



POLICIES AND PROCEDURES

POLICY TYPE:	Workforce Innovation and Opportunity Act Grievance Policy
EFFECTIVE:	July 1, 2017
REVISED:	July 1, 2025

PURPOSE

This policy provides guidance under which Lane Workforce Partnership accepts and processes grievances and complaints that allege a violation of the Workforce Innovation and Opportunity Act (WIOA) Title I regulations, grants or other agreements administered under the Act. This policy pertains to all WIOA Title I recipients and subrecipients.

POLICY

Lane Workforce Partnership values customer service and customer satisfaction and prefers that dissatisfaction with services received be resolved amicably as close to the point of service delivery as possible. When this is not possible, grievances are to be processed following the guidelines established within this policy. LWP Contractors/Service Providers are required to submit all complaints received to LWP's Equal Opportunity (EO) Officer for coordination and resolution.

This policy:

- Provides guidelines for the resolution of grievances or complaints related to:
 - Non-criminal violations of WIOA Title I.
 - For allegations of criminal violations or allegations of fraud and/or abuse related to the provision of WIOA Title I services refer to Lane Workforce Partnership's *Incident Reporting Policy*.
 - Nondiscrimination grievances of WIOA.
 - For allegations of discrimination, refer to Lane Workforce Partnership's *Equal Opportunity and Non-Discrimination Policy*.
- Establishes requirements for Lane Workforce Partnership to:
 - Designate an Equal Opportunity (EO) Officer.
 - Require Lane Workforce Partnership's designated EO Officer to notify Lane Workforce Partnership's Executive Director immediately upon the receipt of any complaint related to the provision of WIOA Title I services or services provided through a contractor/service provider that is a recipient or beneficiary of WIOA Title I funding; and
 - Require each sub-recipient/provider that is a recipient or beneficiary of WIOA Title I funding to establish a written policy ensuring that grievances related to WIOA Title I programs or services are referred to Lane Workforce Partnership's EO Officer for resolution.

The designated Lane Workforce Partnership's Equal Opportunity (EO) Officer for the Lane Workforce area is:

Cindy Perry, Director of Workforce Programs
Lane Workforce Partnership
1401 Willamette St., Second Floor
Eugene, OR 97401
541-255-8116
Cindy@laneworkforce.org

General Provisions

The Workforce Innovation and Opportunity Act (WIOA) mandates the development of procedures for processing complaints and grievances submitted by participants and other interested persons affected by, and who allege, violations of the requirements of WIOA Title I and WIOA Title I related regulations or policies. This WIOA Title I Complaint and Grievance Policy applies to WIOA Title I Adult, Dislocated Worker, and Youth program complaints and complaints regarding WIOA Title I one-stop operator services/activities only.

Sub-Recipient/Provider Staff are required to inform each participant of their right to file a grievance and the procedure to do so, in accordance with this policy, at the time of program enrollment. Participants must be informed of the Lane Workforce Partnership's Grievance Policy using the Equal Opportunity is the Law customer information handout and it must be recorded in the participant's iTrac case notes that this was completed. Reasonable efforts will be made to ensure that complaint procedures are understood by participants, individuals, and recipients of federal assistance under WIOA Title I. The written grievance procedure will include notice that the complainants and respondents have the right to be represented by an attorney or other individual of their own choice. All complaints must be filed within one year (365 days) from the date of the alleged occurrence.

Types of Complaints

- Alleged violations of WIOA Title I and its regulations refer to any instance where a person or entity claims that a specific action or inaction has violated the provisions of WIOA Title I or its related regulations. These claims can cover a wide range of issues, including discrimination, fraud, misuse of funds, and gross mismanagement.
- Noncriminal complaints excluding discrimination refer to grievances that do not involve criminal activity and are not based on discriminatory practices.
- Criminal complaints including allegations of fraud outline the facts and circumstances that support a claim that a person potentially committed fraud, a crime involving deception or deceit to gain an unfair advantage or cause harm to another. **Please refer to Lane Workforce Partnership's Incident Reporting Policy for reporting requirements.**
- Discrimination complaints are those alleging there was unjust or prejudicial treatment of different categories of people in a protected class (i.e., ethnicity, age, sex, disability). Discrimination complaints must be filed within 180 days of the alleged violation. **Please refer to Lane Workforce Partnership's Equal Opportunity and Nondiscrimination Policy for additional information.**

Filing Requirements

All complaints must be filed with Lane Workforce Partnership's EO Officer regardless of the method by which they are communicated to Contractor/Service Provider staff (i.e., phone, text, email). Upon receipt of a grievance/complaint, Lane Workforce Partnership's EO Officer will:

- Determine if the complaint relates to a violation or alleged violation of the WIOA Title I regulations, grant, or other agreements under the Act, or is more appropriately referred to another program or organization offering services through the WorkSource Oregon system.
- Lane Workforce Partnership's EO Officer will notify the complainant in writing of the determination within five (5) days of the receipt of a complaint. As appropriate, notification will include the referral of the complaint to the appropriate non-WIOA Title I program or organization offering the services.
- Complaints determined to relate to a violation or alleged violation of the WIOA Title I regulations will be investigated by Lane Workforce Partnership's EO Officer.
- The EO Officer will provide a written resolution of the complaint to the complainant following the completion of the investigation.
- If not satisfied with the EO Officer's resolution, the complainant may appeal to the Higher Education Coordinating Commission/Office of Workforce Investments (HECC/OWI). The mailing address is:

State Grievance Coordinator
HECC/OWI
3225 25th Street SE
Salem OR 97302

ACTION

Lane Workforce Partnership and its sub-recipients/providers will take the necessary action to support and ensure adherence to this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

ISSUED:

Date: July 1, 2025

LWP Director of Workforce Program