# ATTACHMENT 23
# Accessibility Policy - Persons with Limited English Proficiency

## KANSAS CITY & VICINITY
### WORKFORCE DEVELOPMENT BOARD

Serving the city of Kansas City, Mo. and Cass, Clay, Platte, and Ray counties.

The Full Employment Council, Inc. (FEC) is the fiscal agent and workforce support organization for the Kansas City & Vicinity Workforce Development Board.

**Workforce Innovation and Opportunity Act (WIOA) Policy**

**ACCESSIBILITY & LIMITED ENGLISH PROFFICIENCY POLICY**

**POLICY NUMBER: 2017-015, MODIFICATION 1**

**EFFECTIVE DATE: 12-01-2017**

**MODIFICATION DATE: 6-11-2020**

## APPROVED BY

*DocuSigned by:*

*Clyde McQueen*
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Clyde McQueen, President/CEO
Full Employment Council, Inc.,
Strategic Workforce Organization/Fiscal Agent
Kansas City and Vicinity Workforce Development Board

## INQUIRIES

Questions about this issuance should be addressed by email to Andrea Robins, Sr. Director of Planning, Compliance and Management Systems at arobins@feckc.org, who shall disseminate the agency response after consultation with Workforce Development Board staff.

## PURPOSE

The purpose of this issuance is to establish guidelines for access to program services for persons with disabilities, limited English proficiency and special needs. This Issuance is based on Missouri Division of Workforce Development (DWD) Issuance No. 12-2017, Minimum Standards for Assistive Technologies in Missouri Job Centers and DWD Issuance No. 06-2014, Access to Meaningful Services for Individuals with Limited English Proficiency (LEP).

## BACKGROUND

This Issuance addresses guidelines for compliance with the Americans with Disabilities Act of 1990 (ADA), as amended, WIOA guidelines, and State DWD policy.

**FULL EMPLOYMENT COUNCIL ACCESSIBILITY POLICY**

**POLICY NUMBER: 2017-015, Modification 1**

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## POLICY

The Full Employment Council shall assure program and physical access to persons with disabilities, including communication access.

This includes the availability and use of assistive technologies, following practices associated with service delivery, making the public aware of the availability of such technology and practices, Staff training, and implementation of the Accessibility policy.

This policy also includes identifying language barriers and developing strategies to overcome those barriers are essential for state agencies to comply with federal requirements

## A. ACCESSIBILITY

### I. ASSISTIVE TECHNOLOGY

In the public resource computer center, there shall be at least one adjustable height table to accommodate customers who use wheelchairs, as well as those small or large in stature.

For individuals with low vision, there shall be screen-enlargement software on computers and at least one large screen monitor.

Where computer assess is required, a trackball and alternative keyboard shall be available for use by individuals who have difficulty using a traditional mouse and/or keyboard.

Staff will be trained on accessibility practices and technology and will communicate with customers regarding the availability of accessibility practices and technology, as appropriate. This includes familiarity with Relay Missouri as an alternative telecommunications tool for individuals who are deaf, hard-of-hearing, deaf/blind, or have a speech impairment

Accessibility technology includes:

- Features built into the Microsoft Operating System (i.e., on-screen keyboard, voice input, sticky keys, bounce keys, other Microsoft software features).

- For individuals with a mild to moderate hearing loss, an assistive listening device (ALD) available for use in one-on-one and group settings. The Full Employment Council utilizes UbiDuo communication technology for typed captioned communication at each of its sites.

- Captioning display for viewing of videos.

- Amplified Telephone. Consumers will have access to telephones with high-grade amplification in areas with a suitable environment to utilize the telephone without noise interference.

- Telecommunications Device for the Deaf (TDD) with Printout. Individuals will have access to TDD devices that have message taking capabilities.

- Hands-Free Speakerphone with Large Keypad.  Customers will have access to telephones that have speaker capabilities and can be used hands-free and have enlarged keypads.

- Flatbed Scanner.  Customers will have access to flatbed scanners that are connected to computers that can convert an image from a printed page to a computer file.

- Speech Synthesizer and Screen Reading Software.

## II.     ASSISTIVE TECHNOLOGY USES:  DEVICES AND COMPUTER-BASED

The following tables provide information into devices and their uses (Table 1), and the accessibility features built into the Windows Operating System (OS).  Staff should use these to understand assistive technology availability and uses.

**Table 1:  Devices and Associated Uses and Benefits**

| Device | Benefits |
| --- | --- |
| Assistive Listening Device | Hard-of-hearing individuals |
| Trackball (wired or wireless) | Mobility/dexterity impairments |
| Adapted keyboard | Mobility/dexterity impairments |
| Height Adjustable Table (with hand crank or motorized adjustment) | Mobility/dexterity impairments |
| Phone amplifier (in-line) | Hard-of-hearing individuals |
| Large screen monitor (22"–24") | Low vision individuals |

**Table 2:  Windows OS Built-in Accessibilities Features for Inclusion**

| Feature | Benefits | Description |
| --- | --- | --- |
| Magnifier | Low vision individuals | Enlarges portions of the screen making it easier to view text and images and see the whole screen. Has multiple levels of magnification and 3 magnification options: full-screen mode, lens mode and docked mode. |
| On-screen keyboard | Mobility/dexterity impairments | Displays a visual keyboard with all the standard keys. Used in conjunction with a mouse to select keys. Includes a text prediction feature that can be turned on and which speeds process up for users. |
| High contrast | Low vision individuals | If it's hard to read text on your screen, you can |

| Feature | Benefits | Description |
|---|---|---|
| | | change the theme of your PC to a color combination that's easier to read. |
| Mouse keys, sticky keys, filter keys | Mobility/dexterity impairments | Alternative methods available for users who need a work around for common keyboard actions. When activated, Mouse Keys uses the arrow keys on the numeric keypad to move the pointer. Sticky Keys prevents someone from having to press three keys at once (e.g.,Ctl+Alt+Del). When Sticky Keys is turned on, the user can do these functions by pressing one key at a time.  Filter Keys will ignore keystrokes that occur in rapid succession and keystrokes that are held down several seconds unintentionally. |

## III.   SERVICE DELIVERY

People with disabilities shall be served in integrated settings and participate in programs and services of the Job Center alongside people without disabilities.

All customers are made aware of the availability of various types of accommodations or special assistance that enable everyone to take full advantage of Job Center services. Staff shall not single out individuals and offer specific aids based on their own intuitions or perceptions.

Printed publications are available (immediately or in a timely manner) in alternative formats such as Braille, large print, electronic text, and/or audio.  Alternative methods shall be available, such as sign language interpreters certified at intermediate or above and assistive listening devices.  The Full Employment Council shall have request a one-day notice should alternative methods be requested.

Should a customer request other materials, the staff member receiving a request for alternate formats shall be directed to the Manager of Equal Opportunity/Community Recruitment. These alternative formats, as appropriate, shall be delivered to the customer in a reasonable amount of time.   If further assistive technological devices are required to assure access to services, the Full Employment Council shall secure these devices or technology.

The Job Center has a procedure for responding in a timely manner to requests for auxiliary aids and services not readily available in the center (i.e., specialized assistive technology). The Job Center has identified a source for certified American Sign Language interpreters and can respond to interpreter requests.

## IV.    PUBLIC AWARENESS

A list or notice that auxiliary aids and services for communication, assistive-technology devices, and materials in accessible formats are available shall be made known in writing or verbally to all customers, regardless of whether they disclose, or appear to have, a disability. Customers should be uniformly informed that they have a right to request accommodations, however unsolicited offers of specific formats or devices to individual customers shall be avoided. Such unsolicited offers can be perceived as a reflection of staff perceptions or stereotypes about particular disabilities and are contrary to the Americans with Disabilities Act (ADA).

## V.    STAFF TRAINING

Quarterly training will occur to assure Staff recognize the importance of making people with disabilities feel welcome, have a basic awareness on how to meet the needs of customers with disabilities, understand that they are required to provide reasonable accommodations to customers with disabilities.

