WIOA Title I Complaint and Grievance Procedures and Appeals Process Policy

For WIOA Title I Program Complaints and Grievances

Revised September 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded 100% with federal dollars. For more information, visit: https://advancecentralpa.org/about-us/public-notices/

Advance Central PA WIOA Title I Program Complaint and Grievance Procedures and Appeals Process Policy

Purpose

In compliance with the Workforce Innovation and Opportunity Act (WIOA) of 2014 and for any other federal or state contracts passed through Advance Central PA, the Workforce Development Board for the Central Pennsylvania Local Workforce Development Area has implemented this WIOA Title I **Program Complaint and Grievance Procedures and Appeals Process Policy** outlining a uniform process for receiving, processing, resolving, and appealing complaints and grievances alleging violations of the requirements of WIOA Title I.

These procedures are established pursuant to:

- WIOA Section 181(c) Grievance Procedure
- WIOA Section 188 Nondiscrimination
- 20 Code of Federal Regulations (CFR) 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 the WIOA
- Pennsylvania Department of Labor and Industry's (L&I) Office of Equal Opportunity (OEO) Nondiscrimination Plan
- Other applicable federal and state law and regulation

Regulatory (20 CFR 683.600)

Each Local Workforce Development Area, State, outlying area, and direct recipient of WIOA Title I funds (except Job Corps) must establish and maintain written grievance and complaint procedures.

This Policy is Implemented to Include Key Requirements:

- Establish a formal grievance and complaint process for WIOA Title I programmatic complaints.
- Provide information about complaint procedures to participants, partners, service providers, and other interested parties.
- Ensure complaint information is understandable to all affected individuals, including youth and individuals with limited English proficiency (LEP).
- Provide an opportunity for informal resolution and a hearing within sixty (60) days of filing a complaint.
- Allow appeals to the State when no decision is issued within sixty (60) days or when a party is dissatisfied with the local decision.
- Allow U.S. Secretary of Labor to investigate grievances and complaints when a state decision is not issued within 60 days; or a party receives an adverse state decision and appeals to the Secretary.
- Maintain complaint records and publicize complaint rights.

Scope and Audience

This policy is designed to ensure individuals, program participants and other interested parties that are affected by the local workforce development system can file grievances or complaints alleging violations of the requirements of WIOA Title I.

Who May File a Program Complaint or Grievance

Complaints or grievances may originate from WIOA Title I-funded facilities, programs, services and activities administered by or operated by the LWDB, PA CareerLink® Operator, and other LWDA affiliated entities including the following:

- PA CareerLink® 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 a LWDA's workforce delivery system

Note- the Job Corps program is excluded from these provisions and have their own regulatory requirements

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

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

Reasons a Program Complaint can be Filed

A program complaint involves an issue with how program services are delivered. Complaints regarding the Equal Opportunity Policy should be submitted in accordance with Advance Central PA EO/Civil Right Discrimination Policy and Procedure. Complaints alleging discrimination or retaliation based on protected status must immediately be referred to the Equal Opportunity (EO) Officer.

Program Complaint Types

Examples of complaints covered under these procedures include:

- 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 A Program Complaint/Grievance

Complaints may be filed:

1. In person
2. By mail
3. By email
4. Electronically
5. By telephone with staff assistance

Staff shall assist individuals who require help reducing complaints to writing. This includes listening to concerns and providing the **WIOA Title I Complaint/Grievance Form** which is attached to this policy in a format accessible to the individual. Reasonable accommodation and language assistance services must be provided when necessary. If staff complete the Form for an individual, they are required to read it back to the complainant to confirm that it correctly communicates what they intended.

In all cases, the form must be signed by the complainant indicating their attestation that the information provided is accurate. In cases where staff assist the complainant in filling out the form, it may be emailed for application of the signature or mailed with a self-addressed stamped envelope for return.

Content of the Program Complaint/Grievance

Complaints must include the following:

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

Complainants are encouraged to use the attached **WIOA Title I Complaint/Grievance Form** which provides sections for each of the required content areas.

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.

Complaint Coordinator

Advance Central PA designates the following individual to coordinate WIOA Title I complaints and grievances. Complainants must submit their complaint to this individual.

Marca O'Hargan, Compliance Monitor/EO Officer
Advance Central PA
130 Kelly Square, Suite 1
Lewisburg, PA 17837
570-568-6868
mohargan@advancecentralpa.org

Complaint/Grievance Filing Process Overview

1. **Complainant Submittal of the Complaint**
   Complainant must submit their complaint/grievance to the Complaint Coordinator.

2. **Informal Resolution**
   Within 10 working days of receiving the complaint, the Complaint Coordinator will review the complaint and may attempt informal resolution prior to a formal hearing. Informal resolution methods may include:
   - Staff conferences
   - Mediation
   - Corrective actions
   - Settlement discussions

   If the complainant cannot be reached or fails to respond , the Complaint Coordinator will proceed with processing the complaint based on the complaint that was submitted, internal records such as the PA CareerLink® system of record, CWDS, as applicable, and information gathered from any available parties.

