

WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT

2015-2017 MOA

ELEMENT 2 - NARRATIVE

NOTICE AND COMMUNICATION

Workforce Development Boards:

The official policy guidance for WIA – WIOA Title I programs administered by DET is the WIA Policy Manual issued August 2012. The Workforce Programs Guide reflected DET policy prior to August 2012 and revised as needed when required due adjustments made by statutes or regulations. The Policy Manual is on the Division’s website at: http://dwd.wisconsin.gov/dwdwia/PDF/wia_wisconsin_policy_manual.pdf

The portion of the Manual which informs the WDBs and other DWD Grantees of their Civil Rights Obligations is found in Chapter 7. Assurances and Certifications, “B. Compliance Statement, 1-3 and C. Nondiscrimination and Equal Opportunity Requirements, 1-4.” See Exhibit 2-A, Chapter 7 is found electronically in pages 100-102. http://dwd.wisconsin.gov/dwdwia/PDF/wia_wisconsin_policy_manual.pdf

The prescribed language for the “Equal Opportunity Is the Law” (EO) notice in the English and Spanish versions was initially disseminated to the WDAs on August 15, 2001. A Hmong version of the notice initially developed in September 2001 was disseminated to all WDBs through their local E.O Officers and the State E.O Officer. The notices were revised in June 2008 to reflect the appointment of Civil Rights Center Director, Ramón Surís-Fernández, and changes in the Division’s organizational structure. Subsequently, another Director has been appointed and substantial changes in staffing at the State level have necessitated changes in these notices. The updated notices are provided in Exhibits 2-B through Exhibit 2-D and are provided in English, Spanish and Hmong. The federal Civil Rights Center also has “Discrimination is Against the Law” posters in English, Spanish and Hmong that provides information to employees of businesses, organizations, persons applying for jobs or members of the general public who may need to file a complaint. These posters are provided in Exhibits 2E-2G.

The requirements for conspicuous posting of the notice, as well as the requirement to make the notice available in alternate formats for persons with visual impairments are delineated in the WIA Policy Manual. Where required, the notice is read to persons with visual impairments. The notice is to be placed in every Job Center and WDB office in the state (since not all WDB offices are located in Job Centers). The basic method for advising enrolled program participants of their rights is the "Rights and Responsibilities" form that is routinely included as part of the orientation to the WIA Program. The "Rights and Responsibilities" format is not unique to WIA Title I programs. Every DET-administered program, regardless of funding source uses a version of the “Rights and Responsibilities” format to advise participants of their right to fair treatment and the right to file a complaint. See the English version as Exhibit 2-H and Hmong version as Exhibit 2-I. Participant records are maintained by the grantee and services are tracked electronically on the ASSET reporting system. Grantees use alternative methods for

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documenting notification such as providing the information during orientation sessions for new participants.

The E.O Officer reviews compliance in recruitment brochures and other public information to ensure that the taglines "equal opportunity employer/program," and "auxiliary aids and services are available upon request to individuals with disabilities," are included in public information. Telephone numbers for TDD/TTY access or Telephone Relay Service (TRS) are also expected to be compliant. When needed, documents are provided in large print, Braille or electronic form.

Additionally, DET policy requires each WDB administrative entities to assess the physical, programmatic and communication accessibility of all its comprehensive Job Centers to determine they are in compliance with the accessibility requirements for individuals with disability pursuant to WIA Section 188. The most recent Administrative MEMO 12-06 dated September 18, 2012 was issued to WDB, EO Officers, Job Center Partners, Vocational Rehabilitation Offices, and Job Service District Offices. See Exhibit 2-J, "Work Investment Act Physical Programmatic and Communication Accessibility Requirements. Furthermore, in October 2011 DWD –DET was awarded a Disability Employment Initiative Grant (DJ-22466-11-75-A-55). The goal of the program is to improve coordination and collaboration among employment and training and asset development programs implementation at the state and local levels, including Ticket-to-Work Programs, and build effective community partnerships and to leverage public and private resources to better serve individuals with disabilities with aim of improving employment outcomes. Six WDA - WDB were the recipients of funds, this project has resulted in improvements to all comprehensive job centers within each WDAs by providing increased physically and programmatic accessibility by improving technological. Assistive technology inventories of all comprehensive job centers are being planned for early part of 2015 to determine what other technological assistive areas need improvement and to increase our accessibility for persons with disability.

