SOUTH CENTRAL OKLAHOMA WORKFORCE BOARD, INC.

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A proud partner of the American **Job**Center network

SUBJECT: Star Accessibility Framework Policy

PURPOSE: This policy is intended to provide guidance for the initial assessment phase of implementation of the Access for All Star Accessibility Framework.

REFERENCES:

- The Workforce Innovation and Opportunity Act (WIOA) Sections 101(d)(6), 121(e)(2), 121(g)(1), 121(g)(3)
- Training and Employment Guidance Letter (TEGL) 16-16
- 20 CFR 678.800 (a)(3), and 188 CFR 678 Subpart F; 20 CFR 678.400-430; 20 CFR 678.800(b)); 20 CFR 361.400-430; 29 CFR 38; 34 CFR 463.410-430; 20 CFR 678.300(d)(3)
- OKLAHOMA WORKFORCE DEVELOPMENT ISSUANCE #11-2020
- <u>Title I of the Americans with Disabilities Act</u>, which applies to employment settings (http://www.ada.gov/ada title I.htm)
- <u>Title II of the Americans with Disabilities Act</u>, which applies to state and local governments (http://www.ada.gov/ada_title_II.htm)
- <u>Title III of the Americans with Disabilities Act</u>, which applies to private places of public accommodation (http://www.ada.gov/ada_title_III.htm)
- Oklahoma Works Access for All initiative (https://www.okabletech.org/employment-services/oklahoma-works-access-for-all/)

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POLICY:

Oklahoma Works Access for All was developed as a system-wide effort to coordinate training and strategies in support of making one-stop American Job Centers and technology accessible to individuals with disabilities, as described in 29 CFR part 38, the implementing regulations of

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area Jefferson County, Stephens County, and City of Duncan Labor Market Area WIOA sec. 188. The Star Accessibility Framework operationalizes the Access for All system strategy by providing an assessment tool for the continuous improvement of the workforce system in the areas of customer service, training, outreach, and physical accessibility. The Star Accessibility Framework Rubric is designed to be a tool in support of continuous improvement at American Job Centers and system efforts including but not limited to center certification and strategic planning. In Phase I of implementation of the Star Accessibility Framework, local workforce development areas will conduct an initial assessment of centers.

INSTRUCTIONS:

The rubric and evaluator's scoring sheet for Star Accessibility Framework is included in Attachment A: Star Accessibility Framework Rubric and Score Sheet. SCOWB will use the tool to conduct an initial assessment of all currently certified comprehensive and affiliate centers. Evaluation of specialized centers is recommended, but not required.

Oklahoma Works (One-Stop) Centers will be assessed no less than once every two years alternating with the biennial cycle for center certification. SCOWB may direct additional assessments at their discretion and must electronically submit an update to OOWD.

Assessment teams will be established by SCOWB and are responsible for conducting independent and objective assessments of one-stop sites and providing scoring outcomes to SCOWB. While the SCOWB has discretion in forming the assessment team's size and membership, it is expected that an assessment team includes a minimum of two evaluators. It is recommended that assessment teams adopt a peer evaluation model and include representatives from multiple workforce system partners or programs. Assessment teams may include local experts who represent targeted populations, experts from the state level, a third-party evaluator, or experts from outside the local area to ensure evaluations are equitable. A representative from the assessment team should be identified as the primary contact person.

SCOWB will use the assessment process including an application, desk review, and on-site review that is provided in the SCOWB center certification policy. SCOWB will align the assessment process with the procedures and documentation required for center certification.

Once the review has been completed, the assessment team shall present within 30 days a completed score sheet for each evaluator and a letter on behalf of the team summarizing the results of the assessment for each center. It is expected that the SCOWB will make the results of the assessment available to their board members for review and strategic discussion. A copy of the letter and completed score sheets shall be sent electronically to OOWD no later than September 30, 2021. The deadline to request an extension to complete the assessment process is June 30, 2021. Requests for extension must include a list of centers that are not yet assessed, an explanation of why the extension is requested, and a plan with a timeline for completion of the evaluation.

The assessment results from the local areas will be reviewed by a joint taskforce including members of the Star Accessibility Framework work group and members of the System Oversight Subcommittee of the Workforce System Oversight Committee for the purpose of

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area Jefferson County, Stephens County, and City of Duncan Labor Market Area process oversight and coordination of training resources. The State board will review the evaluation criteria and process every two years as part of the review and modification of the state planning process.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT:

All Recipients, and Sub-recipients/Sub-grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

ACTION REQUIRED: This SCOWB Policy is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

ATTACHMENTS: A - Star Accessibility Framework Rubric and Score Sheet

REVISED: 03/18/2021

APPROVED: SCOWB EXEC COMMITTEE FULL BOARD APPROVAL: 6/10/2021