Staff members shall be aware of, know how to access, and have a basic understanding of how to use assistive technologies, both stand-alone devices and accessibility options built into the computer operating system, and how to assist customers in their use.  Functional Leaders will coordinate with the Job Center Disability Navigators to arrange trainings on a quarterly basis.

## VI.    IMPLEMENTATION

- Architectural access in compliance with the ADA shall be maintained at all locations.

- Training and/or technical assistance on an on-going basis shall be provided to staff regarding the use of basic assistive technology, procedures and local resources available for the arrangement of access services such as sign language, interpreting, braille transcription, how to respond to specific requests for auxiliary aids and services, and guidance on disability etiquette and culture.

- The Full Employment Council shall have materials, in a variety of accessible formats and media, to market the availability of accessible technologies.

## B.  LIMITED ENGLISH PROFICIENCY

### I.      CUSTOMERS WITH LIMITED ENGLISH PROFICIENCY

**General Policy:**
Per The Full Employment Council's policy on accommodation (2017-004, Modification 1) (FEC), complies with the Americans with Disabilities Act (ADA) and is committed to the fair and equal employment of people with disabilities and Limited English Proficient individuals. FEC does not discriminate against qualified job applicants or employees with disabilities with regard to job application procedures, hiring, employee compensation, advancement, services, training, discharge or other terms, conditions and privileges of employment.

If a customer with limited English proficiency whose primary language is other than English request services, Staff should serve this person with respect to the appropriate workforce resources of the Job Center. Staff members will proceed using the provision of language interpretation/translation service process as stated in the policy.

Staff Members will communicate with the customer utilizing the Language Link (Attachment C) if the Staff Member is not able to communicate proficiently with the customer in the customer's primary language.  The Language Link is a telephonic source for interpreters and is accessible at (800) 208-2620.

**Notification of services:**
Through our website, postings throughout the job center, and on all of our flyers, and outreach events, we provide information for individuals in need of LEP services. All items above will be updated on an as needed basis.

**Identifying "most used languages":**
The Full Employment Council uses the initial Jobs.mo.gov data that recognizes the most used languages other than English. We also utilize the State's Equal Opportunity Department provided data, reporting on most commonly spoken languages in our area.

**Complaints and Grievances:**
All complaints and/or grievances will be governed according to the Full Employment Council's Complaint and Grievance Policy. (FEC Issuance #2013-02 Mod 4)

The Equal Opportunity Manager, and Equal Opportunity Compliance Specialist will oversee the implementation of the LEP plan.

**Provision of language interpretation/Translation Services:**
Qualified job applicants, customers, and employees with additional needs shall be provided reasonable employment-related accommodations when necessary, unless the accommodation would impose an undue hardship. This policy provides guidelines for employees, service recipients, and job applicants who wish to apply for reasonable accommodations with FEC and prescribes the steps to take if he or she is the victim of discrimination or retaliation in his or her request for an accommodation.

## II. MAKING ACCOMODATION REQUESTS

1. Employees, and customers may request an accommodation by requesting it from any staff/management of the Full Employment Council.

2. Limited English proficient individuals will be guided to a State provided "point to your language" sign located throughout the job centers, to establish the language that needs translating.

3. At the customer's request, staff will utilize the CTS language link system.

4. If additional LEP services are needed (in person translation) the Full Employment Council will schedule and secure a translator within no more than 24 to 48 business hours at no cost to the customer.

5. Vital information will be transferred thorugh secure methods, inforamtion will be share through one drive or through mojobs in documents and when appropriate marked as medical to lock.

Attachment A

Missouri Division of Workforce Development Issuance No. 12-2017, Minimum Standards for Assistive Technologies in Missouri Job Centers

**Missouri Division of Workforce Development**
**DWD Issuance 12-2017**

**Issued: November 09, 2017**
**Effective: November 09, 2017**

| | |
|---|---|
| **Subject:** | **Minimum Standards for Assistive Technologies in Missouri Job Centers** |
| 1. Purpose: | This Issuance establishes minimum standards of the Division of Workforce Development (DWD) to ensure that programs and services delivered through Missouri One-Stop Job Centers and Affiliate Job Centers are physically and programmatically accessible to all, including individuals with disabilities. Toward that end, this policy specifically addresses the provision of Assistive Technologies. It leaves the logistical disposition of those resources to the discretion of the Local Workforce Development Board (Local WDB). The responsibility for monitoring local adherence to these standards shall be the responsibility of the Local WDB's Local Equal Opportunity (EO) Officer.[1] |
| 2. Background: | All Workforce Innovation and Opportunity Act (WIOA)[2] Title I-financially assisted programs and activities must be *programmatically accessible*. This includes providing reasonable accommodations for individuals with disabilities and communicating with persons with disabilities as effectively as with others. Recipients must provide appropriate auxiliary aids or services, **including Assistive Technology devices and services,** upon request, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity.[3]

*Assistive Technologies* are mitigating measures to aid people with disabilities that substantially limit their abilities to receive or to communicate information about themselves, programs, or services.[4] Assistive Technologies usually take the form of auxiliary aids or services, but also may include modifications to the physical environment related to the use of devices.

Since the 1999 effective date for regulations implementing the Section 188 nondiscrimination provisions of the Workforce Investment Act of 1998 (WIA)[5] DWD has conducted EO reviews of accessibility in Missouri Job Centers. These reviews have focused simply on whether Assistive Technologies for physical and sensory disabilities were available or not, without specific regard for functionality or product features. |

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[1] 29 CFR 32.7, 29 CFR 38.31 and DWD Issuance 08-2012, "Designation of Local-Level Equal Opportunity (EO) Officers," December 11, 2012, and subsequent guidance.
[2] Pub. L. 113-128 [29 U.S.C. 3101, et seq.].
[3] 29 CFR 38.13(b) and 29 CFR 38.35.
[4] 29 CFR 38.4(q)(5)(iv)(B).
[5] Pub. L. 105-220; *repealed by WIOA, July 22, 2014.*

The statutory principles of nondiscrimination and EO law have evolved significantly since the 1998–1999 effective dates of WIA and its implementing regulations. The Americans with Disabilities Act (ADA)[6] was amended by the ADA Amendments Act of 2008 (ADAAA).[7] Agencies enforcing these statutes issued regulations and guidance affecting federal financially assisted programs and activities to reflect these legal developments.[8] The Rehabilitation Act of 1973[9] also has been amended twice. Section 504[10] of that act provides that individuals with disabilities may not be excluded from participation in, or denied benefits of, or subjected to discrimination in programs or activities receiving federal assistance.

Finally, WIA itself was superseded and repealed by WIOA in 2014. The Part 38 final rules[11] for implementation of the Section 188[12] nondiscrimination provisions of WIOA became effective in January 2017.[13] They are substantially revised from the Part 37 rules which served the same purpose under WIA. All comprehensive One-Stop Job Centers[14] and Affiliate Job Centers[15] must be physically and programmatically accessible to individuals with disabilities, as described in the Part 38 rules, which include a new subpart regarding accessibility requirements[16] and an expansion of the previous subpart on communications with individuals with disabilities.[17]

The definition[18] of auxiliary aids or services includes:
- Communications accessibility for individuals with hearing impairments
    - Qualified interpreters, on-site or through video remote interpreting (VRI) services;
    - Notetakers;
    - Real-time computer-aided transcription services;
    - Written materials;
    - Exchange of written notes;
    - Telephone handset amplifiers;
    - Assistive listening devices;
    - Assistive listening systems;
    - Telephones compatible with hearing aids;
    - Closed caption decoders;
    - Open and closed captioning, including real-time captioning;

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[6] Pub. L. 101-336, as amended.

[7] Pub. L. 110-325 [29 U.S.C. 12101, et seq.].

[8] *See [1]* U.S. Department of Justice, Office of the Attorney General, *Amendment of Americans with Disabilities Act Title II and III Regulations to Implement ADA Amendments Act of 2008; Final Rule,* 81 FR 53204, August 11, 2016 (revising 28 CFR Parts 35 and 36); *[2]* U.S. Equal Employment Opportunity Commission, *Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act, as Amended; Final Rule,* 76 FR 16978, March 25, 2011 (29 CFR part 1630).

