Disability Program Compliance Assessment Preparation Guide

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Background

What is the Disability Program Compliance Assessment (DPCA)?

It is:

- Conducted every 2 years on a schedule set by the National Office of Job Corps

- An independent compliance assessment of the center's Disability Program

- To evaluate the delivery of Disability Program services on centers in accordance with Federal laws and regulations, as well as requirements in PRH Section 6.14

- Conducted by subject matter experts

General Planning for your DPCA

Ensure that you are familiar with the following policy requirements and supporting resources:

- Chapter 1: 1.4 – Center Process for Reviewing Applicant Files

- Exhibit 1-1 – Essential Admission Requirements

- Appendix 107 – Center Guidance for Processing Applicant Files

- Exhibit 5-2 – Plan and Report Submission Requirements

- Exhibit 5-4 – Required Staff Training

- Chapter 6: 6.14 – Disability Program Requirements

- Appendix 605 – Reasonable Accommodation Guide

This guide provides essentially everything you need to be prepared prior to and during your DPCA, so provide copies to other relevant staff members (e.g., members of your File Review Team (FRT), the Reasonable Accommodation Committee (RAC), Records Manager, Safety & Security, other center management, etc.).

Read and review this guide and Attachments A-F (*Planning Tools and Support Documents)*. Then re-review relevant sections multiple times prior to your assessment.

Other planning recommendations:

1. Certain documents will be requested by the assessor prior to arrival. Please ensure that these are provided to the assessor by the dates requested. See items 1-3 in **Attachment A: Pre-Disability Program Compliance Assessment Action Items.**

2. Locate a space for the assessor to work that has sufficient room to interview individuals and review files.

3. Try to schedule all interviews in the least amount of locations so the assessor can get to everyone and stay on schedule. It helps the assessor be better prepared which provides more time at the end of the DPCA for technical assistance (TA).

4. While on center, your assessor will review the documents requested in **Attachment D: Disability Program Compliance**

Attachment A:
Pre-Disability Program Compliance Assessment Action Items

Attachment B:
Disability Program Compliance Assessment Staff Interview Schedule

Attachment C:
Disability Program Compliance Assessment Questions

Attachment D:
Disability Program Compliance Assessment Documents and Materials Checklist

Attachment E:
Applicant File Review Process Self-Check

Attachment F:
Reasonable Accommodation Process Self-Check

Assessment Documents and Materials Checklist. The assessor will also review your Accommodation Files, Disability, No Accommodation Files and Student Health Records. To ensure that you receive credit for meeting requirements and any innovative practices, materials requested should be available when the assessment begins. The assessor will give you an opportunity to present any omitted documentation before the end of the assessment.

5. Consider areas that TA would be helpful – the more quickly the assessment is completed, the more time the assessor will have to provide TA.

6. Disability Coordinators should plan to be available throughout the 2-day assessment for questions and assistance. If the assessor cannot locate what is needed, you will not be given credit for that requirement or strength.

Disability Program Requirements

Disability Coordinators
[6.14, R1 (a-b)]

Requirements

a. The Health and Wellness Manager (HWM) (or a health staff designee) and Academic Manager (or an academic staff designee) will function as Disability Coordinators (DCs) to oversee the program. Additional DCs may be appointed. Centers may choose to hire a full or part time DC to oversee the program rather than or in addition to appointing an academic and health DC.

b. The roles and responsibilities of each DC will be defined in an SOP.

Quick Tips!

• A sample DCs' Responsibilities SOP is available on the Job Corps Disability Web site.

IMPROVING YOUR DPCA SCORE
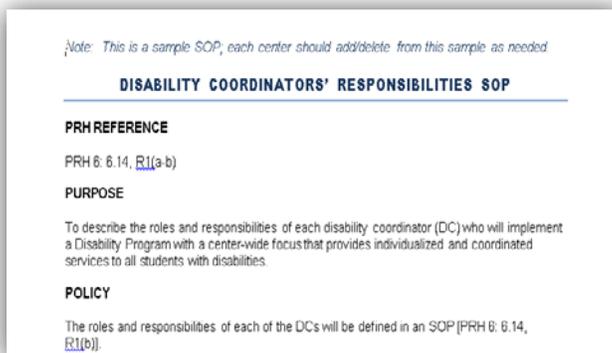
• Hire a full or part-time DC or assign dedicated hours for the DC position

• Hire DCs with a background in Vocational Rehabilitation (VR), Special Education or related fields

• Ensure DCs attend monthly DC calls and webinars conducted By Regional Disability Coordinators

WHAT WILL THE ASSESSOR BE REVIEWING?

• DCs' Responsibilities SOP

Applicant File Review
[6.14, R2 (a-c); 1.4, R1-4; Appendix 107; Exhibit 5-1]

Requirements

a. To ensure equal opportunity for all applicants, including those with disabilities, all centers are required to follow the same applicant file review process. This process will be described in an SOP (See Exhibit 5-1) that describes in detail how an applicant file is processed, from the time it is received from the admissions contractor, until the applicant is accepted into the program and assigned a start date, or recommended for denial and a final disposition is made by the Regional Office.

b. The applicant's file must be processed within 30 calendar days from receipt by center. If the center reasonably can substantiate needing longer than 30 days to complete the file review process, then an extension may be discussed with the respective Regional Office Project Manager (PM).

c. While each center file review procedure may have unique aspects, all center procedures must incorporate the following requirements:

   • Location where files are sent and logged in upon arrival to the center and the method of tracking the movement of the file to include an explanation of the center's disposition of the file.

