

LWDA Equal Opportunity Pre-Monitoring Survey

DWD Regulatory Oversight & Compliance (ROC) Division

LWDA:

Date:

Local EO Officer Name:

Local EO Officer Email:

Local EO Officer Phone:

Directions & Interview Prep

- Review the **“Benchmarks”** and mark the box **“☑”** for each benchmark the LWDA has achieved successfully (*Mark all that apply within each category*).
- Add additional info as applicable within the **“Comments”** section (e.g., if the LWDA is in the process of implementing a benchmark but not yet complete).
- If there is additional information to share please include specifics on the final page under **“Additional Comments.”**
- Submit the completed survey to oversight@dwd.in.gov in accordance with the instructions in the Monitoring Documentation Checklist attached to the PY2018-19 Monitoring Announcement Letter.

This survey is used as a pre-monitoring review tool and is NOT all inclusive or limiting. For questions or concerns while completing the survey, please contact the State EO Officer at EO@dwd.in.gov.

Assurance: 38.25	
Does the grantee provide a “Written Assurance” that complies with the recipient’s obligation of WIOA Section 188?	
Benchmarks:	
<input type="checkbox"/>	Recipient is aware of its obligations to comply with the nondiscrimination and equal opportunity provisions for the duration of the grant contract
<input type="checkbox"/>	The recipient maintains a policy that describes how EO Regulations will be carried out
<input type="checkbox"/>	The required assurance language of 29 CFR Part 38.25, or a reference to it, is provided on all grant applications, agreements, and contracts
<input type="checkbox"/>	Local staff have reviewed and are aware of the current DWD EO policies & regional policies
Comments:	
Local Equal Opportunity Officer: 38.28	
Local EO Officer ready to provide support?	
Benchmarks:	
<input type="checkbox"/>	Recipient has designated a local EO Officer
<input type="checkbox"/>	Local EO Officer’s name, title/position, address, and telephone number have been made public at the local level (including on web-site); contact info appears on internal and external communications regarding nondiscrimination programs
<input type="checkbox"/>	Local EO Officer is a senior level employee of the recipient
<input type="checkbox"/>	The Local EO Officer does not have other responsibilities that create a conflict or the appearance of a conflict with the responsibilities of an EO Officer
<input type="checkbox"/>	Local EO Officer has staff and/or resources sufficient to carry out the EO requirements
Comments:	

Does the Local EO Officer understand their roles and responsibilities?

Benchmarks:

<input type="checkbox"/>	The Local EO Officer has a solid knowledge of the EO Regulations, 29 CFR Part 38
<input type="checkbox"/>	The Local EO Officer undergoes mandatory training to maintain competency with WIOA Section 188 and its EO Regulations
<input type="checkbox"/>	The Local EO Officer reviews the recipient's written policies to make sure that those policies are nondiscriminatory
<input type="checkbox"/>	The Local EO Officer monitors and investigates the recipients and entities that receive WIOA Title I funds to ensure compliance
<input type="checkbox"/>	The Local EO Officer tracks discrimination complaints filed against recipient
<input type="checkbox"/>	The Local EO Officer provides local area staff with EO training

Comments:

Notice and Communication: 38.34

What action has the recipient taken to disseminate EO notice?

Benchmarks:

<input type="checkbox"/>	"EO is the Law" poster is posted prominently, in reasonable numbers and places, in available and conspicuous physical locations, and on recipient's Web site pages
<input type="checkbox"/>	The EO tagline is printed in recruitment brochures and other materials that describe requirements for participation by recipients and participants
<input type="checkbox"/>	All orientation sessions for new employees, new participants, and/or the general public include a discussion of rights and responsibilities of the nondiscrimination and equal opportunity provisions of WIOA and the EO Regulations
<input type="checkbox"/>	Babel Notices written in multiple languages are included with vital documents
<input type="checkbox"/>	Auxiliary aids or services are available in alternate formats (to ensure communication with individuals with disabilities or LEP individuals is as effective as communications with others)

Comments:

Data and Information Collection/Maintenance: 38.41

Does the LWDA collect and maintain data and other information securely to ensure nondiscrimination and equal opportunity provisions of WIOA?

