

Equal Opportunity Compliance

Desk Aid for Central Region Missouri Career Centers

3/3/2015



Guidance on Disability Accommodations, Limited English Proficiency and
Complaint & Grievance Policies

Disability Accommodations and Resources

Disability accommodations can be simple, but most importantly, they should be offered in response to any request or customer-identified need. Accommodations may require “thinking outside-of-the-box” or researching resources. Many resources for providing accommodations are available for Career Center staff including those listed on WorkSmart at the references listed below. The following DWD issuances discuss a few of the many accommodations that can be offered by staff to customers with a disability. DWD Issuance 02-2012, Attachment 1, page 2 of 2, discusses how Career Center staff can make an accommodation for any customer with a disability or requesting accommodation in the Membership screen process. DWD Issuance 05-2011, Attachment 1, page 3 of 4, addresses disability accommodations for the Quick Guide Initial Assessment. Other possible accommodations are listed for Career Center staff on WorkSmart at https://worksmart.ded.mo.gov/documents/view_items.cfm?MenuID=6&CategoryID=174 .

The following is a quick summary of some of the assistive technology in the Career Centers that can be provided as an accommodation. Many other resources for accommodations are listed on WorkSmart:

Blind: ADA computer with large screen and Window Eyes (Screen Reader) software. This screen reader software will read aloud all text and symbols, icons and pictures that appear on the computer (website or software program). For the Membership screen and jobs.mo.gov <CTRL><SHIFT><a> toggles the Browse Mode ON/OFF, allowing the customers to type their information on the Welcome screen.

Tip: Make certain that you have tested the ADA computer to ensure that it has received the network updates. Have headphones available for anyone who chooses to use them.

Low Vision: ADA computer with large screen and Zoom Text (Screen Enlarger) software. This screen enlarger will adjust to magnify everything that appears on the screen as well as invert colors etc.

A Closed Circuit TV or “CCTV” is also available to enlarge the view of paper documents.

Deaf: An American Sign Language (ASL) Interpreter should be provided for any customer who is deaf and requests this accommodation. Career Center staff should use the State of Missouri’s contract to obtain a licensed interpreter. An interpreter should be made available within 2-3 days of the request. Staff cannot “act as an interpreter” unless they are licensed, however, they may communicate directly using sign language to provide services as long as they are not “interpreting” for another staff.* See WorkSmart https://worksmart.ded.mo.gov/includes/secure_file.cfm?ID=2381&menuID=6 for the Sign Language Interpreter Desk Aid and Checklist.

The TTY is a phone for the Deaf that can be used for outgoing calls using Relay Missouri. (See Assistive Technology Desk Guide https://worksmart.ded.mo.gov/includes/secure_file.cfm?ID=2503&menuID=6

Physical disability: An adjustable height table is available for customers who use a wheelchair or need the table height adjusted. A trackball mouse is available for customers with limited mobility.

Note: Many other accommodations can be made using the resources available to Career Center staff on WorkSmart at https://worksmart.ded.mo.gov/documents/view_items.cfm?MenuID=6&CategoryID=174 * RSMO
209.321.1

Staff are welcome to contact Kristin Funk, DWD Disability Coordinator at kristin.funk@ded.mo.gov or 573-751-1098.

Equipment Technology Consortium

Missouri Assistive Technology operates the Equipment Technology Consortium (ETC) which is a short-term assistive technology equipment loan program for agencies and school districts in Missouri. The equipment loan program is for adults and children of all ages. Agencies, districts, and other organizations can borrow equipment on behalf of individuals with disabilities to try out the equipment before purchasing, for use during the time equipment is in repair, or for other short-term needs.

Each loan period is up to six weeks. The program includes a wide range of equipment including switches and mounts, computer access devices, environmental controls, hearing devices, home modifications, visual aids and augmentative communication devices. For more information: Contact our office with any questions. Phone: (816) 655-6708.

Steps for borrowing equipment:

Short term loan agreements are to be completed by agencies that do not have a three year agreement on file. To request a short term loan agreement please e-mail moatetc@att.net (<mailto:moatetc@att.net>).

Step 1

Visit the ETC equipment catalog and identify the equipment you are interested in borrowing. You can borrow up to six items. If you would like to borrow an iPad, Nexus Tablet or Chromebook, you can select up to 10 apps.

