

## CHAPTER THREE: Ensuring Compliance

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This chapter begins with a discussion of administering the nondiscrimination requirements of WIA Sec 188 and 29 CFR §37. It then describes a practical approach to organizing and implementing each One-Stop delivery system's effort to come into compliance with disability nondiscrimination

### STATE ADMINISTRATIVE DESIGN

As mentioned in Chapter One, the term recipient applies to several levels within the WIA Title I structure for State programs. Generally there are three levels: State, local, and "service provider" level. Part 37 places primary responsibility for nondiscrimination compliance with the Governor. However, since programs and activities at each level are also considered recipients, each of them is required to comply with Section 188 and 29 CFR part 37. Moreover, liability for compliance is assigned "jointly and severally" to the Governor and all recipients [29 CFR §37.52(a)].

### Governors' Responsibilities

Each governor's responsibilities include ensuring nondiscrimination compliance for all State programs and activities that are financially assisted by WIA Title I. To this end, each governor (and State) must prepare a **Methods of Administration (MOA)**, a document that provides a reasonable guarantee that all recipients will comply, and are complying with the nondiscrimination and equal opportunity provisions of WIA [29 CFR 37.54(a)(2)]. Each State is required to prepare and submit the MOA to the US Department of Labor's Civil Rights Center within 180 days of the date the State first becomes subject to this requirement [29 CFR § 37.55].

### Methods of Administration

State Methods of Administration (MOAs) must be prepared in writing. They must address a number of required topics, be signed by the governor, and reviewed periodically. At a minimum, these MOAs must describe how State programs and recipients are providing:

#### 29 CFR §37.51

##### ***What are a Governor's oversight responsibilities?***

The Governor is responsible for oversight of all WIA Title I-financially assisted State programs. This responsibility includes ensuring compliance with the nondiscrimination and equal opportunity provisions of WIA and this part, and negotiating, where appropriate, with a recipient to secure voluntary compliance when noncompliance is found under Sec. 37.95(b).

#### 29 CFR §37.52(a)

(a) The Governor and the recipient are jointly and severally liable for all violations of the nondiscrimination and equal opportunity provisions of WIA and this part by the recipient,...

#### 29 CFR §37.54(a)(1)

(a) (1) Each Governor must establish and adhere to a Methods of Administration for State programs as defined in Sec. 37.4. In those States in which one agency contains both SESA or unemployment insurance and WIA Title I-financially assisted programs, the Governor should develop a combined Methods of Administration.

(2) Each Methods of Administration must be designed to give a reasonable guarantee that all recipients will comply, and are complying, with the nondiscrimination and equal opportunity provisions of WIA and this part.

- Assurance of nondiscrimination and equal opportunity;
- Appointment of an Equal Opportunity (EO) Officer;
- Nondiscrimination and EO notice and communication;
- Data and information collection and maintenance;
- Universal access to programs and activities;
- Governor's administrative oversight responsibilities; and
- Complaint processing procedures [29 CFR §37.54(d)(1)].

Additional elements that must be specified in MOAs include:

- a system for determining whether grant applicants or training providers are likely to conduct their Title I-assisted programs in a nondiscriminatory way;
- a system for periodic monitoring of recipients' compliance with Section 188 and 29 CFR §37;
- reviews of recipients' various policies, plans, and agreements;
- procedures for ensuring nondiscrimination compliance, training of EO officers and recipients' staffs, and corrective actions when they are required; and
- supporting documentation to show that MOA-specified commitments have been and/or are being carried out. [29 CFR §37.54(b)(2)].

One-Stop operators should consult with their State or local workforce investment area EO Officer regarding these administrative obligations.

### **Equal Opportunity Officers**

As mentioned above, one of the basic requirements for administering WIA Title I financially-assisted programs is the appointment of equal opportunity officers. Recipients at each level of the workforce investment system must designate EO officers. The exceptions to this requirement are small recipients (those that serve fewer than 15 beneficiaries within a grant year and employ fewer than 15 employees on any given day during the grant year), and service providers (whose compliance with nondiscrimination and EO provisions must be ensured by the governor or LWIA grant recipient).