   • Responsibilities and roles of FRT members to include the HWM, the center clinicians, and the center's DC(s) which usually will include the center's HWM.

   • Procedures for reviewing an applicant file to include the acceptable reasons for recommending denial of an application.

   • Procedures for reviewing and determining reasonable accommodation.

   • Procedures for processing application withdrawals both before and after submitting a file for regional review.

   • Timeframe the center establishes to complete the file review process to ensure it meets the PRH required timeframe of 30 calendar days.

- Storage, transmission and maintenance of the applicant file information (see Appendix 607). See 1.4, R1-3 and Appendix 107.

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- A sample Applicant File Review SOP is available on the Job Corps Disability Web site.

Note: This is a sample SOP; each center should add/delete from this sample as needed.

APPLICANT FILE REVIEW SOP

PRH REFERENCE

PRH 6: 6.14, R2(a-c); PRH 1: 1.4, R1-3; Appendix 107

PURPOSE

To provide a description of the center's policy on applicant file review and how an applicant file is processed from the time it arrives on center from the outreach and admissions (OA) contractor until the applicant is accepted into the program and assigned a start date, or recommended for denial and a final disposition made by the regional office.

POLICY

The center shall develop a written policy and procedure related to the center's review of applicant files [PRH 6: 6.14, R2(a); Exhibit 5-1]

Reasonable Accommodation

[6.14, R3 (a-c); Appendix 605; 3.21, R2G (g); Exhibit 5-1]

Requirements

a. An applicant or student with a disability may request and receive reasonable accommodation to participate in the Job Corps program at any time during the admissions process or enrollment. Each center will have a process for ensuring applicants/students with disabilities who request accommodation, indicate they may need accommodation, and/or provide documentation of a disability are engaged in an interactive process to consider/determine the functional limitations re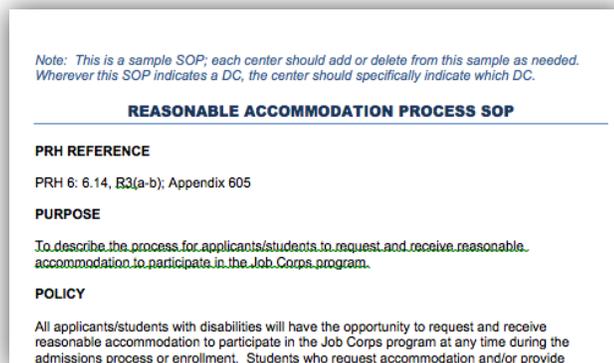sulting from their disability and the potential accommodations that would allow them to participate in the Job Corps program. An SOP describing this process is required (See Exhibit 5-1) and it and the center's reasonable accommodation process will include all the components outlined in Appendix 605.

b. The DCs will coordinate the center's reasonable accommodation process.

c. During Career Transition Readiness all students will receive information about workers' rights and responsibilities including reasonable accommodation in the workplace (see Section 3.21, R2, g).

<div style="background-color:#cc0000; color:white; text-align:center; font-weight:bold;">Quick Tips!</div>

- A sample Reasonable Accommodation SOP is available on the Job Corps Disability Web site.

> Note: This is a sample SOP; each center should add or delete from this sample as needed. Wherever this SOP indicates a DC, the center should specifically indicate which DC.
>
> **REASONABLE ACCOMMODATION PROCESS SOP**
>
> **PRH REFERENCE**
>
> PRH 6: 6.14, R3(a-b); Appendix 605
>
> **PURPOSE**
>
> To describe the process for applicants/students to request and receive reasonable accommodation to participate in the Job Corps program.
>
> **POLICY**
>
> All applicants/students with disabilities will have the opportunity to request and receive reasonable accommodation to participate in the Job Corps program at any time during the admissions process or enrollment. Students who request accommodation and/or provide

- A

- Provide extensive monitoring for students with accommodation plans

- Encourage students to carry a copy of their accommodation plan and advocate for accommodations if needed

WHAT WILL THE ASSESSOR BE REVIEWING?

- The Reasonable Accommodation SOP

- Reasonable Accommodation Folders

- Disability, No Accommodation Folders

- Documentation of effectiveness reviews

- Copies of email notifications to staff regarding student accommodation plans

- RAC meeting notes

- Career Transition Readiness materials/curriculum provided to students about worker's rights and responsibilities including reasonable accommodation

sample Reasonable Accommodation Brochure is available on the Job Corps Disability Web site.

- Career Transition Readiness materials are available on the Job Corps Disability Web site.

Introduction To Center Life
[6.14, R4 (a-c); 2.2, R1 (b11); 2.2, R1 (d4), R2]

Requirements

a. Centers shall provide new students with information that will lead to an understanding of the opportunities and benefits available as part of the center's Disability Program (see Section 2.2, R1, b11).

b. Centers shall provide a variety of opportunities for new students to meet and interact with the DCs (see Section 2.2, R1, d4).

c. The student handbook will include information about the Disability Program (see Sections 2.2, R1, b and 2.2, R2).

