

William J. Harris Equal Opportunity Award Nomination

1. Award Questions

1. Contact Information of Individual Submitting Nomination

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2. Title of the project/initiative *(Please create a title if one does not currently exist)*

EO Compliance

3. Describe the innovative procedures or processes that identified barriers to a successful equal opportunity program.

There were two recent events that allowed the Texas Equal Opportunity office (EO) to improve and create innovative processes. New requirements for Center Certification were required at the end of calendar year 2017. All 210 one-stop centers within the state of Texas were required to complete One-Stop Certifications. With EO at the table coordinating with TWC Workforce Division and Local Board Support along with the State Level EO Officer, it was ensured that EO requirements would be considered as a compliance part of the certification process. It was decided that all LWDA's would be required to submit substantial EO related documents to verify EO compliance for certification. Boards were required to submit completed WIOA Section 188 checklists and Texas Accessibility Standards (TAS) checklists along with their certification forms. The EO Compliance Department then used the information received during Center Certification to determine areas of risk and training needs for the upcoming monitoring rotation and future training endeavors.

This brought EO compliance to the forefront of the conversation and allowed an opportunity for examination and open communication of existing issues. The Texas Workforce Commission (TWC) began integrating the VR programs and facilities into the one-stop delivery of services and co-locating offices. As this began, the need to discover existing and predictive issues and to eliminate any architectural and programmatic barriers to service delivery on the front end became paramount. The TWC EO Compliance Department created a liaison with the local Board EO Officer, facilities staff, the VR integration project staff, and others to ensure that TWC facilities meet Texas Accessibility Standards (TAS). These standards are equivalent to and in many areas more stringent than ADA requirements. The EO Department and others involved in EO activities utilize a comprehensive, priority-driven checklist to test all existing, rebuilds and new facilities for TAS compliance. The TWC EO Compliance Department ensures that all 210 centers are complying or have relevant and measurable remediation plans in place prior to VR integration. As a final verification, the State-Level EO Officer must sign off on the go-ahead for integration activities at various steps in the integration process.

4. Describe the nominee's significant contributions towards the understanding and achievement of equal opportunity and nondiscrimination for all employees and customers.

The EO Compliance Department has made it a priority to expand their mission as broadly as possible. TWC disseminates Workforce Development (WD) and Equal Opportunity (EO) Letters as guidance to Boards on all related subjects. EO has issued WD letters on diverse topics ranging from EO is the Law Notice to step by step discrimination complaint processing to the duties and responsibilities of a local EO Officer and others in the service delivery system. The TWC EO Coordinator stays in the role as the constant technical assistance contact with the local EO Officers and VR EO liaisons, providing up to date best practice information. TWC and the LWDA's have developed a committee called the Quality Assurance Network (QAN) that meets quarterly to discuss topics related to QA and monitoring. The EO Compliance Department regularly presents at these quarterly conferences to impart understanding of the absolute importance of ensuring that our customers have full and equal access to the programs and services we provide. In the last fiscal year, they presented on an array of topics to ensure all staff, not just EO Officers, understand what EO compliance entails. In addition to the QAN trainings, the EO Compliance Department presents at the annual Subrecipient Monitoring (SRM) trainings and at the annual Statewide Texas Workforce Conferences. During the SRM trainings, the topics of EO training include detailed guidance of how to conduct an onsite EO visit and what to ask during interviews with Board and Contractor staff to ensure the staff being interviewed understand the need for an effective EO program. During the latest Statewide Texas Workforce Conference, the EO Compliance Department presented a heartfelt presentation on "Why You Should Care About Equal Opportunity." The presentation dealt with the broader topics of inclusion, diversity, and breaking down stereotypes and biases to provide services to customers free from programmatic, physical, or communication barriers.

In addition to training and conferences, the EO Compliance Department regularly meets with Policy staff, VR staff, the Accessibility Team, program monitoring staff and others to discover ways that the mission of EO can further enhance TWC, the Boards, and service provider's missions. One such recent instance was when the EO Compliance Department partnered with the Accessibility Team on electronic accessibility awareness. All Boards received brochures and posters with steps on how to make Word, Excel, PDF, videos, etc. accessible to individuals with disabilities.

5. Provide a statement of results, accomplishments, impacts and any other appropriate information that demonstrates why the nominee's efforts were an exceptional contribution to the state workforce agency.

The EO Compliance Department has creatively revamped their EO monitoring processes to ensure new regulation compliance and utilization of all available resources and subject matter experts. With the new federal regulations, annual EO monitoring of all WIOA recipients is required.

Through innovative collaboration and process development, EO includes subrecipient monitors and VR staff to continually and progressively monitor the facilities' physical accessibility, processes and procedures and report back any findings to the EO Compliance Department. Once an issue has been reported, the EO Compliance Department initiates an interactive process of remediation and resolution. In addition to the TAS Checklist which tests for physical accessibility, the TWC EO Compliance Department has developed a checklist that touches on the high points of EO compliance for a quick EO assessment when a program monitor is visiting a center. The EO Compliance Department stands by the idea that EO monitoring isn't just something that happens annually but should be assessed, adjusted, and considered on a daily basis by all staff to be be aware and diligent just as demographics and individual needs of customers appear on a daily basis. The EO Compliance Department created and utilizes a very thorough document request package (DRP) that is sent out prior to an on-site TWC EO monitoring review that requests local monitoring documentation, policies, procedures, job descriptions, evidence of assurances, EO staff training hours, evidence of continuing notice, etc. from the Boards. This allows for TWC EO staff to conduct a thorough desk review to discover and remediate issues prior to TWC arriving on site, making the best use of time and resources. And lastly, a new impact initiative is integrating Vocational Rehabilitation (VR) liaisons into the overall complaint process within TWC.

6. Provide samples of work including creative materials, videos, graphics, documents, plans, etc.

(File limit: 10 | 10 MB limit per file)

[EO Tool - One Center \(updated 10.09.18\).docx](#)

[FY19_DRP.doc](#)

[TAS Checklist Current.docx](#)

[WIOA Section 188 Review Checklist revisions8.2018.docx](#)

[EO Compliance for distro.pdf](#)

[SRM-Led EO Reviews.pdf](#)

7. Please upload a copy of the email or document with your state agency administrator's approval.
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