The EO officer is responsible for the administration of the recipient's nondiscrimination and equal opportunity obligations under WIA. WIA State level EO Officers are responsible for preparing the MOA [29 CFR §37.25(g)]. The EO Officers have

been trained in the preparation of the MOA and have been provided written guidance. The guidance will be published in the Federal Register. Information about your State's MOA is available from your State's EO Officer.

## A PROCESS FOR ENSURING COMPLIANCE

### Recipient Self-Assessment

Recipients that have been assisted by Employment and Training legislation prior to the WIA have found it most effective to complete a thorough initial self-assessment and then to establish policies of ongoing assessment or periodic re-assessment to ensure their compliance with disability nondiscrimination. Since there are differences between 29 CFR § 37 and former employment and training nondiscrimination regulations, it is recommended that all recipients conduct a thorough self-assessment at the outset of participation in the WIA. More experienced recipients may recall having gone through a similar process as required by the ADA in the early 1990s. For those that have been through such a process, documentation or approaches that were established may provide a helpful starting point for this new self-assessment.

Recipients that are experienced with the ADA self-evaluation of the early 1990s have found it helpful to conduct their nondiscrimination self-assessments in *three phases*. During the first phase, the EO Officer and his or her staff are appointed, an Access Team Leader may be designated, participants for an access team are identified from among One-Stop partners and the LWIB, and procedures for communication and coordination are established. In the second phase, a comprehensive assessment of current policies, practices, and services is undertaken. In the third phase, the collected information is reviewed and any necessary modifications that were identified during the second phase are carried out.

### Appointment of the Equal Opportunity Officer

As mentioned above, the Equal Opportunity (EO) Officer is responsible for the administration of the recipient's nondiscrimination and equal opportunity obligations under WIA. Every recipient is required to designate an EO Officer,

#### 29 CFR §37.23

#### Who Must appoint an Equal Opportunity Officer?

Every recipient must designate an Equal Opportunity Officer (EOO) 15 business days after the recipient and service providers as defined in §37.4. (The EOOs for all of the small employers are designated by §37.27 through 29.

with the exception of service providers and those recipients that meet the definition of “small recipients.”<sup>1</sup> Small recipients are defined as those that serve a total of fewer than 15 beneficiaries during the entire grant year, and employ fewer than 15 employees on any given day during the grant year [29 CFR § 37.4]. Though small recipients are exempted from having to designate an EO Officer with the full range of responsibilities, they are required to designate an individual who will bear responsibility for developing and publishing complaint procedures and processing complaints [29 CFR §37.27]. The compliance of service providers is to be ensured by the governor or LWIA grant recipient, as specified in a State’s MOA [29 CFR §37.28].

The first step in the compliance process is to determine into which of the three categories a recipient falls: service provider, small recipient, or all other recipients. Small recipients must appoint the required individual who will be responsible for publishing complaint procedures and processing complaints. All other recipients must appoint EO Officers, who become the point of contact for all questions about WIA nondiscrimination and equal opportunity, and who provide overall leadership for the self-assessment process that is described in this guide. Depending upon the recipient and the terms of the state’s MOA, some EO Officers may also have responsibility to ensure the compliance of some or all of the service providers in a given LWIA.

### **The Role and Responsibilities of the EO Officer**

29 CFR §37.15 assigns six responsibilities to EO officers of recipients below the state level:<sup>2</sup>

- 1) serve as the recipient’s liaison with the Civil Rights Center (CRC), which is responsible for monitoring compliance and responding to discrimination complaints under WIA Title I;
- 2) monitor and investigate the activities of the recipient and the activities of the entities that receive WIA Title I funds from the recipients, to ensure that the recipients’ and its subrecipients

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<sup>1</sup>See the section, “Who Must Comply?” in chapter 1 for the definition and complete listing of recipients under Title I.

<sup>2</sup>State EO Officers are assigned the additional responsibility of overseeing the development and implementation of the state’s MOA [29 CFR §37.25(g)].

- are not violating their nondiscrimination and equal opportunity obligations;
- 3) review the recipient's written policies to ensure that those policies are nondiscriminatory;
  - 4) develop and publish, the recipient's procedures for processing discrimination complaints;
  - 5) report directly to the appropriate official (including, but not limited to, the State WIA Director, Governor's WIA Liaison, Job Corps Center Director, SESA Administrator, or LWIA grant recipient) about equal opportunity matters;
  - 6) undergo training (at the recipient's expense) to maintain competency, if the Director of the CRC requires the EO Officer and/or his or her staff to do so [29 CFR §37.25].