<div style="background:red;color:white;text-align:center">Quick Tips!</div>

- Language for the handbook is available on the Job Corps Disability Web site - just copy and paste!

EXPECT. EMPLOY. EMPOWER. What can YOU do?

NATIONAL DISABILITY EMPLOYMENT AWARENESS MONTH

IMPROVING YOUR DPCA SCORE

- Meet with each new student to explain the accommodation process and determine if the student would like to make a request

- Make Disability brochures available in several areas around center

- Post posters in several prominent areas around center that focus on individuals with disabilities. The Job Corps Disability Web site lists several free resources

WHAT WILL THE ASSESSOR BE REVIEWING?

- Disability Program information/materials provided to new students

- Student handbook information related to Disability Program and/or reasonable accommodation

CIS Disability Data Collection And Accommodation Plans
[6.14, R5 (a-f)]

Requirements

a. A DC will accurately enter the required data in the disability data collection and accommodation plan icons in the Central Information System (CIS) as soon as possible after the student enters the program.

b. For students who require Test of Adult Basic Education (TABE) testing accommodations, this data will be entered prior to the administration of the first TABE test.

c. Only the DCs will have access to the disability data collection entry screen, Disability Data Report and the Accommodation Plan Report with Notes Report in CIS.

d. Generally only the DCs will have access to the accommodation plan entry screen; however, if a designee is appointed to enter accommodation plans, this staff person can have access.

e. All center staff responsible for providing accommodations will have access to the Accommodation Plan Report in CIS.

f. Accommodation plans will not contain any medical or diagnostic information.

Quick Tips!

• Review your monthly data memo and ask for help from your Regional Disability Coordinator (RDIC) if needed.

• Audit data collection and accommodation plans prior to the DPCA and on a regular basis.

• Check staff CIS access prior to the DPCA and on a regular basis.

IMPROVING YOUR DPCA SCORE

• Maintain outcomes data (e.g., academic and career technical gains, separation category, etc.) for students with disabilities and use this data to compare outcomes for students with disabilities to those students without disabilities

• Look at disability specific (e.g., learning disability, mental health disability) data to see if there are disabilities that may need more focus or are being served with increased frequency by the center. Use this data to guide staff training needs

WHAT WILL THE ASSESSOR BE REVIEWING?

• CIS Reports (Disability Data Report, Accommodation Plan w/ Notes Report, TABE Accommodation)

• CIS authorization/staff access reports for disability data, reasonable accommodation plan, and reasonable accommodation plan w/notes (should be available from JCDC POC)

Partnerships And Resources
[6.14, R6 (a-c)]

Requirements

a. Each center must develop resources and partnerships with outside agencies and programs that will assist the center in serving students with disabilities. Special focus should be given to developing resources and partnerships that can assist the center in identifying or providing accommodation support that promotes student independence and employability.

b. Other appropriate staff should be involved in this process.

c. Each center will document efforts to develop resources/partners by completing the Disability Partnership Tool available on the Job Corps Disability Web site or their customized Disability Partnership Tool available from their RDIC.

Quick Tips!

• The Disability Partnership Tool is available on the Job Corps Disability Web site or contact your RDIC to get your customized Disability Partnership Tool.

• Staff may already have good contacts that can become partners and provide services to students with disabilities.

IMPROVING YOUR DPCA SCORE

• Develop multiple partnerships that provide direct services to students during and after Job Corps

• Allow staff to participate in community disability groups. For example, a center is a member of the City's Disabilities Collaborative, a networking group of community organizations that helps build collaborative relationships to better serve people with disabilities. The DCs take turns attending the monthly meetings to network with potential disability partners and have expanded their disability partnerships as a result of this membership.

• Secure services for students with disabilities while on center and when they leave, VR, Centers for Independent Living, etc

• Create relationships that provide assistive technology (AT) for students (e.g., State AT Programs and Bookshare)

WHAT WILL THE ASSESSOR BE REVIEWING?

• Disability Partnership Tool and any other evidence of community partnerships and resources

Referral Process
[6.14, R7 (a-b)]

Requirements

a. A written referral/feedback system shall be established to document a referral to the DCs when a student discloses a disability and may want reasonable accommodation or staff suspects a student may have a disability that is impacting his/her success in the program and should meet with the DCs to consider reasonable accommodation.

b. All referral forms will be stored in the student's Accommodation File or in the Student Health Record if no Accommodation File exists.

<div style="background-color:red; color:white; text-align:center; font-weight:bold;">Quick Tips!</div>

- A sample referral form is available on the Job Corps Disability Web site.

- Most centers place the form on the "S" drive.

- Train center staff to use the referral form - do not accept only phone calls or emails.

DISABILITY COORDINATOR REFERRAL FORM

Staff should use this form to document a referral to the Disability Coordinators when a student discloses a disability and may want reasonable accommodation or staff suspects a student may have a disability that is impacting his/her success in the program and should meet with the Disability Coordinators to consider reasonable accommodation.

