

WIOA Title I Grievances and Complaint Policy

Purpose:

The purpose of this policy is to establish a uniform procedure for receiving, investigation, and resolving grievances and complaints related to Workforce Innovation and Opportunity Act (WIOA) programs administered by NWPA Job Connect (Workforce Development Board).

These procedures are established pursuant to:

- WIOA Section 181(c) Grievance Procedure
- WIOA section 188 Nondiscrimination
- 20 Code of Federal Regulations (CRF) part 683 Subpart F- Grievance Procedures, Complaints, and State Appeals Processes (20 CFR 683.600-620)
- 20 CFR 38 Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIOA
- Pennsylvania Department of Labor and Industry's (L&I) Office of Equal Opportunity (OEO) Nondiscrimination Plan
- TEGL 15-23: ETA Recipient Responsibilities for reporting instances of Suspected Fraud, Program Abuse, and Criminal Conduct
- Other applicable federal and state law and regulation

Scope and Audience:

NWPA Job Connect's grievance and complaint procedures are designed to ensure individuals, program participants, and other interested parties affected by the local workforce development system can file grievances or complaints, alleging violations of WIOA Title I requirements. Complaints or grievances may originate from WIOA Title I-funded facilities, programs, services, and activities administered by or operated by NWPA Job Connect, One-Stop Operator (OSO), and other local workforce development area affiliated entities, including:

- One Stop Program Partners
- WIOA Title I program service providers and contractors
- Eligible Training Providers and other entities providing training services
- Affiliated entities which provide services, activities, and supportive services within the NWPA workforce delivery system.

The Job Corps program is excluded from these provisions.

The following individuals or entities may file a complaint or grievance alleging violations of WIOA Title I requirements.

- Individuals; Program Applicants and Participants
- Former Participants
- Employees
- Employers
- Service Providers
- Contractors
- Training Providers
- Labor Organizations
- Community Based Organizations
- Other Interested Parties

Background:

According to 20 CFR 683.600, each local workforce development area and direct recipient of WIOA Title I funds must establish and maintain written grievance and complaint procedures.

This process ensures transparency, accountability, and equitable treatment in the administration of federally funded workforce programs. NWPA Job Connect will ensure all grievances and complaints are handled promptly, fairly, and consistently.

Definitions: See Appendix A

Complaint Types:

This policy covers the processes for the following types of complaints. This list shows some examples of complaints covered under this policy.

- Denial of program access
- Eligibility disputes
- Improper termination from services
- Failure to provide required services
- Violations of WIOA Title I Requirements
- Procurement disputes
- Misuse of WIOA funds
- Service delivery concerns
- Violations of local policy

Methods of Filing:

Complaints may be filed:

- In person
- By mail
- By email
- Electronically
- By telephone with staff assistance

Staff will assist individuals who require help reducing complaints to writing. Reasonable accommodations and language assistance services must be provided when necessary.

Content of Complaint:

Complaints should include:

- Name and contact information of complainant
- Name of respondent, if known
- Description of allegations
- Relevant dates
- Supporting documentation, if available
- Requested resolution

Time Limit for Filing:

Complaints must generally be filed within one (1) year of the alleged violation unless another law or regulation establishes a different filing period.

All program related grievances or complaints arising in connection with the administering of WIOA funded programs and activities by NWPA Job Connect via the PA CareerLink®, recipients, subrecipients, service providers, etc., will follow the steps listed below.

Step 1: Filing a Complaint or Grievance

Complainant should attempt to resolve their complaint informally with the entity where they receive services. If the complainant is not satisfied with the resolution, the complainant may file a complaint using the NWPA Job Connect General Complaint and Grievance Form, found in Appendix B.

