

## Service Accessibility Guide

Under the law, it is not sufficient that Workforce1 Career Centers (Workforce1) simply respond to requests for assistance and accommodations from people with disabilities. When Workforce1 designs services, they are required to proactively anticipate the needs of people with various physical, mental, and sensory disabilities. This checklist provides guidelines for service accessibility as well as a summary of the most important equipment that customers need to access Workforce1 resources.

Through the use of this checklist, Workforce1 can help ensure they:

- comply with the law (Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act)
- create an environment that makes people with disabilities feel welcome; and
- design services so that people with disabilities can fully benefit.

### Staff Knowledge

- Staff recognize the importance of making people with disabilities feel welcome
- Staff understand that they are required to provide reasonable accommodations to customers or potential customers with disabilities, unless senior staff determine that providing such an accommodation would cause an undue hardship
- Staff understand the obligations of Workforce1 under the Americans with Disabilities Act, the Rehabilitation Act, and the Nondiscrimination and Equal Opportunity Regulations for WIA, including:
  - people with disabilities have the same rights as anyone else to use the services of Workforce1
  - services and facilities must be readily accessible
  - services must be delivered in a setting that is fully integrated as possible (meaning that customers with disabilities receive services alongside customers who are not disabled)
  - Staff understand that they must make reasonable modifications in service delivery to avoid discrimination against people with disabilities, unless senior staff determine that making these modifications would fundamentally alter the nature of the service
- Staff understand that Workforce1 is required to provide appropriate auxiliary aids and services to ensure that communication with customers and potential customers with disabilities is as effective as communication with other individuals, unless this would result in a fundamental alteration in the nature of the service or activity
- Staff are aware that they cannot decide that an action which would allow program

access by a person with a disability is unfeasible. Such decisions must be made by the designated senior staff member.

- Staff have been trained in emergency evacuation procedures for people with disabilities, including the evacuation of persons with mobility impairments
- Staff know how to procure and use various equipment and materials for assisting people with disabilities, including Workforce1 telecommunications device for the deaf (TT/TTY/TDD), accessible work stations, accessible materials, etc.

## **Disclosure of Disability**

- When working with customers with disabilities, staff discuss disability only as it pertains to the customer's need to access employment and training services
- Staff who are working with a customer with a disability get permission from the customer before discussing information about the individual's disability with other Workforce1 staff or external individuals (e.g., other agencies)
- When working with customers with disabilities, staff provide information to other Workforce1 staff about a customer's disability only as needed
- Private office space is available for discussion of disability-related issues
- All discussions with customers and other individuals about a customer's disability take place in private; if discussions are by phone, calls are made in an area where the caller cannot be overheard
- Policies and procedures are in place to ensure that staff do not disclose information about a person's disability to other customers
- Staff understand that under the ADA, Workforce1 may ask whether a customer has a disability (under Title II), but that employers are prohibited from doing so during the job application process (under Title I). As a result, staff also understands that they may not disclose the fact that an individual has a disability to an employer without the customer's permission.
- The management information systems for Workforce1 have been reviewed to ensure that access to information concerning a customer's disability status, and information about their disability, is limited only to staff who require such information to effectively deliver services to the individual

## **Accommodation Requests**

- Workforce1 has procedures and guidelines for handling requests for reasonable accommodations and reasonable modifications in policies, practices, or procedures.
- A senior management person has been designated to make determinations that a reasonable accommodation or modification is unfeasible, because it would result in a fundamental alteration in the nature of the program or pose undue financial or administrative burdens
- Workforce1 posts clear procedures for requesting reasonable accommodations and

modifications in waiting areas, the resource library, and other public areas, and includes them in writing in outreach materials.

## **Registration and Orientation**

- Staff offer every customer assistance with filling out forms and application materials
- When signing up for orientation, everyone is asked whether they will need assistance or accommodations to participate
- If a person needs assistance in filling out registration or intake forms, this is done one-on-one in a private room, where the individuals responses will not be overheard
- If customers are asked whether they have a disability, this is asked of every customer, and asked in writing, not verbally
- If Workforce1 has special programs for people with disabilities, this information is given in writing, so that people with disabilities don't have to inadvertently disclose by writing down information that is given orally
- Information in orientation sessions is explained slowly and clearly, with plenty of time and opportunities for questions
- As required by WIA regulations, every orientation session includes a presentation of customers rights to nondiscrimination and equal opportunity, including the right to file a complaint,
- Clearly understood procedures for requesting reasonable accommodations and modifications are included in writing and reviewed verbally during orientation
- A list of Workforce1 auxiliary aids and services for communication, assistive technology devices, and material in accessible formats is provided in writing and reviewed verbally during orientation

## **Service Delivery**

- People with disabilities are served in integrated settings; people with disabilities participate in the programs and services of Workforce1 alongside people without disabilities
- If people with disabilities are served separately from other customers, doing so meets the legal requirement that this be necessary in order for people with disabilities to have opportunities as effective as those provided to other customers
- If permissible separate programs exist at Workforce1, people with disabilities are not required to participate in such programs
- People with disabilities have the access to the full range of core, intensive, and training services available to all customers, and are not served exclusively via services from Vocational Rehabilitation
- The eligibility criteria for intensive and training services do not discriminate

against people with disabilities, either overtly or inadvertently [by design or in effect]