Name of Student (Print or Type):	Date of Referral:
Referring Staff/Title: (Print or Type):	Counselor:

| Did the student disclose a history of special education services, IEP or past accommodations? | Yes ☐ | No ☐ |

WHAT WILL THE ASSESSOR BE REVIEWING?

- Referral Form(s) or other evidence to document a referral to the DC by staff when a disability is suspected

Readily Achievable Barrier Removal
[6.14, R8 (a-e); Exhibit 5-2)]

Requirements

Each center must consider readily achievable barrier removal—things center staff can do to make the center more accessible that are easily able to be carried out without much difficulty or expense. To accomplish this, centers must:

a. Determine potential improvements to the physical accessibility (e.g., ramps, elevators, adjustable work stations, restrooms, etc.) of the center, by completing the Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal (a link to this checklist is available on the Job Corps Disability Web site).

b. Determine potential improvements to the programmatic accessibility (e.g., communication options such as audio tapes, large print, etc.; center's public materials contain a statement that reflects a commitment to providing reasonable accommodations for all of their programs, etc.) of the center, by completing the program Center Accessibility Tool (this document is available on the Job Corps Disability Web site).

c. Develop an accessibility plan with priorities and next steps based on the results of the Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal and Center Accessibility Tool. The plan will be used as a tool for center staff to think about the simple things that can be done to ensure that students with disabilities can access/participate in the program on an equal basis with students without disabilities. This plan is not intended to be used to determine compliance for new construction or facilities being altered and is separate from the center's facility survey requirement in PRH 5:5.10.

d. The accessibility plan will be reviewed and updated annually by June 30th (see Exhibit 5-2).

e. The safety and facilities maintenance staff should play a primary role in completing the plan with support from managers in all areas.

- Get students involved; for example, students in carpentry may complete sections of the Americans with Disabilities Act Checklist

- Make changes as a result of the accessibility plan

WHAT WILL THE ASSESSOR BE REVIEWING?

- Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal (2011 version)

- Center Accessibility Tool

- Accessibility plan

- A sample accessibility plan is available for use on the Job Corps Disability Web site.

- Assign safety and facilities staff to complete the checklist.

- Assign staff appropriate areas of the Center Accessibility Tool to complete.

- Assign an administrative staff person to incorporate the findings from the checklist and tool into a plan, cut and paste using the sample plan.

ADA Checklist for Existing Facilities

Based on the 2010 ADA Standards for Accessible Design

- Use a portion of a management team meeting to review contents of plan, determine any actions that can be taken, and establish priorities and timelines.

- Use a portion of a June management team meeting to update the plan.
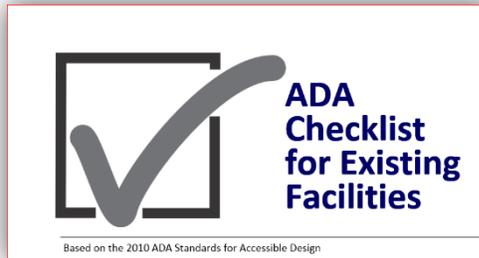
Staff Training
[6.14, R9; Exhibit 5-4]

Requirements

- Centers will provide disability-related staff training in accordance with Chapter 5, Exhibit 5-4 (Required Staff Training).

In other words:

- The center is providing annual all staff training on the Disability Program or a disability-related topic.

- The center is ensuring new hires complete the required reasonable accommodation training in the Job Corps Learning Management System (LMS), "Supporting Students with Disabilities in the Job Corps Program" within 90 days of hire.

- The center is ensuring staff complete the required reasonable accommodation training in LMS, "Supporting Students with Disabilities in the Job Corps Program" annually.

Quick Tips!

- Training suggestions are available on the Job Corps Disability Web site.

Quality Indicators

There are 4 program quality indicators as part of the assessment. The information provided for each of the following four quality indicators are areas that the assessor will be paying close attention to.

Quality Indicator 1: Students are able to identify and access appropriate disability-related supports and/or services to meet individual needs.

- Students with accommodation plans are familiar with DCs/Disability Program

- Students report they were contacted prior to arrival to discuss their accommodation needs

- Students know who to ask if they have a disability or accommodation concern

Quality Indicator 2: Students are able to explain their accommodation needs and self-advocate for needed supports.

- Students are aware of their accommodation plans and can name some of their accommodations.

- Students know they should have input in their plan and are aware of effectiveness reviews

- Students are able to share examples of how they receive accommodations and where they receive them on center

- Students are aware they can receive accommodations in other academic settings, the workplace, and for testing/certification exams

Quality Indicator 3: Accommodation plans demonstrate employability readiness by featuring accommodations that foster student independence.

- Accommodation plans are not geared towards testing or just classroom accommodations

- Accommodation plans are provided to students with a variety of disabilities

- Students with behavioral issues are provided behavioral plans and supports

- Accommodation plans include AT (books on tape, colored overlays, or other AT)

- Students understand how accommodations relate to the work environment (Work-based Learning/Career Transition)

- Students are aware of various technologies that allow them to function more independently

Quality Indicator 4: Staff is aware of Disability Program requirements and their individual role in supporting students with disabilities.

