Oklahoma Works

Appendix A

Oklahoma's Workforce System

A Roadmap for Physical and Technology Accessibility Standards Certification

Prepared by the Oklahoma Department of Rehabilitation Services
and Oklahoma ABLE Tech

www.oklahomaworks.gov

www.okdrs.gov
1.800.845.8476

okabletech.okstate.edu
1.800.257.1705

Oklahoma Works Workforce System
Roadmap for Physical and Technology Accessibility Standards Certification

It is critical Oklahoma Works Partners do not discriminate against people with disabilities. Oklahoma Department of Rehabilitation Services (DRS) and Oklahoma ABLE Tech partner to help Agencies to remove physical and technological barriers that block access to Agency programs.

This roadmap document serves to detail coordination among the Oklahoma Works System Partners with regards to efforts to make Oklahoma's Workforce System accessible to job seekers with disabilities.

Below is an outline of the process that a Workforce System Partner representative can use to get answers and technical assistance for questions about accessible and inclusive physical spaces and technology services.

ACCESS TO OKLAHOMA WORKS PARTNER PROGRAMS

One of the central purposes of civil rights laws like the Americans with Disabilities Act (ADA) is to prevent discrimination against people with disabilities when delivering Agency programs. For Oklahoma's Job Seekers, Programs might include:
- Education
- Job coaching
- Job placement
- Skills assessment
- Workforce development

WORKFORCE INNOVATION AND OPPORTUNITY ACT

The ADA is not the only law that aims to prevent discrimination against job seekers with disabilities. The Workforce Innovation and Opportunity Act (WIOA) specifically calls on agencies to increase employment opportunities by focusing on job seekers with disabilities. Section 188 specifically includes job seekers with disabilities among the other protected classes specified in the law. This Section will help to achieve the overall WIOA goal of creating integrated and competitive employment for job seekers with disabilities.

Program delivery happens in many different ways. Agencies might have offices or centers where Job Seekers work with people or technology tools. Agencies may provide training or support through information and communication technology, like websites or software. And Agencies might provide services through telephone systems and printed material.

In every instance, program delivery cannot discriminate against people with disabilities on the basis of their disability. And, Agencies must ensure that communication with Job Seekers with disabilities is effective.

TWO DISTINCT ASPECTS OF PROGRAM ACCESS

This Roadmap focuses on two distinct aspects of Program Access: the built environment and information and communication technology (ICT).

1) The **built environment** includes the buildings and offices that job seekers access to interact with Workforce Partners across the state. From the parking lot to the inside of the building itself, the built environment must be accessible so that job seekers with disabilities do not encounter physical barriers that prevent them from securing competitive and integrated employment.

2) **Information and communication technology** includes websites, software and information or registration kiosks that Workforce Partners use to interact with job seekers. Similar to the built environment, technology resources must also be accessible to make sure that job seekers with disabilities do not encounter digital barriers. Informational materials such as printed forms and brochures must be available in additional formats other than standard print. For example, individuals with low vision will need large print materials or may use an online version to enlarge the font size.

OVERSIGHT

Three roles oversee accessibility in an Oklahoma State Agency's built environment and technology: the **Agency ADA Coordinator** and the **Agency Accessibility Compliance Representative, or ACR**. At the area level within the Workforce System, some of the duties in those two roles are combined into the **Area Accessibility Representative, or AAR.**

An ADA Coordinator is familiar with the accessibility provisions of the Americans with Disabilities Act. The ADA Coordinator may also know how other civil rights laws steer the Agency to create an environment that is accessible to job seekers with disabilities. The ADA itself establishes the role of ADA Coordinator and requires that public entities fill that role.

The ADA itself is a broad civil rights law that applies to both public and private entities. Within Oklahoma Works public partners, the ADA creates the expectation that all programs, services and activities will be offered to all job seekers without discriminating against job seekers with disabilities.

An Accessibility Compliance Representative (ACR) is familiar with Oklahoma's Electronic and Information Technology Accessibility (EITA) law and the standards that the law specifies. Like the ADA Coordinator, the ACR helps an agency to manage accessibility in its technology.

Technology such as websites, software and digital documents (such as Microsoft Word, PowerPoint or Adobe PDF formats) must be accessible to job seekers with disabilities.

Oklahoma's EITA law (https://www.ok.gov/accessibility/) applies to state agencies, higher education institutions and the Oklahoma Career and Technology Schools. EITA establishes standards that those entities must apply to technology that they create, use or acquire.

