WIOA TITLE I COMPLAINT, GRIEVANCE AND APPEAL POLICY AND PROCEDURE

Philadelphia Works Inc. has a formal WIOA Title I Complaint, Grievance and Appeal Policy and Procedure ("the Procedure") for individuals, program participants and other interested parties who believe that they have been treated unfairly with respect to WIOA Title I programs funded by Philadelphia Works, Inc. All individuals, program participants and other interested parties are to be notified of the Procedure, and a template grievance form is available to all WIOA Title I providers. Complainant Rights are publicly posted. Due to changes in the regulations, revisions have been made to the Procedure. These revisions are pursuant to the established following procedures:

- 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 Nondiscrimiation 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

This policy outlines the process to be followed internally by Philadelphia Works' and/or WIOA Title I Provider staff upon receipt of a grievance by individuals, program participants and other interested parties who has received or attempted to receive services from WIOA Title I – funded facilities, programs and activities administered by or operated by Philadelphia Works, Inc., One Stop Operator (OSO) and other Philadelphia Works, Inc. 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 a LWDA's workforce delivery system

The Job Corps Program is excluded from these provisions.

Per (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.

The grievance procedures in 20 CFR 683.600 do not apply to discrimination complaints filed under WIOA Section 188 and 29 CFR Part 38. Such complaints must be processed through Equal Opportunity/Nondiscrimination complaint procedures.

Procedure

Audience

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

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.

Scope

When an above referenced individual(s), program participant(s) and other interested party(s) has a complaint/grievance, they should notify the appropriate staff member, manager, supervisor, HR Representative of the complaint/grievance. A staff member, manager, supervisor, HR Representative will provide the Complaint and Grievance Form to the individual(s), program participant(s) and other interested party(s) and assist in completing the form. Once the form is completed, the Complaint and Grievance Form should be sent to the Compliance Department of Philadelphia Works, Inc., within 24 hours.

In some cases, a complaint/grievance will have been filed directly with the Commonwealth. In cases where a complaint/grievance is filed directly with the Commonwealth, the Commonwealth will remand the complaint/grievance to Philadelphia Works, Inc. for initial resolution in accordance with 20 CFR Part 683, SubpartF. This is to ensure that WIOA's administrative framework is compliant while preserving the Complainant's right to appeal to the state level.

Informal Resolution

A staff member, supervisor, manager or HR representative from a WIOA Title I funded Provider shall try to find an informal resolution with the individual(s), program participant(s) and other interested party(s). If a staff member, supervisor, manager or HR representative cannot come to a resolution, Philadelphia Works, Inc. will attempt an informal resolution with the complainant. The respective Operations Department Director within Philadelphia Works, Inc. and respective Program Managers will work with the appropriate staff member(s) of the respective program provider facility to determine if the individuals, program participants and other interested parties previously engaged in any meetings or discussions with a staff member(s) about the issue, and if so, gather all information regarding the meeting. Philadelphia Works, Inc. will set up an informal conference either by phone, virtually or in person with the complainant or legal guardian, if complainant is under the age of 18, within ten (10) working days. The Compliance Department will work with the Operations Department to provide a response in writing to the complainant within ten (10) working days following the informal conference that outlines the reasons for the decision made. The Complainant will be advised of their right to request a hearing if the decision is unfavorable.

Informal resolution methods may include:

• Staff conferences
• Mediation
• Corrective actions
• Settlement discussions
**Informal resolution efforts shall not delay the complainant's right to a hearing.*

If an informal resolution cannot be achieved, the Complainant must inform Philadelphia Works, Inc. in writing within five (5) business days of receipt of the findings and shall be provided an opportunity for a formal hearing within Philadelphia Works, Inc. to seek resolution.

* The Grievance Procedure in 20 CFR 683.600 does not apply to discrimination complaints filed under WIOA Section 188 and 29 CFR Part 38. Such complaints must be processed through Equal Opportunity/Nondiscrimination complaint procedures.