- The center has the required disability program SOPs and may only need minor improvement

- Staff know the DCs and their role

- Staff have an understanding of the reasonable accommodation process and their role in it

- Staff know how to access accommodation plans, can name some accommodations and participate in effectiveness reviews

- Staff can articulate the written referral/feedback process

- All required staff training is completed and staff can recall some details of the training

Scoring

The PAG is used to score each of program requirement areas. As you can see in the chart below, a score of 4 or 5 means that you are **meeting** program requirements. In order to score above a 5, you have to meet program requirements consistently AND demonstrate implementation of innovative approaches targeted to continuous quality improvement of the Disability Program or that result in program enhancements and/or improved outcomes.

Score	Rating	Requirement
0-1	Unsatisfactory	Critical requirements are missing – quality not achieved
2-3	Marginal	Requirements and/or quality indicators are missing and quality assurance is minimal
4-5	Satisfactory	Requirements and quality indicators are generally evident (requirements have been met)
6-7	Very Good	Requirements are consistently met – innovative approaches are employed to promote continuous improvement
8-9	Exceptional	Quality delivery of all requirements and achievement of quality indicators - Innovative approaches result in program enhancements and improved outcomes

Feedback and Conclusions

DPCA "Brief-Out"

Upon completion of the assessment, the assessor "briefs out "typically with the Center Director, DCs, any other management team members the Center Director wishes to have present, and the Regional Office PM (by phone).   This meeting configuration may vary slightly from region to region. During the brief-out, the assessor provides an overview of the concerns identified during the assessment.

Pre-Brief-Out

If time allows, your assessor will provide a brief overview of the findings with the DCs prior to the formal brief-out along with relevant technical assistance targeted to corrective action guidance. This support may be provided throughout the assessment in lieu of a pre brief-out meeting with the DCs, again, should time permit.

DPCA Report

The National Office releases a report of the identified positives and concerns to the regional office approximately 30 days after the assessment is completed. The center's respective Regional Office PM provides the report to the Center Director. Contact your PM if you do not receive the report. Once the report is received, the center is asked to complete a Center Action Plan (CAP) to address how it plans to correct the identified weaknesses.

Attachment A: Pre-Disability Program Compliance Assessment Action Items

Ensure **item numbers 1-3** are completed and provided to your assessor one week prior to the assessment

1. Schedule staff interviews and submit to your assessor at least one week prior to your assessment (Attachment B)

2. Complete the Disability Program Compliance Assessment Questions and return them to your assessor at least one week prior to your assessment (Attachment C)

3. Ensure the following are received at least one week prior to your assessment:

    - Records Manager emails the reviewer the applicant file review log that is used to track applicant files from arrival on center through a final disposition (at least a year of the log should be provided, 2 years preferably)
    - DCs email the reviewer the Disability Program SOPs (i.e., DC responsibilities, applicant file review, and reasonable accommodation)

4. Gather documents and materials needed for the assessment (Attachment D)

5. Complete the Applicant File Review Process Self-Check (Attachment E)

6. Complete the Reasonable Accommodation Process Self-Check (Attachment F)

7. Identify space for the assessor to work that includes room for review of student files and allows for interviews of students and staff

8. Identify best practices (i.e., any practice, procedure, activity or effort that is above and beyond a requirement and be prepared to give evidence of its existence)

9. Clear schedule with supervisor(s), if necessary, and plan to be available throughout the 2-day assessment for questions and assistance

10. Identify any technical assistance (TA) needed or that would be helpful so if assessment is completed early, the assessor can provide additional TA

11. If you have a Reasonable Accommodation Committee (RAC) meeting scheduled during the days of your assessment, make arrangements for the assessor to observe this meeting

Attachment B: Disability Program Compliance Assessment Interview Schedule

As part of the Disability Program Compliance Assessment, it will be necessary for the disability assessor to meet with additional staff members. Please schedule the staff members listed below in the time slots allotted. Please only schedule groups if indicated below. Additional interviews will be requested as needed.

Staff Members (as individuals):
- Academic Manager (If not Disability Coordinator)
- Career Technical Manager
- Career Transition Readiness Manager
- Center Mental Health Consultant
- Counseling Manager
- Records Manager (Please schedule on Day1)
- TABE Administrator

Staff Members (as a group):
- Group 1 (3 Academic Instructors, 3 Career Technical Instructors, 1 CPP Instructor)
- Group 2 (Business Community Liaison, Center Standards Officer, Residential Manager, Work Based Learning Manager)

Day 1

Time	Staff Member/Group
9:30-11:30	
1:00-1:30	
1:30-2:00 pm	
2:00-2:30 pm	
2:30-3:00 pm	
3:00-3:30 pm	
3:30-4:00 pm	
4:00-4:30 pm	

Day 2

Time	Staff Member/Group
10:00-10:30 am	
10:30-11:00 am	
11:00-11:30 am	
11:30-12:00 pm	
12:00-12:30 pm	
12:30-1:00 pm	
1:00-1:30 pm	
4:00-4:30 pm	

Except for the Records Manager whose meeting will occur in his/her office; interviews should be scheduled in the area where the assessor is working. However, if more space is needed or there are other concerns, the interview

can be scheduled in another location. <mark>Please complete and return to me at least one week prior to your assessment</mark>.

