant year and employs fewer than 15 employees on any given day during the grant year. Small Recipients must designate an individual who will be responsible for adopting and publishing complaint procedures and processing complaints as explained in [§§ 38.72](#) through [38.75](#).

****Service Providers**

A service provider is any entity that is selected as an eligible training provider for WIOA participants. A service provider may also be any operator of or provider of aid, benefits, services, or training to any program or activity that receives WIOA Title I financial assistance from the state or Vermont Department of Labor.

Entities serving participants through an Individual Training Account (ITA) would also be considered service providers.

The responsibility for ensuring service providers are meeting the non-discrimination and equal opportunity provisions rests with the WIOA recipient who holds the agreement for service (contract, grant, memorandum, etc.) with the provider.

References:

- Code of Federal Regulations (CFR) requirement: [29 CFR Part 38 Subpart B - Equal Opportunity Officers](#)
- Further information found in the [Vermont WIOA Non-Discrimination Plan](#), Element 2.