

**Office of Workforce Opportunity (OWO)
 NH Business and Economic Affairs (DBEA)
 COMPLIANCE AND OVERSIGHT
 CONTRACT MONITORING
 PY19 EO REVIEW**

Workforce Innovation Opportunity Act Youth (CFDA 17.259)

On-Site Review Date: February 14, 2020

Attendee: Elizabeth Lafontaine, WIOA Youth Administrator
 Lisa Hinson-Hatz, DOE EO Officer (2/26/20)

Reviewer: Meelynn Wong, WIOA Program Manager, BEA/OWO

Report Date: March 23, 2020

Corrective Action:

There is one corrective action. The EO/Grievance form is determined as a vital document and should be available in Spanish. Please have the EO/Grievance form translated to Spanish, provide a copy to OWO, and have it easily accessible for potential customers beginning 30 days from the date of this report.

Color Code Definitions

YES	Meeting Performance		
NO	Not Applicable	Performance Improvement is Needed	Not meeting performance, corrective action required

Element 1: Designation of EO Officer(s)

Name of Local EO Officer:	Yes	No	Lisa Hinson-Hatz, DOE WIOA Administrator
To whom does the EO Officer report? Please provide a job description for the EO Officer.	Yes	No	Deputy Commissioner, NH Dept. of Education. Job Description on file with OWO.
Describe any non-EO related job functions that may create a conflict of interest or the appearance of a conflict of interest.	Yes	No	As the DOE WIOA Administrator, Ms. Hinson-Hatz does not have related job functions that may create a conflict of interest.
How is the EO Officer's identity made known to participants and service providers?	Yes	No	The State EO Officer's is the contact person in the EO is the Law poster materials. In addition, EO Officers' identities are made known at all WIOA partner EO trainings.
On what internal and external communication concerning the Local Workforce Area nondiscrimination and equal opportunity programs does the EO officer's identity and contact information appear? Please provide examples.	Yes	No	NH is a single workforce area. The State EO Office contact information is on the Grievance form and EO is the Law Poster.
Does this person <ul style="list-style-type: none"> • Process complaints? • Review participant reports for equality of service? • Provide EO training to staff and contractors? • Review written policies to make sure they are non-discriminatory? • Develop and publish discrimination complaint procedures? 	Yes	No	<ul style="list-style-type: none"> • As the EO Officer Ms. Hinson-Hatz may process complaints. • Elizabeth Lafontaine as the WIOA Youth Administrator has access to participants' reports for equality of service. • EO training of staff and contractors is provided by the State OWO office. • Ms. Lafontaine, in writing and reviewing policies, works to ensure they are non-discriminatory. • The WIOA discrimination complaint procedures were developed at the state level by OWO.
What equal opportunity training has been provided to staff (please specify date and locations)	Yes	No	DOE staff and its contractors' staff have been provided EO training as coordinated by the NH Works Professional Development Team. The training was available at each of the NH Works Offices as well as able to access remotely on their computer screens. The training date was November 13 th , 2019. WIOA Youth Administrator,

			Program Specialist, and all contract staff from My Turn and JAG attended the EO training. Any new staff hired after November 13 th will view the EO training electronically when available.
What training has been provided to service providers and contractors? Please be specific.	Yes	No	Service providers and staff were included in the November 13 th , 2019 EO training. They were able to access the training at either the NH Works office or at their program site via computer remote access.
What professional training has the Local EO Officer attended? Identify the training received and dates.	Yes	No	The EO Officer attended the EO training on November 13, 2019 and review ADA requirements online. https://www.nh.gov/disability/links/index.htm
Describe staffing support for the EO Officer, if any.	Yes	No	Ms. Lafontaine is the WIOA Youth Administrator. She conducts contractor on-site reviews that include questions pertaining to EO and site accessibility.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested.

Element 2: Notice and Communication

Where are the WIOA “Equal Opportunity is the Law” posters displayed and which versions are displayed – English, Spanish or both? Are they posted in reasonable numbers and places? Are the posters centrally located and in plain sight?	Yes	No	The EO is the Law posters are posted in plain site at the DOE Site and Ms. Lafontaine report that the contractors’ posters are in plain site as well. At DOE the posters are displayed in English only. EO is the Law posters are available in English, Spanish, and French.
How is it ensured that participants are notified of their rights to file a complaint? Does the form include the required WIOA “Equal Opportunity is the Law” language? Please provide applicable copies of applicable documents.	Yes	No	Participants are notified of their rights to file a complaint through the EO and grievance form submitted for their review and signature as part of the application process.

