



# WORKFORCE SOLUTIONS of the Coastal Bend

## POLICY

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CATEGORY:	Quality Assurance	No: 5.0.102.02
TITLE:	Equal Opportunity - Accessibility Monitoring	
SUPERSEDES:	5.0.102.01 dtd 10/25/2012	
EFFECTIVE:	February 28, 2014	
BOARD APPROVAL:	February 27, 2014	
DATE REVIEWED:	January 24, 2014	

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### I. PURPOSE:

To provide Workforce Solutions of the Coastal Bend (WFSCB) professionals with the policy and procedures necessary to ensure customers with disabilities have access to WFSCB facilities.

### II. DEFINITIONS:

*Board* – Coastal Bend Workforce Development Board

*Equal Opportunity Officer* – Responsible for ensuring WFSCB professionals are trained to comply with this policy; coordinating the recipient's obligations and compliance activities under the nondiscrimination and equal opportunity provisions of WIA and for providing oversight and monitoring of adherence and compliance with this policy.

*Service Providers* – Responsible for the delivery of workforce services in accordance with applicable laws, rules, Board policy and the terms of the contract.

### III. POLICY STATEMENT:

In accordance with Section 188 of the Workforce Investment Act (WIA), Americans with Disabilities Act (ADA) of 1990, Americans with Disabilities Act Amendments Act of 2008 (ADAAA), Section 504 of the Rehabilitation Act, as amended; Title VI of the Civil Rights Act of 1964, as amended, including additional state and federal laws and regulations, The Board's Equal Opportunity Officer or his designee will conduct annual equal opportunity and accessibility monitoring reviews for programmatic and physical accessibility compliance at all WFSCB facilities. The Services Provider's designated Career Center Manager at each WFSCB facility will provide the necessary training to ensure staff is capable of meeting the needs of customers. Career Center Managers will monitor compliance and accessibility on a daily basis to ensure the programs and facilities are in compliance with this policy.

#### IV. PROCEDURES:

The Equal Opportunity Officer will conduct monitoring reviews of the full service and satellite centers in the area to ensure compliance with the applicable laws, rules and Board policy. An annual equal opportunity accessibility monitoring review will assess compliance.

##### a. Board Role & Responsibilities

The monitoring will be conducted in accordance with guidelines issued by the applicable funding sources and TWC. The equal opportunity accessibility monitoring survey developed by the TWC monitoring department will be utilized to ensure program operations, physical and programmatic accessibility are in compliance with:

- 1) Federal/state/local laws, regulations, policies, procedures and other authoritative directives.
- 2) Contractual and grant requirements.
- 3) Overall goals of delivering quality universal accessible services effectively and efficiently.

##### b. Service Provider Role & Responsibilities

In preparation for the Board's annual review, the service provider will conduct reviews of their respective site(s) to ensure on-going compliance and accessibility. Any deficiencies must be communicated to the Board with a timeline for resolving these issues. The service provider's review must include the following:

1. Will conduct a walk through to ensure the building is safe and free of barriers that would prevent someone with a disability from entering or moving about the building. Care must be taken to prevent creating hazards or obstructions which result in barriers.
2. Will ensure all required posters for the general public as well as for employees are current and posted in the proper areas. The Board will provide the initial posters and the service providers's EO coordinator is responsible for maintaining them up to date.
3. Will ensure trained personnel are available to assist customers requesting special accommodations and/or requesting auxiliary aids.
4. Will provide the following tag line on any printed media advertising programs and/or services underwritten with WIA funding:

#### **Equal Opportunity Employer/Program**

Auxiliary aids and services are available upon request to individuals with disabilities.

**Relay Texas:** 1-800-735-2989 (TDD) and 1-800-735-2988 or 7-1-1 (Voice).

5. Will ensure all new employees take the Equal Opportunity in the Workforce Investment Act (computer based training) on the Texas Workforce Commission's (TWC) intranet site at [intra.twc.state.tx.us](http://intra.twc.state.tx.us) with in 90 days of the date of hire. Upon completion of the testing a copy of the signed certificate will be sent to the Board EO Officer.

6. **Will** be responsible for conducting equal opportunity training to their employees/staff member. The Board EO Officer will provide any assistance or Technical Assistance (TA) upon a written request for training from the contractor or the site manager.
7. **Will** ensure equal opportunity and nondiscrimination monitoring requirements are conducted as referenced at WIA 29 CFR §37.51 through §37.69 and §37.99 through §37.100. The Equal Opportunity Officer will use, at a minimum, the following tools as a part of the equal opportunity and nondiscrimination monitoring requirements:
  1. WIA Section 188 Checklist
  2. EO Accessibility Monitoring Survey

### c. Monitoring Review Schedule

As required by Section 188 of the WIA and 29 CFR 37, the Monitoring Plan requires an annual review of all Board full service and satellite centers as listed below:

#### Full Service Centers:

1. Alice Workforce Center, 601 E. Main St., Alice, TX
2. Beeville Workforce Center, 3800 Charco Road, Beeville, TX
3. Kingsville Workforce Center, 1417 East Corral, Kingsville, TX
4. Sinton Workforce Center, 113 E. Sinton St., Sinton, TX
5. Staples Workforce Center, 520 Staples, Corpus Christi, TX
6. Sunrise Mall Center, 5858 So. Padre Island Dr., Corpus Christi, TX

#### Satellite Centers:

1. Falfurrias Office, 1200 E. Highway 285, Falfurrias, TX
2. Refugio Office, 414 B North Alamo, Refugio, TX
3. Rockport Office, 619 N. Live Oak, Rockport, TX

## V. RELATED POLICY INFORMATION:

Workforce Investment Act (WIA) of 1998 Public Law 105-20 August 7, 1998

Federal Register: November 12, 1999 Part II 29 CFR Part 37.23 – 37.26

Title VI of the Civil Rights Act 1964, as amended

Section 504 of Rehabilitation Act of 1973, as amended

Architectural Barriers Act Article 9102, Texas Civil Statutes Prepared and Administered by the

Policies and Standards Divisions Architectural Barriers Section Adopted by the Commission

December 17, 1993 – Effective April 1, 1994

## VI. RESPONSIBILITIES:

Board President/CEO – Responsible for the Board's adherence to all applicable laws and rules with respect to this policy.

Equal Opportunity Officer – Responsible for ensuring all WFSCB professionals are trained to comply with this policy; coordinating the recipient's obligations and compliance activities under the

nondiscrimination and equal opportunity provisions of WIA; and providing oversight and monitoring adherence and compliance with this policy.

Service Providers – Responsible for the delivery of workforce services in accordance with applicable laws, rules, Board policy and the terms of the contract.

**VII. FORMS AND INSTRUCTIONS:**

Equal Opportunity Accessibility Monitoring Review Survey

**VIII. DISTRIBUTION:**

Board of Directors

Board Staff

Service Provider Staff

**IX. SIGNATURES:**

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Reviewed by EO Officer

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Date

\_\_\_\_\_  
President/CEO

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Date