Step 2: Informal Resolution

- The NWPA Job Connect Monitor or Director will notify the complainant to acknowledge receipt of the complaint within five (5) calendar days of receiving the complaint.
- The NWPA Job Connect Monitor or Director will schedule a meeting with the complainant to occur within 15 calendar days of receiving the complaint to attempt to reach an informal resolution between the parties.
 - If an informal resolution is reached, NWPA Job Connect will request a written confirmation from the complainant verifying they agree to the resolution terms. NWPA Job Connect will notify all parties involved in writing that an informal resolution was reached.

Step 3: Hearing

If NWPA Job Connect and the complainant cannot reach an informal resolution, the complainant may request a hearing with NWPA Job Connect's Executive Committee. If a hearing is requested, the Executive Committee will meet within 45 business days of receipt of the complaint.

Notice of Executive Committee Hearing Process

The complaint hearing with the NWPA Job Connect Board's Executive Committee

must be posted 24 hours prior to the hearing date as well as printed in the newspaper, as this is a public hearing. The complainant and respondent (person or entity alleged to have violated policy or regulation) must be notified in writing at least ten (10) days prior to the date of the hearing with the following information: date of the notice, name of the complainant, name of the party against whom the grievance or complaint is filed, date, time, and place of the hearing, and a statement of the alleged violations. An agenda will be created and sent to the attendees as well as posted within 24 hours of the meeting. Agenda will state: "Special Meeting of NWPB Job Connect Executive Committee."

Conduct of Executive Committee Hearing Process

The NWPB Job Connect Board's Executive Committee Chair or Vice-Chair will conduct the hearing in an informal manner with strict rules of evidence not being applicable. A summary of the complaint will be provided by the Executive Committee Chair or Vice-Chair. There will be a review of applicable policies and procedures. Additional details from the complainant may be offered. The parties have the right to be represented. The hearing will be recorded.

Note* A Hearing Officer (Solicitor) may conduct the hearing, but this must be done with a motion by Executive Committee members. If using a Hearing Officer, the committee will motion for the Executive Committee Chairperson to resume the meeting after Executive Session and/or to call for vote.

Executive Session

NWPB Job Connect Board's Executive Committee members may move into Executive Session to discuss the information presented during the hearing and reach a decision. Executive Session requires a motion. The committee members will reconvene after Executive Session to render their final decision. A motion will be made to reconvene the meeting. The final decision must be stated in the public meeting and have a recorded vote. Roll call votes are required.

Additional Meetings:

If there are additional Executive Committee meetings, minutes from the previous meeting will be linked to the agenda for approval. Additional information by all parties may be discussed during the additional meetings. All other processes remain the same for additional meetings.

Written Decision:

A formal decision will be issued in writing to the complainant and respondent within thirty (30) days of reaching the decision. The written decision must contain the following information: The names of the parties involved; a statement of the alleged violation and issues related to the alleged violation; the Executive Committee's decision and reason for the decision; a statement of the facts; a statement of corrective action or remedies for the violation if any, and notice of the right of either party to appeal this decision. If a decision is not reached within 60 days, an appeal may be addressed to the PA Department of Labor and Industry at the following address:

Pennsylvania Department of Labor and Industry
Bureau of Workforce Development Association

651 Boas Street 12th Floor
Harrisburg, PA 17121

Grievances or complaints under 20 CFR 683.600, submitted directly to US DOL, will be referred to the appropriate state or local level area for resolution, unless US DOL notifies the parties involved that they would investigate the submitted complaint or grievance.

USDOL reviews complaints and grievances when:

1. A decision on a grievance or complaint under 20 CFR 683.600(d) has not been reached within 60 days of receipt or within 60 days of receipt of a request for an appeal of a local level grievance and either party appeals to US DOL. Appeals under this scenario must be filed within 120 days of the filing of the grievance with the state, or the filing of the appeal of a local grievance with the state.
2. A decision on a grievance or complaint under 20 CFR 683.600 (d) has been reached and the party to which such decision is adverse appeals to US DOL. Appeals under this scenario must be filed within 60 days of receipt of the decision being appealed.