In exercising these prescribed responsibilities, the EO Officer has overall responsibility for coordinating the recipient's nondiscrimination obligations. The EO Officer will have both expertise in the areas of equal opportunity and nondiscrimination and ongoing relationships with both state level EO staff and CRC staff. Because of their expertise, the EO Officers will be called upon to answer recipient staff members' questions regarding equal opportunity and nondiscrimination. Moreover, having a single point of contact, at both the recipient and Department of Labor levels, helps to ensure a consistent interpretation and application of the requirements of the nondiscrimination and equal opportunity provisions of WIA and 29 CFR §37.

### **Persons Eligible to Serve as an EO Officer**

Because of the importance of his or her responsibilities, the EO Officer must be a senior-level employee. The recipient must establish clear lines of authority and accountability for its EO activities, and must provide the EO Officer with appropriate levels of support. The EO Officer may be assigned other duties, depending upon the size of the recipient's WIA Title I programs. However, such additional assignments may not create a conflict or the appearance of a conflict with the responsibilities of an EO Officer [29 CFR §37.24].

Recipients are not required to designate a separate or additional EO Officer to implement the nondiscrimination obligations imposed by WIA. Nor is it required to employ a WIA EO Officer to work full-time in that position. Recipients

### **29 CFR §37.24**

#### **Who is eligible to serve as an Equal Opportunity Officer?**

A senior-level employee of the recipient should be appointed as the recipient's Equal Opportunity Officer. Depending upon the size of the recipient, the size of the recipient's WIA Title I-financially assisted programs or activities, and the number of applicants, registrants, and participants served by the recipient, the EO Officer may, or may not, be assigned other duties. However, he or she must not have other responsibilities or activities that create a conflict, or the appearance of a conflict, with the responsibilities of an EO Officer.

may use existing EO Officers and staff (provided that the EO Officer meets the requirements of §37.24), or assign additional duties to a newly-appointed EO Officer, so long as the EO Officer is able to give priority to, and to fulfill all of, his/her responsibilities under the nondiscrimination and equal opportunity provisions of WIA [29 CFR §37.24].

Along with appointing an EO Officer, recipients have the additional obligations to:

- make the EO Officer's name and his or her position title, address, and telephone number (both voice and TTY/TDD) public;
- ensure that the EO Officer's name and contact information appear on all communications regarding equal opportunity and nondiscrimination programs;
- assign sufficient staff and resources, along with the necessary support of top management to ensure equal opportunity and nondiscrimination compliance;
- provide training for the EO Officer and his/her staff, to ensure their competent exercise of required EO activities [29 CFR §37.26].

The success of a recipient's nondiscrimination and equal opportunity program depends heavily upon the tangible and intangible support that the recipient provides to its EO Officer. The recipient's top management should provide a significant amount of that support. As such, recipients must ensure that the EO Officer and his/her staff are afforded the opportunity to receive the training necessary and appropriate to maintain competency. In addition, recipients are required to pay for any training that the Director of the Civil Rights Center requires of the recipient's EO Officer and staff. Ultimately, the recipient is responsible for ensuring that its EO Officer and staff maintain the level of knowledge, skills, and abilities necessary to carry out their responsibilities fully and effectively. The training needed to maintain such level of competency may be, in particular cases or for particular recipients, more extensive than the training required by the Director. The State EO Officer should be an excellent source for information and assistance in identifying training programs and opportunities for other recipients' EO Officers.

#### **FOUR BEST PRACTICES FOR ENSURING EFFECTIVE COMPLIANCE**

Experience among recipients has shown the following four best practices as keys to an effective compliance process.

- 1) Gain commitment from leaders;
- 2) Coordinate compliance activities;
- 3) Involve people with disabilities; and
- 4) Institutionalize compliance procedures.

Each of these practices will help open doors for persons with disabilities to participate fully in the aid, benefits, services, or training activities of a LWIA recipient. Not only will they help recipients comply with the specific requirements of Federal disability laws, they will also foster an inclusive, hospitable community that will help identify and end other discriminatory practices as well.

