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| **Indiana Department of Workforce Development - DWD Compliance and Policy Division (Compliance Team)** |
| **Equal Opportunity Pre-Monitoring Survey for PY2020-21** |

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| LWDA: | |
| Local EO Officer: | Date: |
| Email: | Phone: |

Directions & Interview Preparation

* Review the **“Benchmarks”** and mark the box “**☒**” for each benchmark your LWDA has achieved successfully.
* Add additional information as applicable within the **“Additional Comments”** section.
* Submit the completed survey via email to [**oversight@dwd.IN.gov**](mailto:oversight@dwd.IN.gov) by the due date.
* The State EO Officer will schedule the specific review time with the Local EO Officer during the week of the monitoring visit to review this survey and discuss your LWDA’s overall EO compliance.

*This survey is used as a pre-monitoring review tool and is NOT all-inclusive or limiting. For questions or concerns while completing the survey, please contact the State EO Officer at* [***EO@dwd.in.gov***](mailto:EO@dwd.in.gov)*.*

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| **Local Equal Opportunity Officer: 38.28 - 38.31** |
| Is the Local EO Officer ready to provide support? |
| Benchmarks:   |  |  | | --- | --- | |  | Recipient has designated a Local EO Officer | |  | Local EO Officer’s name, title/position, address, and telephone number have been made public at the local level (including on web-site); contact info appears on internal and external communications regarding nondiscrimination programs | |  | Local EO Officer is a senior level employee of the recipient | |  | Local EO Officer does not have other responsibilities that create a conflict or the appearance of a conflict with the responsibilities of an EO Officer | |  | Local EO Officer has sufficient staff and resources to carry out the EO requirements | |  | Local EO Officer has a solid knowledge of the EO Regulations (29 CFR Part 38) | |  | Local EO Officer undergoes mandatory training to maintain competency with WIOA Section 188 and its EO Regulations |   **Comments:** |
| Does the Local EO Officer understand their roles and responsibilities? |
| Benchmarks:   |  |  | | --- | --- | |  | The Local EO Officer reviews the recipient’s written policies to make sure that those policies are nondiscriminatory | |  | The Local EO Officer monitors and investigates the recipients and entities that receive WIOA Title I funds to ensure compliance | |  | The Local EO Officer tracks discrimination complaints filed against the recipient | |  | The Local EO Officer provides local area staff with EO training |   **Comments:** |
| **Notice and Communication: 38.34 - 38.40** |
| What action has the recipient taken to follow notice and communication requirements in 38.34? |
| Benchmarks:   |  |  | | --- | --- | |  | “EO is the Law” poster is posted prominently, in reasonable numbers and conspicuous places, on recipient’s Web site pages, and in employee and participant handbooks | |  | The EO tagline is printed in recruitment brochures and other materials that are distributed or communicated with participants and staff that describe requirements for participation | |  | All orientation sessions for new employees, new participants, and/or the general public include a discussion of rights and responsibilities of the nondiscrimination and equal opportunity provisions of WIOA and the EO Regulations | |  | Babel Notices written in multiple languages are included with vital documents | |  | Auxiliary aids or services are available in alternate formats (to ensure communication with individuals with disabilities or LEP individuals is as effective as communications with others) |   **Comments:** |
| **Assurance: 38.25** |
| Does the grantee provide a “Written Assurance” that complies with the recipient’s obligation of WIOA Section 188? |
| Benchmarks:   |  |  | | --- | --- | |  | Recipient is aware of its obligations and has the ability to comply with the nondiscrimination and equal opportunity provisions for the duration of the grant contract | |  | Recipient maintains a policy that describes how EO Regulations will be carried out | |  | The required assurance language of 29 CFR Part 38.25, or a reference to it, is provided on all grant applications, agreements, and contracts | |  | Local staff have reviewed and are aware of the current DWD EO policies and regional policies |   **Comments:** |
| **Affirmative Outreach: 38.40** |
| Has the recipient taken appropriate steps to ensure that they are providing equal access to their WIOA Title I-financially assisted programs and activities? |