ETC Program Catalog (</device-loan/etc-catalog.html>)

Step 2

Complete and submit the **ETC online device loan request form (<etc-request.html>)**. The request will be emailed to Missouri Assistive Technology and processed.

Sign Language Interpreter Desk Aid & Checklist

For use by all Career Centers and Cooperative Procurement Program members.

*****A sign language interpreter should be provided in response to all requests, generally within 2-3 days, when requested by a customer who is Deaf, or because of a speech disability. Only a licensed interpreter can be used to provide sign language interpreting services per RSMo 209.321.1.**

*****A customer is never responsible for providing his or her own disability accommodation or interpreter. For example, a customer should not be asked to bring or use a family member or friend who can provide sign language or other language interpreting to access Career Center services.**

The Career Centers' procedure for obtaining a *licensed* American Sign Language (ASL) interpreter or other sign language interpreting for any customer who needs or requests an interpreter is below. If you have any questions, please contact Kristin Funk, DWD Disability Coordinator, 573-751-1098 or kristin.funk@ded.mo.gov.

Go to:

<http://archive.oa.mo.gov/purch/contracts/>

Scroll down to **4. Search by Contract Type**, Select the radio button for “**Statewide Professional Service Contracts**”, Select “**Communication and Support Services**” and click Submit

Scroll down to “**Interpreting Services for People with Hearing Loss**” and click the “**Contract number**” **hyperlink** to the right of the title (any hyperlink will go to the contract).

Select PDF or Word Format

Find your county on the alphabetical list of counties where the interpreter is needed (pages 21-42). Advanced and Comprehensive Level interpreter rates are listed on pages 43-88. You will not need these advanced levels unless you have a specialized project that requires this (see 1.4.1.a. #1 on page 7).

Note: The interpreter agency may send an Advanced or Comprehensive Level interpreter, but your contracted rate is based on the level of interpreter you request—“Intermediate Level”.

Identify the low-cost, hourly rate, Vendor for your county.

Match the vendor to the list of vendors and their contact info on pages 1-3.

Call and inform this interpreter agency (vendor) that you are using the State Contract to obtain services. Request a “Level 3, Intermediate Level Interpreter” to be provided on a given date and time that has been jointly arranged with the customer and staff.

Confirm the contracted hourly rate and that there are no additional charges. (The contracted hourly rates listed are a flat hourly rate. No additional charges for travel, travel time or mileage are allowed (see 1.7.9 on page 10) unless no contracted vendor is available (1.7.7 on page 10).

The contractor/interpreter will be paid for a minimum of 2 hours even if their services are required for less than 2 hours or if the state agency cancels with less than 24-hour notice. It is important to let the customer know when the interpreter has been confirmed and exactly what timeframe to expect. (1.7.3.c. on page 9)

When the interpreter arrives, ask to see their Missouri State Sign Language Interpreter’s license in order to make a copy for your records. The copy can be kept in order to document the interpreter’s credentials. (1.3.4.a. on page 7)

Track the amount of time that the interpreter is there (1.7.3.a. on page 9) and ask to make a copy of the interpreter’s license to keep on file. This is proof that a Missouri licensed interpreter was used. You can also search <https://renew.pr.mo.gov/licensee-search.asp> to check the list of Missouri licensed sign language interpreters.

Remember that **you are communicating with your customer, not the interpreter. Look at your customer, rather than the interpreter.** Be certain to address your customer directly when you speak, for example, **don’t** say “tell him” or “tell her”. **Speak directly to your customer** in your usual manner; there is no need to speak slowly or loudly. Make the most of your time and **use facial expression and body language to help convey your message.** You will need to provide a clear line of vision for your customer, the interpreter and yourself. A conference table or office with adequate space may work best.

(July 2013)

Sign Language Interpreter Checklist **(Confidential)**

(Complete the following to ensure that effective services are provided to anyone requesting a sign language interpreter.)