***BEST PRACTICE ONE: Gain Commitment from Local Workforce Investment Board and One-Stop Administrators***

It is critical that a leadership commitment be communicated clearly and convincingly to all staff and program participants. When high-level officials in the Workforce Investment System and others in responsible positions assume strong leadership roles, program managers and staff are far more motivated to address nondiscrimination. The senior leadership should remain involved throughout the compliance process, reviewing progress and participating in decision-making at critical points (e.g. approval of budgets for barrier removal).

***BEST PRACTICE TWO: Coordinate Compliance Activities***

Nondiscrimination compliance is a complex process that affects the Workforce Investment System at many levels. Experience indicates that compliance activities are best approached as a coordinated whole; few problems can be effectively remedied through a fragmented effort. Coordination can facilitate the sharing of information and resources, and strengthen accountability. The designation of the EO Officer (or, in the case of small recipients, the individual charged to develop a complaint procedure and to process complaints) is a critical first step in promoting coordination. In addition, the One-Stop Administrator should form a One-Stop Access Team to conduct the assessment.

### ***BEST PRACTICE THREE: Involve People with Disabilities***

The experience of many communities in complying with the ADA and other disability statutes confirms that cooperation between the disability community and public entities can lead to creative problem solving, improved communications, and mutual understanding. Many associations and advocacy organizations that serve persons with disabilities would very likely be responsive to calls requesting nominations for committee membership. These groups have frequently made the most effective, least expensive recommendations for modifications, where they have been necessary.

### ***BEST PRACTICE FOUR: Institutionalize Compliance Procedures***

A recipient's initial assessment will target needed modifications in employment practices, operating procedures, communications, and access to programs and facilities. Ensuring that these modifications are made and that equal opportunity for persons with disabilities is institutionalized is a difficult task.

Success in implementing permanent changes depends to a great extent on the quality of the planning process itself and on the degree to which compliance becomes integrated in ongoing operations. For example, it is important that training be offered to familiarize new employees with nondiscrimination policies and practices. Also, the ADA requires that accessible features, once installed, must be regularly maintained [28 CFR §35.133(a)]. This Guide recommends that Access Teams, composed of individuals representing major organizational divisions and functions, work with the EO Officer to ensure ongoing compliance.

### **A THREE-PHASE PROCESS**

As mentioned above, some recipients have found it helpful to divide the self-assessment process into three phases:

Phase 1: Preparation

Phase 2: Evaluating policies, practices, and services

Phase 3: Selecting and implementing modifications



<b>Three Phase Self-Assessment Process</b>		
<b>Phase One: PREPARATION</b>	<b>Phase Two: SELF-EVALUATION</b>	<b>Phase Three: MODIFICATIONS</b>
<ul style="list-style-type: none"> <li>• Appoint EO Officer and Access Team Leader, where appropriate</li> <li>• Gain statement of commitment from Workforce Development System leadership.</li> <li>• Plan assessment process.</li> <li>• Engage appropriate partners and organizations (entities and subrecipients).</li> <li>• Appoint access team members.</li> <li>• Orient/train team members.</li> <li>• Refine compliance process.</li> <li>• List all programs, services, and activities.</li> <li>• Collect summary data for listed programs, services, and activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Assess affirmative obligations: assurances, notices, data collection, universal access, complaint procedures.</li> <li>• Audit programs, services, and activities to ensure nondiscriminatory policies and procedures.</li> <li>• Evaluate employment policies and practices.</li> <li>• Evaluate facilities to ensure access to all programs, services, and activities.</li> <li>• Evaluate communications to ensure they are equally effective for persons with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Modify discriminatory policies and practices.</li> <li>• Plan for ongoing staff orientation.</li> <li>• Make nonstructural modifications.</li> <li>• Develop plan for structural modifications.</li> <li>• Make structural modifications.</li> <li>• Develop communications capacity.</li> </ul>

### **PHASE ONE: Preparation**

During Phase 1, an Access Team Leader is appointed and placed in position with a strong statement of mission and commitment from the senior leadership of the local Workforce Investment System. For many recipients, the Access Team Leader will be the EO Officer; others will find it more appropriate to appoint a separate individual, who will work as Access Team Leader with the close cooperation and support of the EO Officer. The Access Team Leader becomes thoroughly familiar with the requirements of the regulations through review of materials, training, conversations with peers, and other means. The Access Team Leader will work closely with the EO Officer and will facilitate the defining of the One Stop's compliance process.

