

# **U.S. Department of Labor**

## **Evaluating the Accessibility of American Job Centers for People with Disabilities**

### ***Site Visit Instruments***

***AJC Staff Interview Discussion Guide  
Physical Assessment Guide***

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#### ***Submitted to:***

U.S. Department of Labor  
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# **PART A:**

## **AJC STAFF INTERVIEW DISCUSSION GUIDE**

## **PART A: AJC STAFF INTERVIEW DISCUSSION GUIDE**

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### **1. AJC Staff Interview Overview**

As part of the broader study being conducted to assess the level of accessibility of American Job Centers (AJCs) to people with disabilities (PWD), the IMPAQ team will conduct interviews with AJC staff at 100 AJCs as part of the study's data collection activities. An overview of the interviews to be conducted is presented below.

#### **1.1 Purpose of the Interviews**

Interviews with AJC staff will be used in combination with information gathered through physical assessments of AJCs described in Part B, to assess socially-desirable responses (SDR) from a Web-based survey of AJC Directors and to assess non-response bias. This will be done by comparing the results of the Web-based survey with information gathered through staff interviews. In addition, interviews will provide qualitative descriptions of related to AJC accessibility.

#### **1.2 AJC Interviewees**

It is expected that four AJC staff will be interviewed at each AJC, on average. This will include some combination of the following AJC staff: Director, Manager, Disability Specialist, Resource Room Staff Member and/or Case Manager.

#### **1.3 Site Selection**

Our strategy for identifying AJC sites will involve random sampling of 70 sites to gather information to assess social desirable responding and 30 sites for assessing non-response bias. A stratified sampling approach using three levels of stratification will be used for selecting sites, including geographic regions, urban/rural and accessibility level.

### **2. Interview Preparation**

#### **2.1 Scheduling**

Once AJC sites have been selected and agreed to participate, scheduling and coordination of all site visits will be conducted by an IMPAQ team member dedicated to this task. This will involve: 1) assigning sites to site visit teams, 2) identifying an appropriate on-site liaison to discuss potential interviewees and to assist in the scheduling of site visits, 3) making travel arrangements, and 4) providing all site visit details to assigned team members.

## 2.2 Training

In-depth training for staff interviews will occur approximately two – four weeks prior to the start of site visits. Training of all staff will take place in IMPAQ’s Columbia, MD office and occur over a period of three days. Training will involve both formal “classroom” style instruction and on-site training at selected AJC in the Baltimore/Washington, D.C. area. Detailed manuals and other relevant materials will be developed for use during training.

## 3. Interview Discussion Guide

### 3.1 Introduction/Purpose of the Study

The OMB Control Number for this information collection is <insert number> and the expiration date is <insert date>.

According to the Paperwork Reduction Act of 1995, persons are not required to respond to this collection of information unless it displays a currently valid OMB control number and expiration date. Responding to this interview is voluntary. Public reporting burden for this collection of information is estimated to average 75 minutes per response. Send comments regarding this burden estimate or any other aspect of this collection of information to Dr. Stefanie Schmidt at [schmidt.stefanie@dol.gov](mailto:schmidt.stefanie@dol.gov).

*[NOTE TO INTERVIEWER: Below are suggested introductory remarks. While it is not necessary to follow this as a script, it is important that you cover all of the main points contained here.]*

*I work for \_\_\_\_\_, and we are evaluating the accessibility of American Job Centers for people with disabilities. The U.S. Department of Labor’s Chief Evaluation Office contracted with us and our partners (IMPAQ International, the Burton Blatt Institute of Syracuse University, Evan Terry Associates) to conduct this study. You may recall that we previously requested that your center complete an online survey on the subject.*

*As part of our study, we will be interviewing selected managers and staff at the AJCs to understand the experience at your center for people with disabilities. We will be assessing the programmatic, communication, and physical accessibility of the AJC system for individuals with all types of disability – physical, visual, hearing, emotional, cognitive, etc. This is not an audit for compliance with laws and regulations regarding accessibility for American Job Centers. Rather, the purpose of the study is to gather data to paint a broad picture about the degree to which American Job Centers as a whole are accessible to PWD. We will be using the information we learn from our visit today to inform our feedback to the U.S. Department of Labor. What you have to say is important to us; we appreciate you helping us understand the extent to which the programs and services of the AJC system are accessible to people with disabilities.*

*Everything that we discuss during this interview will be kept confidential and used only for purposes of this study. This means that your responses will not be shared with USDOL or anyone else in any way that could identify you. Before we begin, do you have any questions about the purpose of the evaluation or our confidentiality policy?*

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB number for this data collection is <insert OMB number>, which expires on <insert date>. If you have questions regarding this data collection request, please contact Stefanie Schmidt at the USDOL, [Schmidt.Stefanie.R@dol.gov](mailto:Schmidt.Stefanie.R@dol.gov), 202-693-5901.