Attachment C: Disability Program Compliance Assessment Questions

Please provide **<u>written</u>** responses to the following questions. The purpose of the visit is to **verify** and **clarify** compliance with PRH requirements as well as to highlight program qualities and strengths. Please ensure all information (e.g., data, forms, materials, logs, surveys, files) necessary to support your responses is available for the review. <mark>Please complete and return to me at least one week prior to your assessment</mark>.

Disability Coordinators (PRH 6: 6.14, R1 (a-b))

a) Who are the disability coordinators on center? How long have they been in this position and what other position(s) do they hold on center?

b) Do the DCs attend the region's monthly DC call/webinar on a regular basis? Have both DCs attended the DC Orientation webinar? How many disability or file review-related webinars have the DCs attended in the past year?

c) Is there an SOP describing the specific roles and responsibilities of each of the DCs?

Applicant File Review (PRH 6: 6.14, R2 (a-c); PRH 1: 1.4 R1-4; Appendix 107; Exhibit 5-1)

a) Does the center have written SOP for the applicant file review process?

b) Are files processed within 30-calendar day from receipt by center? If not, how do you address the situations when an applicant file is not processed within the 30-calendar day timeframe?

c) Who receives the applicant files?

d) Who maintains the applicant file review log?

e) Does the log document:

- How long the file has been on center?
- Where the applicant file is on center/how long it has been there?
- Who reviewed the file and when?
- Any movement or actions taken related to the file?
- The center's recommendation regarding enrollment?
- Files sent to the regional office as recommendations for denial?

f) Who is the center's File Review Coordinator?

g) Which staff members make up the File Review Team (FRT) and who determines the members of the FRT?

h) What is the procedure for reviewing an applicant file on center?

i) What reasons does the center recommend denial?

j) Describe the accommodation review process when the center is considering recommending denial due to health care needs or because of direct threat?

k) Under what circumstances does the center return files to the Admissions Counselor?

l) Where is protected applicant file information (e.g. health/disability) stored and maintained during the file review process?

Reasonable Accommodation Process (PRH 6: 6.14, R3 (a-c); Appendix 605; PRH 3: Section 3.21, R2 (g))

a) Does the center have a written reasonable accommodation SOP?

b) Who coordinates the center's Reasonable Accommodation process?

c) If an applicant/student declines accommodations, how is the decline documented?

d) Who participates in the reasonable accommodation committee (RAC) meetings?

e) Who determines the participants in the RAC meetings?

f) For what purposes are RAC meetings convened?

g) Where is documentation of RAC meetings stored?

h) How is the applicant/student involved in this process?

i) Who informs staff that a student has a new or updated accommodation plan in CIS? How is this notification provided and how often?

j) How is the effectiveness of accommodations evaluated? If the evaluation indicates a concern, how is it handled?

k) Who maintains the accommodation files and disability, no accommodation files? Where are these files stored? What happens to these files when a student separates from the program?

l) Has the center denied any requests for accommodation? If yes, please explain the process.

m) Are students receiving information about workers rights and responsibilities including reasonable accommodation in the workplace during Career Transition Readiness? If yes, describe.

Introduction to Center Life (PRH 6: 6.14, R4 (a-c); PRH 2 section 2.2, R1 (b11, d4), R2

a) What information about disability and reasonable accommodation is provided to new students during orientation to center life?

b) Describe how/when new students are introduced to the disability coordinators?

c) Is there information about the disability program and/or reasonable accommodation in the student handbook?

CIS Disability Data Collection and Accommodation Plans (PRH 6: 6.14, R5 (a-f))

a) Is the center entering required disability data in CIS? Who is entering this information?

b) Who enters the accommodation plans in CIS? How often?

c) Who is entering testing accommodations? Are students receiving their accommodations on their first TABE test?

d) Who is documenting the accommodation process in the CIS Notes Tab?

Networking/Partnerships (PRH 6: 6.14, R6 (a-c))

a) Describe your relationships/partnerships with outside agencies and programs that assist the center in serving students with disabilities?

b) Have you completed the Disability Partnership Tool available on the Job Corps Disability website or the customized Disability Partnership Tool provided by your regional disability coordinator?

c) How do other staff assist the DCs with developing relationships/partnerships with outside agencies and programs that assist the center in serving students with disabilities?

Referral Process (PRH 6: 6.14, R7 (a-b); Appendix 605)

a) What is the center's referral/feedback system when a student discloses a disability and may want reasonable accommodation or staff suspects a student may have a disability that is impacting his/her success in the program and should meet with the DCs to consider reasonable accommodation?

b) Is there a form/other documentation to document this process? Where is it stored?

Readily Achievable Barrier Removal (PRH 6: 6.14, R8 (a-e); Exhibit 5-2)

a) Has the center completed the ADA Checklist for Readily Achievable Barrier Removal to determine potential improvements to the physical accessibility of the center?

b) Has the center completed the Center Accessibility Tool to determine potential improvements to the programmatic accessibility of the center?

c) Does the center have an accessibility plan with priorities and next steps to improve the programmatic and physical accessibility of the center?

d) Is the plan updated annually (due 6/30)?

e) Does safety and facilities maintenance staff play a role in completing the plan? What staff is involved?

f) In the past two years, have any actions to improve the programmatic or physical accessibility of the center been taken?