### **PHASE TWO: Evaluating Current Policies, Practice, and Services**

During Phase 2, work groups thoroughly investigate how the One-Stop Operator, partners, and service providers currently operate in each of the areas covered by the regulations and document the situation as it exists. Areas to be examined

include: required assurances and notices, nondiscrimination policies and procedures in programs and activities; employment; accessibility to facilities where programs, services, and activities occur; and effective communication.

### **PHASE THREE: Selecting and Implementing Modifications**

During this phase, staff training and other internal communication must occur to ensure that everyone understands what changes are made and why. Clear and appropriate training and communication will maximize the support and understanding of the One-Stop Center staff and partners overall, and help ensure that violations do not occur because of lack of knowledge. This training and communication must occur on an ongoing basis, since employees change continually. New employees must be routinely familiarized with their part in ensuring continued compliance.

### **IMPLEMENTING THE PROJECT START-UP**

The Access Team Leader (whether the EO Officer or another person) initiates planning through a series of tasks designed to gain personal familiarity with the legal requirements; to structure and initiate the compliance process; to develop an overview of the recipient's programs, aids, benefits, services, training, and employment; and to complete initial action steps. Substeps may include the following:

#### *Complete Personal Orientation to the ADA and WIA Nondiscrimination and Equal Opportunity Provisions*

- Review the ADA WIA Section 188, 29 CFR §37, other federal disability, regulations, and technical assistance materials.
- Attend an ADA/Section 188 training program (many of the Disability and Business Technical Assistance Centers (DBTACs) are offering training on ADA, Section 188, and serving customers with disabilities).
- Review the disability compliance plans and documents.
- Discuss compliance with key staff and community leaders.

#### *Structure and Initiate the Compliance Process*

- Evaluate personnel and resources needed for the self-assessment and larger compliance process.
- Convene or recruit, orient, and train your Access Team.
- Draft an Access Assessment Plan.

*Develop Overview of One-Stop Center's Partners, Programs and Services*

- List programs, services, and activities provided directly by the recipient, by subrecipients, or service providers through the One-Stop Center Program.
- Collect concise descriptions for programs, services, and activities.
- Collect and document policies and practices governing administrative procedures for these programs, services, and activities.

*Resource 3-1, located at the end of this chapter, will help an access team monitor its completion of these initial tasks.*

## **Complete Personal Orientation to Nondiscrimination and EO Requirements**

The Access Team Leader's personal orientation process is extremely important. Where they are two individuals, both the EO Officer and the Access Team Leader, must understand federal nondiscrimination requirements thoroughly. The EO Officer should be able to answer questions from others employed by the One-Stop Center, as well as from those who are served by the programs. As the Access Team Leader begins to accumulate information, it is important to develop an effective filing system that will help to readily access the information that will be needed by the various parties of the One-Stop System. A new EO Officer or team leader is advised to keep record of those who help during these initial stages; this will become the beginning of a network of well-informed and reliable resources who can be contacted when specific issues arise.

## **Structure and Initiate the Compliance Process**

There is no one correct approach to compliance. Each One-Stop System must develop an approach that meets its own needs and those of the community it serves. The following

guidance and resources, however, may be helpful in planning an approach.

A **team approach** is key to achieving successful compliance for several reasons. First, to complete the self-assessment, information must be collected from *all* of the One-Stop Center's partners, programs, services, and activities. Depending on the size of the center, this is often too large a task for one person. Second, the various components of the self-assessment require varied expertise and specialized skills. A team approach enables individuals with all of the necessary skills to be involved in the compliance process.

One of the important aspects of the team leader's job is to identify the various players needed for this team effort. While each LWIA, One-Stop Center, or recipient will have its own considerations and requirements regarding team formation, the following criteria should be considered in establishing the compliance team and structure:

1. *Include representatives from all major organizational units.* Each partner, department, agency, or other major organizational unit should designate a liaison to the compliance team. Liaisons should participate in overall planning and decision making, collect information regarding their respective organizations' policies and practices, inform staff within their organizations of nondiscrimination requirements, and serve as contact persons for the public within that organization.