Customer Name _____

Customer's Contact Information (email/phone/text) _____

Day(s) & Timeframe(s) customer is available for appointment:

(Example: Tuesday, March 11 at 8am – 4pm; Wed & Thursday 10-2pm)

Contact Interpreter Agency *(Instructions are on pages 1 - 2 of the Desk Aid)*

Low cost Agency's Name _____

Phone # _____

Agency's office contact person _____

Interpreter's Name & Cell phone #: _____

Agency available? (Y / N), *(If not available, record reason and contact next agency to ensure 2-3 day turnaround)*

Confirm the state contract's cost per hour (x2-hour min) \$_____

Request a written confirmation of appt date/time & location using state contract

Email the interpreter the Career Center's address, phone #, directions & contact person

Date and Timeframe of appointment (Interpreter confirmed) ____/____/____ : ____ - ____ : ____

Date and Timeframe Confirmed with Customer by: Email, Phone, In Person

Office Use:

Date _____ Staff Name _____

Notified Functional Leader or Designee by: email / phone / in-person/ _____

Planned Meeting's Attendees and Staff _____

Planned Services Welcome / Skills / Jobs / EUC / Workshop / Resume/Other:

(Forward this form to the Functional Leader)

Day of Meeting:

Interpreter's Name _____ Copy of Interpreter License (Y / N)

Time Started / Completed _____

Applicant ID/Future Appointment date _____

****Form should be maintained according to DWD Confidentiality Policy 01-2008, Change 2. Keep this form in a locked cabinet, separate from the job seeker file.**

Limited English Proficiency (LEP) Policy

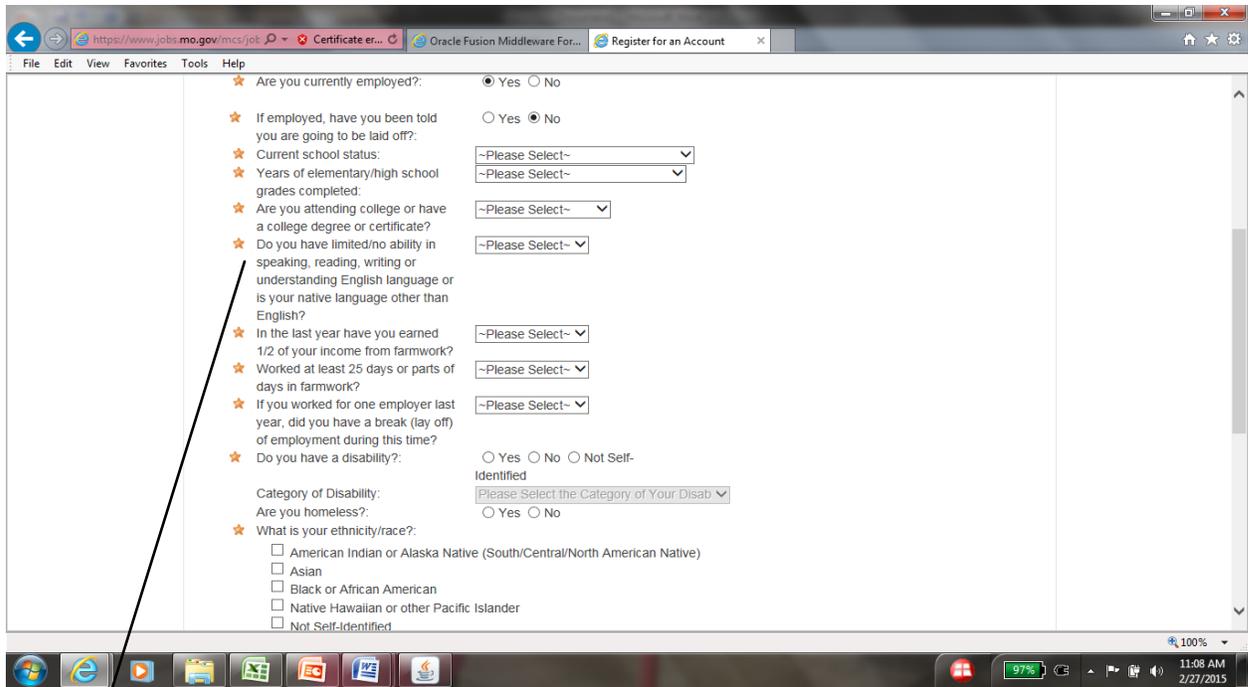
Intake Procedures for LEP Individuals (See DWD Issuance 06-2014)