[9] Pub. L. 93-112 [29 U.S.C. 701 et seq.].

[10] 29 U.S.C. 794. The U.S. Department of Labor (DOL) regulations implementing this section are engrossed in 29 CFR Part 32—"Nondiscrimination on the basis of handicap in programs or activities receiving federal financial assistance."

[11] 29 CFR Part 38.

[12] 29 U.S.C. 3248: Nondiscrimination.

[13] DWD Issuance 09-2016, "Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act," January 18, 2017.

[14] 20 CFR 678.305.

[15] 20 CFR 678.310.

[16] 29 CFR 38.13.

[17] 29 CFR 38.15.

[18] 29 CFR 38.4(h).

- o Voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices;
- o Videotext displays; or
- o Accessible electronic and information technology.
- Communications for individuals who are blind or have low vision
  - o Qualified readers;
  - o Taped texts;
  - o Audio recordings;
  - o Brailled materials and displays;
  - o Screen reader software;
  - o Magnification software;
  - o Optical readers;
  - o Secondary auditory programs (SAP);
  - o Large print materials; or
  - o Accessible electronic and information technology.

3. Substance:

In the light of changes to laws and rules, DWD and its WIOA State agency partners[19] have determined that a set of minimum standards **(Attachment)** must apply to Assistive Technologies available in Missouri Job Centers to accomplish the nondiscrimination provisions of WIOA and to comply with 29 CFR Part 38. These minimum standards do not include every Assistive Technology on the above bulleted list, and it is not intended that every Job Center have every Assistive Technology on the list on hand and immediately available. However, any item above might be reasonably named in a request for accommodation. Contingencies should be available to allow the person with the disability to communicate and participate to the same extent as a person without a disability.

A report[20] commissioned by the U.S. Department of Labor (DOL) and released in January 2017 indicates improvements need to be made in the accessibility available to individuals with disabilities in American Job Centers (AJCs). The report, which involved a survey[21] sent to every AJC in the country, found that 63 percent of AJCs were "not fully accessible" to people with disabilities, failing in physical accessibility, communications accessibility, programmatic accessibility, or a combination of those areas. In the specific area of communications accessibility (providing technology-based options to people with disabilities for incoming and outgoing calls, sign language interpreters, and materials in accessible formats for the visually impaired), 30 percent of Job Centers were not fully accessible, although most were "partially accessible," by providing one or more of those options.

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[19] State agencies that are part of the Missouri Job Center system [besides the Department of Economic Development (DED)/Division of Workforce Development (DWD)], include: the Office of Administration (OA) Information Technology Support Division (ITSD); the Department of Labor and Industrial Relations' (DOLIR) Division of Employment Security (DES); the Department of Social Services'(DSS) Family Support Division (FSD) and Rehabilitation Services for the Blind (RSB); the Department of Corrections (DOC); the Department of Elementary and Secondary Education's (DESE) Division of Learning Services, Office of Adult Learning and Rehabilitation Services, Vocational Rehabilitation (VR) and the Division of Learning Services, Office of Adult Learning and Rehabilitation Services, Missouri Adult Education and Literacy (AEL) Program; the Coordinating Board for Higher Education (CBHE); and the Department of Health and Senior Services (DHSS). This includes State agencies acting under the delegated authority of these agencies.

[20] *Evaluating the Accessibility of American Job Centers for People with Disabilities,* Final Report to the U.S. Department of Labor, IMPAQ International LLC, January 13, 2017.

[21] The rate of response to survey questions among Missouri Job Centers ranged from 66.8 to 74.5 percent, above the national average response rate of 55 percent.

The report specifically notes that, "An additional obstacle to communications accessibility was limited staff training and knowledge. For example, many staff members were unaware of the types of Assistive Technology available at the AJC or had limited knowledge of how to use them." The survey results further indicated that, "Most AJCs reported that they had an accessible workstation for customers with disabilities. However, staff often were unaware that their AJC had accessible computers and other assistive technology, or were not trained in how to use it, which rendered even the best system inaccessible."

The survey results indicate only 46.6 percent of new Job Center employees receive training orientation for serving persons with disabilities, and only 61.9 percent receive training on how to help persons with disabilities use the Assistive Technologies available in their Job Center.

Therefore, DWD and its WIOA State agency partners request that Local WDBs strive toward 100 percent competency of Missouri Job Center staff on the availability and uses of Assistive Technologies. Their availability and the staff expertise to use them successfully with Job Center customers are also requirements for Job Center certification.[22] It is also the intent of the Statewide WIOA partner agencies that Assistive Technologies be fully integrated into the customer resource areas of Job Centers, to the extent practical. Offering "separate but equal" resources is contrary to the programmatic accessibility requirements of the regulations ("administering programs in the most integrated setting appropriate").[23]

Local WDBs must be mindful that the guidance herein and the nondiscriminatory practices required by WIOA and found in the Part 32 and Part 38 rules apply as equally to employees and applicants for employment of the Local WDB as they do to customers of the job centers.[24]

DOL has stipulated that providing unsolicited offers of information in alternative formats is contrary to the ADA because it reflects another's perception or stereotype about particular disabilities. An individual is always free to request an accommodation of auxiliary aids and services, and the obligation to provide such is only triggered upon such a request. However, it is important to provide notice of the general availability of auxiliary aids and services to all participants.[25]

This Issuance does not require Local WDBs to acquire Assistive Technologies only by direct procurement, or to maintain a full stock of all Assistive Technologies cache available on demand at all Job Centers. Recipients must provide aid, benefits,

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[22] DWD Issuance 03-2017, "Missouri One-Stop Job Center and Affiliate Job Center Certification Evaluation and Criteria," September 19, 2017.
[23] 29 CFR 38.13(b).
[24] 29 CFR 32.12(a)(1) and 29 CFR 38.2.
[25] DOL preamble discussion, *Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act, Final Rule,"* December 2, 2016, at 81 FR 87170 and 81 FR 87171.

services, and training on an equal basis to qualified individuals with disabilities. When reasonable accommodations or modifications are necessary to accomplish that, recipients must provide them in a timely manner (absent undue hardship or a fundamental alteration of the program, activity, or service).

If Local WDBs are able to acquire Assistive Technologies that meet these standards by donation, loan, sharing, joint purchase, or similar means, and are thereby able to respond adequately to a request to provide auxiliary aids or services, the requirements of this policy will be deemed to be met. Resources to advise and assist Local WDBs acquisition of aids and services include:

- Missouri Assistive Technology (https://at.mo.gov/), directed by the Missouri Assistive Technology Council, which was established by state statute in 1993. Contact: David Baker, Director at (818) 655-6707, or email at dbaker@mo-at.org.
- Vocational Rehabilitation Program, Missouri Department of Elementary and Secondary Education, Division of Learning Services, Office of Adult Learning and Rehabilitation Services, https://dese.mo.gov/adult-learning-rehabiliation-services/vocational-rehabilitation/rehabilitation-technology, at (573) 751-3251, or email at info@vr.dese.mo.gov.
- Partnership on Employment & Accessible Technology (PEAT), funded by the DOL Office of Disability Employment Policy, http://www.peatworks.org/Buy-IT

4. <u>Action</u>: This Issuance is effective immediately. All Local WDBs must ensure that the minimum standards for Assistive Technologies in the **Attachment** are adhered to in all Job Centers. Distribute this Issuance to all Local EO Officers and other Missouri Job Center staff as appropriate.

5. <u>Contact</u>: Danielle Smith, DWD WIOA State Equal Opportunity Officer, at (573)751-2428, or danielle.smith@ded.mo.gov.

6. <u>References</u>: Section 188 [29 U.S.C. 3248], "Nondiscrimination," Workforce Innovation and Opportunity Act.

28 CFR Part 35, "Nondiscrimination on the basis of disability in state and local government services."

29 CFR Part 32, "Nondiscrimination on the basis of handicap in programs or activities receiving federal financial assistance."

