

## Edits to the February 2006 draft MOA

### General comments

1. The policy statement and Agency policies that are included have not yet been discussed with the Agency's current director, Linda South.
2. The guidance paper *Language Assistance for Limited English Proficient (LEP) Persons* (at Tab 4-A), is still shown as a draft. Comments received in response to the consultation paper that was issued in April 2006 were regarding the following:
  - a. Cost of document translation in written form.
    - 1) Several RWBs suggested that AWI get common-use forms/documents translated and made available to the RWBs (on line, if possible).
    - 2) Also suggested: additional funding for the RWBs, for RWB use in translating/preparing locally developed materials.
  - b. Cost of interpreter services, particularly in light of limited/reduced WIA funding anticipated in the coming program year.
  - c. The need for local-office staff training in LEP customer service delivery.

The Office of One-Stop and Program Support and the Office for Civil Rights are addressing these issues. Final guidance should be issued soon.

4. The guidance paper, *Guidelines for Compliance with the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, and Section 188 of the Workforce Investment Act of 1998* (at Tab 5-B), is still in revised draft, reflecting changes made following a review of the guidance by the Civil Rights Center (CRC), U.S. Department of Labor. Review of the revised draft by the CRC is still pending.

**Edits to the February 2006 draft MOA (reflected in the current draft, dated July 2006):**

<b>Page</b>	<b>Edit</b>
xiv	Agency position-count updates
xv	one-stop count updates
II-4	footnote 15: on-line orientation projected availability changed to summer 2006
II-5	Section 230: addition of April 2006 training information (UC staff)
IV-2	revision to the paragraph beginning “If the recipient . . .” so that it now reads (shaded language added): <p>If the recipient publishes, distributes or makes available to staff, customers, or to the public at large, recruitment materials, informational publications, or other materials to describe the programs under the WIA and SESA<sup>1</sup> programs, or the requirements for participation by recipients and participants, the recipient shall ensure that the required language ("taglines") are included and indicate that the WIA- or SESA-funded program or activity in question is an "<i>equal opportunity employer/program</i>" and that "<i>auxiliary aids and services are available upon request to individuals with disabilities.</i>" This requirement applies to information provided in either written or oral form, electronically or on paper. This was discussed during the 2001, 2004, and 2006 training for equal opportunity officers.</p> <p>(reference: 29 CFR 37.34)</p>
IV-2	paragraph beginning “The OCR . . .”, second sentence: addition of the word “respective” ( <i>respective workforce boards</i> )
IV-3	Section 420: The first paragraph has been rewritten to indicate the revised LEP guidelines have been issued, and are no longer in draft. This is in anticipation of a June 2006 issuance.
V-8	Section 575: Addition of the statement that training is to be given again in 2006-2007.
VI-1	lead paragraph: addition of UI (UC) data to the list of data that OCR will be getting directly from the data warehouse; statement that OCR will complete revisions to its analyses in June 2006 (a revised time frame); statement that data for each workforce region will be shared with the respective workforce boards on a recurring basis.
VI-3	top paragraph: deleting “welfare-to-work”; adding “Welfare Transition.”
VII-1	first paragraph, second sentence: revised dates, referencing the fiscal year ending June 30, 2006. paragraph beginning “Site visits . . .”: changed to reference the 2006-2007 review cycle. addition of footnote 28 regarding training/technical assistance during review trips.
IX-4	Note 2: addition of the citation in 29 CFR part 37 prohibiting payment of monetary relief from federal funds.

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

<sup>1</sup> SESA is the acronym for “state employment security agency.”