1. Walk-in LEP customer – use “I Speak” card (*this is required*) to indicate language of choice. **Contact CTS Language Link (see attached IVR instructions and Tips and Advice) by telephone.** With assistance of interpreter, conduct standard intake steps to serve the LEP individual.
2. Must provide location suitable to confidentiality, such as conference room with speaker phone.
3. During intake, provide LEP individual with copy of the “I Speak” language card listing the language of their choice. The individual may keep card in their possession to display to staff as they are processed through Career Center. *Accepting and/or maintaining this language identification card is voluntary and will not impede the delivery of services.*
4. If you cannot determine language of LEP individual after using “I speak” card or any other readily available method (i.e., bilingual/multilingual staff), immediately contact CTS Language Link to determine appropriate language of individual.
5. Use the language interpretation service during each step of initial assessment, including and up to service delivery.

Serving LEP Individuals – Important Points:

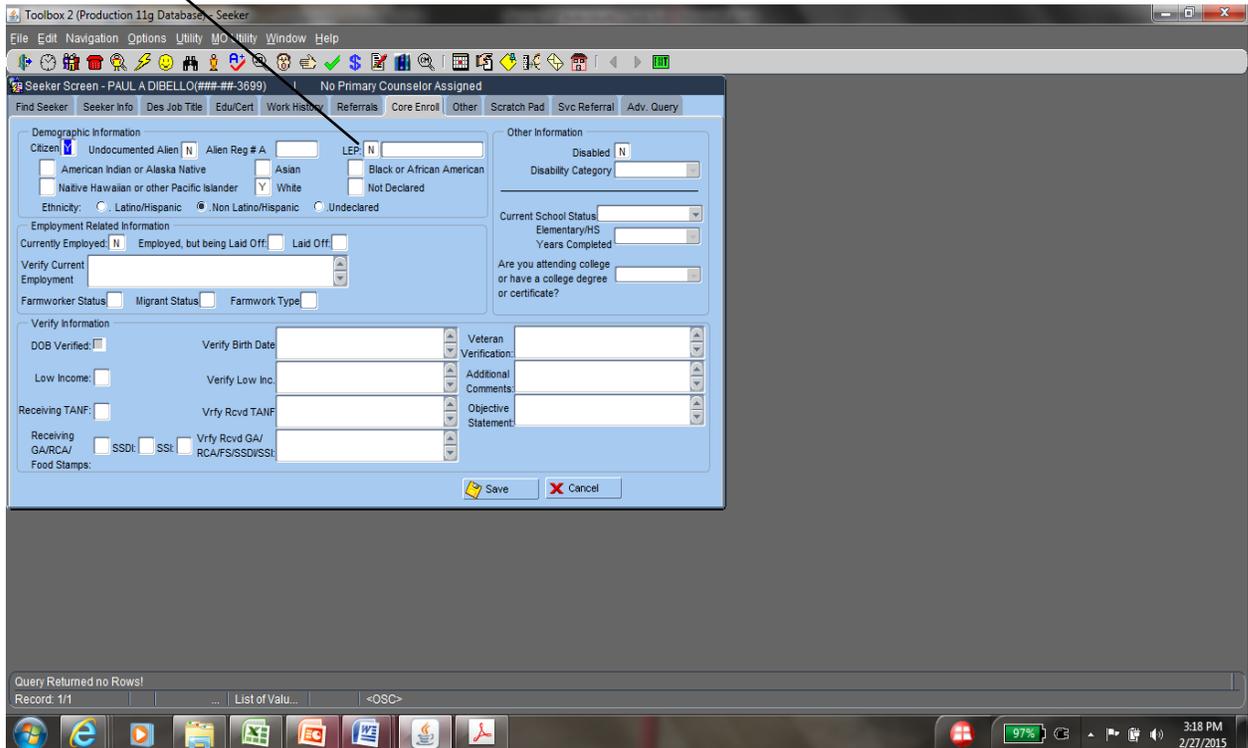
At a minimum, intake or welcome **staff must record the language of the LEP individual in his/her file (including electronic files) so that subsequent interaction will be conducted in the same language.** If interpretation service is used, record a brief description of how the service was used in the LEP Individual’s file (case note). Limited English Proficiency will be noted on the Demographic tab of the jobs.mo.gov membership registration screen. When “Yes” is selected for LEP, the customer will be prompted to select a language via dropdown. This will then be documented on the Core Enroll tab of the Seeker Screen in Toolbox.

