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GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA

COMMUNITY DEVELOPMENT
DEPARTMENT

1200 WEST SEVENTH STREET
LOS ANGELES, CA 90017



ANTONIO R. VILLARAIGOSA
MAYOR

DATE: November 1, 2005
TO: LA's Workforce Development System
FROM: Manny Chavez, Director
Workforce Development Division
SUBJECT: PY 05-06 WIA DIRECTIVE NO.06-07
REASONABLE ACCOMMODATION WRITTEN POLICY

EFFECTIVE DATE

This Directive is effective upon date of issue.

PURPOSE

The purpose of this directive is to ensure compliance with 29 CFR 37; Section 188 of the Workforce Investment Act; Section 504 of the Rehabilitation Act; and the California Fair Employment and Housing Act.

BACKGROUND

In the EO Officer training offered by the EO Compliance Unit in 2004 and 2005, each contractor was instructed to develop a written reasonable accommodation policy. (See EO Officer's Toolbox, "Checklist" tab, day two, page 1.) During each site visit conducted in 2004 and 2005, the contractor was asked to provide copies of "policies and procedures regarding reasonable accommodation and auxiliary aids and services."

Training on developing a reasonable accommodation policy was provided by Quest Diversity Services in May, 2004, as well as technical assistance provided directly to the contractors.

REQUIRED ACTION

Each WIA contractor must develop a written reasonable accommodation policy. It must be submitted to the following address for review:

City of Los Angeles
Community Development Department
EO Compliance Unit
1200 West Seventh Street, 4th floor
Los Angeles, CA 90017
Attn: Eileen Scally, EO Compliance Officer

DEADLINE FOR RESPONSE

All policies must be received by the EO Compliance Unit by November 30, 2005.

CONTACT

If you have any questions or require further information, please contact Maureen Brown at (213) 744-7272 (TTY 213-744-7290).

MC:mab



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**INSERT WORKSOURCE CENTER NAME
Policies and Procedures**

Effective Date: INSERT DATE

Policy: **INSERT WORKSOURCE CENTER NAME** recognizes the need to provide reasonable accommodations and universal access to program participants as required by the Americans with Disabilities Act (ADA), PL 101-336; Section 188 of the Workforce Investment Act; and Fair Employment and Housing Act (FEHA), Government Code Section 12900.

Purpose: To ensure that reasonable accommodations are provided to remove or mitigate barriers which prevent or limit access to services by persons with disabilities.

Personnel Affected: **All Staff**

Forms/Paperwork: **Reasonable Accommodation Policy Statement for WorkSource Customers**

Procedures:

1. As is feasible, steps will be taken to ensure universal access to programs and services, including but not limited to:
 - a. Purchase and installation of assistive technology and equipment allowing universal access as outlined in physical accessibility guidelines under the ADA.
 - b. Provisions for outreach, marketing, other written materials, assessments, and other documentation in alternative formats.
 - c. Ongoing training of program staff, at a minimum quarterly, to maintain knowledge and awareness of legal requirements under the WIA, ADA, and FEHA, definitions of key terminology, expectations for providing reasonable accommodations, and key service issues related to serving customers with disabilities. The training will be provided via:
 - i. LEGACY Training & Certification Program
 - ii. Initial staff orientation (new hires)
 - iii. Monthly Staff meetings
 - iv. On-site as needed
2. Customer rights and how to request an accommodation are posted clearly in all areas accessed by customers.
3. If a reasonable accommodation is requested, staff will follow the following procedure/guidelines:
 - a. All requests for accommodation will be documented in the Reasonable Accommodation Log located at INSERT LOCATION.
 - b. Basic requests for items that are readily available will be documented by the INSERT JOB TITLE OR PERSON RESPONSIBLE (Resource Center Specialist,

Policy on Reasonable Accommodation and Accessibility for WorkSource Customers

- Disability Coordinator, etc.)
- c. Any accommodation requiring resources that are not readily available will be referred to the INSERT NAME/TITLE (Program Manager or person able to approve possible expenditures) for approval or further review.
 - i. When determining the type and feasibility of the accommodation, the process will be interactive and always include the input of the person requesting the accommodation.
 - ii. If needed, additional staff/specialists will be consulted regarding the request.
 - iii. The customer's confidentiality will be protected at all times during this process.
 - d. All requests for accommodations will be reported, if needed, and documented by the staff person taking the request within one (1) working day.
 - e. Accommodations will be provided as soon as possible, but in most cases no more than five (5) days after the request. If procurement of the accommodation will take longer than five (5) working days, the customer will be notified of the projected time frame. In general, this extended time frame will/should not exceed 30 days.
 - f. The Center will explore all alternative accommodations and/or partner resources prior to the determination that an accommodation is not feasible or would cause an undue hardship.
 - g. If, after exhausting all potential options, it is determined that the reasonable accommodation request isn't feasible or would cause an undue hardship for the center, the INSERT NAME/TITLE will contact the City of Los Angeles' Equal Opportunity Unit for consultation prior to notifying the customer in writing.
4. This policy and procedure will be updated as required by changes in the law.

INSERT NAME
Executive Director