



Workforce System Directive

Access for All-Star Accessibility Framework Phase I – Initial Assessment

Effective Date of Policy: 1/19/24

Policy Number: WSD #87-2024

Rescissions: OWDI #11-2020

Approved By: Trae Rahill, Chief Executive Officer

Approved by Governor’s Council for Workforce and Economic Development: 01/19/2024

STAKEHOLDERS:

- Chief Local Elected Officials
- Workforce Development Board Chairs
- Workforce Development Board Staff
- Designated Fiscal Agent Staff
- Oklahoma Career Tech
- Oklahoma Rehabilitation Services
- Wagner Peysner

REFERENCES:

- [The Workforce Innovation and Opportunity Act](#) (WIOA) Sections 101(d)(6), 121(e)(2), 121(g)(1), 121(g)(3)
- Training and Employment Guidance Letter [TEGL 16-16](#)
- [20 CFR 678.800 \(a\)\(3\)](#), and [20 CFR 678 Subpart F](#); [20 CFR 678.400-440](#); [20 CFR 678.800\(b\)](#); [20 CFR 361.400-430](#); [20 CFR 678.300\(d\)\(3\)](#)
- [29 CFR 38](#)
- [34 CFR 463.410-430](#)
- [Title I of the Americans with Disabilities Act](#), which applies to employment settings.
- [Title II of the Americans with Disabilities Act](#), which applies to state and local governments.
- [Title III of the Americans with Disabilities Act](#), which applies to private places of public accommodation.
- [Oklahoma Works Access for All initiative](#)
- WSD #10-24

PURPOSE: This Workforce System Directive (WSD) is intended to provide guidance to the local workforce boards and joint system partners for the initial assessment phase of implementation of the Access for All Star Accessibility Framework.

MESSAGE: The Oklahoma Employment Security Commission (OESC) as the Governor's Workforce Innovation and Opportunity Act (WIOA) administrative entity, provides this issuance as joint guidance to the local workforce development boards and core partners for the implementation of the Star Accessibility Framework evaluation model.

Oklahoma Works Access for All was developed as a system-wide effort to coordinate training and strategies in support of making one-stop American Job Centers and technology accessible to individuals with disabilities, as described in 29 CFR part 38, the implementing regulations of WIOA sec. 188. The Star Accessibility Framework operationalizes the Access for All system strategy by providing an assessment tool for the continuous improvement of the workforce system in the areas of customer service, training, outreach, and physical accessibility. The Star Accessibility Framework Rubric is designed to be a tool in support of continuous improvement at American Job Centers and system efforts including but not limited to center certification and strategic planning. In Phase I of implementation of the Star Accessibility Framework, local workforce development areas will conduct an initial assessment of centers.

Instructions:

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

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

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

Each LWDB will establish an assessment process which must be established through local policy or a guidance letter. The process should include a timeline for completion of the process and any forms developed by the local area for the completion of the assessment process. An example process that includes an application, desk review, and on-site review is provided in the state guidance for center certification (WSD #10-2024). Aligning the assessment process with the procedures and documentation required for center certification is recommended.

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

The assessment results from the local areas will be reviewed by a joint taskforce including members of the Star Accessibility Framework work group and members of the System Oversight Subcommittee of the Workforce System Oversight Committee for the purpose of process oversight and coordination of training resources. The State board will review the evaluation criteria and process every two years as part of the review and modification of the state planning process.

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

ACTION REQUIRED: This Workforce System Directive (WSD) is to become a part of your permanent records and made available to appropriate staff and sub-recipients.

INQUIRIES: If you have any questions or concerns regarding issuance email: WorkforceServices.Inquiry@oesc.ok.gov.

ATTACHMENTS:

Attachment A – Star Accessibility Framework Assessment Score Sheet

Customer Service

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

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

Evaluator Information

Evaluator Name

Evaluator Email Address

Evaluator Phone Number

Evaluator Organization

Evaluator Role

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

Assessment Score

- 1 Star: Compliance
- 2 Stars: Maintenance
- 3 Stars: Prevention
- 4 Stars: Actively Responsive
- 5 Stars: Proactive

Evaluator Notes:

Evaluator Notes

Customer Service

Compliance



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

Maintenance



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

Prevention



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

Actively Responsive



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

Proactive



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

Training

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

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

Evaluator Information

Evaluator Name

Evaluator Email Address

Evaluator Phone Number

Evaluator Organization

Evaluator Role

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

Assessment Score

1 Star: Compliance

2 Stars: Maintenance

3 Stars: Prevention

4 Stars: Actively Responsive

5 Stars: Proactive

Evaluator Notes:

Evaluator Notes

Training

Compliance



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

Maintenance



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

Prevention



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

Actively Responsive



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

Proactive



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

Outreach

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

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

Evaluator Information

Evaluator Name

Evaluator Email Address

Evaluator Phone Number

Evaluator Organization

Evaluator Role

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

Assessment Score

1 Star: Compliance

2 Stars: Maintenance

3 Stars: Prevention

4 Stars: Actively Responsive

5 Stars: Proactive

Evaluator Notes:

Evaluator Notes

Outreach

Compliance



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

Maintenance



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

Prevention



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

Actively Responsive



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

Proactive



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

Physical Accessibility

Center Information

Choose an item.

Oklahoma Works American Job Center Name

Address of Oklahoma Works American Job Center

Choose an item.

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

Evaluator Information

Evaluator Name

Evaluator Email Address

Evaluator Phone Number

Evaluator Organization

Evaluator Role

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

Assessment Score

1 Star: Compliance

2 Stars: Maintenance

3 Stars: Prevention

4 Stars: Actively Responsive

5 Stars: Proactive

Evaluator Notes:

Evaluator Notes

Physical Accessibility

Compliance



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

Maintenance



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

Prevention



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

Actively Responsive



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

Proactive



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