

Standard Operating Procedures

**REFERENCE POLICY
NUMBER:
N/A**

Title: Serving individuals with Disabilities or Limited-English Proficiency (LEP)	
Unit: Operations	Function: To provide the Workforce Center Subrecipient with information and guidelines when providing services to customers with disabilities or LEP.
Implementation Date: November 18, 2019	SOP Revision History: N/A
Effective Date: November 18, 2019	Scheduled for Review: November 18, 2023

DEFINITIONS:

Limited English Proficiency (LEP): An individual who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP."

PURPOSE: To ensure that all individuals with disabilities or with Limited-English Proficiency (LEP) have equal opportunity and access to all workforce services. The Workforce Solutions for North Central Texas (WSNCT) Workforce Center Subrecipient shall make available on-site interpreters, auxiliary aids, assistive technology and LEP services, as needed for reasonable accommodations in order to minimize communication barriers and increase employability for customers served.

SCOPE: These guidelines and standard operating procedures apply when serving customers with disabilities or LEP in all WSNCT Workforce Centers.

PREREQUISITES: Workforce Center staff utilization of assistive technology and auxiliary aids currently in place at the center. Workforce Center staff must be trained on the use of this assistive technology and auxiliary aids prior to assisting customers.

RESPONSIBILITIES: Workforce Center Subrecipient shall provide physical and programmatic accessibility to employment and training services for individuals with disabilities.

PROCEDURE: The Workforce Center Subrecipient shall use the following, but not limited to, assistive technology, auxiliary aids and LEP services, as necessary, when providing assistance to customers with disabilities or limited English proficiency.

ASSISTIVE TECHNOLOGY & AUXILIARY AIDS

TTY Phones

The Workforce Center Subrecipient staff shall follow these steps when making a TTY call from a Workforce Center:

- Before you dial, make sure the CAPTIONS button is on (red light on). You can turn captions on/off at any time during your call by pressing the CAPTIONS button.
- Lift the handset.
- Dial the phone number of the person you wish to call. (Note: If you need to dial a 6 or other number to get an “outside” line, enter that number first, then dial the phone number.)
- As you dial, the display screen shows the status as your *CapTel* phone connects to the captioning service, letting you know when captions are ready. (Note: It is okay if the captioning service connects before you finish dialing the phone number. Just continue dialing.)
- Listen or watch the signal meter to know when someone answers. Watch the display screen for captions. Begin your conversation as you normally would.
- When you are done with your call, hang up the handset.

Pocket Talkers

The pocket talker is a personal amplifier system. This device is small enough to transport and can easily be used in a one-on-one or group session, as needed, by customers.

In-Person Interpreters

The Workforce Center Subrecipient shall arrange for the continued availability and provision of qualified interpreter services for deaf and hard of hearing individuals who receive workforce center services. To provide effective communication with deaf and hard of hearing customers, the Workforce Center Subrecipient shall adhere to the following:

- Determine the most effective and appropriate interpreter service provider.
- Contract interpreter services from a provider listed on the Communication Services for State Agencies (CSSA) contractors list located at: <https://dhhs.hhsc.state.tx.us/providers/CSSAContractors.asp>. (Note: For this purpose, Boards are considered state agencies when contracting services with other state entities under the Interagency Cooperation Act, as defined in Texas Government Code Sec. 771.002).
- Procure interpreter services from one of the following:
 - a local interpreting agency or qualified interpreter within the local workforce development area not covered by a CSSA; or
 - a video remote interpreting provider.
- Ensure that costs incurred for the coordination and provision of interpreter services are in compliance with the cost principles set forth in:
 - Office of Management and Budget Circular A-87 or A-122, as applicable, as supplemented by the Uniform Grant Management Standards (UGMS);
 - The procurement of goods and services as set forth in TWC’s Financial Manual for Grants and Contracts (FMGC), Chapter 14, Procurement; and

- U.S. Department of Health and Human Services' (DHHS') Communication Access Maximum Rates for the current fiscal year at <https://hhs.texas.gov/doing-business-hhs/vendor-contractor-information/cssa-maximum-rates>.