<p>What steps are taken to see that continuing notice is provided in the appropriate language when a significant number or proportion of the population eligible to be served, or likely to be directly affected, need service or information in a language other than English.</p>	Yes	No	<p>When there is a significant number or proportion of the population eligible to be served, or likely to be directly affected, that needed service or information in a language other than English - steps would be taken to translate materials in the appropriate language and interpreters would be brought in. The EO is the law poster is available in English, Spanish, and French.</p>
<p>What equal opportunity tagline is included in brochures, pamphlets and flyers? In which is it included? What other forms of communications is the tagline included in? (I.e. materials distributed or communicated in written, oral or electronic form to applicants, staff and the general public). Is the tagline included in program announcements and broadcasts? The appropriate tagline indicates that the WIOA Title I- financially assisted program is an “equal opportunity employer/program” and that “auxiliary aids are services are available upon request to individuals with disabilities”. Please provide examples.</p>	Yes	No	<p>Outreach materials are developed by the service providers and on all brochures, pamphlets, and flyers include the EO tagline. The EO tag line is also printed out on all OJT and ITA contracts through Eteams (computerized case management system).</p>
<p>How does the DOE ensure that continuing notice is provided to the following applicable groups that it does not discriminate on any prohibited ground:</p> <ul style="list-style-type: none"> • Applicants, registrants, participants • Employees and applicants for employment • Other recipients of WIOA funds • Members of the public • Members of the public with disabilities, including impaired vision and hearing • Unions or professional organizations that hold collective bargaining or professional agreement with your organization 	Yes	No	<p>The continuing notice is provided in the EO is the Law poster, intake grievance forms, personnel hiring of both state and contractor personnel, web site and official documents to reach the public. Members of the public with disabilities may access the materials through the web (i.e. JAWS software) or through accessibility materials available at the NH Works offices or the schools.</p> <p>Collective bargaining unit follows the state personnel rules in compliance with federal funding and laws.</p>

Describe how photographs and other pictorial displays include and portray positive images of women, minorities, and individuals with disabilities and persons of varying age groups engaged in a variety of workplace and skilled training capacities.	Yes	No	When these photographs or pictorial displays are used DOE secures pictures from its contractors with appropriate sign-off releases
How has the DOE communicated the requirement not to discriminate on the basis of disability and the obligations to provide reasonable accommodations to its sub-recipients?	Yes	No	This requirement is communicated through both written and training to DOE personnel and its contractors. They are aware that support service funds can provide for accommodations or partner with Vocational Rehabilitation as appropriate.
What efforts does the DOE make to ensure that communications with individuals with disabilities are just as effective as communication with others? In all communications indicating that the Agency may be contacted by telephone, is the telephone number for the TDD/TTY or relay service provided?	Yes	No	The Department of Education has both phone and TDD Access number on its web site. DOE may reach out for interpreter services for sign language when needed.
How is the Equal Opportunity Notice provided in alternate formats for individuals with visual impairments?	Yes	No	Should the EO notice be needed in alternative formats, it would be provided based on the applicant's preference (braille, software enlarger, reader, etc.). The contractors as well as its service providers work closely with both the NH Works Centers as well as Vocational Rehabilitation. DOE also collaborates with Services for the Blind and Visionally impaired to offer larger printed items when needed.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested.

