

November 17, 2009

DIRECTIVE: JOB CORPS PROGRAM INSTRUCTION NO. 09-25

TO: ALL JOB CORPS NATIONAL OFFICE STAFF
 ALL JOB CORPS REGIONAL OFFICE STAFF
 ALL JOB CORPS CENTER DIRECTORS
 ALL JOB CORPS CENTER OPERATORS
 ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
 ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS

FROM: LYNN A. INTREPIDI
 Interim National Director
 Office of Job Corps

SUBJECT: New CIS Disability Data Collection and Reasonable Accommodation Processes

1. Purpose. To provide information about the new disability data collection system and process for creating and managing accommodation plans in the Center Information System (CIS).
2. Background. The National Office of Job Corps began collecting and analyzing disability-related data from centers in January 2002. In 2004, to ease the reporting burden on center staff, to allow the program to collect more detailed data about students with disabilities, and to allow centers to create and manage accommodation plans using CIS, the Job Corps Data Center (JCDC) developed disability data collection and disability accommodation screens in CIS. Since 2004 information has been gathered on how to make the system more user friendly, and additional information has been learned about reasonable accommodation from a legal/regulatory perspective. Therefore, the disability data collection and disability accommodation screens in CIS have been updated.

These CIS changes and related changes to the reasonable accommodation guidelines will ensure that the program is more accurately collecting/reporting information about students with disabilities. The changes will also decrease the amount of staff time being devoted to creating and maintaining accommodation plans, as (1) some information can now be entered using drop-down menus rather than typing; (2) the process for notifying staff about accommodations will be simplified; (3) the process for updating accommodation plans will be simplified; and (4) more documentation related to managing accommodation plans can now be maintained in CIS.

- a. Disability Data Collection

Several fields have been deleted from this screen. Disability Coordinators will still choose from drop-down selections to enter disability category and specific disability, and select yes/no depending on whether an accommodation plan is needed. All existing disability data will be automatically imported to the new data collection system.

b. Accommodation Plan

The accommodation plan screen is new; it replaces the disability accommodation screen and the test accommodation screen. Use of the new accommodation plan screen is now the required process for creating and managing accommodation plans. Paper accommodation plans are no longer permitted either in lieu of or in addition to CIS-developed plans. The new screen allows the user to create an accommodation plan using mostly drop-down selection boxes; however, a comments field is available to provide more specific information about an accommodation when needed. Signature lines for the Disability Coordinator and student will also be included on the plan.

The accommodation data from the existing testing accommodation screen will be migrated to the new screen. Data from the existing disability accommodation screen cannot be migrated due to significant differences in the data structure.

c. Managing Existing Accommodation Plans

Centers will need to determine how to manage existing paper and CIS accommodation plans from the options below. All policy requirements for managing accommodation plans must be met, regardless of which option is selected.

- (1) *Options for Students Already on Center With a Paper Accommodation Plan.* The center can either enter the student's accommodation plan in the new CIS disability accommodation screen or continue to manage the plan using a paper system.
- (2) *Options for Students Already on Center With an Accommodation Plan in CIS.* The center can either re-enter the student's accommodation plan in the new CIS disability accommodation screen and use the new system to manage the plan or continue to use the current CIS accommodation screen *only* to share the plans with staff.

For centers that choose to continue to use the current CIS accommodation screen, keep the following in mind:

- (a) After October 19, 2009 no changes can be made to accommodations plans currently in CIS, so this screen can only be used to

share plans with staff. Staff can view existing plans using the “Old Disability Accommodation” report that will be available in the Wellness and Accommodation Module in CIS.

