

## Bay Consortium Workforce Development Board

**Policy Number:** 20-03

**Effective Date:** May 6, 2020

**Title:** WIOA Outreach and Tagline Policy

### PURPOSE

It is the policy of the BCWDB to ensure that all advertising and outreach materials meet regulatory requirements and are also consistent with Virginia Career Works Brand Standards as outlined in the Virginia Career Works Brand Standards Manual and reflect the VA Career Works Center/American Job Center brand as directed in VWL No. 17-03. The purpose of this policy is to provide guidance to BCWDB staff and BCWDB WIOA Service Provider staff in order to ensure expenditures for advertising and outreach fall within these requirements.

### REFERENCES

- 2 CFR Part 200.421: Advertising and Public Relations
- 29 CFR Part 38 Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act; Final Rule
- Virginia Career Works Brand Standards Manual 6.18.18, V1.7
- VCCS VWL No. 17-03

### BACKGROUND

OMB Uniform Administrative Requirements, Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subsection 421 - General Provisions for Selected Items of Cost: Advertising and Public Relations Costs outlines costs that are both allowed and disallowed. Allowable advertising costs for participant outreach must include a description of the program being provided and a method for individuals to find out more about the program/service through a phone number, address, or website. Advertising for the recruitment of program implementation staff is also allowable.

29 CFR Part 38.9 prohibits WIOA grant recipients from discrimination based on national origin, including limited English proficiency and further states in (b) A recipient must take reasonable steps to ensure meaningful access to each limited English proficient (LEP) individual served or encountered so that LEP individuals are effectively informed about and/or able to participate in the program or activity.

29 CFR Part 38.13 (b) outlines Programmatic Accessibility requirements for all WIOA Title I financially assisted programs and activities which includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with persons with disabilities as effectively as with others, and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity.



## PROCEDURE

1. All WIOA funded programs, activities, media, commercial materials, and outreach materials, or items distributed to the public, are required to contain the notice as worded below with the current year funding amount and contract number. (See **Example** below)
2. Discretionary grant funded programs and activities, media, commercial materials, outreach materials, or items distributed to the public are required to use the wording specified in the tagline.
3. An advertising or outreach proof must be submitted to the BCWDB staff approval prior to public distribution. A description of the purpose of the advertisement shall be included with this submission.
4. Once approval is returned by the BCWDB staff a copy of the approved proof must be kept on file for auditing purposes.
5. Questions regarding the Outreach and Tagline Policy should be submitted to the BCWDB staff.

## EXAMPLE

“The Virginia Career Works (Name of Center) is an Equal Opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. TDD: VA Relay Center: 711 or 800.828.1120. This workforce product was 100% supported with U.S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act funds (Federal Award Number) under contract (Contract Number, Award Amount) awarded by the Bay Consortium Workforce Development Board to (WIOA Contractor Name). This does not necessarily reflect the official position of the VCCS or DOLETA.”