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

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

Methods of Filing
Complaints may be filed in the following manner:
• In person
• By mail
• By email
• Electronically
• By telephone with staff assistance

Grievances may be filed with Philadelphia Works at the following address:
Name: Philadelphia Works, Inc.
C/o: Compliance Department
Address: 1617 JFK Boulevard, Suite 1300
Philadelphia, PA 19103

Phone: (215) 963-2100

Hearing Procedures

Philadelphia Works, Inc. will conduct a formal hearing when requested. Philadelphia Works, Inc. will appoint an impartial hearing officer to review the complaint/grievance. This person will not have previous knowledge of the individual(s), program participant(s) and other interested parties nor the complaint/grievance. The Hearing Officer may discuss the facts with all staff members who have been involved in the grievance process in order to make an informed and fair decision. The Hearing Officer will send out notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard. The Complainant is permitted to be represented by counsel (at their own expense) or another representative. The Complainant has to right to present evidence and call witnesses to support their complaint/grievance. The Hearing Officer will hold a hearing within thirty (30) business days from date of the hearing request and will then have sixty (60) working days to render a decision.

Hearing Timeline

- Conduct a hearing when requested (within 30 business days of request for hearing); and
- Issue a written decision within sixty (60) days of the filing of the complaint.

Hearing Requirements

Hearings shall:

- Be conducted by an impartial hearing officer
- Provide reasonable advance written notice
- Allow both parties to present evidence
- Allow witness testimony
- Permit representation by counsel or another representative
- Maintain an official record of proceedings

The Hearing Officer will maintain an official record of the proceedings which will be transferred to the Compliance Department once a resolution has been agreed upon or if the Complainant decides to elevate to the Appeal Process. The written decision shall include the following information:

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

If the decision is unfavorable, the Hearing Officer will advise the complainant of his or her right to appeal to the Commonwealth.

Appealing to the Commonwealth

If the Complainant does not receive a decision from Philadelphia Works, Inc., within 60 business days of filing the complaint or receives a decision that is unsatisfactory to the Complainant, the Complainant has the right to Appeal

to the Commonwealth. The appeal request must be made within 20 working days from the decision or if the 60-day deadline from Philadelphia Works, Inc. missed for issuing a response.
A request for a local level appeal (20 CFR 683.600(c)(4)) to L&I can be made by either a complainant or a respondent not satisfied with local area's hearing decision or no local area decision was reached within 60 of the filing of the grievance or complaint.

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 SWA shall be BWPO's Customer Service Coordination Unit Supervisor. The Agency Liaison is responsible for coordinating activities with the appointed hearing examiner.

Appealing to the U.S. Department of Labor

Grievances or complaints under 20 CFR 683.600, submitted directly to US DOL, will be referred to the appropriate state or local area for resolution, unless US DOL 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 US DOL. 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 US DOL. Appeals made under this scenario must be filed within 60 days of the receipt of the decision being appealed.

Under the scenarios listed above 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

All Complainant information shall be maintained confidentially to the maximum extent of the 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

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 and be kept with the Compliance Department at Philadelphia Works, Inc.:
• Complaint forms
• Correspondence
• Investigation materials
• Hearing records
• Determinations
• Appeals
• Resolution documentation

Public Notice

Philadelphia Works, Inc. shall:
• Publicly post complaint procedures
• Include complaint rights in participant materials
• Make procedures available upon request
• Ensure staff are trained regarding complaint procedures and rights

Exceptions to this Policy

Equal Opportunity (EO) Complaints

Complaints alleging discrimination or retaliation based on protected status must immediately be referred to the Equal Opportunity (EO) Officer.

WIOA Section 188 and 29 CFR Part 38 prohibit discrimination in WIOA Title I-funded programs, activities, and employment practices.
Protected groups include race, color, religion, sex (including pregnancy, gender identity, transgender status, and sex stereotyping), national origin, age, disability, political affiliation or belief, and for beneficiaries, applicants, and participants, citizenship status and participation in a WIOA Title I-funded program or activity.