Under these scenarios, US DOL must make a final decision on the filed appeal no later than 120 days after receiving the appeal. All appeals must be submitted by certified mail, return receipt requested to:

Secretary
U.S. Department of Labor
200 Constitution Ave. NW
Washington, DC 20210
Attention: ASET

Accessibility Requirements:

NWPA Job Connect ensures:

- Language assistance services for Limited English Proficiency (LEP) individuals
- Reasonable accommodations for individuals with disabilities
- Auxiliary aids and services upon request
- Accessible formats and communications
- Meaningful access to complaint procedures

Confidentiality:

NWPA Job Connect will ensure that all parties involved with a grievance or complaint adhere to NWPA Job Connect's Privacy, Security and Protecting Personally Identifiable and Sensitive Information policy.

Retaliation Prohibited

No person may intimidate, threaten, coerce, discriminate against, or retaliate against any individual because they:

- Filed a complaint
- Participated in a complaint investigation
- Assisted in complaint processing

- Opposed unlawful practices

Record Retention:

All complaint records shall be maintained for a minimum of three (3) years following final resolution unless a longer retention period is otherwise required by law.

Records must include:

- Complaint forms
- Correspondence
- Investigation materials
- Hearing records
- Determinations
- Appeals
- Resolution documentation

Public Notice:

NWPA Job Connect will:

- Publicly post complaint procedures
- Ensure complaint rights are included in participant materials
- Make procedures available upon request
- Ensure staff are trained regarding complaint procedures and rights

Equal Opportunity (EO) Complaints:

- This policy does not apply to discrimination complaints brought under WIOA Section 188 and/or 29 CFR Part 38. These types of complaints will be handled as outlined in the NWPA Job Connect Policy #304 Equal Opportunity Policy.
- Questions about or complaints alleging a violation of nondiscrimination provisions of WIOA Section 188 may be directed or mailed to:

Director, Civil Rights Center
U.S. Department of Labor Room N4123
200 Constitution Avenue NW
Washington, DC 20210

WIOA Funding Incidents-Fraud and Waste:

This section focuses on the expectations and procedures for reporting alleged, suspected, known fraud, abuse, or criminal misconduct regarding WIOA funding.

- a) Identifying and Documenting Incidents: Recipients must immediately document allegations, suspicions, and complaints involving possible fraud, program abuse, and criminal misconduct. See Attachment A for definitions and examples. If a recipient is unsure if a situation qualifies as an “incident” based on the definitions, the recipient should report it in accordance with the procedures.
- b) Reporting Incidents: There are two steps to reporting incidents:
 - a. Allegations of fraud, waste and abuse, criminal and other illegal or improper activities in ETA-funded grant programs and operations must be reported to the OIG and ETA.

- i. Recipients must promptly disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code, or a violation of the civil False Claims Act (31 U.S.C. 3729-3733).
 - ii. All incidents should be reported as expeditiously as possible.
 - iii. Situations involving imminent health/safety concerns, or the imminent loss of funds exceeding an amount larger than \$50,000, which are considered emergencies, must be immediately reported to OIG and ETA no later than one working day after the emergency was discovered.
- c) Reporting procedures do not supersede the organization's responsibility to safeguard WIOA funds by taking prompt and appropriate corrective action. Whenever the entity reporting the allegation of an incident believes that immediate action to prevent further financial loss or other damage is necessary, or recovery of funds or property may be impeded if immediate action is not taken, the reporting entity has the responsibility to take any action it deems appropriate, including contacting the local law enforcement agency. Any immediate action taken or planned by the reporting entity must be reported to the NWP Job Connect Director when the incident report is submitted.
- d) All incident reports, emergency or other, must be sent to the Office of Inspector General (OIG), with a copy to the NWP Job Connect Director using the contact information below. NWP Job Connect and its subrecipients will use the OIG Hotline Portal form to immediately document and report suspicions, allegations, or complaints involving:
 - WIOA-related fraud
 - Misfeasance, nonfeasance, or malfeasance
 - Misapplication of funds
 - Gross mismanagement
 - Employee/participant misconduct; or
 - Other potential or suspected criminal actions

The OIG Hotline Portal should not be used for resolving employee grievances, Equal Employment Opportunity complaints, labor disputes, or other personnel concerns.