- (b) If changes are needed to an existing plan, the Disability Coordinator should reenter the plan in the new CIS accommodation screen to ensure that center staff have the most current accommodation information.
- (c) Since no changes can be made to existing plans, the Disability Coordinator will not be able to update the “Last Date Reviewed” field; therefore, Disability Coordinators who choose not to re-enter plans in the new system will need to ensure that effectiveness reviews of plans are documented in the student’s accommodation folder.
- (d) Disability Coordinators who choose not to re-enter existing plans in the new system should ensure through the accommodation notification process that accommodation plans exist in two separate reports within the Wellness and Accommodation Module (i.e., “Old Disability Accommodation” and “Accommodation Plan”).

d. Notes Tab

A notes tab has been added within the accommodation plan icon. This tab can be used to document the accommodation process for the student from application through separation. Information included in this tab could include documentation of IDT meetings and any accommodation-related discussions with student or others. Examples of entries in this tab could include: “met w/ applicant to discuss accommodation needs and develop initial plan”; “student entered program on 10/17, met with student to touch base on how accommodations are working, no concerns so far”; “student had first performance panel to include a review of his accommodation plan, no changes/updates needed.” A copy of a student’s accommodation notes may be maintained in his/her accommodation file. If Disability Coordinators choose not to use the notes tab to document the accommodation process, they must continue to document this process using written notes in the accommodation file.

e. Reasonable Accommodation Guidelines

Use of the new CIS accommodation plan icon to manage accommodation plans requires some updates to the reasonable accommodation guidelines. Specifically, changes include the following:

- (1) The option for the center to use paper accommodation plans in lieu of entering accommodation data in CIS has been deleted.
- (2) Accommodation effectiveness review will be managed through the student performance panel process.
- (3) The process for notifying staff of the development of new accommodation plans or modifications to existing plans has been simplified to allow e-mail notification. A sample form for managing this process is available on the Job Corps Disability Web site. Managers are still responsible for ensuring that accommodations are implemented in their areas of supervision.
- (4) The sample accommodation folder has been modified to reflect the maintenance of accommodation plans using CIS, and effectiveness reviews through the student performance panel process.

The reasonable accommodation guidelines are available in the reasonable accommodation section of the Job Corps Disability Web site. These guidelines will continue to serve as Job Corps' reasonable accommodation policy until the guidelines are added to the Policy and Requirements Handbook (PRH).

f. Training and Technical Assistance

JCDC will provide technical training on the CIS disability data collection and disability accommodation screens. Centers should check the JCDC training calendar for training dates/times and registration information. Regional Disability Coordinators will also provide center Disability Coordinators with information about the JCDC training.

The National Office will offer a webinar presented by Regional Disability Coordinators to discuss the changes from a programmatic perspective and provide any technical assistance needed. This webinar will be repeated several dates/times and Regional Disability Coordinators will provide registration information.

User's Guide: Computer Information System Disability Data Collection (originally released as an attachment to Information Notice 04-33 of the same name) will be updated and expanded. When completed, this document will be re-released with an Information Notice.

3. References.

- a. Program Instruction 08-26, Reasonable Accommodation, Case Management, and CIS Disability Data, provides information to clarify the difference between reasonable accommodation and case management and describes a minor change

to the disability data collection entry requirements. This directive was released as an interim step to the more extensive changes described in the current directive.

- b. Program Instruction 06-27, Reasonable Accommodation, reminds Job Corps staff of the legal obligation to provide reasonable accommodation to applicants or students with disabilities and directs centers to use the reasonable accommodation guidelines section of the Job Corps Disability Web site to ensure that reasonable accommodation obligations are being met.

4. Action. The following actions are required of all centers:

- a. Review the October 19, 2009 CIS Release Notes for technical instructions related to disability data collection and the accommodation plan data entry/reports in CIS.
- b. Continue entering disability data collection using the disability data collection icon in CIS.
- c. Begin using the accommodation plan icon to create and manage accommodation plans for any student who enters the program on/after October 19, 2009.
- d. Provide training for center staff that will need to use and access the accommodation plan report if needed.
- e. Determine how existing paper accommodation plans and existing accommodation plans in CIS will be managed.
- f. Review the reasonable accommodation guidelines section of Job Corps Disability Web site and make necessary modifications to the current center reasonable accommodation process and related SOP.
- g. Attend related JCDC technical training.
- h. Attend related National Office webinar presented by Regional Disability Coordinators.
- i. Contact your Regional Disability Coordinator as needed for technical assistance.

5. Expiration Date. Until superseded.

6. Inquiries. Inquiries should be directed to Carol Abnathy at (202) 693-3283 or abnathy.carol@dol.gov, or Johnetta Davis at (202) 693-8010 or davis.johnetta@dol.gov.