

## VERMONT DEPARTMENT OF LABOR

### WIOA TITLE I

#### EQUAL OPPORTUNITY AND NON-DISCRIMINATION SUPPORTING DOCUMENTATION GUIDE

This guide is a companion document to the Equal Opportunity and Non-Discrimination Monitoring Questionnaire that Workforce Innovation and Opportunity Act (WIOA) Title I recipients are required to complete and submit annually. Below you will find suggestions for the types of supporting documentation to include with your questionnaire submission. It follows the order of the Questionnaire and is not an exhaustive list. We are looking for evidence that you are following each requirement. You may also provide a narrative as supportive documentation in the Recipient Comments section of the form or on a separate document if needed. Questions about supporting documentation may be sent to the person who contacted you about the annual review or to [labor.eooficer@vermont.gov](mailto:labor.eooficer@vermont.gov).

Current copies of the Vermont WIOA Non-Discrimination Plan (NDP), Language Access Plan, and other related tools and resources can be found on the Vermont Department of Labor [Equal Opportunity and Non-Discrimination webpage](#).

#### Notice and Communication (NDP Element 3)

1. Copy of your EO notice in English.
2. Procedure for annual distribution of the EO notice to all WIOA Title I participants.
3. Procedure for distributing the EO notice to new WIOA Title I participants.
4. Procedure for distributing the EO notice to new employees during their orientation.
5. Photo(s) of the EO notice postings with a description of placement and sample copies of EO notices available in alternative formats/multiple languages.
6. Current copies of brochures/materials with the required EO and auxiliary aid statements (“EO tagline”).
7. Agenda or presentation notes/slides that include the discussion of rights and responsibilities related to the non-discrimination and equal opportunity provisions of WIOA.

#### Data and Information Collection and Maintenance (NDP Element 4)

1. Current participant application/intake forms that include the required demographic questions.
2. Copy of the WIOA complaint log from the last year.
3. Records retention procedure for WIOA Title I programs.
4. Record storage procedure that includes steps to ensure confidentiality.
5. Procedure for keeping disability/medical records separate for other records.

#### Affirmative Outreach (NDP Element 5)

If available, provide documentation of the outreach described in this section of the Questionnaire.

#### Language Access (Vermont WIOA Language Access Plan)

Description/documentation of actions you have taken in the last year to make your programs accessible to people with language access needs, such as:

1. Arranging for professional translation and interpretation services.
2. Partnering with organizations who serve immigrants and refugees.
3. Providing multi-lingual (“Babel”) notices with important mailings.
4. Providing program materials in alternative formats.
5. Using a “Point to Your Language” poster.
6. Training staff on how to ensure communication with the public is accurate, meaningful, free, and timely.

#### Complaint Processing (NDP Element 7)

Procedure for processing WIOA Title I discrimination related complaints.

#### Accessibility Requirements (29 CFR 38.13)

1. (Physical Accessibility) Copy of your most recent Section 504 assessment and, if applicable, your most recent ADA Title II assessment for all buildings where WIOA Title I participants are served.
2. (Program Accessibility) Reasonable accommodation procedure for WIOA Title I participants.

Policy Issuance (29 CFR 38.54(c)(2)(ii))

Description and date(s) of the policy review.

EO Officer (NDP Element 2, does not apply to [service providers](#) or [small recipients](#))

1. No supporting documentation required for #1.
2. Copy of your organizational chart.
3. If the answer is yes, a written explanation of the EO Officer's level authority and resources (time, staffing, training, etc.) available to them.
4. An example (photo, screen shot, flyers, etc.) from the last year of how the EO Officer name and contact information was made public.
5. An example communication from the last year that includes information about non-discrimination and equal opportunity programs.
6. Documentation of one EO related training that the EO Officer/support staff attended in the last year.

**The following two sections only apply to recipients who are granting or otherwise providing WIOA Title I financial assistance to another entity**

Assurances – NDP Element 1

If the answer to #1. is yes, provide one copy of each type of WIOA Title I agreement (grant, contract, MOU, training provider agreement, employer/OJT agreement, etc.) from the last year. For example, if you entered into multiple WIOA Title I funded contracts in the last year, just submit one of them.

Compliance Review – NDP Element 6

If the answer to #1 is yes, provide:

1. Your Non-Discrimination and Equal Opportunity compliance monitoring procedures and/or process documents.
2. A list of sub-recipients/service providers you monitored for EO compliance in the last year.
3. A full monitoring packet – monitoring tools, communications, notes, reports, data analysis, findings, etc. – from one of the EO compliance monitoring activities in the past year.