Recipients must designate an EO Officer when required, post and disseminate the 'Equal Opportunity Is the Law' notice, provide meaningful access for LEP individuals, provide reasonable accommodation and auxiliary aids/services, ensure accessibility, maintain complaint records, and conduct monitoring and corrective action as needed.

Discrimination complaints may be filed with the recipient's EO Officer or directly with the U.S. Department of Labor Civil Rights Center.
Such complaints are generally subject to a 180-day filing period and are governed by 29 CFR Part 38 rather than the grievance procedures in 20 CFR 683.600.

EO complaints are governed by:
WIOA Section 188
29 CFR Part 38
Applicable equal opportunity; nondiscrimination and civil rights statute

Fraud and Waste

Pursuant to 20 CFR 683.620, procedures must address allegations of fraud, abuse, criminal misconduct, and misuse of WIOA funds.

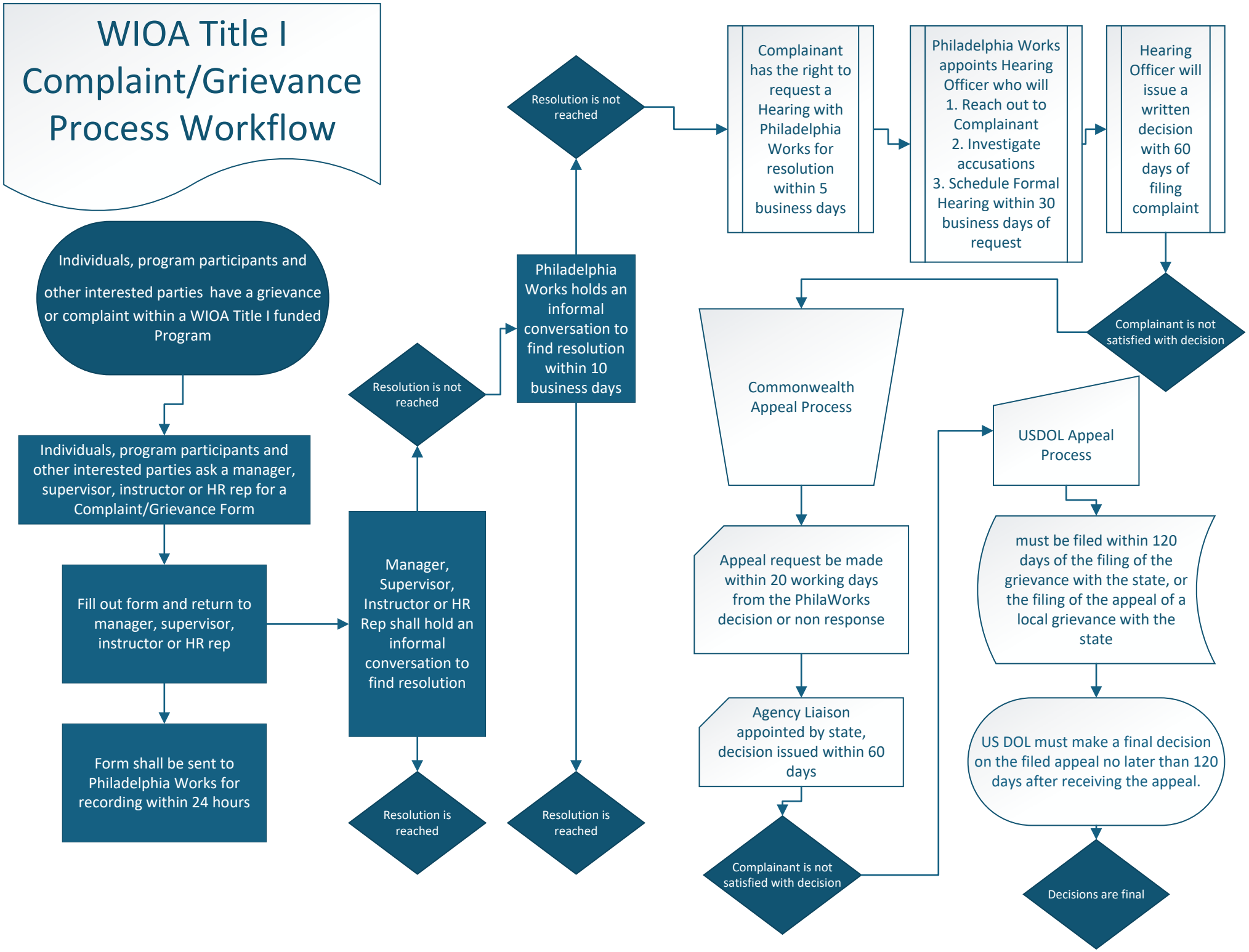
Such allegations may be referred to appropriate investigative authorities and handled separately from standard grievance procedures.