29 CFR Part 38, "Implementation of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act."

7. <u>Rescissions</u>:          None.

8. <u>Attachment</u>:          Minimum Standards for Assistive Technologies in Missouri Job Centers.


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The Missouri Division of Workforce Development is an equal opportunity employer/program.
Auxiliary aids and services are available upon request to individuals with disabilities.
Missouri TTY Users can call (800) 735-2966 or dial 7-1-1.

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Mardy L. Leathers
Director
Missouri Division of Workforce Development

# Minimum Standards for Assistive Technologies in Missouri Job Centers

## Vision

Creating an environment that welcomes people with disabilities and providing people with disabilities full and equal access to services.

## Assistive Technology

- In the public resource computer center, provide at least one adjustable height table to accommodate customers who use wheelchairs, as well as those small or large in stature.
- For individuals with low vision, provide access to screen-enlargement software and have at least one large screen monitor.
- Provide a trackball and alternative keyboard for use by individuals who have difficulty using a traditional mouse and/or keyboard.
- Be familiar with, and communicate to customers the availability of, accessibility features built into the Microsoft Operating System (i.e., on-screen keyboard, voice input, sticky keys, bounce keys, et al).
- For individuals with a mild to moderate hearing loss, provide at least one assistive listening device (ALD) available for use in one-on-one and group settings.
- Be familiar with Relay Missouri as an alternative telecommunications tool for individuals who are deaf, hard-of-hearing, deaf/blind, or have a speech impairment.

## Public Awareness

- A list or notice that auxiliary aids and services for communication, assistive-technology devices, and materials in accessible formats are available is made known in writing or verbally to <u>all</u> customers, regardless of whether they disclose, or appear to have, a disability or not. Customers should be uniformly informed that they have a right to request accommodations, but avoid unsolicited offers of specific formats or devices to individual customers. Such unsolicited offers can be perceived as a reflection of staff perceptions or stereotypes about particular disabilities and are contrary to the Americans with Disabilities Act (ADA).

Service Delivery

- People with disabilities are served in integrated settings; people with disabilities participate in programs and services of the Job Center alongside people without disabilities.
- All customers are made aware of the availability of various types of accommodations or special assistance that enable everyone to take full advantage of Job Center services. Staff do not single out individuals and offer specific aids based on their own intuitions or perceptions.
- The Job Center has a procedure for responding in a timely manner to requests for auxiliary aids and services not readily available in the center (i.e., specialized assistive technology).
- The Job Center has identified a source for certified American Sign Language interpreters and can respond quickly to interpreter requests.
- Printed publications are available (immediately or in a timely manner) in alternative formats such as Braille, large print, electronic text, and/or audio.

Staff Goals

- Staff recognize the importance of making people with disabilities feel welcome.
- Staff have a basic awareness on how to meet the needs of customers with disabilities.
- Staff understand that they are required to provide reasonable accommodations to customers with disabilities.
- Staff members are aware of, know how to access, and have a basic understanding of how to use assistive technologies, both standalone devices and accessibility options built into the computer operating system, and how to assist customers in their use.

## Standalone Assistive Devices for Inclusion

| Device | Benefits |
|---|---|
| Assistive Listening Device | Hard-of-Hearing Individuals |
| Trackball (wired or wireless) | Mobility/Dexterity Impairments |
| Adapted Keyboard | Mobility/Dexterity Impairments |
| Height Adjustable Table (hand-crank or motorized adjustment) | Mobility/Dexterity Impairments |
| Phone Amplifier (in-line) | Hard-of Hearing Individuals |
| Large Screen Monitor (22" – 24") | Low Vision Individuals |

## Windows OS Built-in Accessibility Features for Inclusion

| Feature | Benefits | Description |
|---|---|---|
| Magnifier | Low-Vision Individuals | Enlarges portions of the screen making it easier to view text and images and see the whole screen. Has multiple levels of magnification and 3 magnification options: full-screen mode, lens mode and docked mode. |
| On-Screen Keyboard | Mobility/Dexterity Impairments | Displays a visual keyboard with all the standard keys. Used in conjunction with a mouse to select keys. Includes a text prediction feature that can be turned on and which speeds process up for users. |
| High Contrast | Low-Vision Individuals | If it's hard to read text on your screen, you can change the theme of your PC to a color combination that's easier to read. |
| Mouse Keys, Sticky Keys, Filter Keys | Mobility/Dexterity Impairments | Alternative methods available for users who need a work around for common keyboard actions. When activated, Mouse Keys uses the arrow keys on the numeric keypad to move the pointer. Sticky Keys prevents someone from having to press three keys at once (e.g., CTRL+ALT+DEL). When Sticky Keys is turned on, the user can do these functions by pressing one key at a time. Filter Keys will ignore keystrokes that occur in rapid succession and keystrokes that are held down several seconds unintentionally. |

# Built-in Accessibility Features in Windows Operating System
## What's Available, and How to Access

The Windows Operating System includes accessibility options and programs that make it easier for people with a variety of disabilities to see, hear and use a computer. For the most part, these features are located in the Ease of Access Center, which provides a convenient, centralized place to locate, learn about and activate these features.

The Ease of Access Center is located in the Control Panel. The easiest way to get to it is to select the WINDOWS LOGO KEY + U.
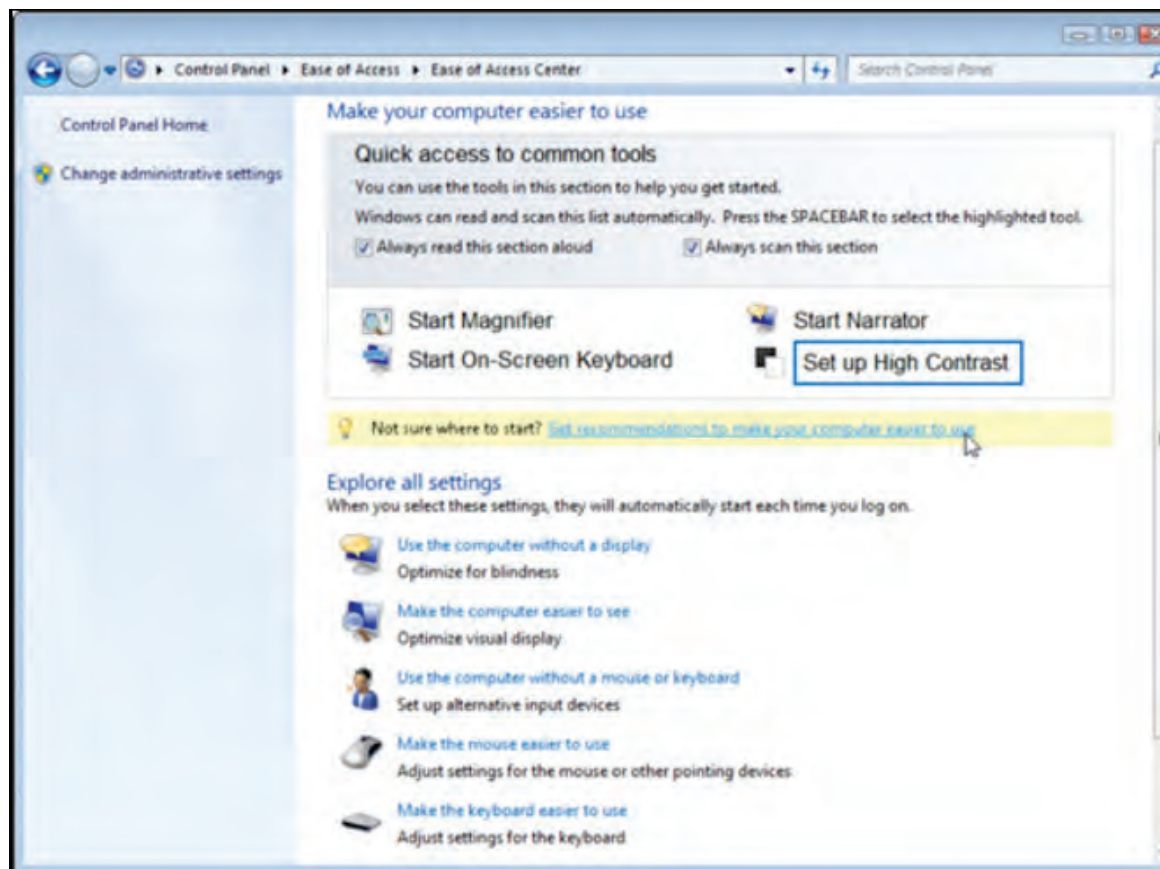
The Ease of Access Center includes:

- **Quick access to common tools** provides a convenient location for the most often used built-in features: Magnifier, On-Screen Keyboard, Narrator and High Contrast.
- **Get recommendations** to make your computer easier to use is a questionnaire that generates recommendations for people unsure what built-in accessibility features they may need.
- **Explore all Settings** helps new users identify features quickly by organizing them by personal need.