Online Interpreter

Communications Services for the Deaf Interpreting Online (CSDIO) enables deaf and hearing people in the same room to communicate through an interpreter at a distant location. Interpreting online is convenient for the customer who needs communication access when traditional in-person interpreting services are not available or practical.

UbiDuo™ System

The UbiDuo™ is a communication device that allows people who are deaf or hard of hearing to communicate instantly with anyone, face-to-face, without the need of a third party to interpret. With the use of this device, Workforce staff can better serve and interact with customers who are hearing impaired. See UbiDuo™ Quick Start Guide (Attachment 1) and UbiDuo™ Quick Reference Guide (Attachment 2). The Workforce Center Contractor must adhere to the following regarding the storage and usage of the UbiDuo™ Systems at all Workforce Center locations:

- Keep both UbiDuo™ units charged and ready for customer use. (System is equipped with a 10-hour battery);
- Store the UbiDuo™ system in a safe and secure location at all times when not in use;
- Use the UbiDuo™ system for simultaneous instant messaging between Workforce staff and the customer in one-on-one or in group sessions, as needed, in order to remove the communication barrier;
- Use the UbiDuo™ at job fairs, rapid response events, employer interviews, etc. as needed to remove the communication barrier between potential employees and employers;
- Check in/out the UbiDuo™ to Workforce staff from *other* Workforce Centers within our board area if more than one system is needed for special events (e.g. job fairs, rapid response events, etc.);
- Allow customers to check in/out the UbiDuo™ *if* needed for an employer interview or special event away from the Workforce Center location; and
- Develop a “check-in/check-out” system which includes, but is not limited to:
 - documentation logs that reflects the personal identification information of the person requesting the device;
 - date of check in/out of the device;
 - times of check in/out of the device;
 - reason and location of the device deployment; and
 - anticipated return date.

MINIMUM STANDARDS COMPLIANCE

The Texas Workforce Commission (TWC) has established minimum standards across the state for Workforce Solutions offices' accessibility requirements. As a result, the WSNCT has established and implemented minimum standards for accessibility in all WSNCT Workforce Centers across the 14 county area.

The WSNCT Workforce Center Subrecipient shall comply with the following minimum standards regarding the provision of assistive technology and/or auxiliary aids available for use within all Workforce Centers. The following assistive technology and/or auxiliary aids must be located at the designated Assistive Technology Computer Station (ATCS), resource room, or training rooms. Those auxiliary aids kept under lock and key shall be made available for checkout upon customer request.

- ZoomText (includes both features) at ATCS
- Headphones (that cover over the ears; use of sanitation wipes required)
- Large Print Keyboards at ATCS
- Pocket Talkers
- ChatterVox Voice Amplifier (used for group settings)
- Telephones with volume control and hearing aid compatibility; including large button phones
- Sorenson Video Relay Service® (SVRS®) at ATCS
- UbiDuo™ System (communication devices)
- Large print or accessible digital content (based on customer request)
- Trackball Mouse
- Adjustable height desk at ATCS
- Keyboard seated on adjustable worktable of each assistive technology workstation (including but not restricted to resource and training rooms)
- Adjustable worktable located in the general training room in each workforce center

Training Resources

The Workforce Center Subrecipient shall provide physical and programmatic accessibility to employment and training services for individuals with disabilities. The Workforce Center Subrecipient shall utilize the following, but not limited to, resources to ensure customer access to high-quality workforce services that prepare individuals with disabilities for competitive, integrated employment:

