
METHODS OF ADMINISTRATION

DISTRICT OF COLUMBIA

DEPARTMENT OF EMPLOYMENT SERVICES

ELEMENT 5**COMPLIANCE WITH SECTION 504**

29 CRF 37.7 through 37.9
Subparts B and C of 29 CFR 32

Non-discrimination on the Basis of Disability

All recipients of Workforce Investment Act (WIA) funds and partners in all American Job Centers must comply with Section 504 of the Rehabilitation Act of 1973, as amended. Assurances are provided in all memorandums of understanding, contracts, grants, cooperative agreements, plans, and similar documentation entered into with partners and recipients of WIA federal funded programs.

The District of Columbia and the Workforce Investment system is dedicated to providing equal access and accommodation to persons with disabilities. As noted in Element 3, all agreements contain "Assurances" provisions requiring compliance in meeting this obligation.

WIA programs and services are available to all individuals. The eligibility criteria for individuals receiving youth services is the same for all youth, as is the eligibility criteria for dislocated workers is the same throughout that program. The same is true for adults receiving training services. WIA services will be made available to all individuals and/or appropriate referrals will be made to ensure equal opportunity to everyone.

WIA American Job Centers and service providers will be required to participate in the Department's EO monitoring review as provided under WIA Section 188 to ensure accessibility to all individuals seeking services. The District's EO Manager will coordinate efforts to provide training and technical assistance, as necessary, to ensure compliance with WIA Section 188 and Section 504.

Reasonable Accommodation

The following assurance is provided to all applicants seeking WIA services through the District's American Job Centers:

Under the District and federal law, qualified applicants with disabilities are entitled to reasonable accommodation. Modifications or adjustments may be provided to assist applicants to compete in the recruitment and selection process, to perform the essential duties of the job or to enjoy equal benefits and privileges of employment available to other employees.

An applicant must request an accommodation when needed. Any applicant or participant in need of such accommodation contacts the program manager. DOES Policy 300.20-2 *Reasonable*

Accommodation provides the agency's guidelines on servicing employees and customers requests pursuant to ADA.

Programmatic and Communication Accessibility Provisions

TDD/TTY devices are available at all DOES American Job Centers. Staff is trained on the proper operation and use of the TDD/TTY devices. TDD/TTY numbers are included in all new departmental stationary, written information materials, or whenever a telephone number is listed. (Exhibit 5C) Also, DOES customers may use the relay service by dialing 1-800-735-2218.

American Sign Language Interpreters are available upon request to provide assistance to those who are hearing impaired. Braille services are also available upon request.

Architectural Accessibility Provisions

The Mayor's Office of Risk Management (ORM) and the Department's EO Manager are primarily responsible for coordinating the District's efforts to ensure that all facilities are ADA compliant. The ADA Compliance Coordinator, through ORM, and the Department's ADA Coordinator perform reviews of all American Job Centers to identify and correct any deficiencies that would prevent a person with a disability from accessing a facility.

The Department also performs an ADA Self-Evaluation every two years in coordination with ORM. The self-evaluation identifies programmatic or architectural areas that are not in full compliance with ADA. The transition plan outlines corrective actions and deadlines for problem areas. DOES Headquarters is ADA compliant and as well as a certified LEED Green Building.

Furthermore, as part of the yearly EO monitoring exercise, the EO Manager performs ongoing and routine evaluation and monitoring of all American Job Centers and makes recommendations for improvements. Any improvement can be funded through the Department's administrative, operating, or facilities budget. The Department collaborates with employers who have hired those with disabilities and those employers who seek to hire. Several projects, whose primary focus is partnership, are underway to increase the employment opportunities for the disabled community. The Deanwood Café is located on the first floor of DOES Headquarters and is a prime example of collaboration between DOES and the Department on Disability Services as the café is owned and operated by disabled DC residents.

The Department also provides assistance through its EO Counselors who are assigned to each of the American Job Centers throughout the District.

Through a combined use of accommodations and an aggressive

policy that eliminates architectural and programmatic barriers, the Department implements a policy of providing, to the maximum extent possible, employment and training opportunities to individuals with disabilities in the same setting as employment and training services are provided to those without disabilities.

Confidentiality

All information collected about registrants, applicants, eligible registrants or applicants, participants, employee and applicants for employment will be stored in a manner that ensures confidentiality, and will be used only for the purpose of record keeping and reporting, and determining eligibility, when appropriate for WIA Title I financially assisted programs or activities.

In accordance with District and agency policy, records that contain medical information on registrants, applicants, eligible registrants or applicants, participants, employees and applicants for employment such as those required under the Family Medical Leave Act, and other medical documents, are treated as confidential.