No action, including retaliation, will be taken against any individual who discloses information concerning criminal or improper activities, or makes a good faith complaint to proper authorities. Individuals may remain anonymous if they choose.

- e) Report Submission. NWP Job Connect and its subrecipients must submit incident reports to the following entities:

Pennsylvania Department of Labor and Industry
Deputy Secretary for Workforce Development
Labor and Industry Building
651 Boas Street
Harrisburg, PA 17121
Phone: (717) 787-0805

Office of Inspector General

Hotline Online Complaint Form: <https://www.oig.dol.gov/hotline.htm>

If internet is unavailable: Toll Free Hotline: 1-800-347-3756

Non-Toll-Free Number: 202-693-6999

Reporting to ETA:

Send screen shots from OIG Hotline Portal or photos of the three OIG Hotline Portal screens to ETA via email at: ETAIncidentReporting@dol.gov.

Subject line of the email should contain: ETA Incident Report- (State Name) for easy identification of the ETA Regional office that needs the information for evaluation as part of the ETA's overall grant monitoring and oversight responsibilities.

Note: Per requirements of 20 CFR 683.620, the Department of Labor Employment and Training Administration (DOLETA) shall be copied on submitted incident reports from the reporting entity.

OIG will determine whether the allegations have merit and, when appropriate, conducts or arranges for an investigation and/or audit. When OIG determines the incident report does not have investigative or audit merit, the incident report is referred to ETA for resolution. Depending on the circumstances, ETA will either forward the incident report to the recipient to research and report back, or ETA will work with the recipient to analyze and report on the incident. When the incident report is referred to the recipient, the recipient must prioritize this activity, so ETA can report the resolution to OIG in a timely manner.

Complaint Coordinator:

NWPA Job Connect designates the following individual to coordinate WIOA Title I complaints and grievances:

Carrie Symes, Monitor and EO Officer
NWPA Job Connect
1174 Elk Street PO Box 831
Franklin, PA 16323
814-758-0659
csymes@nwpajobconnect.org

Required Attachments:

Appendix A: Definitions

Appendix B: Complaint and Grievance Form

Appendix C: Complaint and Grievance Appeal Form

Appendix D: Complaint Tracking Form

Appendix E: Complaint Tracking Procedure
Appendix F: Written Decision Form Template

HISTORY

Name	Date	Rev. Level	Description of change	State Approved Date	Board Approved Date
Susan Richmond	6/29/2026	A	New Policy to combine multiple appeal policies. Maintain state compliance.	09/01/2026	10/09/2026

Recissions:

NWPA Job Connect Participant Eligibility Appeal Policy #300

NWPA Job Connect WIOA Funding Incidents Policy #311

NWPA Job Connect Local Monitoring Appeal Policy # 312

NWPA Job Connect Non-Discrimination/General Complaint Policy #313

Appendix A

Definitions

Complaint: A formal allegation that a specific act or omission has occurred in violation of WIOA law, regulation, or agreement.

Complainant: The individual or entity filing the grievance or complaint.

Emergency: A situation involving imminent health or safety concerns, or the imminent loss of funds exceeding an amount larger than \$50,000.

Employee/Participant Misconduct: Actions occurring during or outside work hours that reflect negatively on the U.S. Department of Labor or its mission involving outside employment, business and professional activities; the receipt or giving of gifts, fees, entertainment, and favors; misuse of Federal property; and misuse of official information and such other activities as might adversely affect the confidence of the public in integrity of the government, as well as serious violations of Federal and state laws.