To start, do you mind if we tape record our session?

### 3.2 Respondent Background

- What is your position?
- How long have you been working in workforce development?
- How long have you been working at this center? How long have you been [job title]? What other positions have you held here?

**PROBE:** *If Respondent is/has been some kind of disability services specialist, probe for details:*

- *Job responsibilities associated with outreach*
- *Job responsibilities associated with inter-agency collaboration*
- *Job responsibilities associated with service delivery*
- *Length of time in role*
- *Background and/or training associated with PWD.*

### 3.3 Center Characteristics

- How is the operation and management of your center structured? In other words, who runs your center? Who is the AJC operator?
- What other programs are offered on-site (including TANF, Pell Grant, Community College representation, etc.)? What training is offered through the AJC?
- Has there been an accessibility review? If so, when? Who participated in the review (include PWD, DBTAC, EEO)? What instrument was used?
- Do they have a disability services specialist (DPN, DRC, etc.)? If so, what does that person do?
- Does the Center have any requirements to serve specific populations?

- Are Vocational Rehabilitation (VR) services offered to people with disabilities (PWD) at your center location? Are VR counselors considered to be co-located with your center?

**PROBE:** Note that “co-location” refers to there being a VR office or workstation located at the center, or a VR counselor being “stationed” at the center on a full- or part-time basis. Probe for details on collaboration with VR, referrals, etc.

- How does the Center coordinate services with VR?

**PROBE:** Has VR provided training to AJC staff? Have they participated in an accessibility review of the Center? Does the Center collaborate with VR on job accommodations? Interpreter services? Assistive technology?

- Is your AJC an Employment Network (EN) in the Ticket-to-Work program? If so, is the AJC currently accepting tickets? If not, does the AJC work with another local EN?

### 3.4 Initial Contacts between PWD and Center

- I'd like now to ask you about your center's communication with customers and your service delivery process. First, does your center conduct outreach to bring new customers in? You may refer to this reaching out as "advertising" or "marketing."

**PROBE:** If the AJC does any kind of outreach, ask about the topics below.

- When your center conducts outreach to bring in new customers, do you provide information about alternative ways to contact you? These might include email, an accessible website, a TDD/TTY number, a telephone relay service, etc.
- Do you indicate whether communication aids and services for PWD are available?
- Do you indicate whether assistive technology is available?
- Do you include images or language about PWD receiving services with other customers in outreach materials?
- Do you consult with disability and other stakeholder groups about how to improve outreach to PWD?

**ADDITIONAL PROBES (If Time Allows):**

- Do you describe types of accommodations available?
- Do you describe the architectural/physical accessibility of center facilities?
- Do you make note of PWDs' right to meaningful participation in center services?
- Do you advertise in media that reaches people with different types of disabilities?

- Do you send notices about center activities to community groups, organizations, and associations that PWD participate in?
- Could you please describe what a potential customer's initial contacts with the center are like? We'd like to know about the experience for all customers, whether they're identified as having a disability, or not.

**PROBE:** *Is the initial contact typically in-person, online, or on the phone? Is there some kind of registration or sign-up procedure that a person new to the center goes through? Probe for detail on the topics below.*

- Are all customers, whether or not known to be a PWD, provided with information on center services and programs for PWD when they first interact with your Center?
- Are all customers provided with information on how to seek accommodations and communication aids and services?
- Is information presented in ways that can be understood by people with all types of disabilities, for example, intellectual disabilities, or deafness?
- Are there notices outlining rights and protections for PWD in high visibility areas?
- Are all customers offered assistance in filling out forms and application materials?
- Is time for questions and explanations allowed during introductions or orientations?
- Can people interact with the center online, for example, by filling out an electronic form or by downloading information? Can people access center services online?

**PROBE:** *Note whether services are provided exclusively online, some services are available online, or no services are available online. If the AJC has a Website, ask about the topics below. Does the website for the center provide:*

- Text descriptions of graphics or pictures?
- Equivalent alternatives for information presented in audio or video?
- Online forms that can be filled out using assistive technology?
- Information on center services and programs for PWD?
- Information on how to seek accommodations and communication aids and services?
- How does your center determine if a customer or prospective customer has a disability?