Staff Training (PRH 6: 6.14, R9; Exhibit 5-4)

a) Does all new staff complete the *Supporting Students with Disabilities in the Job Corps Program* training available in LMS during their 1st 90 days of employment*?*

b) Does all staff complete the *Supporting Students with Disabilities in the Job Corps Program* training available in LMS annually?

c) Has all staff attended training about the Disability Program or a disability-related topic during the past year?

d) In the past year, has any disability-related training beyond the required training been provided?

Center-wide Focus (Quality Indicator 4)

How are these areas on center involved in the Disability Program?

- Academic Manager (if not a DC)

- HMW (if not DC)

- Career Technical Manager

- CMHC

- CSO

- Counseling

- Instructors (Academics/Career Tech/CPP)

- Records

- Residential

- TABE Administrator

- Work Based Learning

- Career Transition Readiness

Self-assessment of the Center's Disability Program

a) What part of the Disability Program is the strongest? Do you feel any aspects of the center's Disability Program are unique or innovative?

b) What part of the Disability Program do you think could improve?

c) In what areas would the center like additional assistance?

Attachment D: Disability Program Compliance Assessment Documents and Materials Checklist

Documents and Materials Checklist	Complete?
Disability Coordinators' Responsibilities SOP	☐
Applicant File Review Process SOP	☐
Applicant File Review Log 　　　o **Provide at least 1 year of log data, 2 years preferably**	☐
Reasonable Accommodation Process SOP	☐
Reasonable Accommodation Committee meeting notes	☐
Copies of email notifications to staff regarding student Accommodation Plans	☐
Career transition readiness materials/curriculum provided to students about worker's rights and responsibilities including Reasonable Accommodation	☐
Disability Program information/materials provided to new students	☐
Student handbook information related to Disability Program and/or Reasonable Accommodation	☐
Disability Partnership Tool or Customized Disability Partnership Tool	☐
Referral Form(s) used by staff when a disability is suspected 　　**Note: It would be very helpful to give the assessor names of students who have had referrals**	☐
Accessibility plan	☐
Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal	☐
Center Accessibility Tool	☐
Staff Training documentation (should be available from Human Resources Manager)	
o　**Sign-in sheets for Annual all staff Disability Program or disability-related topic training**	☐
o　**Certificates for new staff (within 90 days of hire) required Reasonable Accommodation training – "Supporting Students with Disabilities in the Job Corps Program" training available in LMS**	☐
o　**Certificates for annual all staff required Reasonable Accommodation training – "Supporting Students with Disabilities in the Job Corps Program" training available in LMS**	☐
Disability Program Best Practices (i.e., Disability Awareness Day materials, training materials, presenter and visitor information)	☐

Attachment E: Applicant File Review Process Self-Check

The applicant file review process SOP should contain:

☐ Location where files are sent and logged in upon arrival to the center

☐ The method of tracking the movement of the file to include an explanation of the center's disposition of the file

☐ Responsibilities and roles of File Review Team members which include the HWM, center clinicians, and the center's DC(s)

☐ Procedures for reviewing an applicant file to include acceptable reasons for recommending denial of an applicant

☐ Procedures for reviewing and determining Reasonable Accommodation

☐ Procedures for processing application withdrawals both before and after submitting a file for regional review

☐ Timeframe the center establishes to complete the file review process to ensure it meets the PRH required timeframe of 30 calendar days

☐ Storage, transmission and maintenance of the applicant file information

The applicant file review log should contain:

☐ The date the file arrived on center

☐ To whom each file was sent

☐ How long a file has been with a particular department or staff member

☐ How long the file has been on center

☐ Detailed notes/explanation of any delays in the process

☐ The disposition of the file

☐ Requests for extensions and received approvals if there is a brief, reasonable need for the center to exceed the 30 day time requirement

For those files sent to the Regional Office for review, the applicant file review log should contain:

☐ The date the file was sent

☐ To whom each file was sent

☐ The final disposition of the application

For those files in regional review but returned to the center for correction/completion, the applicant file review log should contain:

☐ The date the file was received back on center

☐ The date the file was returned to the regional reviewer or the Regional Office

Process Review:

☐ Does your current applicant file review process match the process outlined in your SOP?

☐ Is your file review team primarily composed of licensed health professionals, the appropriate DC(s), and the Academic Manager?

☐ Does the HWM function as the File Review Coordinator?

☐ Does the HWM/DC review all applicant files?

☐ Does the HWM receive all medical and disability information in sealed, unopened envelopes?

☐ Does the center have a single, ongoing log that tracks applicant files from the time they arrive on center until there is a final disposition?

☐ Are applicant files being stored in a secure, locked location on center?

☐ Does the center submit files as recommendations of denial to the Regional Office when there is an applicant that either potentially poses a direct threat, the center is unable to meet their basic health care needs or there is new information that indicates the applicant "may" no longer be eligible to enroll in Job Corps?

Attachment F: Reasonable Accommodation Process Self-Check

Requesting Accommodation

☐ Are requests being documented using the most current Reasonable Accommodation Request form (see Appendix 605)?

☐ Are the request forms completed and signed?