Benchmarks:

<input type="checkbox"/>	Regional staff tracks applicants, registrants, eligible applicants, eligible registrants, participants, terminees, employees, and applicants for employment
<input type="checkbox"/>	Regional staff tracks race/ethnicity, sex, age, and where known, disability status, of every applicant, registrant, participant, terminnee, applicant for employment, and employee
<input type="checkbox"/>	Regional staff tracks limited English proficiency and preferred language of each applicant, registrant, participant, and terminnee (beginning Jan 3, 2019)
<input type="checkbox"/>	Beneficiary/participant file is free of subjective and/or inappropriate remarks and comments such as on medical and disability information
<input type="checkbox"/>	All medical or disability-related information, whether in hard copy, electronic, or both, is maintained in a SEPARATE file and treated as confidential
<input type="checkbox"/>	Beneficiary/participant signs the state's program application/enrollment form (i.e., client application for ICC); acknowledgement of EO notice
<input type="checkbox"/>	Beneficiary/participant file is retained for at least three (3) years after close of the applicable program year
<input type="checkbox"/>	Such information above is used only for the purposes of recordkeeping and reporting; determining eligibility where appropriate
<input type="checkbox"/>	The recipient ensures that eligibility criteria that can screen out or tend to screen out an individual with a disability is not being offered unless such criteria can be shown as necessary

Comments:

Affirmative Outreach: 38.40

Has recipient taken appropriate steps to ensure that they are providing equal access to their WIOA Title I- financially assisted programs and activities?

Benchmarks:

<input type="checkbox"/>	The recipient conducts affirmative outreach to certain target groups
<input type="checkbox"/>	The recipient advertises its programs and/or activities that specifically target various populations in the media, such as newspapers or radio programs
<input type="checkbox"/>	The recipient sends appropriate notices about openings in its programs and/or activities to schools or community service groups that serve various populations
<input type="checkbox"/>	The recipient consults with appropriate community service groups about ways to improve its outreach and service to various populations

Comments:

Complaint Records: 38.69 – 38.72

Has the LWDA maintained its recordkeeping obligations?

Benchmarks:

<input type="checkbox"/>	The recipient has published procedures for processing complaints in accordance with 29 CFR Part 38
<input type="checkbox"/>	The Local EO Officer maintains a log of complaints for the entire Local Area
<input type="checkbox"/>	The Local EO Officer submits a copy of the log for its LWDA to DWD every quarter
<input type="checkbox"/>	Complaints of discrimination are retained for a period of no less than three (3) years after resolution
<input type="checkbox"/>	Each Notice of Final Action was issued within 90 days of the date the complaint was filed

Comments:

Accessibility: 38.13

Is the recipient meeting its physical and programmatic accessibility obligations for individuals with disabilities?

Benchmarks:

<input type="checkbox"/>	Individuals with disabilities have adequate parking spaces
<input type="checkbox"/>	Individuals with disabilities have appropriate wheelchair accessibility
<input type="checkbox"/>	Individuals with disabilities have appropriate restroom accommodations
<input type="checkbox"/>	Individuals with disabilities are afforded the opportunity to participate in services or training that is equal to or as effective as provided to non-disabled participants
<input type="checkbox"/>	Individuals with disabilities have been provided adequate assistive technology, as needed
<input type="checkbox"/>	Staff has been trained on use of the assistive technology to properly assist participants
<input type="checkbox"/>	Meaningful accommodations are provided regarding registration for the provision of aid, benefits, services or training – including core and intensive training and support services -- to qualified individuals with disabilities

Comments:

Evaluation of Compliance: 38.60

Is the recipient meeting its overall compliance obligations?

Benchmarks:

<input type="checkbox"/>	The LWDA has no unresolved monitoring findings or EO complaints
<input type="checkbox"/>	If unresolved findings or complaints exist, the LWDA has implemented a corrective action plan

Comments:

Additional Comments: