



Subject: Customers Concern and Complaint Resolution Policy

Policy No: 2015-31

Effective Date: 07/29/2013

Revised: 4/12/2019, 1/25/2021, 3/31/21

1. Purpose:

The Benton-Franklin Workforce Development Council (BFWDC) is issuing this policy to provide guidance and standard expectations for processing customer concerns and formal complaints and to clarify the BFWDC oversight role in the complaint process.

2. Background:

The BFWDC and all partners of the WorkSource Columbia Basin (WSCB) One-Stop Center have a legal obligation to ensure that all customer complaints are received and processed following federal, state, and local regulations as outlined in the WorkSource Program Complaint Handbook (Attachment A).

Policy and procedures specific to WorkSource System Discrimination Complaint Processing are found in [Employment Security Department Policy Number 1017](#).

This policy and Attachments A, B, and C provide standard expectations for processing customer concerns and formal complaints. In so doing, it creates distinct definitions of customer “concern” and customer “complaint”. All partners are expected to collaborate and be responsive to the needs of all WSCB customers. Collaboration is essential when a complaint presents allegations that cross jurisdictional boundaries, including allegations that involve more than one program or allegations about a program.

A. Policy and Procedures

All WSCB staff must be able to assist customers interested in filing a complaint. All staff members will adhere to the minimum complaint processing requirements contained in the attached WorkSource Program Complaint Handbook (Attachment A) in addition to the responsibilities listed below:

BFWDC will:

- Designate a local Complaint Coordinator (See Attachment B).
- Update Customers Concern and Complaint Resolution local policy and procedures.
- Process all WSCB discrimination complaints.

WSCB Staff will:

- Make every effort to resolve a customer's concern rather than immediately referring to the customer or elevating it to a complaint.
- Notify customers of their rights to file a complaint when a Concern is elevated to a Complaint.
- Determine partner(s) programmatic complaint jurisdiction when a complaint is filed.
- Escalate official Complaints to Complaint Contact (See local Complaint Concern Flow Chart for information about the WSCB internal process for processing complaints).
- Send Concern email summary to designated leadership.

NOTE: If at any time a customer states they want to file a discrimination complaint based on one of the prohibited factors mentioned below (Definitions), staff will advise customers of their rights to file a discrimination complaint and provide complaint forms. Written discrimination complaints are immediately forwarded to BFWDC Equal Opportunity (EO) Officer (See Attachment B).

Complaint Contacts (Names listed on Attachment B) will:

- Attempt to resolve customer's concern/complaints (non-discrimination) at the lowest level and will document actions taken.
- Process non-discrimination complaints.
- Keep Complaint Coordinator informed of actions taken and resolution.

Complaint Coordinator will:

- Log all programmatic complaints to ensure the integrity of the local complaint process.
- Maintain a secure sharing system (encrypted emails, password protected log) for logging and tracking to closure all programmatic complaints defined in the WSCB Complaint Handbook.
- Collaborate when complaints present allegations involving multiple partners.
- Immediately forward discrimination complaints to BFWDC EO Officer.

B. Local Customer Concern Resolution

The goal is to resolve the concern at the lowest level possible, making every effort to find a resolution rather than immediately referring the customer or elevating to a complaint.

C. Complaint Jurisdiction

All partners located at WSCB are responsible for the outcomes of complaints that fall within their jurisdiction. Determination of jurisdiction will be made based on the specific funding stream that supports the function tied to the complaint allegations, not based on associations other than funding sources. However, collaboration is essential when a complaint presents allegations that cross jurisdictional boundaries. All partners are expected to collaborate and be responsive to the needs of all WSCB customers.

D. Confidentiality

The identity of complainants and any persons who furnish information relating to or assisting in an investigation of a complaint must be kept confidential to the maximum extent possible, consistent with applicable law and a fair determination of the complaint.

E. Definitions

Complaint Contact: Staff designated by the BFWDC as responsible for processing complaints. A contact may also be designated by the One-Stop Operator that initially assists all customers interested in filing a complaint at a local WorkSource office and determines partner(s) program's complaint jurisdiction if a complaint is subsequently filed.

Complaint Coordinator: The BFWDC designated single point(s) of contact for the one-stop center, affiliate, or connection site. The site's Complaint Coordinator is responsible for facilitating the initial process, promoting coordination to resolve all program complaints, and forwarding discrimination complaints to the Local EO Officer or State-Level EO officer for processing.

Concern: Any verbal expression of dissatisfaction or any written expression of dissatisfaction other than alleged violations of program or non-discrimination rules or laws. Concerns must be referred but do not require the same formal process as a complaint (i.e., logging, tracking, etc.). Local processes may include additional requirements.

Program Complaints: the submission of a written and a signed allegation that falls under the jurisdiction of the Workforce Innovation and Opportunity Act (WIOA) Title I, Wagner-Peyser, and Trade Adjustment Assistance (TAA) requirements as noted in the WorkSource Program Complaint Handbook (Attachment A). Program complaints allege a violation of a law, regulations, or policy connected to Wagner Peyser, WIOA, or TAA programs but do not allege discrimination. All program complaints must be filed within one year of the alleged date of the incident (except Wagner-Peyser, which requires the complaint to be filed within two years of an incident).

Discrimination Complaints: alleged violations of law(s) that prohibit discrimination against any individual on the basis of race, color, religion, sex (including pregnancy, childbirth, and

related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or for any beneficiary of, the applicant to, or participant in programs financially assisted under Title I of WIOA, based on the individual's citizenship status, or participation in any WIOA Title I—financially assisted program or activity. Washington State law also prohibits discrimination in employment and public accommodation based on citizenship or immigration status, families with children, marital status, sexual orientation, honorably discharged veteran or military status, and the use of a trained guide dog or service animal by a person with a disability.

F. Attachments

Attachment A: WorkSource Program Complaint Handbook

Attachment B: Local Coordinated Concern and Complaint Resolutions Process