   If an informal resolution cannot be reached with the Complainant or if the Complainant was unable to be reached within 10 business days as outlined above, the Complaint Coordinator will forward the complaint and evidence gathered to Advance Central PA's Policy & Performance Committee. The Policy & Performance Committee will meet within 15 days to review the complaint and associated materials. This Committee will issue its decision to the complainant within 2 working days of such meeting.

   Note: Informal resolution efforts shall not delay the complainant's right to a hearing.

3. **Right to a Hearing**
   If a complaint cannot be resolved informally, the complainant shall be provided an opportunity for a hearing. Therefore, if complainant is not satisfied with the decision of the Policy and Performance Committee, the complainant may submit a request for a hearing along with the reason for dissatisfaction with the decision of the Committee within 5 days.

4. **Hearing Processes**
   Advance Central PA shall conduct a hearing when requested and issue a written decision within sixty (60) days of the filing of the complaint.

   Hearings shall:

   - Be conducted by impartial hearing officer(s), including a designated Workforce Development Board member
   - Provide reasonable advance notice
   - Allow both parties to present evidence
   - Allow witness testimony
   - Permit representative by counsel or another representative
   - Maintain an official record of proceedings
   - Result in written decision

5. **Written Decision**

   Written determinations shall include:

   - Summary of allegations
   - Findings of fact
   - Applicable laws or regulations
   - Conclusions
   - Corrective actions, if applicable
   - Appeal rights and deadlines

Appeals Process

A request for a local level appeal (20 CFR 683.600(c)(4)) to the PA Department of Labor & Industry (L&I) can be made by either a complainant or a respondent not satisfied with the local area's hearing decision or when no local area decision was reached within 60 days of the filing of the grievance or complaint.

Complainants are encouraged to use the attached **WIOA Title I Complaint/Grievance Appeal Form** which provides sections for each of the required content areas.

State hearings or appeals will be conducted in accordance with the Memorandum of Understanding for Independent Hearing Examiner Services between the L&I and the PA Department of State as well as regulatory provisions found at Title 20 CFR 683.600-620.

The designated Agency Liaison for the State Workforce Agency shall be L&I's Bureau of Workforce Partnership Customer Service Coordination Unit Supervisor. The Agency Liaison is responsible for coordinating activities with the appointed hearing examiner.

Grievances or complaints under 20 CFR 683.600, submitted directly to the US Department of Labor (USDOL), will be referred to the appropriate state or local area for resolution, unless USDOL notifies the parties involved that US DOL will investigate the submitted complaint or grievance.

Pursuant to 20 CFR 683.610(a) US DOL will investigate allegations arising through the grievance procedures found in 20 CFR 683.600 when:

1. A decision on a grievance or complaint under 20 CFR 683.600(d) *[i.e., State Procedures]* has not been reached within 60 days of receipt of the grievance or complaint or within 60 days of receipt of the request for appeal of a local level grievance and either party appeals to USDOL. Appeals made under either of these scenarios 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 § 683.600(d) *[i.e., State Procedures]* has been reached and the party to which such decision is adverse appeals to USDOL. Appeals made under this scenario must be filed within 60 days of the receipt of the decision being appealed.

Under the scenarios listed above USDOL 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

Confidentiality

Complaint information shall be maintained confidentially to the maximum extent permitted by law.

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

Complaint/Grievance Tracking and Record Retention

Tracking Procedures

All complaint records will be tracked by Advance Central PA using the WIOA Title I **Program Complaint Tracker** spreadsheet. The tracker includes complainant contact information and all relevant dates regarding complaint informal review, hearing, and appeal.

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 shall include:

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

Public Notice

Advance Central PA will:

- Publicly post complaint procedures

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

Fraud and Waste

Pursuant to 20 CFR 683.620, allegations of fraud, abuse, criminal misconduct, and misuse of WIOA funds may be referred to appropriate investigative authorities and handled separately from standard grievance procedures.

Attachment: WIOA Title I Complaint/Grievance Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Complaint Submittal	
Date Complaint Submitted	
Method of Filing the Complaint	____ In person ____ By mail ____ By email ____ Electronically ____ By telephone with staff assistance
Submitted to	Advance Central PA EO Officer
Description of Allegations	
Date(s) of Allegations	
Location of Allegations	
Name of Involved Person(s), WIOA Title I Program(s), Etc.	

Description of Allegations (Clearly describe your complaint and any relevant information about what happened.)	
Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	

Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	

Attestation

By signing, I attest that the information documented on this form is true and accurate.

_____ _____

Signature Date

Attachment: WIOA Title I Complaint/Grievance Appeal Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Original Complaint Submittal	
Date Initial Complaint Submitted	
Date of Written Decision	
Appeal Submittal	
Date Appeal Submitted	
Method of Submittal	____ In person ____ By mail ____ By email ____ Electronically ____ By telephone with staff assistance
Submitted to	
Description of Appeal	
Description of Reason for Appeal	

Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	
Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	
Attestation	

By signing, I attest that the information documented on this form is true and accurate.

_____ _____

Signature Date

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
June 2024	Annual review completed. No revisions were required.
June 2025	Annual review completed. No revisions were required.
July 2026	Annual review: Draft revisions reviewed per June 18, 2026 notice of the new Local Workforce Development Board (LWDB) Title I Grievance Process Requirements from L&I.
September 2026	Changes approved by the WDB September 16, 2026