

**State of Oregon**  
Governor's Office of Education  
and Workforce Policy  
Salem, Oregon 97310

**Oregon Workforce Letter No. 2-01**

**TO:** ALL LOCAL AND REGIONAL WORKFORCE BOARDS  
ALL STATEWIDE ACTION TEAM MEMBERS  
ALL STATE WORKFORCE AGENCIES  
ALL EO COORDINATORS AND STATE EO OFFICERS

**FROM:** Annette Talbott, Governor's Workforce Policy Coordinator

**SUBJECT:** Equal Opportunity Coordinators at Workforce Region/One Stop Level

1. Purpose. This letter details the role and duties of the Equal Opportunity Coordinators in the One-Stop system in Oregon's workforce regions and local areas.
  - a) Details the job description duties for an Equal Opportunity Coordinator (EO Coordinator);
  - b) Provides the attached complaint form, complaint log, and data reporting form for use in implementing these nondiscrimination provisions in Oregon;
  - c) Specifies that the EO Coordinator shall deliver to all workforce partners in the area or region receive a copy of the assurance that was part of the local plan relating to the partners' responsibilities under Section 188 of the WIA;
  - d) Requires that a Memorandum of Understanding for the area or region amended after the date of this notice, include the assurance language from the local plan referenced in paragraph c above; and
  - e) Abide by the language assistance plan being developed by the state in conjunction with the state EO Officers according to state and federal law.
2. References. The Workforce Investment Act, Section 188; 29 CFR part 37.
2. Background. The requirements in this letter can be found at 29 CFR Part 37, Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998. The specific provisions are 29 CFR 37.23 through 37.26. See Attachment A. The state has drafted a Methods of Administration (MOA) plan to comply with the requirements with the federal law and regulations. The MOA spells out the role of the Equal Opportunity Coordinator and this role is critical to local and state compliance with EO laws and regulations. Their oversight of local programs and resolution of complaints enhances the delivery of equitable services and minimizes costly litigation.

4. Description.

The local or regional workforce boards must designate at least one EO Coordinator for the One Stop system in the local area or region. This employee should have a list of all the recipients of financial assistance under WIA Title I programs within the One Stop(s) in the region or area. The local or regional workforce board may also choose to identify an EO Coordinator per each One Stop center. If it decides to do so, it should designate a lead EO Coordinator for the region or local area to assume the data collection and other monitoring duties or to be able to assist if an onsite One-Stop Center EO Coordinator has a conflict of interest.

The State EO Officer, designated by the Governor's Education and Workforce Policy Adviser, shall:

- Abide by the state's MOA and revise it as necessary;
- Maintain the current list of State EO Officers for One Stop programs that are overseen by state agencies and distribute the list to EO Coordinators;
- Maintain a list of EO Officers for national programs that are operated within the state and distribute the list to EO Coordinators;
- Monitor contracts to determine if the proper assurances are contained therein;
- Document the training that the EO officers and the EO Coordinators attend;
- Monitor and collect EO data that recipients have collected; and
- Periodically visit One Stops to assure the EO is the law posters are in place with the EO Coordinators name and contact information.

The EO Coordinator shall be allowed sufficient time and resources to perform his or her duties and responsibilities. EO Coordinator responsibilities that must be in the description of that position include but are not limited to:

1. Receiving and processing complaints based on prohibited grounds of discrimination per procedure described in the MOA.
2. Providing information about nondiscrimination and equal opportunity laws and the complaint process to agency staff, beneficiaries and interested members of the public on request.
3. Developing and providing compliance reports for review by the state EO Officer.
4. Ensuring compliance with the MOA by all staff and sub-recipients.
5. Monitoring and reporting required data elements to the state EO Officer.
6. Conducting internal self-evaluations of performance in compliance with the MOA and under the guidance of the state EOO.

Each EOC has attended or will attend the initial and subsequent training on the Methods of Administration.

5. Implementation. Immediate.

6. Action Required. The EO Coordinator shall:

- Obtain and read the States' Methods of Administration plan;
- Retain a copy of the contact information for the State EO Officer and the State level participating agency EO officers;
- Attend required quarterly training;
- Maintain complaint logs (Attachment B);
- Assure adequate supply of complaint forms (Attachment C) are available;
- Notify the recipients of financial assistance under WIA Title I programs within the One Stop(s) in the region or area of their roles and duties;
- Determine if any programs in the One Stops in the region/area have other complaint processes and associated timeframes that the EOC needs to adhere to and refer to that partner for dual processing of a complaint; and
- Review the checklist (Attachment D) to make sure the EO Coordinator has carried out all required duties including data collection (Attachment E).

7. Inquiries. Contact Annette Talbott, Governor's Workforce Policy Coordinator, at 503-378-3921, x 24 or Janie McCollister, state Equal Opportunity Officer, at 503-947-1324.

Contact Information for State EO Officer:

Janie McCollister  
State Equal Opportunity Officer  
Oregon Employment Department  
Director's Office, Rm. 305  
875 Union Street, NE  
Salem, Oregon 97311  
503-947-1324  
[Janie.McCollister@state.or.us](mailto:Janie.McCollister@state.or.us)

#### ATTACHMENTS

A- 29 CFR 37.232 through 37.26  
B- Complaint Log  
C- Complaint Form  
D- MOA Checklist  
E – Data Collection Form

#### WEB RESOURCES – [www.workforce@state.or.us](http://www.workforce@state.or.us)

List of State EO Officers and EO Coordinators  
Methods of Administration  
MOA Training Powerpoint presentation