

Policy and Procedures Transmittal Number: 22-01

Effective Date: January 6, 2022

To: CWP Staff and Subrecipient Staff
From: Julie Watson, Compliance & Accountability Administrator
Issue Date: January 6, 2022
Subject: Non-Discrimination and Equal Opportunity Policy



With this transmittal, CWP is issuing revisions to the CWP 2-10.3 Non-Discrimination and Equal Opportunity Policy. This policy revision adds veterans to the list of groups that CWP will neither discriminate nor permit discrimination against and replaces the terms mental retardation with intellectual disability. The revisions also add CT General Statutes Section 4a-60(a)(1) regarding nondiscrimination and affirmative action provisions to the list of laws to which CWP adheres.

In addition to being attached to this transmittal, these policies can be found in CWP's online Policy and Procedures Manual, Section 2-10.3 Non-Discrimination and Equal Opportunity Policy at <https://capitalworkforce.org/policies/>.

Questions regarding CWP's Non-Discrimination and Equal Opportunity Policy should be addressed to me at jwatson@capitalworkforce.org.

CWP Policy and Procedures Manual

Program: General Policy and Procedures for All Programs	Section: 2-10.3
Subject: Non-Discrimination and Equal Opportunity Policy	Effective Date: 7/1/16 Rev: 1/6/22

A. Non-Discrimination and Equal Opportunity Policy (WIOA Section 188 and CGS Section 4a-60(a)(1))

In both its programs and its own hiring and employment practices, it is the policy of CWP to neither discriminate nor permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex, gender identity or expression, status as a veteran, intellectual disability, mental disability or physical disability, including, but not limited to, blindness, unless it is shown that such disability prevents performance of the work involved. CWP will not engage in nor permit discrimination in any manner prohibited by the laws of the United States or of the State of Connecticut. CWP will investigate all complaints alleging discrimination, and will inform all applicants, participants and employees of their rights to file a complaint directly with the Connecticut Commission on Human Rights and Opportunities.

CWP complies with the nondiscrimination and equal opportunity provisions of WIOA Sec. 188, which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.

Additionally, it is CWP policy to adhere to the following laws and regulations.

1. Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
2. The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age;
3. Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in education programs and activities; and
4. Title II of the Genetic Information Nondiscrimination Act of 2008, which prohibits discrimination against employees or applicants because of genetic information.
5. Title VI of the Civil Rights Act of 1964, as amended, prohibits recipients and sub-recipients from discriminating on the basis of race, color, or national origin. Discrimination on the basis of national origin can occur if a recipient or sub-recipient does not provide appropriate language assistance to LEP (Limited English Proficient) individuals because these individuals, whose language is usually tied to their national origin, will not have access to the same benefits, services, information, or rights that the recipient provides to everyone else. Thus, in certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally assisted programs and activities may violate Title VI and its regulations prohibiting national origin discrimination.
6. Federal Executive Order 11246 of September 24, 1965 entitled "Equal Employment Opportunity," as amended and as supplemented in Department of Labor regulations (41 CFR Part 60).
7. CT General Statutes Section 4a-60(a)(1) Nondiscrimination and affirmative action provisions in awarding agency, municipal public works and quasi-public agency project contracts.

B. Nondiscrimination Based on Gender Identity, Gender Expression and Sex Stereotyping (WIOA TEGL No. 37-14)

It is CWP policy to prohibit discrimination based on sexual orientation or gender identity and to ensure that there is equal access to services. CWP will administer this policy in accordance with the guidance set forth in US DOL, Employment and Training Administration's Training and Employment Guidance Letter (TEGL) No. 37-14.