

# PUBLIC SUBMISSION

As of: March 29, 2016  
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Comments Due: March 28, 2016

**Docket:** [DOL-2016-0001](#)

Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act

**Comment On:** [DOL-2016-0001-0001](#)

Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act

**Document:** [DOL-2016-0001-0332](#)

Comment from Mike Riley, KY Office of Employment and Training

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## Submitter Information

**Name:** Mike Riley

**Organization:** KY Office of Employment and Training

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## General Comment

1. Within the compliance section, there is a proposal for "annual reviews" as opposed to the currently listed "periodic reviews", however, there are no identified resources to cover additional duties. Will this be addressed?
2. The new proposal mandates that the EO Officer reports directly to the Governor with adequate staff, resources, etc. Is this a new position to be added in addition to the current EO Officer that reports to the designee of the Governor, or is this the same position defined in previous versions?
3. Employee complaints in agency is or is not the responsibility of the State EO Officer vs other HR staff? Please clarify.
4. What substantiates a "significant number" in terms of languages to have translations readily available? We would recommend a literal policy adoption of the DOJ Civil Rights Policy, instead of a general review that is left open.
5. It is defined that budgetary restrictions are not an allowed reason to not send EO Officers to trainings. Will DOL be allocating funds or funding training so that states can assure this?
6. Babel notice is listed as integral piece for translation, yet in other sections and in communications with CRC it is not sufficient. Please clarify and make definitive.
7. In relation to recipient providing translator and participant electing to bring their own, is this a situation of either/or, or both? And if both, whose interpretation supercedes whose?