Determination of Need

☐ If an applicant/student:

- o Makes an accommodation request by completing the Job Corps Reasonable Accommodation Request Form – Program

- o Indicates on the Job Corps Reasonable Accommodation Request Form – Program s/he would like to discuss the need for accommodation with a DC

- o Provides documentation that indicates s/he may be an individual with a disability who may need Reasonable Accommodation to participate in Job Corps

does a DC engage the applicant in an interactive process (even if the applicant did not request accommodation) to review request and/or determine the need for accommodation?

☐ When an applicant/student declines accommodation is the appropriate form completed?

- o Reasonable Accommodation Review Due to Documentation of Disability Form (or)

- o Job Corps Reasonable Accommodation Request Form – Program

Ensuring Appropriate Documentation

☐ Is there documentation in the student's Accommodation File to support the accommodations being provided?

☐ If the Center Mental Health Consultant is doing testing/evaluations to assist a student in determining disability and/or obtaining updated documentation of a disability, are assessments and procedures in the Student Health Record?

Reviewing the Request

☐ Are all primary Reasonable Accommodation Committee (RAC) functions met?

- o Review an applicant's request or need for accommodation (if documentation of disability is present) to participate in the Job Corps program when a center has recommended denial of an application or when the center intends to enroll the individual;

- o Review a student's request or need for accommodation (if documentation of disability is present) to participate in the Job Corps program;

- o Assist applicant or student in determining needed accommodations by identifying the functional limitations resulting from the disability (i.e., student cannot read print material because text appears as a series of jumbled letters and needs access to a text-reader, audio tapes, or other oral communication supports, student has mobility impairment, and needs first floor dorm room);

- o Ensure accommodation review considers accessibility needs and barrier removal for all areas of the center (residential/classroom/common areas/transportation, etc.) in which it is needed;

- o Meet with students when issues with implementation or effectiveness of accommodation plans are identified during the effectiveness review process and when referrals are made to the DC that indicate an accommodation plan review may be needed;

- o Assist with accommodation review during the Work-Based Learning and Career Transition periods; or

- o Review Tests of Adult Basic Education (TABE) waiver requests to evaluate accommodation supports and effectiveness, make recommendations about additional accommodation needs, if appropriate, and provide feedback for the regional paperwork.

☐ Do RAC meetings include the appropriate people (i.e., always a DC and applicant/student and the addition of other staff for more complex cases)?

☐ Is a summary of any informal or formal meetings with the applicant/student included as a note in the CIS Notes tab?

☐ Is RAC meeting documentation maintained (i.e., copy of agenda/list of attendees)?

Determining Reasonableness

☐ Is each accommodation request evaluated individually, and a determination made regarding whether it is reasonable?

☐ Are the DCs aware that accommodations cannot be denied at the center level?

☐ Are the DCs familiar with the accommodation denial process?

☐ Do the DCs know how to request funding from the National Office for high cost accommodations when no other funding sources are available?

Entering the Plan

☐ Are accommodation plans entered soon after a student arrives and before the first TABE test if TABE testing accommodations are provided?

☐ Are the DCs aware accommodation plans should not include information about an individual student's diagnosis, medication needs, or other health-related history or information?

☐ Are accommodation plans signed by the student and a DC?

☐ Is a copy of the plan provided to the student?

☐ Is there a copy of the signed plan in the Accommodation File?

Notification

☐ Are emails (at least bi-weekly) with a list of all students with accommodation plans sent to all staff who work directly with students?

☐ Does the email indicate students with new or updated plans?

☐ Are copies of these emails maintained?

☐ Is there evidence that managers ensure implementation of plans in their area(s)?

Determining Accommodation Effectiveness

☐ Are accommodation effectiveness reviews done during the student's 60-day Evaluation of Student Progress Panel?

☐ Is student feedback documented?

☐ Is feedback from staff who are required to provide accommodations documented?

☐ Is the process documented in the CIS Notes Tab?

Documenting the Process

☐ Is the entire Reasonable Accommodation process from prior to entry until separation documented in the CIS Notes Tab?

Maintaining the Accommodation File

☐ Is an Accommodation File maintained for each student receiving accommodation?

☐ Does each Accommodation File contain all required documents?

☐ Is there a consistent layout for all files?

Storing Documentation

☐ Does each student have only one Accommodation File?

☐ Are all Accommodation Files stored as a group in a separate drawer, file cabinet, or storage room that is locked?

☐ Is a Disability, No Accommodation File maintained for each student with a disability who declines accommodation?

☐ Does each Disability, No Accommodation File contain all required documents?

☐ Are Disability, No Accommodation Files stored in the same location as the Accommodation Files, but differentiated (e.g., stored as a group in a separate area of the cabinet or color coded)?

☐ When the student separates, is the Disability, No Accommodation File sealed and sent to records in a separate envelope identified as disability/Accommodation File documentation?

☐ Is confidentiality and "need to know" enforced? Who has access to Accommodation and Disability, No Accommodation Files?

Coordinating the Process

Are the DCs coordinating the center's Reasonable Accommodation Process?

☐ During the assessment process if recommending denial to the Regional Office?

☐ Prior to arrival of the student?

☐ After enrollment of the student?

Career Transition Readiness

☐ Are all students receiving information about workers' rights and responsibilities including Reasonable Accommodation in the workplace?