ETAINcidentReporting@dol.gov: This is the email address to which the individual filing the incident report should send the screen shots or photos of each of the three Office of Inspector General (OIG) Hotline Portal screens to complete the incident reporting process.

Fraud, Misfeasance, Nonfeasance, or Malfeasance: Any alleged deliberate action or inaction which may be in violation of Federal statutes and regulations. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants or contractors, intentional payments to a contractor without the expectation of receiving services, payments to ghost (fake) enrollees, misuse of appropriated funds, and misrepresenting information in official reports.

Grievance: A written expression of dissatisfaction by a participant, employee, subrecipient, service provider, or other interested party concerning the administration or operation of WIOA programs.

Gross Mismanagement: Actions or situations arising out of management ineptitude or oversight and leading to a major violation of statutory (such as Workforce Innovation and Opportunity Act or Wagner-Peyser) processes, regulations, or contract/ grant provisions. Such actions or situations have the potential to severely hamper accomplishment of program goals, waste government resources, and jeopardize future support for a particular program/project. This category includes, but is not limited to, unauditable records, unsupported costs, highly inaccurate fiscal reports or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service, and lack of good internal control procedures.

Incident Referrals: The OIG refers incidents and allegations concerning Employment and Training Administration (ETA) programs to ETA where the OIG determines that the incident report does not have investigative or audit merit.

Informal Resolution: An attempt by the parties involved to resolve a grievance or complaint prior to a formal hearing.

Misapplication of Funds: Any alleged deliberate use of funds, assets or property not authorized or provided for by legislation or regulations, grants, or contracts. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activity, ineligible enrollees, conflicts of interest, failure to report income from Federal funds, violation of contract/grant procedures, and the use of Federal funds for other than specified purposes. An incident report should be filed when there appears to be an intent to misapply funds rather than merely for a case of minor mismanagement. It should be noted that there are some exceptions related to nepotism for the Indian and Native American programs, as described in 20 CFR 684.630(d).

OIG Hotline Portal: The OIG operates the OIG Hotline Portal to receive and process allegations of fraud, waste, and abuse concerning Departmental grants, contracts, programs, and operations. The OIG Hotline Portal is also used to address allegations of criminal activity and serious misconduct involving Department employees. Incident reports should be submitted online at: <https://www.oig.dol.gov/hotline.htm>

The OIG Hotline Portal should not be used for resolving employee grievances, Equal Opportunity complaints, labor disputes, or other personnel concerns.

If internet access is not available, incidents can be reported to the OIG via the Toll-Free Hotline at 1-800-347-3756 or (202) 693-6999 (not a toll-free number).

Respondent: The individual or entity against whom a grievance or complaint is filed.

Instructions for Completing the Complaint and Grievance Log

The NWPA Job Connect Monitor or Director (whoever received the complaint or grievance) will enter the information in the Complaint and Grievance Log.

If the complainant was referred to an outside agency, check off all the entities that apply, and detail the specific agencies.

The log will be maintained by program year and stored electronically for monitoring purposes.

The NWPA Job Connect Monitor or Director (whoever handles the complaint or grievance) will complete the log with all applicable information.



Complaint and Grievance Procedure

If you need to file a complaint or grievance alleging violations of WIOA Title I requirements please follow these steps:

1. Visit www.nwpajobconnect.org to view the NWPA Job Connect WIOA Title I Grievance and Complaint Policy.
2. Complete the Grievance and Complaint form and submit to Carrie Symes, see below for her contact information.
3. Please ask for assistance from PA CareerLink® staff if you need help obtaining the policy and form and/or completing the form.

This procedure applies to the following individuals and entities:

- Individuals: Program, Applicants, and Participants
- Former Participants
- Employees
- Employers
- Service Providers
- Contractors
- Training Providers
- Labor Organizations
- Community Based Organizations
- Other Interested Parties.

If you have any questions, please contact:
Carrie Symes, Monitor & EO Officer
csymes@nwpajobconnect.org
814-758-0659 or 711