DET Staff Communications:

The Divisions provide information on a frequent basis to the DWD's Secretary, Reggie Newson. DET Administrator discusses Civil Right Compliance issues with the Secretary at their regularly scheduled meetings when such issues are warranted. The Director for the Bureau of Programs Management and Special Populations (BPMSP) meets with the Administrator and Deputy Administrator on a weekly basis to provide a "Status Report". Nondiscrimination and Equal Opportunity issues are one of several items routinely included and discussed as part of his agenda. An example of the weekly State Report is included as Exhibit 2-K.

Limited English Proficiency:

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One of the most compelling issues of communication is assuring meaningful access to our programs and services for individuals who do not speak English as their first language. DET has been very active in the areas of hiring bilingual staff, translating written documents, providing oral interpreters and coordinating training programs to increase the pool of trained interpreters in Wisconsin. DET has a formal LEP Plan recently updated in November 2014 and reviewed annually as needed. The LEP Plan will be in effect for the period of January 1, 2015 through December 31, 2017. A copy is enclosed in Tab 2, Element 1 Exhibit 1-P.

Contracted Telephone Interpretation - DWD currently contracts with Language Line Services (LLS) to provide oral interpretation on telephone conference calls. The new contract recently negotiated and in effect from November 1, 2014 through October 31, 2016 requires that the vendor be able to provide translation in 21 foreign core languages for DWD – DET; however, Language Line is able to provide oral language interpretation in 157 noncore languages if needed. The vendor is able to provide the following core languages: Spanish; Hmong; Albanian; Amharic; Arabic; Bosnian/Croatian/Serbian; Burmese; Chin; Chinese/Mandarin(simplified); Farsi (Persian); Karen; Khmer (Cambodian); Korean; Lao; Nepali; Russian; Somali; Thai; Tibetan; Tigrinya; and Vietnamese. Interpreters must be available 24 hours a day, 7 days a week. Counties, local municipalities and partner agencies are able to piggyback on the State of Wisconsin contract. Materials provided by LLS can be accessed via the internet: www.LanguageLine.com. The Contract is located on the internet at: <http://vendornet.state.wi.us/vendornet/asp/ContractView.asp?SystemContractNumber=3161&sCommand=DisplayContract>. The contract includes American Sign Language (ASL) vendors capable of providing Video Remote Interpreting (VRI) services as well as in-person ASL interpreters.

Between the periods from May 1, 2013 through October 30, 2014 DWD and its Divisions received a total of 25,684 calls from 50 different LEP language groups and provided 374,222 minutes of services through Language Line interpreters for a total cost of \$276,924.28. A summary of language services provided by individual Division is included as Exhibit 2 -L.

Contracted Written and In Person Translation Services - DWD provides written translation of documents through contract CFD00407. Vendors were selected under a competitive process. Several vendors are included in the bulletin, which covers services of original translation, proof-only work and layout. Price differs by the turn-around time requested and by the length of the document. In total, these vendors provide translation services in 22 core and 12 noncore languages. The Written Translation Contract for written foreign language and Braille translation services is located on the internet at: <http://vendornet.state.wi.us/vendornet/asp/ContractView.asp?SystemContractNumber=3161&sCommand=DisplayContract>

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Tools to Assist Agencies - Examples of some tools developed by the DET Civil Rights staff to assist local agencies include an "I speak" cards that can be used by all offices. More recently DWD, DCF and DHS commissioned an I speak poster that is being disseminated to all WDB and partner agencies for posting at comprehensive Job Centers and partner agency's lobbies and resource rooms. The poster is intended to help LEP speakers identify the language they need assistance through an interpreter. The Poster states "Your Right to An Interpreter" followed by the statement; "You have the right to receive program information in a language that you understand through an interpreter, and translation of vital documents at no cost to you", "Point to your language". The statement is translated to 55 languages, (See Exhibit 2-M). The poster is available at:

http://dwd.wisconsin.gov/det/civil_rights/pdf/language_interpretation_poster.pdf.

DET recently revised its LEP Plan. A copy is included in Tab 2 Element 1 Exhibit 1-P.

The LEP Plan can be review at:

http://dwd.wisconsin.gov/det/civil_rights/translations.htm

The EO Program Officer will be updating the Civil Rights Compliance web site in first quarter of 2015 and will be adding additional LEP resource for WIA funded entities to use locally.