| Benchmarks:   |  |  | | --- | --- | |  | The recipient conducts affirmative outreach to certain target groups | |  | The recipient advertises its programs and/or activities that specifically target various populations in the media, such as newspapers or radio programs | |  | The recipient sends appropriate notices about openings in its programs and/or activities to schools or community service groups that serve various populations | |  | The recipient consults with appropriate community service groups about ways to improve its outreach and service to various populations |   **Comments:** |
| **Accessibility: 38.13** |
| Is the recipient meeting its physical and programmatic accessibility obligations for individuals with disabilities? |
| Benchmarks:   |  |  | | --- | --- | |  | Individuals with disabilities have adequate parking spaces | |  | Individuals with disabilities have appropriate wheelchair accessibility (doors, space allowances, ramps, access routes) | | |  | Individuals with disabilities have appropriate restroom accommodations | | |  | Individuals with disabilities are afforded the opportunity to participate in services or training that is equal to or as effective as provided to non-disabled participants | | |  | Individuals with disabilities have been provided adequate working assistive technology, as needed | | |  | Staff has been trained on use of the assistive technology to properly assist participants | | |  | Meaningful accommodations are provided regarding registration for the provision of aid, benefits, services or training, including core and intensive training and support services, to individuals with disabilities | |   **Comments:** |
| **Data and Information Collection/Maintenance: 38.41** |
| Does the region collect and maintain data and other information securely to ensure compliance with the nondiscrimination and equal opportunity provisions of WIOA? |
| Benchmarks:   |  |  | | --- | --- | |  | Regional staff tracks applicants, registrants, eligible applicants, eligible registrants, participants, exited participants, employees, and applicants for employment | |  | Regional staff tracks race/ethnicity, sex, age, and where known, disability status, of every applicant, registrant, participant, exited participant, applicant for employment, and employee | |  | Regional staff tracks limited English proficiency and preferred language of each applicant, registrant, participant, and exited participants | |  | Beneficiaries/participants files are free of subjective and/or inappropriate remarks and comments such as on medical and disability information | |  | All medical or disability-related information, whether in hard copy, electronic, or both, is maintained in a SEPARATE file and treated as confidential | |  | Beneficiaries/participants sign the state’s program application/enrollment form (i.e., client application for ICC); acknowledgment of EO notice | |  | Beneficiaries/participants files are retained for at least three (3) years after close of the applicable program year | |  | Such information above is used only for the purposes of recordkeeping, reporting, and determining eligibility where appropriate | |  | The recipient ensures that eligibility criteria that can screen out or tend to screen out an individual with a disability is not being utilized unless such criteria can be shown as necessary |   **Comments:** |
| **Monitoring Recipients for Compliance: 29 CFR 38.51 and 38.53** |
| Does the region conduct local monitoring to ensure compliance with the nondiscrimination and equal opportunity provisions of WIOA? |
| Benchmarks:   |  |  | | --- | --- | |  | The recipient conducts annual reviews | |  | The recipient conducts data analysis | |  | The recipient investigates any significant different identified from the data analysis to see if the differences appear to be caused by discrimination |   **Comments:** |
| **Complaint Records: 38.69 – 38.72** |
| Has Recipient addressed and logged complaints in accordance with EO Regulations? |
| Benchmarks:   |  |  | | --- | --- | |  | The recipient has published procedures for processing complaints in accordance with 29 CFR Part 38 | |  | The Local EO Officer maintains a log of complaints for the entire region | |  | The Local EO Officer submits a copy of the log for their region to DWD every quarter | |  | Complaints of discrimination are retained for a period of no less than three (3) years after resolution | |  | Each Notice of Final Action was issued within 90 days of the date the complaint was filed |   **Comments:** |

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| **Are there any areas of concern or findings from last monitoring visit you wish to discuss?** |
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| **Additional Comments:** |
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Revised August 2020