**PROBE:** *Ask how they typically go about identifying someone as a PWD.*

- Do they expect PWD to identify themselves as a PWD?
- If the AJC asks for this information, do they ask it of all customers, or just some?
- If the latter, how do they decide who to ask?

- Does the AJC staff identify PWD through assessments given to all customers, assessments given just to select individuals, or referrals from another agency or organization?

### 3.5 Service Delivery

- Please describe what happens when a new customer comes to your center for services. We'd like to learn how your service delivery works in general, and how a customer who has been identified as having a disability is served at your center. First, if a new customer is identified as a PWD, do you they typically then go through the regular process of signing up for services at your AJC?

*IMPORTANT: Note if they say they refer some or all PWD to other agencies and organizations that specifically serve PWDs instead of serving them at the center. IF ALL PWD ARE REFERRED OUT OF THE AJC FOR SERVICES, PROCEED WITH ASKING THE REMAINING SERVICE DELIVERY QUESTIONS AS BEST YOU CAN.*

- Do center staff offer customers accommodations when completing skills assessments or other service planning activities?

*PROBE: Determine whether accommodations are offered to all customers, to customers who seem to need them (based on staff judgment), to customers who ask for them, or only customers who have been identified as having a disability.*

- Does Center staff explicitly consider strategies for overcoming disability-related barriers when doing service planning and creating Individual Employment Plans (IEPs)?

*PROBE: If the AJC does IEPs or other service plans, ask about examples of specific strategies that might be used, what the procedures are for reviewing IEPs, etc.*

- Do eligibility criteria for intensive or training services pose any particular barriers to participation for PWD? Do Center staff modify eligibility criteria to accommodate the specific needs of PWD?

*PROBE: If yes, ask for examples of the types of changes that they might make.*

- Are services for PWD provided in the same setting as other customers, or are some services provided to PWD in a setting separate or different from other customers?

*PROBE: If they do have separate or different programs or activities for PWD, why is that? Do they offer PWD the opportunity to participate in the "regular" center programs and activities despite the existence of these separate programs? Under what circumstances do customers with disabilities participate in separate versus "regular" programs?*

- Does the state's Eligible Training Provider list include training providers that address the needs of PWD? Does your center contract with external training providers? Do you feel there is an adequate supply of training resources available to PWD that you can contract with or refer to?

**PROBE:** *Do the external training providers with whom the center contracts adequately address the needs of PWD? Do reimbursements to external training providers take into consideration the costs of providing accommodations, communication aids, and services to PWD?*

- Does your center provide benefits counseling (e.g. SSI/SSDI, Medicaid, Medicare) as part of the Core Services offered to PWD?

**PROBE:** *Who provides the benefits counseling to PWD? Center staff? An outside benefits counselor or other consultant? Note if benefits counseling is offered other than as Core Services, e.g., as part of intensive or training service provision.*

- Could you please describe PWD access to core, intensive and training services?

**PROBE:** *Ask whether the center does the following:*

- Routinely ask all customers, not just those with disabilities, if they need accommodations or special assistance?
  - Communicate clear instructions to customers for requesting reasonable accommodations and modifications?
  - Consult with organizations such as the Job Accommodation Network or Vocational Rehabilitation that provide assistance with job accommodations for PWD?
  - Include supervisory staff members who know how to proceed if a PWD customer requests an accommodation?
  - Maintain or have ready access to personnel who can install, set-up and maintain adaptive equipment and materials?
- Now we want to ask how your center addresses confidentiality of disability information.

**PROBE:** *Ask about the following practices that may be followed at the center:*

- How are customers informed that information about their disability will be kept confidential?
- How will staff obtain the customer's permission before discussing his or her disability with other individuals?

- ▶ How is information concerning a person's disability limited to staff who require this information for service delivery?
- ▶ Are all customers asked in writing whether they have a disability?
- ▶ If a customer needs help in filling out registration or intake forms, is this done one-on-one in a private room?
- ▶ How are customers informed both verbally and in writing that the decision to share disability information is strictly voluntary?
- ▶ How do staff discuss with PWD the pros and cons of talking about their disability with employers and/or potential employers?