Additional Resources on Windows Accessibility Features: https://www.microsoft.com/enable/products/windows7/default.aspx.

# Telecommunications Relay Service

Telecommunications Relay Services are telephone services that allow persons with hearing or speech disabilities to place and receive telephone calls. Relay services are free to users. In Missouri, telecommunications relay service is known as Relay Missouri (http://www.relaymissouri.com/). Telecommunications relay services use specially trained operators to facilitate telephone calls between people with hearing and speech disabilities and other individuals. A Relay call can be initiated by either a person with a hearing or speech disability, or a person without such a disability. To illustrate, a person who is deaf and uses a TTY wishes to get in contact with an individual without a hearing impairment. The individual who is deaf utilizes their TTY to call the Relay Service. Relay then places an outbound traditional voice call to the intended recipient, and then serves as a link for the call, relaying the text of the calling party's communication in voice to the called party and then converting it back to text so the individual who is deaf can read it on the screen of their TTY. There are several forms of telecommunications relay services available, depending on the needs of the user and the equipment available.

**The Missouri Division of Workforce Development is an equal opportunity employer/program.**
**Auxiliary aids and services are available upon request to individuals with disabilities.**
**Missouri TTY Users can call (800) 735-2966 or dial 7-1-1.**

Attachment B

Missouri Office of Workforce Development Issuance No. 06-2014,
Access to Meaningful Services for Individuals with Limited English
Proficiency (LEP)

**Subject:**          **Access to Meaningful Services for Individuals with Limited English Proficiency (LEP) Policy**

1. <u>Purpose</u>:          This Issuance is written to provide policy guidance specific to the Division of Workforce Development's (DWD) obligation to ensure LEP individuals have meaningful access to all programs and services; and are able to participate effectively regardless of their ability to speak, read, write, or understand English.

This policy guidance aligns with DWD's position by ensuring statewide consistency in language service delivery; and further assures quality language services are available for LEP individuals, enabling effective communication with workforce system staff.

2. <u>Background</u>:          Identifying language barriers and developing strategies to overcome those barriers are essential for state agencies to comply with federal requirements. These requirements are within several guidance documents, including the following:

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating based on national origin by, for example, failing to provide meaningful access to individuals who are LEP.

Executive Order 13166 signed by the President in August 2000 and titled "Improving Access to Services for Persons with Limited English Proficiency" contains two major initiatives. The first initiative aims to better enforce and implement Title VI of the Civil Rights Act of 1964 by requiring federal agencies that provide federal financial assistance to develop guidance to clarify obligations for recipients of such assistance. The second initiative requires all federal agencies to meet the same standards as federal financial assistance recipients in providing meaningful access for LEP individuals to federally conducted programs.

Section 188 of the Workforce Investment Act (WIA) and its implementing regulations provides that no person shall be subjected to discrimination based on national origin under any program or activity that receives federal financial assistance.

Federal policy guidance is intended to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Labor or other entities that participate in the Missouri workforce system. This guidance is intended to assist recipients in fulfilling their responsibilities to LEP individuals, pursuant to these federal laws and implementing regulations.

3. <u>Substance</u>:

As recipients of federal financial assistance, local Workforce Investment Boards (LWIB), One-Stop operators, and other service providers have a responsibility to ensure non-discrimination in service delivery to LEP individuals. Guiding principles for situations in which an LEP individual is seeking to "access and participate" in public workforce services, programs, and activities include:

LEP individuals must be advised of availability of competent, confidential language interpretation services. The provision of this notice and the LEP individual's election must be documented in any individual record, written or electronic, generated with respect to the LEP individual.

Recipients will take reasonable steps, appropriate to the circumstances, to ensure interpretative services are provided that demonstrate the level of fluency, comprehension, and confidentiality warranted by the nature, type, and purpose of the information at issue.

Recipients will expand the range or nature of language assistance strategies whenever (1) experience, (2) changes in target or service population demographics, or (3) new program-specific data indicates that the failure to do so may result in a denial of substantially equal and meaningful, effective services to a significant LEP population.

LEP, in and of itself, shall not act as a barrier to limit access to vital information, available in English, regarding when, where, or how to obtain benefits or services provided through the workforce system.

4. <u>Action</u>:

Effective March 11, 2010, all LWIBs, program operators, training providers, etc., were required to comply with this guidance as it supports compliance with Section 2 of Executive Order 13166 and the U. S. Department of Labor, Civil Rights Center, Directive No. 2006-03. Please distribute this Issuance to appropriate individuals.

DWD has developed a uniform language-assistance plan (**ATTACHMENT 1**) with clear goals for ensuring non-discrimination, management accountability, and opportunities for community input. All workforce entities (recipients of federal financial assistance as listed above) will take the following actions:

- **Oral Information:** Interpretation is the act of listening to something in one language (source language) and orally translating it into another language (target language). Where interpretation is needed and is reasonable, recipients should consider some or all of the options discussed below for providing competent interpreters in a timely manner.

Competence of Interpreters: When providing oral assistance, recipients should ensure competency of the language service providers, no matter which of the following strategies are used. Competency requires more than self-identification as bilingual. Some bilingual staff and community volunteers, for instance, may be able to communicate effectively in a language other than English when communicating information directly in that language, but **may not** be competent to interpret in and out of English. Likewise, they **may not** be able to do written translations.

Each Career Center location accessible to the public at which vital information is made available (reception desk or areas, resource areas, telephone communication lines, building entries, etc.), will have language assistance resources capable of providing, within a reasonable period of time, information and/or instruction in appropriate languages other than English. A language identification poster or "I Speak Card" **(ATTACHMENT 2)** should be located at each Career Center welcome/reception area for each LEP customer to identify their language.

At points of public contact, appropriate translations of commonly requested information and procedures for access to telephonic interpretive services are required to be in place. Further, procedures for accessing telephonic language assistance resources will be readily available at every point of public contact, and distributed to all workforce staff that routinely have contact with members of the public. All workforce staff who have volunteered to provide language assistance services (in case of an emergency, when telephonic assistance is deemed less timely) will be identified by name, location, business telephone number, work hours, language, and level of fluency; and a region-specific list of these volunteers shall be submitted to each local Equal Opportunity Officer (LEOO).

- **Electronic Information:** Translation is the replacement of a written text from one language (source language) into an equivalent written text in another language (target language).

What Documents Should be Translated? After applying the four-factor analysis, a recipient may determine that an effective LEP plan for its particular program or activity includes the translation of vital written materials into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by the recipient's program. Such written materials could include:

- Applications to participate in a recipient's program or activity or to receive recipient benefits or services;
- Written tests that do not assess English language competency, but test competency for a particular license, job, or skill for which English language proficiency is not required; Consent and complaint forms;
- List of partners at a One-Stop Career Center and services provided;
- Letters containing important information regarding participation in a program or activity;
- Notices pertaining to the reduction, denial or termination of services or benefits and of the right to appeal such actions;
- Notices that require a response from beneficiaries;
- Information on the right to file complaints of discrimination;
- Information on the provision of services to individuals with disabilities;
- State wage and hour and safety and health enforcement and information materials;
- Notices advising LEP persons of the availability of free language assistance; and
- Other outreach materials.