The AAR helps to coordinate training and technical assistance at the Area level. The AAR is unique to the Workforce System. Each AAR will also help to coordinate activities around accessible technology that is offered within the Workforce Area.

It has been suggested that the One-Stop Operator serve as the AAR for a given Area.

The ADA Coordinator and ACR may work together to manage accessibility throughout an agency.

EFFECTIVE COMMUNICATION

Communication is critical to job seekers. Oklahoma Works Partners communicate with job seekers through several methods. Communication can take place over the telephone, through the internet or in person.

Communication is so important to job seekers because it is the key to navigating Oklahoma Works programs and ensuring a positive outcome. There are several things that Oklahoma Works Partners can do to ensure effective communication. Some involve providing an auxiliary aid or service. Auxiliary aids and services include interpreters, communication technology such as TTY relay or sound amplification, and techniques as simple as using pen and paper to have a straightforward conversation instead of talking.

Public entities need to provide effective communication by making sure that they communicate with a job seeker with a disability using the job seeker's preferred communication methods. You can find out more about effective communication under the ADA (http://adata.org/factsheet/communication).

1) ACCESSIBILITY IN THE BUILT ENVIRONMENT

Oklahoma Works System Partners know that the way to create a more inclusive workforce begins with creating more inclusive programs and services for Oklahoma's job seekers with disabilities. For many agencies, the first step toward inclusion is making sure that the buildings that house programs, services and activities are accessible to people with disabilities.

Oklahoma Department of Rehabilitation Services and Oklahoma ABLE Tech are available to help Partner Agencies to assess accessibility in and around Agency buildings. We can also help Partner Agencies with remediation planning.

Each Partner Agency should have an ADA Coordinator or, in workforce areas, an Area Accessibility Representative, identified. Oklahoma Department of Rehabilitation Services and Oklahoma ABLE Tech will coordinate with the Agency ADA Coordinator or AAR to provide desired services and technical assistance.

CERTIFICATION

Agency Partners may achieve certification showing their commitment and work toward creating built environments that are more accessible to job seekers with disabilities. The Access for All Workforce System Certification is based on a set of ADA checkpoints that help to guide Agency activities toward making parking lots, paths of travel, building entry ways, public and employee areas more accessible to Job Seekers with disabilities.

A   Access for All Accessibility Process is being developed to help to guide certificate seekers. Additional information will come from the DRS ADA Coordinator.

Steps to certification include

- Policy and Procedure
    - o   Does the Agency have an ADA Coordinator?
    - o   Is accessibility a part of documented policy?
- Assessment of accessibility barriers in the above areas
- Remediation guidance: Toolkit of Solutions
    - o   Proposed remediation steps
    - o   Budget estimates for remediation
- Reassessment to determine efficacy of remediation

Partner Agencies and areas will/can also receive feedback on the assessments and Toolkits during an in-person or remote meeting. The Certification does not indicate that an Agency's built environment meets every criterion under the Americans with Disabilities Act. However, it will demonstrate an Agency's commitment to an inclusive Workforce.

Submit questions about the Certification process online,
(http://bit.ly/AccessQuestion)

| 2) ACCESSIBILITY OF INFORMATION AND COMMUNICATION TECHNOLOGY STATE STANDARDS |

Procurement, Design and Content

Oklahoma Works Partner Agencies or Institutions shall identify an Accessibility Compliance Representative (ACR). Entities such as Workforce Investment Boards shall identify an Area Accessibility

Representative (AAR). Until a formal method exists to do this, Partners may identify this individual directly to Oklahoma ABLE Tech. Oklahoma ABLE Tech is authorized to provide training and in-depth technical assistance to Oklahoma Works Partners through a partnership with the Oklahoma Department of Rehabilitation Services (OKDRS). Oklahoma ABLE Tech is available to deliver customized, tailored training to Oklahoma Works System Partners to help Partners to acquire, develop and deliver accessible information and communication technology (ICT) products and solutions.

Oklahoma Works Partners may request training or technical assistance through their Agency ACR or AAR. The ACR or AAR serves as the primary point of contact between Oklahoma ABLE Tech and the Agency. Agencies may identify more than one ACR that helps to more fully coordinate ICT accessibility efforts within the Agency. However, one ACR serves as the point of contact between the Agency and Oklahoma ABLE Tech. That ACR will stay informed about the kinds of training or technical assistance requests that come from the Agency. That ACR will also assist to coordinate participation in training provided to the Agency.

