

**COMMONWEALTH OF VIRGINIA**  
**Virginia Community College System**  
**Workforce Investment Act of 1998**

<b>Policy Number:</b>	<b>01-01</b>
<b>Effective Date:</b>	<b>June 25, 2001</b>
<b>Revision #: 1</b>	<b>January 15, 2010</b>
<b>Rescission Date:</b>	
<b>Title:</b>	<b>Methods of Administration</b>

**PURPOSE**

The purpose of the Methods of Administration (MOA) is to provide a reasonable guarantee that all of Virginia’s Workforce Investment Act (WIA) Title I financially assisted programs, activities and recipients comply with the nondiscrimination and equal opportunity requirements stipulated under Section 188 of the Workforce Investment Act of 1998; Final Rule.”

**REFERENCES**

- 1. Section 188, Workforce Investment Act of 1998
- 2. 29 CFR Part 37. *Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998, Final Rule.*
- 3. Gubernatorial Executive Order One (2006)- Equal Opportunity

**POLICY STATEMENT**

Though there have been many sweeping programmatic changes in the workforce development system over the years, the one constant has been the prohibition against discrimination. As such, Virginia’s Methods of Administration, provides that no individual, shall on the grounds of race, color, national origin, disability, age, sex, political affiliation or belief, or religion be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under federally-assisted Title I programs and activities of the Workforce Investment Act of 1998.

**ELEMENTS OF THE METHODS OF ADMINISTRATION**

The MOA is comprised of nine elements that describe the actions Virginia has taken and will continue to take to ensure that its WIA Title I-financially assisted programs, activities, and recipients are complying, and will continue to comply,

with the nondiscrimination and equal opportunity requirements of WIA and its implementing regulations.

**The required elements of the MOA are:**

Element 1 Designation of State and Local-level EO Officers [(29 CFR 37.54 (d) (ii));

Element 2 Notice and Communication (29 CFR 37.54 (d) (1) (iii));

Element 3 Review Assurance, job training plans, contract, and policies and procedures (29 CFR 37.54 (d) (l) (i) and (d) (2) (i), (iii) and (iv));

Element 4 Universal Access (29 CFR 37.54 (d) (l) (vi));

Element 5 Compliance with Section 504 of the Rehabilitation Act of 1973 (as amended) and 29 CFR Part 37 (29 CFR 37.54 (d) (2) (V));

Element 6 Data and Information Collection and Maintenance (29 CFR 37.54 (d) (l) (iv) and (vi));

Element 7 Monitoring Recipients for Compliance (29 CFR 37.54 (d) (2) (ii));

Element 8 Complaint Processing Procedures (29 CFR 37.54 (d) (l) (v));

Element 9 Corrective Actions/Sanctions Procedures (29 CFR 37.54 (d) (2) (vii)).

**REQUIREMENTS**

As provided in 20 CFR 37.55(b), which addresses the requirements relating to submitting and updating the MOA, the Governor, or authorized designee, is required to review the MOA and its implementation every two years, to determine if any changes are necessary, either to the document or the way in which it is implemented. At the time of the review, the Governor, or designee, must either (1) certify to the Director of the Civil Rights Center, in writing, that no changes are necessary, or (2) provide the Director with any changes that are made.

**Revisions: N/A**

**Approved:**

Dr. Glenn DuBois  
Chancellor, Virginia Community College System

Peter Blake  
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Virginia Community College System

January 15, 2010

**Virginia Community College System  
Workforce Development Services**