Regardless of the approach that a One-Stop Access Team takes, there are three levels that need to be considered in the process: 1) board or executive-level decisions related to the process; 2) the work of the access team that conducts the self-assessment and makes recommendations; and 3) sub-task groups that may be assigned to individual areas that address specific components of the self-assessment, e.g. employment, program accessibility, policies and practices, and communication. It will be important to ensure adequate representation and information flow at each and among all of the levels.

2. *Include persons with special skills and expertise.* Including staff and/or outside parties with skills and expertise in the following areas will be particularly helpful to the team:

- capital planning and budgeting;
- general program operations;
- communications technology;
- computer technology; and
- disabilities.

In addition, representation should include:

- facilities management;
- employment/personnel management;
- finance and budgeting;
- contracts and purchasing;
- transportation; and
- food services.

This list is not intended to be complete; rather, these examples should serve as a starting point for a team planning its particular approach.

3. *Include opinion leaders.* Include "opinion leaders" on the compliance team. People who are respected by their colleagues will strengthen cooperation, improve participation during the compliance process, and promote effective institutionalization of the results.
4. *Involve people with disabilities.* Individuals with disabilities are key to achieving nondiscrimination compliance for several reasons. First, the regulation requires that opportunity be given for people with disabilities to participate on planning or advisory boards [29 CFR §37.7(a)(5)]. Second, involving the end users in the process will generate solutions that are creative and effective. Third, involving people with disabilities in decision-making will strengthen the accountability of the process and ensure wise use of limited public resources.

*However, simply having a disability does not, in and of itself, guarantee that a person will contribute quality input in the self-assessment process.* People chosen to participate should have either disability-oriented expertise or applicable skills that will help address one or more areas of the self-evaluation. An effective participant should be able to represent not only his or her personal perspective, but also that of as broad a constituency as possible within the disability community. The

process as a whole should provide for representation of as wide a range of individuals with disabilities as possible.

The experience of many entities has demonstrated that the participation of people with disabilities and disability organizations creates trust and leads to more cost-effective solutions and fewer disputes in the long run.

If a team is unsure of how to identify disability organizations to assist in the self-evaluation, federally funded regional Disability and Business Technical Assistance Centers (DBTACs) may be able to provide a list of organizations in the local area. Locate the nearest DBTAC through the disAbility online website at <http://www.wdsc.org/disability>.

***Resources 3-2 and 3-3 will assist a One-Stop Center in including all of the partnering organizations and programs in the Access Assessment Process. Resource 3-3 is an inventory of programs and partners, their administrators, along with the designated Access Team liaison to each partnering organization. Resource 3-2 is a listing of Access Team members, their organizational affiliations, and their area of responsibility on the Access Team.***

If the One-Stop structure in an LWIA is particularly large, it may be helpful to designate sub-task groups to perform each of the four areas of the self-evaluation:

- Affirmative Obligations, Policies, and Practices
- Employment
- Program Accessibility
- Communication

Once the One-Stop Access Team membership has been approved by the senior political and executive leadership, the Access Team Leader should set up an initial team meeting for the executive committee and/or the entire access team. In the first meeting it may be useful to provide background information. All team members should receive copies of this self-assessment guide, 29 CFR Part 37, and any draft resources preselected for use in reviewing current procedures, practices, and services. Copies of 29 CFR Part 37 may be obtained in a variety of formats from the CRC. The team can then proceed to review and revise the proposed compliance work plan. Based on the compliance plan, the team can form any additional work groups needed to refine the access

process, develop or refine assessment tools, and recruit additional participants. The team should also establish a schedule for conducting assessment activities.

Early on, the team should attend a nondiscrimination training program, either in-house or off-site. ADA and Section 188 training programs are available from a number of sources. Many entities have people on staff, advisory boards, commissions, or nearby community organizations that can contribute to staff development and training. A variety of outside disability-related training opportunities, materials, and consultants may also be available. Referrals to training and consulting sources are available through the regional Disability and Business Technical Assistance Centers (DBTACs).

A word of caution, however, is in order: An industry of instant experts has sprung up around disability issues. Check references and credentials carefully when selecting disability-related or nondiscrimination training or consultants. For more information, request the "ADA-Related Consultant/Contractor Guidelines" from your regional DBTAC.