**ADDITIONAL PROBES (IF TIME ALLOWS):** *When working with customers, does staff discuss disability only as it pertains to the customer's need to access employment and training services? Does staff understand that they require a customer's permission to disclose whether he or she has a disability to an employer?*

- Could you describe whether and how PWD are involved in center planning or operations?

**PROBE:** *Are PWD consulted to help identify accessibility issues at the center? Are PWD consulted to help resolve accessibility issues at the center? Do one or more PWD sit on the WIB and/or center governing team? Do PWD serve as advisors to center staff regarding center operations? Are there PWD on staff who are involved in Center planning or operations?*

- Describe the staff training or technical assistance you provide with regard to serving PWD.

**PROBE:** *Ask whether center provides any of the following staff training or technical assistance. Ask if they provide any other training not mentioned.*

- ▶ Orientation to serving PWD for new employees
- ▶ Basic disability etiquette
- ▶ Procedures for arranging communication aids and services for PWD
- ▶ Specific employment strategies for PWD (e.g., supported employment, Ticket to Work, customized employment)
- ▶ How to help PWD use the assistive technologies currently available in the center
- ▶ Knowledge of specific types of disabilities and implications for service delivery
- ▶ Application of "universal design" principles to center programs and services
- ▶ Community resources and center resources that can support PWD
- ▶ Avoiding assumptions about the capabilities of PWD when evaluating skills or job opportunities

- Emergency evacuation procedures for PWD
- Does your center have a mobile unit? Please describe what kind of unit it is and what it is used for.

**PROBE:** *Can PWD access (get into) the mobile unit? If the mobile unit has one or more computer workstations, does at least one have adaptive technology for PWD? If the mobile unit has training equipment, is it accessible for PWD?*

### 3.6 Addressing the Needs of PWD with Specific Disabilities

- What kind of services do you have for customers that are deaf or hard of hearing?

**PROBE:**

- Is the staff familiar with how to use telephone or web-based options for communicating (e.g., telephone relay service, TDD/TTY)?
- Is the staff familiar with the etiquette of a text-based telephone call?
- Does the center have telephone or web-based options available for customers to call in?
- Does the center provide telephone or web-based options for customers to make outgoing calls?
- Do they have a hands-free speaker phone with large keypad available for customers?
- Do they provide Portable Assistive Listening Devices for customers?
- Do they provide Computer Assisted Real-Time (CART) captioning for customers?
- Is information presented orally also available in writing?
- What kind of services do you have for customers who are blind or visually-impaired?

**PROBE:**

- *If customers request materials in accessible formats (e.g., Braille, large print, audio recorded), are staff able to arrange for these without significant delay?*
- *If the center has videos/DVDs for public use, do they include audio descriptions?*
- What kind of services do you have for customers with cognitive and/or psychiatric disabilities?

**PROBE:**

- *Do staff members offer assistance with the completion of forms?*
- *Is a quiet environment made available for people to read materials?*

- ▶ *Does the staff present information so that it is understandable to people with different language abilities?*
- ▶ *Do staff members offer breaks or the option to continue the session on another day, if needed?*
- What kind of services do you have for customers with speech impairments?

**PROBE:**

- ▶ If a staff member does not understand a customer, does he or she ask the customer to repeat, and then say it back to the customer?
- ▶ Do staff members ask questions that require only short answers or a nod of the head? Are customers offered the option to write their response on paper or on a computer?
- ▶ If no solution to a communication problem can be worked out, does the staff member ask the customer if there is someone who could interpret on their behalf?

### **3.7 Overall Center Accessibility**

- Finally, could you please rate the accessibility of certain aspects of your center on a scale of 1 to 4, with 1 being completely inaccessible and 4 being fully accessible?
  - ▶ What is your opinion of your center's ***Programmatic (Service Delivery) Accessibility?***
  - ▶ What is your opinion of your center's ***Communication Accessibility?***
  - ▶ What is your opinion of your center's ***Physical Accessibility?***
  - ▶ What is your opinion of your center's ***Overall Accessibility?***

**PART B:**

**PHYSICAL ASSESSMENT GUIDE**

## **PART B: PHYSICAL ASSESSMENT GUIDE**

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### **1. Physical Assessment Overview**

As part of the broader study being conducted to assess the level of accessibility of AJCs to people with disabilities (PWD), the IMPAQ team will conduct assessments of physical accessibility at 100 AJCs, as part of the study's data collection activities. An overview of the physical assessments to be conducted is presented below.

