



Local Boards and Service Providers Employment Practices Data Analysis Form

All WIOA recipients must annually conduct an analysis on its employment practices¹. Employment practices covered under WIOA include the following:

- Employers not discriminating in its employment practices on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin, age, disability, or political affiliation or belief in the administration of, or in connection with a WIOA any WIOA Title I-financially assisted program or activity; and any program or activity that is part of the one-stop delivery system and is operated by a one-stop partner listed in Section 121(b) of WIOA, to the extent that the program or activity is being conducted as part of the one-stop delivery system².
- Complying with the with the Uniform Guidelines on Employee Selection Procedures, [41 CFR part 60-3](#), where applicable.
- Comply with the standards for employment-related investigations and reviews.
- Comply with Section 504 of the Rehabilitation Act.
- Comply with Titles I and II of the ADA.
- Comply with the anti-discrimination provision of the Immigration and Nationality Act and should be aware of the obligations imposed by that provision. *See* [8 U.S.C. 1324b](#), as amended.
- Comply with any state employment discrimination laws and requirements.

¹ [29 CFR 38.51\(b\)](#)

² [29 CFR 38.18](#)



Name of Organization: Workforce Development Board of Southeast Missouri

Date submitted 10.30.25

1. Provide a description of the organization's background. **See Attached Report**
2. Summarize the makeup of your workforce data compared to the [Civilian Labor Force Data](#) to the organization employment population. **See Attached Report**
3. Provide a copy of the organization chart or provide a link to the organizational chart.
4. Describe the organization's current hiring practices. Describe the following:
 - How jobs are advertised
 - Application for employment process
 - How applicants are selected for interviews
 - How interviewees are selected for hire**See attached report for all sections**
5. Describe how often your organization analyzes and updates job descriptions. **See Attached Report**
6. Describe how performance evaluations are conducted. **See Attached Report**
7. Describe how employees are selected for training. **See Attached Report**
8. Analyze the organization's employment practices by the required WIOA demographic(race/ethnicity, sex, age, where known, disability status), using the – [80% Rule spreadsheet](#) (Tab Employment Practices) or any statistical analysis the organization has implemented into their operation to analyze data employment data. **See Attached Report**
9. Describe and identify the significant differences⁴ that each demographic group is experiencing for each employment practice tab (i.e. hires, promotion, demotion, training). Describe the quantifiable evidence gathered through the investigation for each demographic group that is experiencing a significant difference. **See Attached Report**
10. Describe the follow-up strategy that will be implemented into the organization's operation to address the significant differences with the demographic group(s).

See Attached Report

Section 188 of WIOA Quick Assessment

This assessment does not determine if a recipient is in compliance with Section 188 of WIOA, 29 CFR Part 38, and the Missouri Nondiscrimination Plan. DHEWD SOEO will determine if the organization is in compliance with the WIOA regulations after the monitoring process is complete. This is a self-assessment tool for the organization to determine if they are meeting the requirements of Section 188 of WIOA, 29 CFR 38, and the Missouri Nondiscrimination Plan.

Section 188 of WIOA Requirements	Yes	No	Technical Assistance Needed
Section 1: Assurances 29 CFR 38.25-27			
1. How does the organization train and notify the public of policies and or procedures on how persons with disabilities are assured participation in programs and activities in an integrated setting (reasonable accommodation/modification policy)?	X		
2. How does the organization evaluate their programs to ensure they comply with the ADA requirements for programmatic and physical (architectural) accessibility?	X		
Section 2: Designating an individual to work with the Local EO Officer 29 CFR 38.33			
3. Has the organization provided a person designated to work with the Local EO Officer? Local EO Officer list	X		
Section 3: Notices and Communications 29 CFR 38.34-39			
4. Does the organization have the EO Poster prominently posted around the facility and on their websites? Is the EO Notice/Poster posted in their handbooks (student/employee)? WIOA EO Poster	X		
5. Does the organization provide an orientation on how to file a complaint under WIOA Section 188 complaint procedures?	X		
6. Does the organization insert the EO statement “equal opportunity employer/program, and auxiliary aids and services are available upon request to individuals with disabilities,” on brochures, websites, flyers, etc.?	X		
Section 4: Affirmative Outreach 29 CFR 38.40			
7. Does the organization have an outreach plan targeting different demographic groups for efforts?	X		
Section 5: Data and Information Collection Maintenance 29 CFR 38.41-45			
8. Does the organization collect data and maintain such records in accordance with Section 188 of WIOA in a manner that a statistical analysis can be conducted?	X		
9. Does the organization provide quarterly complaint logs to the Local EO Officer?	X		
Section 6: Monitoring Requirements for WIOA Recipients 29 CFR 38.51-54			
10. Does the organization conduct an analysis on programs and employment practices annually?	X		
Section 7: Complaint Procedures 29 CFR 38.72-73			
11. Does the organization have the WIOA complaint procedures implemented into its organization?	X		