Where workforce locations maintain a web page accessible to members of the general public, information on the availability of language assistance shall be included. Where vital documents in English are placed on or are accessible through the web page, information on their availability shall be included in the appropriate languages on the web home page or other initial point of access.

- **Signage:** Where signage is maintained and/or posted in English, it shall also be provided, at a minimum, in the two most common non-English languages spoken in the region and served by a specific location. Signage in fewer languages is warranted where current demographic data establishes that the population potentially served by the region, does not include more than one minority (language) group.

  The LWIBs will:
  - Conduct an annual assessment of the language needs of the population to be served throughout the workforce regions beginning with the 2010 census data;
  - Develop and implement a comprehensive, written policy that will ensure meaningful access and communication for LEP individuals;
  - Take steps necessary to ensure state and local partner staff understand the policy and are capable of implementing the policy;
  - Conduct regular oversight of the language assistance program to ensure effective, meaningful access to all workforce programs and services, in a consistent manner.

DWD currently makes available a number of vital documents and outreach materials in Spanish, with the goal to develop updated outreach products in additional languages, other than English.

DWD has re-vended for oral interpretation services through a telephone language assistance service and updated instructions were made available to all LWIBs, Division Supervisors, Regional Coordinators, and LEOOs October 18, 2013.

5. Contact: Direct questions or comments regarding this Issuance, to the State WIA Equal Opportunity Officer, Danielle Smith, at (573) 751-2428 or danielle.smith@ded.mo.gov, or to Julie Gibson, DWD Director, at (573) 751-3349.

6. Reference: Title VI of the Civil Rights Act of 1964
http://www.dol.gov/oasam/regs/statutes/titlevi.htm

Executive Order 13166 www.lep.gov/13166/eo13166.html

Facts about National Origin Discrimination
http://www.eeoc.gov/facts/fs-nator.html

29 CFR Part37, specifically 29 CFR Part 37.35;
http://www.dol.gov/oasam/regs/cfr/29cfr37(2001).htm

CTS LanguageLink: http://www.ctslanguagelink.com/

DWD Issuance 01-2014, Change 1: Equal Opportunity and Complaint Grievance, Notice and Dissemination
https://worksmart.ded.mo.gov/includes/secure_file.cfm?ID=3114&menuID=6

7. Rescissions: This Issuance supersedes and replaces DWD Issuance 23-2009 dated March 11, 2010.

8. Attachments: 1)—Language Assistance Procedure Manual Customer Service for Individuals with Limited English Proficiency (LEP).
2) – U.S. Department of Commerce, Bureau of the Census, Language Identification Flashcard.

The Missouri Division of Workforce Development is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri TTY Users can call (800) 735-2966 or dial 7-1-1.

_____
Julie Gibson
Director
Missouri Division of Workforce Development

**Missouri Division of Workforce Development**

## LANGUAGE ASSISTANCE PROCEDURE MANUAL

### Customer Service
### for Individuals with Limited English Proficiency (LEP)

**General Policy**

Each year the state and local Equal Opportunity Officers will review existing policy and procedures to determine updates in populations serviced in specific regions and recommend changes to the LEP policy. The development, maintenance, and implementation of a periodically updated plan for use by the Division of Workforce Development (DWD) and partner staff when delivering services to the general public, will be the most appropriate and cost effective means of documenting compliance and providing a model for the provision of timely and reasonable language assistance. The Language Assistance Planning Self-Assessment Tool for Recipients of Federal Financial Assistance provides the framework for organizations to develop a comprehensive plan that supports Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP)." While there is considerable flexibility for recipients in development of a comprehensive Language Assistance Plan, the ultimate goal is to provide meaningful access to LEP individuals.

**Assessment**

The state Workforce Investment Act (WIA) agency, as requested by the U.S. Department of Labor/Civil Rights Center, completed the Language Assistance Planning and Self-Assessment Tool to facilitate planning efforts, and has adopted its use for all future language assistance assessments conducted by DWD. This Self Assessment Tool document is intended to assist recipients in planning for the provision of language assistance to the LEP individuals they serve or encounter and to assist in assessing existing, other than English, language service capabilities.

Assessment involves identification of the languages that are likely to be encountered in the provider's service area, estimating the number of LEP individuals that are eligible to receive services or benefits who are directly affected by the provider's program or activity. It is required that the following four factors are considered to determine the nature of language assistance provided and to ensure the most effective, meaningful access for LEP individuals, participating in or seeking benefits from, the program or activity:

1. The number or proportion of LEP individuals served or encountered in the eligible service population or likely to be *directly or significantly* affected by program or activity;

2. The frequency with which LEP individuals come in contact with the program or activity;

3. The nature and importance of the program, activity, or service provided by the recipient; and

4. The resources available to the recipient and costs in carrying out the program or activity.

In cases where language barriers may have impeded access (i.e., LEP individuals did not know of the rights and/or the availability of free language assistance), statistics on past participation will not capture the true need. The proportion of LEP individuals in the overall program service population should correlate with the proportion of LEP individuals participating in or seeking benefits from the program or activity using the Four-Factor Analysis (i.e., Civil Rights Center; Enforcement of the Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting LEP Persons; Pages 32294-32295)..

**Provision of Language Interpretation/Translation Services**

DWD has contracted with CTS Language Link to provide telephone language interpretation services for the workforce system. Designated Career Center locations and Central Office have been provided individual accounts and instructions for use to ensure effective telephone communication between staff and LEP individuals. These instructions include tips for working with interpreters when initiating language assistance calls.

At a minimum, intake or Welcome Team staff, with whom the LEP individual has initial contact, will record the language of the LEP individual in his/her file (including files maintained electronically) so that all subsequent interaction will be conducted in the

**ATTACHMENT 1**

appropriate language. Whenever the interpreter service is used, a brief description of how that service was used will be recorded in the LEP individual's file.

The use of "I Speak" cards is required by intake workers and other staff, who have direct contact with LEP individuals. This language identification aid will assist staff to record the LEP individual's language and be able to obtain appropriate interpreter services.

A system to receive incoming telephone calls from LEP individuals via the agency's existing 888-728-JOBS (5627) line has been developed. The system to receive calls from LEP individuals will be coordinated by the State WIA Equal Opportunity (EO) Officer, utilizing CTS Language Link and the agency's current telephone provider. A three-way response to the LEP individual will be initiated by the State WIA EO Officer directing the caller to the nearest Career Center location.

All LEP individuals will be notified that upon request, they will receive language assistance at no cost, and that vital documents (i.e., documents developed with the purpose of describing a LEP individual's rights, responsibilities, or benefits; requesting information or a response from LEP individuals; notifying LEP individuals of an action that may adversely affect them; requiring the LEP individual's informed consent or acknowledgement; and notifying LEP individuals of the opportunity for free language assistance) will be translated at no cost.

Essentially, translation of applications to participate in a program or activity or to receive benefits or services; consent and complaint forms; list(s) of partners at the One-Stop Career Center and the services provided; other outreach materials; and other informational and instructional documents into languages other than English, is required for LEP individuals after applying the four-factor analysis. The standard "menu" of services will support the identification of vital documents for the workforce system. To the extent reasonable, DWD will support translating vital documents into languages other than English.

Use of Family, Friends or Others as Interpreters

Use of family members, friends, or other informal interpreters present ethical and other privacy complications and is not supported nor recommended. It is our obligation to provide qualified interpreters to all individuals who need and/or request oral language assistance.

Use of family, friends, or others as interpreters may expose the recipient to liability under Title VI of the Civil Rights Act of 1964 and Section 188 of the WIA. Do not require, suggest, or encourage the use of friends, family members (including minor children), and other non-professionals as interpreters. Use of such persons could result in a breach of confidentiality or a reluctance of an LEP individual to disclose personal

**ATTACHMENT 1**

information critical to the LEP individual's situation.  Although the LEP individual's decision to use his or her own interpreter should be respected, there are concerns of confidentiality, conflict of interest, or a minor child's competency in communication to provide interpretation.