The AAR will help to coordinate information between Oklahoma ABLE Tech and the workforce area. The AA will also help to identify skills gaps and coordinate training that will close those gaps over time.

Oklahoma ABLE Tech is available to consult with Oklahoma Works Partners as they identify their Agency AC or ACRs, or AARs. The Agency ACR is the first point of contact within your Agency, and the AAR is the first point of contact within a workforce region.

Submit questions about the Certification process online
(http://bit.ly/AccessQuestion).

CERTIFICATION

As with the built environment, Oklahoma Works Partner Agencies can earn certification recognition for their efforts to create more accessible digital environments. The Information and Communication Technology (ICT) Access for All Workforce System Certification is based on measurable steps toward process change and outcomes. An Access for All Accessibility Process is being developed to help to guide certificate seekers. Additional Certification is granted in the following content areas, where applicable:

Steps to certification include
- **Policy and Procedure**
  - Does the Agency have an Accessibility Compliance Representative identified, or does the Area have an Area Accessibility Representative identified?
  - Has the ACR or AAR received training in order to provide guidance, training and to perform tasks in areas such as:
    - Training and technical assistance for Agency staff or Area partners
    - Web and non-web content evaluation and testing
    - Procurement accessibility evaluation
  - Is ICT accessibility a part of documented policy?

- o Are staff position descriptions that require accessibility written to include experience in it as a primary or preferred skill?
- o Does policy specify the Web Content Accessibility Guidelines 2.0, Level AA as the goal standard for ICT?
- **Procurement and Acquisition**
  - o Does Agency or Area procurement paperwork (Request for Proposal, contracts, scope of work documentation, etc.) include specific language about ICT accessibility?
  - o Are Agency or Area procurement staff or experts informed about how to request documentation from vendors that attests to their product's accessibility?
  - o Does the Agency or Area have a process in place to vet documentation from vendors?
- **Web**
  - o Does the Agency's or Area's website, as determined from a sample of public-facing pages, meet standards set forth in Oklahoma's EITA statute or the Web Content Accessibility Guidelines (WCAG) 2.0, AA?
  - o Are website designers and developers and content managers trained in areas of accessibility that apply to their roles?
- **Non-web**
  - o Does non-web electronic material, (PDF files, PowerPoint presentations and Word documents), as determined from a sample, meet standards set forth in WCAG 2.0, AA?
  - o Are non-web content designers and authors trained in areas of accessibility that apply to their roles?
- **Multimedia**
  - o Is a process in place, with allocated budget, to ensure that web-based audio is transcribed and video is captioned?

Within the above content areas, Oklahoma ABLE Tech will provide training to relevant agency or area staff. The goal is to equip agencies to be self-sustaining. Instead of building dependency on someone from outside of the agency, ABLE Tech will help each agency to become independent in providing training, assessment and monitoring to support its technology accessibility efforts. Oklahoma ABLE Tech is available to help assess a Partner Agency's ICT accessibility program and help to identify and support development of a sustainable and broad effort.

At the workforce area level, the goal is to equip AARs with the knowledge to bring the right people together to account for accessibility in technology tools.

The full ICT Accessibility Certification requires that at least 3 of the above content areas are addressed as outlined above.

RESOURCES AND ADDITIONAL READING

- [Access for All](https://www.ok.gov/abletech/Workforce_for_All/index.html) a partnership between the Oklahoma Department of Rehabilitation Services and Oklahoma ABLE Tech (https://www.ok.gov/abletech/Workforce_for_All/index.html)
- [The Workforce Innovation and Opportunity Act under the United States Department of Labor](https://www.doleta.gov/wioa/) (https://www.doleta.gov/wioa/)

- [Title I of the Americans with Disabilities Act](http://www.ada.gov/ada_title_I.htm) which applies to employment settings (http://www.ada.gov/ada_title_I.htm)
- [Title II of the Americans with Disabilities Act](http://www.ada.gov/ada_title_II.htm) which applies to state and local governments (http://www.ada.gov/ada_title_II.htm)
- [Title III of the Americans with Disabilities Act](http://www.ada.gov/ada_title_III.htm) which applies to private places of public accommodation (http://www.ada.gov/ada_title_III.htm)
- [Oklahoma's Electronic and Information Technology Accessibility law](https://www.ok.gov/accessibility/) (https://www.ok.gov/accessibility/)