Complaint Coordinator

Philadelphia Works, Inc. designates the following individual to coordinate WIOA Title I complaints and grievances:
Name: Megan Marshall
Title: Compliance Specialist
Agency: Philadelphia Works, Inc.
Address: 1617 John F. Kennedy Blvd, 13th Floor Philadelphia PA 19103
Phone: 215-963-2100
Email: info@philaworks.org

Approved: September 17, 2026

WIOA Title I Complaint/Grievance Process Workflow



WIOA Title I Complaint and Grievance Form

Date: _____

Name: _____

Email Address: _____

Telephone Number: _____

Date(s) Event Occurred:

_____

Provider/Location of Complaint/Grievance:

_____

Date Reported: _____

Name of Person allegations were reported to: _____

Description of Allegations:

_____
_____
_____
_____
_____
_____
_____
_____

Requested Resolution:

_____
_____
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_____
_____
_____

One Penn Center
Suburban Station
1617 JFK Boulevard, 13th Floor
Philadelphia, PA 19103

www.philaworks.org
info@philaworks.org
215-963-2100
TTY 267-792-3400

WIOA Title I Grievance Policy Form Instructions

Below you will find examples of complaint types and how to instruct individuals, program participants and other interested parties to file a complaint or grievance regarding WIOA Title I Services.
*Please note that Job Corps Programs are not covered by this policy and form.

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

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

The following are Examples of Complaint Types:

- 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

This complaint can be filed in the following manner(s):

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

CHECK LIST

Please use the following checklist to make sure all required documents are collected

- ☐ Grievance Form (Completed in Full)
- ☐ Back up documentation supporting grievance (if there is documentation)
- ☐ Intake person has filled out their section
- ☐ Forms sent to the Philadelphia Works, Inc. info@philaworks.org

*Missing information could delay or impede resolution in a timely manner, please make sure the grievance file is complete.

FOR INTERNAL USE ONLY

Processed By:

Date Submitted to Philadelphia Works, Inc. Compliance Department:

WIOA Title I Complaint and Grievance Appeal Form

Name _____

Email Address _____

Telephone Number_____

Date Formal Hearing Occurred:
_____

Date Appeal Requested: _____

Description of Resolutions Provided by Philadelphia Works, Inc.:
_____
_____
_____
_____

Reason Provided Resolutions are not Satisfactory:
_____
_____
_____
_____
_____
_____
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_____

Reason for Appeal Request:
_____
_____
_____
_____
_____

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215-963-2100
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CHECK LIST

Please use the following checklist to make sure all required documents are collected

- ☐ Initial Complaint/Grievance Form (Completed in Full)
- ☐ Back up documentation supporting grievance (if there is documentation)
- ☐ Documentation from Formal Hearing including Resolutions
- ☐ Forms sent to the Commonwealth or US DOL

*Missing information could delay or impede resolution in a timely manner, please make sure the Appeals file is complete.

FOR INTERNAL USE ONLY Processed By: Date Submitted to Commonwealth or USDOL