

Exhibit A

Department of Labor and Industrial Relations Non-Compliance, Corrective Action, and Sanction Guidelines

NoN-COMPLIANCE, CORRECTIVE ACTION, AND SANCTION GUIDELINES

<i>Area of Non-Compliance</i>	<i>Corrective Action</i>	<i>Pre-sanction and Sanction</i>
<u>I. Practices and Policies</u> A. Policies or procedures which discriminate, or have the effect of excluding identifiable groups of individuals or denying the administration of benefits, participation in, employment, or other activities in connection with WIA.	1. Technical Assistance 2. Elimination or modification of policies, practices, and procedures which have been found to be discriminatory within a time period specified by the reviewing EO Officer.	1. Warning of non-compliance 2. Recommendation of reduction of funding. 3. Reduction of funding.
B. Programs, activities, or services which are inaccessible to disabled or limited English-speaking individuals.	1. Technical Assistance 2. Identification of inaccessible features, and modification of inaccessible features, within the timeframe specified by the reviewing EO officer.	1. Warning of non-compliance. 2. Reduction of funding 3. Disallowance of cost in inaccessible programs, activities, or services. 4. Elimination of funding. 5. Legal action under applicable laws.
C. Non-existent, incomplete, or inadequate accessibility assessment tool on file as required by Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990.	1. Acquisition of technical assistance materials. 2. Prompt modification or elimination of non-complaint policies, practices, and procedures within a time specified by the reviewing EO Officer	1. Warning of non-compliance. 2. Recommendation of reduction of funding. 3. Legal action under State law, based upon the recipients' assurance of compliance with WIA, Federal Regulations, and Governor's Directives.

Area of Non-Compliance	Corrective Action	Pre-Sanction and Sanction
D. Policies, practices, or procedures which are not in compliance with Section 188, 29 CFR 37, or other Civil Rights Legislation.	<ol style="list-style-type: none"> 1. Acquisition of technical assistance materials. 2. Prompt modification or elimination of non-compliant policies, practices, and procedures within a time specified by the reviewing EO Officer. 	<ol style="list-style-type: none"> 1. Written warning of non-compliance. 2. Propose reduction of funding. 3. Proposed elimination of funding. 4. Legal action under State law, based upon the recipient's assurance of compliance with WIA, Federal Regulations, and Governor's Directives.
E. Non-existence of a staff analysis by race, sex, and age.	<ol style="list-style-type: none"> 1. Completion of staff analysis within thirty (30) days of receipt of written report of non-compliance. 	<ol style="list-style-type: none"> 1. Written warning of non-compliance. 2. Recommendation of reduced funding. 3. Reduction of funding.
II. <u>Administrative Duties</u>		
A. Lack of implementation of procedure for resolving complaints alleging a violation of the WIA, or relating to terms and conditions of employment.	<ol style="list-style-type: none"> 1. Obtain technical assistance and take necessary steps to achieve compliance. 	<ol style="list-style-type: none"> 1. Warning of non-compliance. 2. Terminate federal financial assistance.
B. Non-compliance with 29 CFR 37, on due process, protection of confidentiality, and fairness in the resolution of complaints	<ol style="list-style-type: none"> 1. Set internal controls to achieve compliance. 	<ol style="list-style-type: none"> 1. Warning of non-compliance. 2. Terminate Federal Financial assistance.
C. Complaint procedures not in compliance with 29 CFR 37.	<ol style="list-style-type: none"> 1. Obtain technical assistance and take necessary steps to achieve compliance 	<ol style="list-style-type: none"> 1. Written warning of non-compliance. 2. Propose suspension of Federal financial assistance. 3. Proposed termination of Federal financial assistance.

<i>Area of Non-Compliance</i>	<i>Corrective Action</i>	<i>Pre-Sanction and Sanction</i>
D. Failure to comply with equal opportunity directives issued by the State EO Officer or the Governor's Office, and with applicable laws and regulations.	1. Take immediate action to comply within the time frame specified by the reviewing EO Officer.	1. Written warning of non-compliance. 2. Propose termination of Federal financial assistance.
E. Failure to carryout oversight responsibilities by monitoring equitable service performance of its subcontractors.	1. Require immediate implementation of oversight and written report of the results to the State EO Officer within three (3) months of the receipt of the report on non-compliance.	1. Written warning of non-compliance. 2. Proposed suspension of Federal financial assistance. 3. Proposed termination of Federal financial assistance.
F. Failure to collect and maintain records as required in 29 CFR 37.	1. Take immediate action to comply within a time frame specified by the State EO Officer.	1. Written warning of non-compliance. 2. Propose suspension of Federal financial assistance. 3. Propose termination of Federal financial assistance.