

CITY OF LOS ANGELES

CALIFORNIA



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ECONOMIC AND WORKFORCE
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1200 W. 7TH STREET
LOS ANGELES, CA 90017

DATE: July 18, 2019

TO: LA's Workforce Development System

FROM: Gerardo Ruvalcaba, Director
Workforce Development System

Paul J. Nelson For GR

SUBJECT: WDS DIRECTIVE NO. 20-01
(Supersedes WDS Directive No. 18-02)

**REQUEST FOR EQUAL OPPORTUNITY (EO) COMPLAINTS OFFICER,
DISABILITY COORDINATOR, AND LIMITED ENGLISH PROFICIENCY
(LEP) COORDINATOR**

EFFECTIVE DATE

This directive is effective upon date of issue.

PURPOSE

The purpose of this directive is to request contact information and delineate the roles and responsibilities of the Equal Opportunity (EO) Complaints Officer, Disability Coordinator, and the Limited English Proficiency (LEP) Coordinator.

BACKGROUND

The City of Los Angeles Workforce Development Board's Annual Plan includes the Nondiscrimination and Equal Opportunity Policy which requires that each WorkSource Center/America's Job Center of California and YouthSource Center appoint an Equal Opportunity (EO) Complaints Officer, a Disability Coordinator to manage compliance with Section 504 of Rehabilitation Act regulations, and a LEP coordinator to manage compliance with Executive Order 13166 and the Dymally-Alatorre Bilingual Services Act.

Position Duties

The **Equal Opportunity Complaints Officer** is responsible for ensuring that the Workforce Innovation and Opportunity Act (WIOA) programs are delivered in full compliance with the State's Methods of Administration and for coordinating and implementing nondiscrimination and equal opportunity compliance obligations under additional Federal, State, and City regulations. The designated EO Complaints Officer must assure that official complaints brought under the WIOA are handled at the primary level and within required time frames. Handling complaints at the earliest level consists of acknowledging receipt of the complaint and scheduling informal resolution meetings; facilitating informal resolution meetings; and preparing the settlement agreement or notice of impasse. If a complaint proceeds to administrative hearing, the Center's EO Complaints Officer is expected to coordinate the

presentation of the Center's position before the administrative hearing officer, and possibly make the presentation on behalf of the Agency.

The EO Complaints Officer must routinely provide training to all Agency staff on equal opportunity-related topics and coordinate with the Disability Coordinator and LEP Coordinator to have them provide regular training on relevant disability and LEP topics. The EO Complaints Officer's contact information must be widely publicized to clients, partners, and staff. It is mandatory that the Center's EO Complaints Officer attend all EO Officer trainings provided by the Economic and Workforce Development Department (EWDD), as well as complete Legacy level I online training (Basic and Intermediate levels) if Legacy live training is not available. The module "Roles and Responsibilities," provided in the EO Officer's handbook, details additional duties of these positions. The EO Complaints Officer is responsible for completing the Physical and Program Accessibility (PPA) Checklist and coordinating the annual EO Compliance site visit.

The **Disability Coordinator** is responsible for developing and coordinating the Agency's ability to serve people with disabilities, particularly through participating in training offered through the EmployABILITY Partnership and the Legacy program. The Disability Coordinator must:

- Attend all EO Officer trainings;
- Complete Legacy I, II, and III training;
- Regularly attend meetings of the EmployABILITY Partnership;
- Regularly disseminate the information learned at these meetings to all staff in training sessions and at staff meetings.
- Assist EO Complaints Officer with yearly Physical and Program Accessibility (PPA) Checklist; and
- Maintain and compile disability-related resources and information.

The **LEP Coordinator** is responsible for developing and coordinating the Agency's ability to serve people with Limited English Proficiency. The LEP Coordinator must:

- Attend all EO Officer training.
- Complete Legacy I training (Basic and Intermediate).
- Attend all LEP Coordinator meetings;
- Disseminate the information learned at these meetings to all staff in training sessions;
- Maintain a list of staff members, including partner staff, who are bilingual.

It is useful, but not mandatory, to have designated alternates for each of these positions who have completed the training and are able to assist each of the coordinators. Designated alternates are especially useful when the coordinator is on vacation or leave. It is also very useful to have a trained alternate when it is necessary to make a change in the designated individual.

Performance Evaluation Criteria

Response to this directive will have an influence on two administrative capability factors. The response will be judged as to its timeliness (received by the deadline stated). The

designated Center's EO Complaints Officer, Disability Coordinator, and LEP Coordinator will be evaluated to determine if they have completed the requisite training(s).

ACTION REQUESTED

Each WorkSource/America's Job Center of California and YouthSource Center is requested to submit **in writing, on its own letterhead**:

- 1) The Center's name and address where city-funded WIOA services are being provided.
- 2) The name and email address of the Program Director.
- 3) The name, address, phone number, fax number, TTY number, and email address of the Center's designated EO Complaints Officer.
- 4) The name, address, phone number, fax number, TTY number, and email address of the designated Disability Coordinator.
- 5) The name, address, phone number, fax number, TTY number, and email address of the designated LEP Coordinator.

The response to this directive should be signed by the Center's Executive Director in acknowledgement of the extra duties and responsibilities assigned to these individuals. If there are designated alternates, please provide the same information for the alternates. **It is the responsibility of the Centers to notify the EO Compliance Unit immediately when there is a staffing change in any of the designated positions.**

DEADLINE FOR RESPONSE

The deadline for response is **August 23, 2019**. Please submit the requested information to:

Richard Cheng
EO Compliance Officer
City of Los Angeles
Economic & Workforce Development Department
1200 W. 7th Street, 6th Floor
Los Angeles, CA 90017

The response may be submitted electronically, as a scanned attachment, to Richard.Cheng@lacity.org.

CONTACT

If you have any questions or require further information, please contact Richard Cheng at (213) 744-9351 or TTY (213) 744-7290.

GR:RC:cg