CITY OF LOS ANGELES
CALIFORNIA

JAN PERRY
INTERIM GENERAL MANAGER

ERIC GARCETTI
MAYOR

ECONOMIC AND WORKFORCE DEVELOPMENT DEPARTMENT

1200 W. 7TH STREET
LOS ANGELES, CA 90017

DATE: August 6, 2013

TO: LA's Workforce Development System

FROM: Jaime H. Pacheco-Orozco, Director
Workforce Development System

SUBJECT: **WDS DIRECTIVE NO. 14-02**
(Supersedes WDS Directive No.13-07)
REQUEST FOR EO COMPLAINTS OFFICER, DISABILITY COORDINATOR, AND LEP COORDINATOR INFORMATION

EFFECTIVE DATE
This directive is effective upon date of issue.

PURPOSE
The purpose of this directive is to request EO Complaints Officer, Disability Coordinator, and LEP Coordinator information per the Equal Opportunity/Nondiscrimination Obligations and Assurances under the City of Los Angeles WIA Title 1 Financially Assisted Program.

Directive 08-15, dated April 28, 2008, transmitted the City of Los Angeles Local Workforce Investment Area (LWIA) Equal Opportunity/Nondiscrimination Policy. This policy details the steps necessary to comply with Federal nondiscrimination laws and the State Methods of Administration (MOA) under the Workforce Investment Act (WIA).

The Equal Opportunity/Nondiscrimination policy details the requirement that each WorkSource Center and YouthSource Center appoint an Equal Opportunity (EO) Complaints Officer (see page 8 of the Equal Opportunity/Nondiscrimination Policy). This individual is responsible for coordinating the Center's obligations under Federal, State, and City regulations, including handling, at the first level, complaints brought under the WIA. Handling complaints at the first level consists of: acknowledging receipt of the complaint and scheduling an informal resolution meeting; facilitating the informal resolution meeting; and preparing the settlement agreement. If a complaint proceeds to administrative hearing, the Center's EO Complaints Officer is expected to coordinate the presentation of the Center's position on the complaint case before the administrative hearing officer, and possibly make the presentation for the agency.

The Center's EO Complaints Officer is also responsible for ensuring that the WIA programs are delivered in full compliance with all nondiscrimination regulations and the State Methods of Administration. The Center's EO Complaints Officer should routinely give

training to all staff on EO topics, and should coordinate with the Disability Coordinator and LEP Coordinator to have them provide training. The Center's EO Complaints Officer's name and phone number should be widely publicized to clients and staff. It is mandatory that the Center's EO Complaints Officer attend all EO Officer training as well as Legacy I training. The module "Roles and Responsibilities" provided during recent trainings detailed the duties of these positions.

The EO Complaints Officer is responsible for completing the biennial Physical and Program Accessibility Checklist (PPA). Although it is assumed that the Disability Coordinator and others will assist on this project, the EO Complaints Officer is ultimately responsible for completion of this project.

The Equal Opportunity/Nondiscrimination Policy also requires that each WIA service provider designate a person to coordinate the agency's efforts in complying with the Section 504 Rehabilitation Act regulations (see page 4 of the Equal Opportunity/Nondiscrimination Policy). This individual should develop expertise in serving people with disabilities, particularly through training offered through the EmployABILITY Partnership and the Legacy program. The Disability Coordinator must

- attend all EO Officer training;
- complete Legacy I, II, and III;
- regularly attend meetings of the EmployABILITY Partnership;
- disseminate the information learned at these meetings to all staff in training sessions and at staff meetings.

The designated Disability Coordinator at the WorkSource Centers will also be the designated coordinator for the Disability Employment Initiative grant program. The WorkSource Center Disability Coordinator should attend all trainings related to the Disability Employment Initiative.

In response to Executive Order 13166 and in order to ensure compliance with the Dymally-Alatorre Bilingual Services Act, the City of Los Angeles LWIA requires each WorkSource and YouthSource Center to appoint an LEP Coordinator. The LEP Coordinator is responsible for coordinating service to persons with Limited English Proficiency. The LEP Coordinator should

- maintain a list of staff members, including partner staff, who are bilingual;
- attend all LEP Coordinator meetings;
- disseminate the information learned at these meetings to all staff in training sessions;
- attend all EO Officer training; and
- complete Legacy I.

It is useful, but not mandatory, to have designated alternates for each of these positions, who have completed the training and are able to assist each of the coordinators. Designated alternates are especially useful when the coordinator is on vacation or leave.

It is also very useful to have a trained alternate when it is necessary to change the designated individual.

It is the responsibility of the WorkSource or Youth WorkSource Center to notify the EO Compliance Unit promptly when there is a change in the designated individuals.

ACTION REQUESTED
Each WorkSource or YouthSource Center is requested to submit **in writing, on its own letterhead**,

1) Name of center, and address where City-funded WIA services are being provided:
2) Name and e-mail of program director;
3) Name, address, phone number, fax number, TTY number, and e-mail for the Center's designated EO Complaints Officer,
4) Name, address, phone number, fax number, TTY number, and e-mail for the designated Disability Coordinator
5) Name, address, phone number, fax number, TTY number, and e-mail for the designated LEP Coordinator.

If there are designated alternates, please provide the same information for the alternates. The response to this directive should be signed by the Executive Director.

PERFORMANCE EVALUATION CRITERIA
Response to this directive will have an influence on two administrative capability factors. The response will be judged as to its timeliness (received by the deadline stated.) The designated Center's EO Complaints Officer, Disability Coordinator, and LEP Coordinator will be evaluated to determine if they have completed the requisite training.

DEADLINE FOR RESPONSE
Please submit the requested information by **August 21, 2013** to

Maureen Brown
EO Compliance Unit
City of Los Angeles
Economic and Workforce Development Department
1200 W. 7th Street, 4th floor
Los Angeles, CA 90017

The response may be faxed to (213) 744-7289. The response may also be submitted electronically as a scanned attachment to Maureen.Brown@lacity.org.

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

JHP:MB:am