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 Workforce Investment Act.** An LEP individual has the right to decline staff offer of free interpreter services, however, all declined offers must be documented in the individual’s file, including those files maintained electronically (Toolbox).



LEP Question on Membership Registration screen in jobs.mo.gov

LEP indicator on Core Enroll tab/Seeker Screen in Toolbox



How to Use Interactive Voice Response (IVR)

Step 1: Call 1 888-338-7394

Step 2: Enter Account Number 16408, followed by # sign

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

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

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@ctslanguageink.com.

DWD Equal Opportunity Policy – Discrimination Complaints

Who may file a complaint:

Any person (employee, former employee, customer, non-customer or employer) who feels that he/she or another person has been, or is being subjected to discrimination. A complaint can be filed by the affected individual or through an authorized representative.

Basis of a discrimination complaint:

Race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship or status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIA Title I financially assisted program or activity.

Time & Place for filing:

- 1) Filing must occur within 180 days of the alleged discrimination
- 2) Discrimination complaints may be filed with:
 - a) State Equal Opportunity Officer – Danielle Smith – (573) 751-2428
 - b) Director of the Civil Rights Center (CRC), US Department of Labor, 200 Constitution Ave NW, Room N-4123, Washington, DC 20210
 - c) Local EO Officer – Paul DiBello – (573) 346-1766 (who will immediately log the complaint and forward to the State EO Officer for processing)

Time Limits:

DWD must complete discrimination complaint processing procedures and issue a written notice of final action within 90 calendar days from the date the complaint was filed.

Initial Review:

Any DWD or partner employee may take a written discrimination complaint from a complainant or designated representative. Discrimination complaints may be made on the Discrimination Complaint Form (DWD-101 & DWD-101s for Spanish). There is a PDF fillable form available on WorkSmart at https://worksmart.ded.mo.gov/includes/secure_file.cfm?ID=333&menuID=5113. Regardless of whether or not the form is used, a written discrimination complaint must include the following items:

- 1) Name and address
- 2) Identity of the individual or entity that the complainant alleges is responsible for the discrimination
- 3) Description of the allegations in enough detail to allow an initial determination of jurisdiction, timeliness, and apparent merit of the complaint
- 4) Complainant's signature or the signature of the complainant's authorized representative

No DWD or partner employee may discharge, intimidate, retaliate, threaten, coerce or discriminate against any individual who has filed or participated in investigation of a discrimination complaint.

General WIA Program Complaint and Grievance Policy

Who may file a complaint:

Any applicant, employee, participant, service provider, program recipient, or other interested party may file a complaint alleging a violation of local WIA programs, agreements or LWIB policies and activities.

Time limits:

One year from the date of the event

Complaint categories (jurisdiction):

- 1) Complaints involving *local* WIA programs, agreements or LWIB policies and activities
- 2) Complaints involving *state* WIA policies, programs, activities or agreements

For all General Complaints, both state and local, use DWD General WIA Complaint Form (DWD-104 & DWD-104s for Spanish). There is a PDF fillable form available on WorkSmart at https://worksmart.ded.mo.gov/includes/secure_file.cfm?ID=332&menuID=5113

If DWD-104 is unavailable, the following information must be included:

- 1) Full name, telephone number, and address of the person making the complaint
- 2) Full name and address of the respondent
- 3) Statement of the facts (including dates) that constitute the alleged violation(s)

Complainants with Disabilities: Accommodations will be provided, including:

- 1) Alternate formats for notification of hearings, results and any other written communication
- 2) Auxiliary aides and services, such as deaf interpreters or assistive listening devices
- 3) Accessible location for hearings/other meetings on request

For detailed information on the Resolution Process for complaints, refer to DWD Issuance 09-2012. Here is a summary of resolution steps at both the Local and State levels:

General WIA Complaints - Resolution Steps	
Local Level	State Level
1) Initial Review	1) Intitial Review - State EO Officer
2) Informal Resolution (10 days from filing)	2) Refer or establish complaint file
3) Formal Resolution (20 days from filing)	3) Informal Resolution (10 days from filing)
4) Hearing (45 days from filing)	4) Formal Resolution (20 days from filing)
5) Final Decision (60 days from filing)	5) Hearing (45 days from filing)
6) If appealing - request to State EO Officer within 90 days from initial filing	6) Final Decision - 60 days from filing