

## **Mississippi Partnership Local Workforce Area EO Monitoring Instrument**

### **ELEMENT 1: DESIGNATION OF EO OFFICERS**

1. Name of Local Person for EO:
2. To whom does the contract person send the EO report to?
3. How is the Local Contact Person's identity made known to participants and service providers?
4. On what internal and external communications concerning MDES, LWIAs, subrecipient, contractors, and eligible training providers nondiscrimination and equal opportunity programs does the EO Officer's identity and contact information appear?

### **ELEMENT 2: NOTICE AND COMMUNICATION**

1. Where are the WIA "Equal Opportunity is the Law" posters displayed and which versions are displayed-English, Spanish, both or if applicable other language?
2. Are they posted in reasonable numbers and places?
3. Are the posters centrally located and in plain sight?
4. How is it ensured that participants are notified of their rights to file a complaint?
5. Does the form include the required WIA "Equal Opportunity is the Law" language?
6. What steps are taken to see that continuing notice is provided in the appropriate language when a significant number or proportion of the population eligible to be served, or likely to be directly affected, need services or information in a language other than English?
7. What equal opportunity tagline is included in brochures, pamphlets, and flyers? In which is it included?
8. What other forms of communications is the tagline included in? (i.e., materials distributed or communicated in written, oral or electronic form to applicants, staff and the general public)Is the tagline included in public announcements and broadcasts?
9. Describe how photographs and other pictorial displays include and portray positive images of women, minorities, and individuals with disabilities and persons of varying age groups engaged in a variety of workplace and skilled training capacities. [Not applicable to providers because we receive documents from MDES.](#)
10. How is the requirement communicated not to discriminate on the basis of disability and the obligation to provide reasonable accommodations?
11. What efforts are made to ensure that communications with individuals with disabilities are just as effective as communications with others?
12. In all communications providing contact data, is the telephone number for the TDD/TTY or relay service provided?
13. How is the Equal Opportunity Notice provided in alternate formats for individuals with visual impairments?

### **ELEMENT 3: ASSURANCES**

1. Do contracts contain the approved equal opportunity assurance language? Please provide an example of a contract Equal Opportunity Assurance section.

2. How is the contractor or service provider made aware that the EO assurances are incorporated, by operation of law, whether or not it is physically incorporated in the contract or agreement? **Not applicable to service providers. Fiscal Agent ensures EO assurances are in boilerplate of subgrant. Our subgrantee do not have third party contracts therefore this does not apply.**
3. How do you insure equal opportunity and nondiscrimination for employees? What equal opportunity and nondiscrimination policies are in place for employees? **Not applicable to subgrantees. Most subgrantees are under the State Personnel Board therefore this is monitored by the State.**

#### ELEMENT 4: UNIVERSAL ACCESS

1. What reasonable steps have been taken to ensure services and other information are provided to Limited English Proficient persons?
2. In what languages is information provided other than English?
3. What documents have been determined "vital" and translated into languages designated as essential? Please provide examples.
4. Where telephone numbers are indicated, what alternate provisions are listed for the hearing impaired, such as TTY/TDD or relay service?
5. Which brochures, pamphlets, and flyers include a TTY/TDD or Relay Service telephone number for the hearing impaired?
6. How are the required notifications provided in alternative formats for the visually impaired?
7. How do training providers provide programmatic and architectural accessibility for individuals with disabilities?
8. What outreach plans, strategies, and activities have been identified for serving various groups: members of both sexes, various racial and ethnic groups, individuals with disabilities, and individuals in differing age groups?

#### ELEMENT 5: COMPLIANCE WITH SECTION 504

1. Have American Disabilities Act (ADA) assessments been completed for your office and facility?
2. If structural changes are needed are transition plans on file?
3. Are contractor and service provider sites accessible to individuals with disabilities?
4. Is there at least one entrance to all buildings that is wheel chair accessible? If yes, does it have the international symbol for accessibility for individuals with disabilities posted?
5. Do inaccessible entrances have signs indicating the location of the nearest accessible entrance? Explain.
6. Are there designated restrooms with appropriate signage available for individuals with disabilities?
7. Are there provisions for reasonable accommodations in employment? Describe.
8. Please describe the availability of assistive equipment for individuals with disabilities.
9. Please describe any reasonable accommodations that have been provided for applicants, participants, or employees with disabilities.
10. How are reasonable accommodations provided regarding the registration for, and the provision of, aid, benefits, services or training--including core and intensive training--and support services to qualified individuals with disabilities?
11. Describe how you meet the obligation of a recipient to operate programs or activities so that, when viewed in their entirety, they are readily accessible to qualified individuals with disabilities, through means such as: redesign of equipment; reassignment of classes or other services to accessible buildings; assignment of aides to beneficiaries; home visits; delivery of services at alternative accessible sites; alteration of existing facilities and construction of new facilities in conformance with standards **for new**

construction; or any other method that results in making its program or activity accessible to individuals with disabilities?

12. Is there a written reasonable accommodation policy? If so, please provide a copy.

13. Describe how medical condition information is maintained separate from other files and secured.

#### ELEMENT 6: DATA AND INFORMATION COLLECTION AND MAINTENANCE

1. Please explain how EO data has been collected (race/ethnicity, sex, age, and where known, disability status)? [Not applicable subgrantees](#)
2. Please explain how files/records about the population being served have been maintained? [Not applicable subgrantees](#)
3. How is these data maintained under safeguards that will restrict access to authorized personnel only? Please explain. [Not applicable to subgrantees](#)
4. Are the records kept for a period of three years?
4. How is staff made aware that data must be collected on race, sex, age, disability, etc.? [Not applicable subgrantees](#)
5. How is the data collected by staff? [Not applicable to subgrantees](#)
6. How are EO data analyzed and disparities communicated and addressed? [Not applicable to subgrantees](#)

#### ELEMENT 7: MONITOR RECIPIENTS FOR COMPLIANCE

1. List the EO Officer monitoring visits. [Not applicable](#)  
How often on-site monitoring is conducted?
2. Please provide a record and/or summary report of the EO monitoring visits (dates, locations, entities and findings) since your last WIA Monitoring review. [Not applicable](#)

#### ELEMENT 8: COMPLAINT PROCESSING PROCEDURES

1. What discrimination complaint policies and procedures are used by the WIN Job Center? Please provide copies. [Not applicable to subgrantees, applies to the Fiscal Agent](#)
2. Explain how customers and employees obtain a copy of the discrimination complaint policy and procedures and/or discrimination complaint form? [Not applicable applies to the Fiscal Agent](#)
3. Does the discrimination complaint log for formal discrimination complaints include the following: [Not applicable to subgrantees, applies to the Fiscal Agent](#)
4. Please list any formal complaints that have been filed since the last EO monitoring visit. Has the State EO Officer been advised of the complaint? [Not applicable to subgrantees, applies to the Fiscal Agent](#)
5. Describe the process established to keep the discrimination complaint records for a period of three years.
6. Describe the process for keeping the identity of the complainant confidential. [Not applicable to subgrantees, applies to the Fiscal Agent](#)

#### ELEMENT 9: CORRECTIVE ACTION AND SANCTION PROCEDURES

1. What are the recipient's procedures for obtaining voluntary compliance when equal opportunity violations are found? [Not applicable to subgrantees, applies to the Fiscal Agent](#)
2. What is the follow up policy for violations? [Not applicable to subgrantees, applies to the Fiscal Agent](#)
3. What, if any, corrective actions/sanctions were taken against contractors since the last monitoring review? [Not applicable to subgrantees, applies to the Fiscal Agent](#)