WORKFORCE INNOVATION AND OPPORTUNITY ACT

Star Accessibility Framework Policy

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EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients and sub-recipients/subgrantees 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.

South Central Oklahoma Workforce Board's Workforce Innovation and Opportunity Act Title I program funding statement can be found at https://scowib.info/funding

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

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)
- WSD #87-2024
- Title I of the Americans with Disabilities Act, which applies to employment settings (http://www.ada.gov/ada_title_I.htm)
- Title II of the Americans with Disabilities Act, which applies to state and local governments (http://www.ada.gov/ada_title_II.htm)
- Title III of the Americans with Disabilities Act, 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/)

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 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 OESC.

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 OESC 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 task force 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 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.

ACTION REQUIRED: SCOWB will disseminate the Star Accessibility Framework Policy to all SCOWB contractors, staff, and board members. All contractors, staff, and board members will be responsible for following this policy.

ATTACHMENT A: Star Accessibility Framework Rubric and Score Sheet
ATTACHMENT B: Star Accessibility Letter

Customer Service

Center Information

Choose an item.

Oklahoma Works American Job Center

Name Address of Oklahoma Works

American Job Center*Choose an item.*

Date of assessment: Click or tap to enter a date.

Evaluator Information

Evaluator Name

Evaluator Email Address Evaluator

Phone NumberEvaluator Organization

Evaluator Role

Directions to Evaluator: Use the scoring rubric to determine an assessment score for thiscategory.

Assessment Score

☐ 1 Star: Compliance

☐ 2 Stars: Maintenance

☐ 3 Stars: Prevention

☐ 4 Stars: Actively Responsive

☐ 5 Stars: Proactive

Evaluator Notes:

Customer Service

Compliance

Most staff demonstrate awareness of basic knowledge and skills for serving customers with disabilities, but show limitations in processes and strategies related to disability etiquette to evaluate and provide service to individuals with disabilities (may have been serving people with disabilities but are unaware that they have a disability).

Maintenance

Most staff have awareness of accommodations available for customers with disabilities, but do not proactively offer accommodations to customers. Processes and strategies have been developed to create a “no wrong door” approach to accessibility for current customers.

Prevention

The majority of staff proactively offer accommodations and assistance to customers throughout the service process. There is evidence of processes and strategies to anticipate customer needs and practice positive, efficient etiquette for individuals with disabilities.

Actively Responsive

All staff demonstrate ability to assess and anticipate accessibility needs of job-seekers and advocate on their behalf. There is evidence of a process to assess and exchange feedback for improvement in the accessibility of services across partner agencies. There is a designated accessibility subject matter expert on site on behalf of the workforce system.

Proactive

All staff continuously assess accessibility needs of all job-seekers through established processes, mindsets, and shared values of customer service. Customers and stakeholders are included in the development of policies and processes for service. There is a designated accessibility subject matter expert on site on behalf of the workforce system.

Training

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

Date of assessment: Click or tap to enter a date.

Evaluator Information

Evaluator Name

Evaluator Email Address Evaluator Phone Number

Evaluator Organization Evaluator Role

Directions to Evaluator: Use the scoring rubric to determine an assessment score for this category.

Assessment Score

☐ 1 Star: Compliance

☐ 2 Stars: Maintenance

☐ 3 Stars: Prevention

☐ 4 Stars: Actively Responsive

☐ 5 Stars: Proactive

Evaluator Notes:

Training

Compliance

Training in serving people with disabilities is included in orientation for all new staff and annual all-staff training. Some additional training is available to designated staff, but it may be limited in scope.

Maintenance

100% of staff have participated in annual training related to serving individuals with disabilities and at least 30% of staff have attended 2 or more accessibility trainings per year.

Prevention

Staff receives quarterly training on multiple topics related to serving people with disabilities. At least 60% of staff have attended 2 or more specialized accessibility trainings per year.

Actively Responsive

Consistent and frequent staff training related to accessibility is available to all staff and incorporates customer and partner feedback to improve services to individuals with disabilities. There is evidence of a followed process of keeping current with practices and lesson relevant to serving people with disabilities that may include ongoing learning; continuous efforts to be accessible, including up to date training, policies/procedures for new staff, up-to-date adaptive technology, etc.

Proactive

100% of staff receive consistent and frequent training on a wide range of accessibility-related topics on a regular, ongoing basis. Staff demonstrate knowledge and ability to apply “best practice” strategies for overcoming disability-related employment barriers and anticipating customer needs (e.g. Individual Response Teams, Customized Employment, Supported Employment, Asset Development, etc.).

Outreach

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

Date of assessment: Click or tap to enter a date.

Evaluator Information

Evaluator Name

Evaluator Email Address Evaluator Phone Number

Evaluator Organization Evaluator Role

Directions to Evaluator: Use the scoring rubric to determine an assessment score for this category.