When staff inform the LEP individual of the right to free interpreter services and the individual declines (wanting to use a family member or friend as an interpreter), the staff may use the LEP individual's designated person as an interpreter while taking steps to document the LEP individual's choice is strictly voluntary and the offer of free interpreter services was declined.  Staff should document all offers for language services that are declined; in the LEP individual's file, including those files maintained electronically.

Outreach/Training/Monitoring

Outreach efforts, ensuring awareness among workforce system (i.e., jobseekers, businesses, and workforce professionals) entities, will include the implementation of the language access policy.  LEP individuals in need of language assistance services will receive "reasonable" notice of the availability of such services.  The availability of free language assistance will be promoted/advertised as a part of regional outreach. Signage and other notices in lobbies, waiting areas, intake desks, etc. should be available in the two or three primary languages identified by region.  Postings should inform individuals of their right to free interpreter services and invite them to identify themselves as individuals needing language assistance.

All staff should be knowledgeable regarding:

1.  The nature and scope of language assistance services and resources available, and

2.  The procedures to access language services for their LEP individuals.

A successful language access plan aligns with the overall obligation to ensure programs and services are provided in a non-discriminatory and equal manner.  Access to services and programs has to be as effective for LEP individuals as the general public. It is unlawful to discriminate due to national origin; and through this plan; we affirm consistent, effective LEP access and compliance for all federally assisted programs and services operated within the Missouri workforce system.

Intake Procedures for LEP Individuals

1.  When a walk-in LEP individual for services indicates the language of choice using the "I Speak" card, the intake personnel (i.e., welcome team member) will contact the Language Link contractor by telephone for language interpretation

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services.  At that time, the intake personnel will conduct the standard steps, with the assistance of the interpreter, to serve the LEP individual.

2.  The LEP individual will be served in a location suitable to allow confidentiality, such as a conference room with speaker phone or other suitable arrangement.

3.  During intake, the LEP individual will be provided a language identification card ("I Speak" card) listing the language of their choice.  The LEP individual may keep this language identification card in their possession to display to staff as they are processed through the Career Center.  Accepting and/or maintaining this language identification card is voluntary and will not impede the delivery of services.

4.  In the event the intake personnel are unable to determine the LEP individual's language choice (after using the "I Speak" cards or any other readily available method, i.e., bilingual/multilingual staff), the intake staff will immediately contact the language interpretation service to attempt to determine the appropriate language to use with the LEP individual.

5.  Each step of the initial assessment for services, including and up to service delivery, will include the language interpretation service.

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**United States Census 2000**

U.S. Department of Commerce
Bureau of the Census

## LANGUAGE IDENTIFICATION FLASHCARD

☐ .املأ هذا المربع اذا كنت تقرأ أو تتحدث العربية | Arabic

☐ Խնդրում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն: | Armenian

☐ যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | Bengali

☐ សូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | Cambodian

☐ Matka i kahhon komu un taitai pat un sang i Chamorro. | Chamorro

☐ 如果您具有中文閱讀和會話能力，請在本空格內標上Ｘ記號。 | Chinese

☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen. | Creole

☐ Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | Croatian (Serbo-Croatian)

☐ Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | Czech

☐ Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | Dutch

☐ Mark this box if you read or speak English. | English

☐ اگر خواندن ونوشتن فارسی بدرهستین، این مربع را علامت بگذارید. | Farsi

D-3309

| | |
|---|---|
| ☐ Cocher ici si vous lisez ou parlez le français. | French |
| ☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | German |
| ☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | Greek |
| ☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस गोले पर चिह्न लगाएँ। | Hindi |
| ☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | Hmong |
| ☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet. | Hungarian |
| ☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | Ilocano |
| ☐ Marchi questa casella se legge o parla italiano. | Italian |
| ☐ 日本語を読んだり、話せる場合はここに印を付けてください。 | Japanese |
| ☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | Korean |
| ☐ ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ. | Laotian |
| ☐ Zaznacz tę kratkę jeżeli czyta Pan/Pani lub mówi po polsku. | Polish |
| ☐ Assinale este quadrado se voce lê ou fala Português. | Portuguese |

| ☐ Însemnaţi această căsuţă dacă citiţi sau vorbiţi Româneşte. | Romanian |

| ☐ Пометьте этот квадратик, если вы читаете или говорите по-русски. | Russian |

| ☐ Maka pe fa'ailoga le pusa lea pe afai e te faitau pe tusitusi i le gagana Samoa. | Samoan |

| ☐ Обележите овај квадратић уколико читате или говорите српски језик. | Serbian (Serbo-Croatian) |

| ☐ Označte tento štvorček, ak viete čitať alebo hovoriť po slovensky. | Slovak |

| ☐ Marque esta casilla si lee o habla español. | Spanish |

| ☐ Markahan ang kahon na ito kung ikaw ay nagsasalita o nagbabasa ng Tagalog. | Tagalog |

| ☐ ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย. | Thai |

| ☐ Faka'ilonga'i 'ae puha ko'eni kapau 'oku te lau pe lea 'ae lea fakatonga. | Tongan |

| ☐ Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою. | Ukrainian |

| ☐ اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانہ میں نشان لگائیں۔ | Urdu |

| ☐ Xin đánh dấu vào ô này nếu quý biết đọc và nói được Việt Ngữ. | Vietnamese |

| ☐ צייכנט דעם קעסטל אויב איר שרייבט אדער לייענט איידיש. | Yiddish |

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ATTACHMENT C

CTS LANGUAGE LINK "HOW TO USE INTERACTIVE VOICE RESPONSE (IVR)'

# How to Use Interactive Voice Response (IVR)

**Step 1:** Call 1 888-338-7394

**Step 2:** Enter Account Number followed by # sign (Refer to intranet or contact center supervisor for Account number)

**Step 3:** Select 1 to be connected directly to your Spanish interpreter, *or*

Select 2 to be connected directly to your Russian Interpreter, *or*

Select 3 to be connected directly to your Vietnamese interpreter, *or*

Select 4 to be connected directly to your Somali Interpreter, *or*

Select 9 for all other languages

*\*If you require a 3rd party call, **press 9** to reach a Customer Service Representative*

**Step 4:** Enter Location Code, followed by # sign (Refer to intranet or contact center supervisor for Location Code)

**IVR FAQs:**
**What if I do not know my Account number?**
You do need this information in order to reach the interpreter directly. If you are unsure of your account number, wait and the system will direct you to a live operator who will look up your account.

**What is IVR?**
IVR stands for Interactive Voice Response. CTS LanguageLink's IVR system allows a customer to quickly select the language desired for interpretation and be connected immediately to an interpreter without interaction with a live attendant. The benefit of this is an even faster connect time to your interpreter and better service to your limited English proficient (LEP) client.

**What is a third party call?**
A third party call is when you need CTS LanguageLink to call the LEP client and then bridge the call together with you and the interpreter.

**How do I make a third party call with CTS LanguageLink?**
If you need a third party call, **press 9** *(even for Spanish)* to reach a Customer Service Representative (CSR) and let the operator know you need a third party call. We are happy to assist you with this at no additional charge. Our *interpreters are not able to make the third party call* directly.

**I need another language other than the ones listed. How do I get my interpreter on the line?**
**Press 9** for other languages and let the CSR know which language you require and they will connect you. If the language is unknown, you may reference the "Point to your Language" visual for help with most requested languages or ask a representative for assistance.

Please contact our Client Relations Team if you have any further questions:

Email: clientrelations@ctslanguagelink.com
Toll Free: 1 (855) 579-2704

ATTACHMENT D

CTS LANGUAGE LINK "TIPS AND ADVICE" HOW TO WORK WITH A
TELEPHONE INTERPRETER

## TIPS AND ADVICE

### *How to Work with a Telephone Interpreter*

## YOUR ROLE

Telephone interpreters may receive several calls a day—each one requiring special attention in a specific field. When working with an interpreter over the phone, there are a few things you should keep in mind to ensure your call is handled quickly and successfully.