Even before the team is assembled, the Access Team Leader may find it helpful to draft a compliance process work plan. Once the access team is in place, it will refine that work plan and, upon approval, proceed to implement it.

### **Develop an Overview of One-Stop Center Programs**

Since some access teams will review compliance efforts throughout an entire Local Workforce Investment Area, team members need a way of "getting the big picture" quickly. Many of them may be thoroughly familiar with their own programs, but not with other programs. One way to gain this familiarity is to ask for preliminary documentation and summaries from each program area. Collect policy statements and procedures manuals. This information will help the team identify potential areas of concern and recognize the unique features of different program areas that must be taken into account as resources are developed or adapted for use in the self-assessment.

The preliminary information collected during the preparation phase of the assessment process will serve as a convenient summary for future reference. Remember that all programs

offering aid, benefits, services, training, or employment must comply with the nondiscrimination regulations.

***Resource 3-4 will help a team collect, preliminary information from programs, activities and services that are a part of a One-Stop Center. Use the lists of program administrators and Access Team liaisons designated on resources 3-2 and 3-3 to assemble a contact or mailing list. Use Resource 3-4 as an interview protocol or as the basis for a letter that is addressed to all of the partnering One-Stop agencies and service providers.***



## Resource 3-1: One-Stop Access Review Start-Up Tasks

***Check off each task in the start-up phase of  
nondiscrimination compliance as it is completed:***

- " Appoint EO Officer
- " Appoint Access Team leader, where appropriate
- " EO Officer and/or Access Team Leader review nondiscrimination statutes and regulations
- " EO Officer and/or Access Team Leader attend nondiscrimination training program
- " Review any existing disability compliance documents and plans
- " Discuss compliance with key staff and community leaders
- " Identify organizations and sources of access team members
- " Recruit and train access team members
- " Draft access assessment plan
- " List programs, organizations, and entities that offer aid, benefits, services, training, or employment through the program of the One-Stop Center
- " Collect or prepare concise descriptions for entities, programs, and services—including policy statements

### Resource 3-2: One-Stop Access Team Members

*Use this tool to identify access team members and contacts:*

Team Member	Organization/ Affiliation	Phone; e-mail	Area of Responsibility

### Resource 3-3: One-Stop Partners, Programs, and Administrators Contact Information for Team Liaisons

*Use this tool to identify One-Stop partners, programs, and administrators:*

Partners and Programs	Administrators	Administrator Phone; e-mail	Access Team Liaison

## Resource 3-4: Request for Program, Activity, or Service Summary

*Please provide a concise description of your program area that includes the following basic information. Summaries should be returned to the Access Team Leader by the following date:*

### **Policies and Procedures**

1. List and provide copies of basic policies and procedures for your program area. These policies and procedures may be in the form of written policies, manuals, policy directives, guidance memoranda, or even unwritten policies.

### **Contracting and Staffing**

2. Indicate what role, if any, contractors play in your program area.
3. Indicate what role, if any, other non-employees play in your program area.
4. Indicate any unique features of your program area's employment policies and requirements.

### **Facilities Used by the Program Area**

5. Please list all facilities your program area uses.

### **Communications**

6. Please indicate briefly how each of the following are used in your program. Of interest is who (in general terms) uses these forms of communication, for what purpose, and approximately how frequently.

- Telephone access
- Libraries or reading rooms
- Automated equipment, including computers
- Audio-visual presentations (television, tapes, etc.)
- Meetings and presentations
- Books and other printed material

7. Please list the normal means by which your program area communicates policies and other key information to staff and to customers.

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team approach	
1. <i>Include representatives from all major organizational units.</i>	
2. <i>Include persons with special skills and expertise.</i>	
3. <i>Include opinion leaders.</i>	
4. <i>Involve people with disabilities.</i>	
Develop an Overview of One-Stop Center Programs	Ch. 3 Pg. 15
Resource 3-1: One-Stop Access Review Start-Up Tasks	Ch. 3 Pg. 17
Resource 3-2: One-Stop Access Team Members	Ch. 3 Pg. 18
Resource 3-3: One-Stop Partners, Programs, and Administrators	Ch. 3 Pg. 18
Resource 3-4: Request for Program, Activity, or Service Summary	Ch. 3 Pg. 19