Assessment Score

☐ 1 Star: Compliance

☐ 2 Stars: Maintenance

☐ 3 Stars: Prevention

☐ 4 Stars: Actively Responsive

☐ 5 Stars: Proactive

Evaluator Notes:

Outreach

Compliance

100% of current, public-facing outreach documents and announcements for advertising, recruitment, and feedback are consistent with modern accessibility standards (WIOA Section 188 and 29 C.F.R. part 38). Website and 100% of current, public-facing digital outreach materials are accessible. Evidence of a reasonable effort to conduct targeted outreach to at least one population protected by WIOA Section 188 and 28 C.F.R. part 38.

Maintenance

100% of current, public-facing digital and non-digital outreach materials are accessible, including website. Effectiveness of targeted outreach is analyzed for improvement. EO data reports from OKJobMatch inform outreach strategies and continuous improvement efforts.

Prevention

All outreach documents and announcements comply with 29 C.F.R. 38.38. There is consistent and frequent analysis of outreach efforts and strategy development to protected populations. There is evidence of the development of an annual outreach plan to local businesses to identify equal opportunity and nondiscrimination training needs.

Actively Responsive

Implementation of annual assessment of employer and community partner needs related to equal opportunity and nondiscrimination. Evidence of feedback incorporated into outreach plan and/or strategies. Quarterly review of EO data reports on OKJobMatch informs strategies and updates to annual outreach plan implementation and identify areas of improvement. Outreach plan strategies align with locally identified sector strategies and demand occupations.

Proactive

Evidence of ongoing employer and community outreach to meet training needs and promote resources and best practices for equal opportunity and nondiscrimination. Outreach plan proactively identifies and actively responds to appropriate employers and community service groups within target occupational sectors about ways in which it may improve its outreach and service to underserved EO populations. Track and evaluate target population changes to inform employer and community outreach efforts and develop promising strategies and initiatives to anticipate workforce needs.

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

Date of assessment: Click or tap to enter a date.

Evaluator Information

Evaluator Name

Evaluator Email Address Evaluator Phone Number

Evaluator Organization Evaluator Role

Directions to Evaluator: Use the scoring rubric to determine an assessment score for this category.

Assessment Score

☐ 1 Star: Compliance

☐ 2 Stars: Maintenance

☐ 3 Stars: Prevention

☐ 4 Stars: Actively Responsive

☐ 5 Stars: Proactive

Evaluator Notes:

Compliance

Facility is missing more than one of the following essential elements: accessible parking spaces, parkingaccess aisles, ramps, door clearance sizes, accessible toilet room. Facility has EEAP filed indicating whatalternative measures staff will take to ensure accessibility and a timeline for remediation of non- compliant elements.

Maintenance

Facility is missing one of the following essential elements: accessible parking spaces, parking accessaisles, ramps, door clearance sizes, accessible toilet room. Facility has EEAP filed indicating what alternative measures staff will take to ensure accessibility and a timeline for remediation of non- compliant elements.

Prevention

Facility has all elements identified for 4 and 5 star ratings, but which exceed maximum variances outlined in those ratings. Facility has EEAP filed indicating what alternative measures staff will take toensure accessibility.

Actively Responsive

Parking spaces, access aisles, cross slopes, ramp landings, and maneuvering clearances contain no measured slopes greater than 3.5%. Ramps contain no measured slopes greater than 9.5%. Handrails, ifnecessary, are installed on both sides with width corresponding to accessible route dimensions.
Handrail gripping surfaces and extensions may have measurement errors of no more than 4 inches. Doors utilized by public have appropriate maneuvering clearance sizes for their configuration or are equipped with automatic openers. Toilet rooms have minimal, easily correctable errors (i.e. mirrors, insulated pipes). Properly sized grab bars may be improperly located by no more than 4 inches.

Proactive

Parking spaces, access aisles, cross slopes, ramp landings, and maneuvering clearances contain no measured slopes greater than 3%. Ramps contain no measured slopes greater than 9%. Handrails, if necessary, are installed on both sides with width corresponding to accessible route dimensions (36 inches). Handrail gripping surfaces and extensions may have measurement errors of no more than 2 inches. Doors utilized by the public have appropriate maneuvering clearance sizes for their configuration or are equipped with automatic openers. Toilet rooms have minimal, easily correctable errors (i.e. mirrors, insulated pipes). Properly sized grab bars may be improperly located by no more than 3 inches.

ATTACHMENT B

ACCESS FOR ALL STAR ACCESSIBILITY CENTER ASSESSMENT REQUEST SUMMARY LETTER/APPLICATION

Organization Name: _____ Date: _____

Contact Person: _____ Phone Number:

_____

Site Assessed _____

Site Address:

_____

Website:

_____

Certified as a/an:

☐ **Comprehensive Center**

☐ **Affiliate Center**

Hours of Operation: Monday-Friday 8:00 AM to 5:00 PM

Current Certification Status:

_____

Documents Provide May Include: Desk Review Materials, Completed score sheets for each evaluator and a summary of results for each center. Stars Access for All SCOWB Policy, Center Staff Training Documents, Customer Survey Results & feedback, Outreach materials, flyers, brochures, etc., EEAAP Assessment, Menu of assistive technology, Applications, Referrals, Agenda for staff cross training, Maps/layout of AJC,