- Always speak in first person, just as you would in normal conversation. For example, say, "Do you have a fever?" rather than "Ask her if she has a fever, please."

- Immediately introduce yourself to the limited-English proficient (LEP) client and explain your reason for calling.

- Telephone interpretation is "consecutive" interpretation. That means you will experience pauses when the interpreter repeats each statement in the respective language.

- After you speak one-two sentences or finish a thought, pause to give the interpreter enough time to interpret.

- Be prepared to explain some things in more detail for the telephone interpreter. Some terminology and concepts may not have an equivalent in the target language.

- Control the conversation. The telephone interpreter is only there to interpret. You are responsible for making sure the LEP client receives the same service as an English-speaking client.

- Ask the interpreter and the LEP client questions to ensure they understand what you want to communicate.

- Avoid asking the interpreter for his/her opinion about the situation being interpreted.

- We can accommodate three-way telephone interpretation calls. Tell the call center agent the name and phone number of the third party, and they will arrange the call for you. The interpreter cannot facilitate this for you. You must ask the call center agent at the beginning of the call.

- Follow up by providing us with feedback about your interpretation services.

## YOUR TELEPHONE INTERPRETER'S ROLE

We expect our interpreters to meet high standards and want to know when they are meeting our expectations. To that end, your feedback is critical

- Make sure your interpreter introduces himself/herself using a first name and ID number. They are not required to provide a last name.

- Your interpreter should not have a side conversation with you or the client. He or she must relay everything that is said back to you or your client. This includes any advice that the client may ask of the interpreter.

- Your interpreter should not discuss anything unrelated to the telephone interpretation assignment.

More questions about telephone interpretation? Contact us at 1-866-610-1338 or email info@ctslanguagelink.com.

ATTACHMENT E

JOB NUMBERS VALID DECEMBER 1, 2019

| JOB NUMBERS VALID December 1, 2019 | | | |
|---|---|---|---|
| D9100000 | | OWD UNASSIGNED | |
| D9000000 | | UNASSIGNED | |
| D9121000 | | CES | |
| D9122000 | | LAUS | |
| D9123000 | | OES | |
| D9124000 | | ES 202 | |
| D9164900 | | LABOR CERTIFICATION | |
| D9170800 | | TAA STAFFING | |
| D9170800 | | TAA TRAINING-SCHOOL PAYMENTS | |
| D9175900 | | WORK OPPORTUNITY TAX CREDIT | |
| D9185000 | | WAGNER-PEYSER 10% | |
| D9200300 | | VETERAN'S INCENTIVE | |
| D9202000 | | LOC VET EMP REP | |
| D9203000 | | DVOP | |
| D9204000 | | CONS ACTIV DVOP/LVER | |
| D9205000 | | WAGNER-PEYSER | |
| D9215000 | | WORKFORCE INFORMATION GRANT | |
| D9249000 | | DWD WORK FOR DOLIR | |
| D9434900 | | MO 43 - SPRING 2019 FLOODING | |
| D9440900 | | DWG- OPIOID | |
| D9455800 | | RESEA | |
| D9545800 | | DISLOCATED WORKER TET GRANT | |
| D9546000 | | SAE 3.0 | |
| D9460700 | | WDQI | |
| D9535700 | | APPRENTICESHIP USA EXPANSION | |
| D9705000 | | Required Job Services (RJS) | |
| D9788000 | | DWD RR FY20 | |
| D9796000 | | DWD-WIOA | |
| | | | |
| The Job Numbers directly correlate to your project code in ETA | | | |
| | | | |
| The object codes and org codes are on separate tabs of this worksheet. | | | |
| | | | |
| All Job Numbers above will use the following codes on the expense report: | | | |
| **Fund** 0155 **Agcy** 555 **Org** 5XXX **Appr Unit** 5161 **Activity** your ETA task **Obj** 2XXX **Job** see above | | | |
| | | | |
| **For MERIC funding use:** | | | |
| **Fund** 0155 **Agcy** 555 **Org** 3051 **Appr Unit** 5175 **Activity** your ETA task **Obj** 2XXX **Job** see above | | | |

| LOCAL OFFICE NAME | SAM II ORG # | SUB-ORG |
|---|---|---|
| ARNOLD | 5529 | |
| BRANSON | 5548 | |
| CAMDENTON/LINN CREEK | 5536 | |
| CAPE GIRARDEAU | 5542 | |
| CHILLICOTHE | 5516 | |
| CLINTON | 5523 | |
| COLUMBIA | 5537 | |
| FLORISSANT | 5512 | |
| FT LEONARD WOOD | 5530 | |
| FULL EMPLOYMENT COUNCIL (FEC) | 5519 | |
| HANNIBAL | 5531 | |
| INDEPENDENCE | 5518 | |
| JEFFERSON CITY | 5532 | |
| JOPLIN | 5543 | |
| KC-NORTHLAND | 5524 | |
| KENNETT | 5550 | |
| KIRKSVILLE | 5539 | |
| LEBANON | 5533 | |
| NEVADA | 5521 | |
| PARK HILLS | 5551 | |
| POPLAR BLUFF | 5545 | |
| ROLLA | 5541 | |
| SEDALIA | 5528 | |
| SIKESTON | 5552 | |
| SPRINGFIELD | 5546 | |
| ST CHARLES COUNTY (ST PETERS) | 5509 | |
| ST JOSEPH | 5522 | |
| SLATE | 5514 | |
| ST LOUIS NORTH OAKS | 5515 | |
| WARRENTON | 5556 | |
| WASHINGTON | 5535 | |
| WEST PLAINS | 5547 | |

### CENTRAL OFFICE STAFF

| | SAM II ORG # | SUB-ORG |
|---|---|---|
| DIRECTOR'S OFFICE | 5225 | 5A |
| STATE BOARDS | 5655 | 5B |
| COMPLIANCE AND ADMINISTRATION | 5675 | 5C |
| COMMUNICATIONS | 5243 | 7C |
| WORKFORCE DATA | 5240 | 6B |
| POLICY AND PERFORMANCE | 5228 | 5E |
| WORKFORCE SERVICES | 5227 | 5G |
| FINANCIAL MANAGEMENT | 5660 | 2E |
| EO | 5230 | 5D |
| MERIC - Economic & Workforce | 3051 | 6C |
| LEGAL | 5239 | 8A |
| APPRENTICESHIP | 5232 | 4G |
| HR | 5245 | 2H |
| FACILITIES | 5226 | 2G |
| MERIC - Labor Market | 3051 | 6D |
| | | |
| Trade Payments | 5231 | |
| Sub Payments | 3065 | 5M & 5N |
| | | |
| SPECIAL PROJECTS | 3065 | 5O |

| Object Code | Sub-Object | Description |
| --- | --- | --- |
| 2100 | 06 or '07 | IN-STATE MILEAGE  (06 Standard or 07 fleet) |
| 2102 | | IN-STATE USAGE OF STATE VEHICLES |
| 2103 | | IN-STATE COMMERCIAL TRANSPORTATION-TRAVEL AGENCY |
| 2104 | | IN-STATE COMMERCIAL TRANSPORTATION-OTHER |
| 2106 | | IN-STATE LODGING |
| 2109 | | IN-STATE MEALS |
| 2112 | | OTHER IN-STATE TRAVEL EXPENSES |
| 2383 | | CHAMBER OF COMMERCE |
| | | |
| 2114 | | OUT-OF-STATE USAGE OF STATE VEHICLES |
| 2115 | 06 or '07 | OUT-OF-STATE MILEAGE  (06 Standard or 07 fleet) |
| 2118 | | OUT-OF-STATE COMMERCIAL TRANSPORTATION-TRAVEL AGENCY |
| 2119 | | OUT-OF-STATE COMMERCIAL TRANSPORTATION-OTHER |
| 2121 | | OUT-OF-STATE LODGING |
| 2124 | | OUT-OF-STATE MEALS |
| 2127 | | OTHER OUT-OF-STATE TRAVEL EXPENSES |