

Section-01 Organization and Administration	P-0100300	Effective Date: 06/17/2021
Replaces TAWDB P-0100300 Equal Opportunity and Non-Discrimination Policy dated 10/24/2019, EWB Equal Opportunity and Nondiscrimination Policy and Procedure dated 08/2019, TAWDB TU 2018-082018 Anti-Harassment Policy dated 08/16/2018		
Delaney Rea, GCWDB Chair		

Non-Discrimination and Equal Opportunity Policy

It is the policy and commitment of the Green Country Workforce Development Board (GCWDB) that discrimination is strictly prohibited on the grounds of race, ethnicity, orientation, religion, sex, gender, national origin, age, disability, political affiliation, or belief, and for beneficiaries only, citizenship or participation in a WIOA Title I-financially assisted program or activity. GCWDB will follow the guidance and requirements as set forth in state policy OWDI #13-2017, Change 2 entitled “Nondiscrimination and Equal Opportunity” dated January 31, 2018, OWDI #05-2019 entitled “Nondiscrimination and Equal Opportunity Corrective Actions and Sanctions” dated July 10, 2019 and OWDI #01-2018, Change 1 entitled “Discrimination Complaint Procedures” dated July 10, 2019.

I. Equal Opportunity: GCWDB is committed to a policy that ensures nondiscrimination and equal opportunity for all applicants, registrants, claimants, participants, employees, subrecipients and contractors that are beneficiaries of Workforce Innovation and Opportunity Act (WIOA) services and activities without regard to race, color, sex (including pregnancy, child birth, 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 the 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. GCWDB is committed to assuring that we will act affirmatively to:

Develop programmatic approaches to the elimination of all unjust exclusionary practices, policies, and consequences; and

Develop mechanisms for swift and judicious resolution of problems of human rights discrimination consistent with our policy, the Governor's executive orders, and other applicable legal requirements.

References:

- A. Section 188 of the Workforce Innovation and Opportunity Act (WIOA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I- financially assisted program or activity;

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA’s Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities. Green Country Workforce is an equal opportunity employer/program.

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- B. Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color, and national origin;
- C. Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- D. The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
- E. Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.

II. Discriminatory Harassment: Harassment or intimidation of a client, staff person or guest because of that person's race, age, color, sex, national origin, physical or mental disability, or religion is specifically prohibited and may be grounds for corrective action, sanctions, or termination. Harassment and intimidation include abusive, foul, or threatening language or behavior. The Green Country Workforce Development Board is committed to maintaining a workplace that is free of any such harassment and will not tolerate discrimination against staff, volunteers, or agency clients.

III. Intimidation and Retaliation Are Prohibited: No recipient may discharge, intimidate, retaliate, threaten, coerce, or discriminate against any individual because the individual has filed a complaint alleging any of the following:

- A. A violation of the WIOA.
- B. Opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of the WIOA.
- C. Furnished information to, or assisted or participated in any manner in an investigation, review, hearing, or any other activity related to administration of, exercise of authority under, or exercise of privilege secured by the nondiscrimination and equal opportunity provisions of WIOA or 29 CFR Part 38.

IV. Sanctions and Corrective Actions: Sanctions are available for any violation of a nondiscrimination and equal opportunity issue within this policy and under 29 C.F.R. Part 38. Sanctions include any remedy legally available under WIOA laws and regulations. Sanctions may be necessary when a recipient refuses to implement voluntary corrective action, submit requested data or documentation, or refuses to provide access to premises or records during an EO and Nondiscrimination compliance review. Sanctions will be considered a last resort.

V. Filing of Complaints: Issues of discriminatory treatment, harassment, or intimidation on any of these basis should immediately be reported to the immediate supervisor, board Equal Opportunity Officer or the Executive Director who will maintain an open-door policy as outlined in OP-0100301 entitled "Grievance and Complaint Process". If substantiated, prompt action will be

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taken. Complaints may be initiated by participants, staff, volunteers, or representatives of any entity conducting business with or on behalf of the Green Country Workforce Development Board. Staff are to consider each concern seriously and not attempt to discourage the reporting of complaints or issues.

All discrimination complaints involving denial of access to, or participation in programs and activities delivered by or through a “recipient” as defined at 29 C.F.R. § 38.4(zz) must be filed with the EO Officer for the Green Country Workforce Development Board, Oklahoma Employment Security Commission Unemployment Insurance (UI) EO Officer, State EO Officer at the Oklahoma Office of Workforce Development, or the U.S. Department of Labor Civil Rights Center.

VI. Equal Opportunity and Nondiscrimination Statement: All recipients, and subrecipients/subgrantees must comply with WIOA’s Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

VII. Action: The Executive Director is responsible for compliance of this policy. The Executive Director is responsible for annual review and revisions if needed. Any exceptions to this policy statement will require prior written approval from the chair of the GCWDB.

This policy will be effective immediately upon approval of the GCWDB membership.

Chair, Green Country Workforce Development Board / Date

Attachment:

- A. TA 06-2020 Workforce Innovation and Opportunity Act Equal Opportunity Compliance Technical Assistance Guide, issued December 14, 2020
- B. EO Appointment 1.31.2021
- C. OP-0100301 Grievance and Complaint Process

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