#### **1.1 Purpose of the Physical Assessment**

Physical assessment at AJCs will be used in combination with information gathered through the on-site interviews of AJC staff described in Part A, to identify socially-desirable responses (SDR) from a Web-based survey of AJC Directors and to assess non-response bias. This will be done by comparing the results of the Web-based survey with on-site assessments of physical barriers to AJC programs and services.

#### **1.2 Site Selection**

Physical assessments will occur at same locations and, as possible, at the same time as the on-site interviews of AJC staff described in Part A. Our strategy for identifying AJC sites will involve random sampling of 70 sites to gather information to assess social desirable responding and 30 sites for assessing non-response bias. A stratified sampling approach using three levels of stratification will be used for selecting sites, including geographic regions, urban/rural and accessibility level.

### **2. Preparation for Physical Assessments**

#### **2.1 Scheduling**

This task will be coordinated with the on-site visits to interview AJC staff as described in Part A. Once AJC sites have been selected and agreed to participate, scheduling and coordination of all site visits will be conducted by an IMPAQ team member dedicated to this task. This will involve: 1) assigning sites to site visit teams, 2) identifying an appropriate on-site liaison to discuss the physical assessments and to assist in the scheduling of site visits, 3) making travel arrangements, and 4) providing all site visit details to assigned team members.

## 2.2 Training

This analysis will be conducted by Evan Terry Associates (ETA), an architectural firm specializing in the study and application of facilities and program access requirements. ETA maintains trained, expert consultants for reviews of healthcare facilities, pharmacies, banks, hotels, convenience stores, utilities, large corporations, and federal, state and local government clients. ETA's work with the Americans with Disabilities Act (ADA) has earned the firm a nationwide reputation as one of the leaders in the field of access compliance and accessible design.

## 3. Physical Assessment Guide

### 3.1 Overview of Approach

Evan Terry Associates' (ETA) physical assessment surveys will begin at AJC arrival points used by customers, such as public transportation stops on the site, public sidewalks, accessible parking, and passenger loading zones (if provided). The ETA surveyors will then proceed to the accessible building entrance(s) used by the AJC customers and then to the customer entrance to the space. Once inside, the surveyors will look at which spaces customers use, including the resource room, how those spaces are used, and what equipment is used for delivery of the programs and services. ETA will also look at toilet rooms and any other important spaces and elements that are necessary for customer usability. Communications barriers that are structural in nature, like signage and alarm systems, will also be analyzed by the ETA team for their usability. When usability difficulties are identified, ETA will coordinate its findings with on-site IMPAQ team researchers to identify whether alternative methods of delivering the services are in use by the AJC.

Aside from a few minutes at the start of the data collection process needed to coordinate the survey schedule and room availability with the AJC's schedule, ***ETA team members will be able to complete the surveys with little or no input from staff at the Center.***

### 3.2 Categories of Physical Assessment

The following categories will be examined as part of the physical accessibility analysis:

- Accessible routes connecting streets, sidewalks, public transportation stop(s), accessible passenger loading zones, and accessible entrances on the site
- Curb ramps on the accessible routes
- Ramps on the accessible routes
- Public circulation paths within the site
- Accessible parking
- Accessible passenger loading zones (if provided)

- Public transportation stops on the site
- Exterior signage
- Facility entrance(s)
- Interior accessible routes
- Doors, gates, and hardware
- Ground and floor surfaces in accessible spaces and at accessible elements
- Interior circulation paths
- Interior signage
- Emergency alarm systems, pull stations, fire extinguishers, and signaling devices
- Public/trainee computer workstations
- Public/trainee tables, counters, work surfaces, & seating
- Self-service displays, public bulletin boards, and magazine/free literature racks
- Vending machines
- Public/trainee-operated controls
- Dispensers, receptacles, and public/trainee equipment
- Telephones
- Drinking Fountains
- Elevator lobbies
- Elevator cabs
- Platform lifts
- Stairs
- Toilet and bathrooms, fixtures, and accessories
- Service and information counters
- Public/trainee point of sale devices, kiosks, and interactive transaction machines
- Public/trainee storage lockers (if provided)

### **3.3 Analysis of Findings**

Following completion of their survey, Evan Terry Associates will provide a detailed report to the IMPAQ team partners identifying the barriers to customer usability that were found during their review. The surveyors will also assist the IMPAQ team site visitors in completing their assessment of the accessibility of the AJC using the survey tool.