- All customers are routinely asked if they will need some type of accommodations or special assistance to take full advantage of Workforce1 services
- All customers are routinely offered the option of meeting with staff in private offices
- Information is presented in a way that is understandable to people who have limited or no reading skills
- Information that is presented orally is also available in writing for people who are deaf or hard of hearing, and for people whose learning style requires reinforcement of items in writing
- Services are designed so that individuals who are not knowledgeable, comfortable with, or able to use electronic technology (i.e., computers) can fully benefit from Workforce1
- Quiet work space is available for people with Attention Deficit Disorder and hearing impairments to thoroughly read and comprehend materials

## **General Communication Requirements**

- Workforce1 has taken appropriate steps to ensure that communication with customers and potential customers with disabilities is as effective as communication with other customers
- Workforce1 staff regularly ask all customers if they need information in alternative formats, or need help understanding information
- Workforce1 staff regularly inform all customers that communications aids and services are provided upon request
- Workforce1 has a procedure for responding to requests for auxiliary aids and services. This procedure includes a mechanism for determining that if an aid or service must be substituted for one that was requested, the aid used was equally effective
- Workforce1 has identified a source for sign language interpreters, and can respond quickly to interpreter requests

## **Work Stations and Equipment**

- Accessible work station: At least one computer work station for customers has been designed to be as universally accessible as possible for customers with disabilities.
- Large monitor: For people with low vision, the center has a 19" - 21" monitor with a moveable mounting arm that provides increased character size and a clearer, sharper image
- Screen enlargement capability: Workforce1 has computers that allow users with low vision to enlarge the print on the monitors screen



- Voice output capability: For people with visual disabilities and reading limitations, Workforce1 has a work station that can read text on the screen and convert the text into voice output; computer has a headphone jack and headphones
- Flatbed scanner: Workforce1 has a scanner that can convert a paper document into electronic format [useful for people who access information through voice output]
- Trackball: The center has a work station with a trackball as an alternative to a mouse. [This is useful for customers who have gross motor skills but lack fine motor skills]
- Alternative keyboard: For people with a variety of disabilities, including those with limited use of their hands and those who tire easily, the center has a modified version of the standard keyboard that allows key selection by variable hand and finger motion
- Word prediction software: Workforce1 has word prediction software that enables the user to reduce the number of keystrokes used in typing
- Large keyboard caps and keyboard orientation aides: For customers with low vision, the center has a work station with key markings that enlarge letters and numbers on the keyboard
- Height adjustable table: Work stations and work tables include height-adjustable tables for use by wheelchair users
- Digital Recorder: A digital recorder is available for customers who have difficulty taking notes to record presentations and discussions, and for staff to make audio recordings of written material.

### **Evacuation Procedures**

- There is a mechanism for ensuring that people who are deaf or hard of hearing are aware of an activated fire or smoke alarm
- There is an established emergency evacuation procedure that addresses the needs of people with disabilities, including persons with mobility impairments

### **Access to Transportation**

- If the service delivery area has public transportation, Workforce1 is in a location that provides optimal public transportation access so that people with disabilities and others who do not drive can easily reach Workforce1
- Any Workforce1 materials that contain driving directions also include public transportation directions, and/or other transportation options for individuals who do not drive. This includes directions contained on the Workforce1 web site.

## **Notice on Equal Opportunity and Nondiscrimination**

- Workforce1 posts notices in the waiting area, resource library, and other public areas that outline rights and protections for people with disabilities and other individuals, including the right to equal opportunity, accessible services, and complaint procedures. These posters comply with the required wording in the nondiscrimination and equal opportunity regulations, and include the contact information of the Equal Opportunity Officer
- The required notice about nondiscrimination and equal opportunity is:
  - Included in orientation materials made available to every customer
  - Disseminated in internal communications
  - Provided in accessible formats
  - Provided to applicants for employment and employees
  - Provided to sub-recipients or subcontractors that receive WIA Title I funds from Workforce1

## **Equal Opportunity and Nondiscrimination Regulations**

- Workforce1 has an Equal Opportunity Officer, who is a senior level employee, as required by WIA regulations
- The Equal Opportunity Officer fulfills all the requirements of this position including:
  - Serving as the liaison with the U.S. Department of Labor Civil Rights Center
  - Monitoring Workforce1 activities and written policies to ensure compliance with all applicable laws pertaining to nondiscrimination and equal opportunity
  - Receiving and investigating any complaints concerning possible discrimination by Workforce1
  - Reporting directly to appropriate officials (including the state WIA director and Governors WIA liaison) about equal opportunity matters
  - Participating in ongoing training concerning nondiscrimination and equal opportunity
- Workforce1 management and staff are aware of and follow the requirements contained in the states Methods of Administration (MOA) for Nondiscrimination and Equal Opportunity under WIA
- Services, programs, and facilities are reviewed at least annually to ensure that Workforce1 and its services are nondiscriminatory and provide equal opportunity for customers with disabilities

## **Record Keeping Requirements**

- Logs of complaints alleging discrimination are kept by Workforce1, as required by law
- The disability status (when known) of all customers and applicants for services is recorded. This information is stored in a way that ensures confidentiality.

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