- National Center on Workforce and Disability (NCWD) - provides articles, webinars and other resources designed to assist One-Stop systems in meeting the needs of individuals with disabilities. <http://www.onestops.info/>
- TWC Computer-Based Training (CBT) - People-First Language is designed to assist staff in communicating appropriately and respectfully with and about individuals with disabilities, emphasizing the individual first, not the disability. (Note: download poster “Communicating With and About People with Disabilities” by clicking here: https://www.cdc.gov/ncbddd/disabilityandhealth/pdf/disabilityposter_photos.pdf).
- TWC Classroom Training - offers courses to assist workforce center staff in the areas of basic facts, myths, rights, etiquette, accessibility, accommodations, and more. Contact TWC Training & Development via email at: training.development@twc.state.tx.us.
- TWC Accessibility Team - offers training and assistance to make documents, web content, and applications accessible: accessibility@twc.state.tx.us.
- Coalition of Texas with Disabilities (CTD) - focuses on governmental advocacy, public awareness activities, and professional disability consulting, which include interactive trainings and workshops. <http://www.txdisabilities.org/consulting>.

- American Foundation for the Blind - provides information and computer-based training on the latest adaptive technology for individuals who are blind. <http://elearn.afb.org/>.
- Association of Assistive Technology Act Programs (ATAP) - promotes the national network of Assistive Technology (AT) Programs. ATAP enables individuals with disabilities, service providers and others to learn about, access, and acquire AT needed for education, employment, and community living. ATAP provides device demonstration, information, videos, webinars, etc. www.atap.org
- Texas Technology Access Program (TTAP) - develops programs to improve access to, advocacy for, and awareness of Assistive Technology, and provides information and demonstrations of assistive technology to advocates, employers, and educators. <http://tatp.edb.utexas.edu/>.
- Texas Governor's Committee on People with Disabilities - offers online learning modules for making Word, PowerPoint, and Excel documents accessible at: <https://gov.texas.gov/organization/disabilities/accessibledocs>.

Limited-English Proficiency (LEP)

Individuals with LEP may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. An assessment of English language proficiency occurs and arrangements for interpretation will be made by Workforce Center Subrecipient staff after communication with the customer. The Workforce Center Subrecipient is required to take reasonable steps to ensure access to all programs and activities by LEP persons. Free interpretive services may be provided for those with LEP. Written Materials for Orientations, Workshops, Trainings, etc. may be available in Spanish or identified language, if requested.

I Speak Cards

I Speak cards are maintained at the front desk or in the Resource Room of each Workforce Center to enable staff to quickly identify the customer's language.

Language Line

Language Line Interpreter Services is available for Workforce staff use 24/7. The "Quick Reference Guide" (Attachment 3) should only be shared with authorized users as it contains the Workforce account access number and client ID. Authorized staff will need to keep the Quick Reference Guide as a desk aide for easy access and to effectively use Language Line Interpreter Services as needed in day-to-day operations and provision of services.

The Workforce Center Subrecipient is required to have available information regarding resources such as English as a Second Language. The Subrecipient is responsible for coordinating services through available resources to provide access to intensive pre-vocational skills and integrated vocational skills-based language training, as necessary.

For additional guidance regarding assistance for customers with LEP, refer to Board Standard Operating Procedure, *How to Assist Customers with Limited English Proficiency*.

REFERENCES:

Board Standard Operating Procedure, *"How to Assist Customers with Limited English Proficiency."*
Texas Workforce Commission, *Technical Assistance Bulletin 287* "Training, Assistive Technology, and Accessibility."

Texas Workforce Commission, WD Letter 57-07 “Interpreter Services for Deaf and Hard of Hearing Individuals.”

Texas Workforce Commission, WD Letter 24-01 “Prohibition Against Discrimination Based on Disability or Limited English Proficiency in the Administration of Workforce Services.”

ATTACHMENTS AND DEFINITIONS:

Attachment 1: “UbiDuo™ Quick Start Guide”

Attachment 2: “UbiDuo™ Quick Reference Guide”

Attachment 3: “Language Line Quick Reference Guide”



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