Element 3: Assurances

Do contracts contain the approved equal opportunity assurance language?	Yes	No	The ITA, Work Experience and OJT training contracts include the EO assurance statements. This is automatically done through Eteams.
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How the contractor or service provider is made aware that the EO assurances are incorporated by operation of law whether or not it is physically incorporated in the contract or agreement?	Yes	No	The contractors are aware through mandatory EO training. In NH, the ITA, OJT, and work experience contracts are developed through the Eteams system which has the requisite language.
How do you ensure equal opportunity and nondiscrimination for employees? What equal opportunity and nondiscrimination policies are in place for employees? Please provide a copy.	Yes	No	The Department of Education is a state agency and follows state personnel requirements. Their policies can be found at https://das.nh.gov/hr/policy.html EO policies are also included in their Contractors manual. All WIOA Youth staff from DOE and Contractors employed at the time attended the annual EO training conducted by OWO on 11/13/19.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 4: Universal Access

Describe efforts to conduct a demographic analysis of the population to be served using labor market information?	Yes	No	The WIOA Case Management System, E-Teams, has a demographic section for review by Program Administrators. Program administrator also looks at school communities demographics. In addition, a EO monitoring review report for each program year is provided to DOE by OWO. Copy of report is attached.
What reasonable steps has the Department taken to ensure services and other information is provided to Limited English Proficient persons?	Yes	No	In WIOA Youth, there are two programs: 1) In-School youth - DOE's contractors work closely with the respective school district to ensure appropriate services are provided to limited English Proficient persons. 2) The Out-of-School Youth program works with the Adult Education Centers to ensure they have an understanding of English to be able to succeed in the programs.
In what languages is information provided, other than English?	Yes	No	Spanish and French as well as the Babel and English language line.

What documents have been determined “vital” and translated into languages designated as essential? Please provide examples.	Yes	No	EO is the Law poster and the Release of Information Form is in both English and Spanish. The Grievance/EO Complaint form should also be translated in Spanish.
What brochures, pamphlets and flyers include a TTY/TDD or Relay Service telephone number for the hearing impaired?	Yes	No	The DOE website includes the Relay Service phone number. All contracts include TTY/TDD telephone number and EO tagline.
How are the required notifications provided in alternative forms for the visually impaired?	Yes	No	Notifications would be provided through appropriate software that enlarges the print, or a reader depending on the applicant’s preferred choice. Currently, no requests have been made to utilize those services.
How do training providers provide programmatic and architectural accessibility for individuals with disabilities?	Yes	No	DOE and its contractors follow the ADA Accessibility Checklist.
What outreach plans, strategies, and activities have been identified for various groups (members of both sexes, various racial and ethnic groups, individuals with disabilities, individuals in differing age groups) served?	Yes	No	DOE contractors are responsible for outreach dependent on program eligibility requirements (i.e. . age). DOE contractors do outreach to Voc. Rehab., NH Works, Adult Education, Job Corps, K-12, and SNAP programs. For OSY programs outreach is often done through word of mouth and having a bilingual staff that can speak Spanish has assisted with outreach as well.
Do these measures include: Advertising? Notices to schools and community service groups? Consultation with community service groups?	Yes	No	DOE Contractors are responsible for advertising and recruiting within the schools and community groups. DOE contractors advertise in local communities and attend partner meetings. DOE in conjunction with its contractors conducts partner recruitment and referral sessions to the NH Works partners.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested.

Element 5: Compliance with Section 504

Does the DOE have an Americans with Disability Act (ADA) self-survey on file? If yes, provide a copy.	Yes	No	The State of NH has an ADA accessibility survey on file at https://www.nh.gov/disability/links/index.htm For more information: https://www.nh.gov/disability/
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<p>Have ADA assessments been completed for One-stops and affiliates. If so, please explain the shortfalls. If not, when are they anticipated?</p>	Yes	No	<p>The NH Works Consortium is responsible for the one-stop and its affiliates' accessibilities. According to the PY19 NH Works Comprehensive NH Works On-Site Review all partners are following required laws that include: Section 188 of the WIOA Nondiscrimination and EO Regulations, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990.</p>
<p>If structural changes are needed, is there a transition plan on file? If so, please provide a copy. If not, please explain when they are anticipated to be completed.</p>	Yes	No	<p>Not applicable</p>
<p>Are contractor and service provider sites accessible to individuals with disabilities?</p> <ul style="list-style-type: none"> • Is there at least one entrance to the buildings that are wheel chair accessible? If yes, does it have the international symbol for accessibility for individuals with disabilities posted? If no, where are these participants directed to go? Explain. • Do inaccessible entrances have signs indicating the location of the nearest accessible location? Explain • Are there designated restrooms with appropriate signage available for individuals with disabilities? Explain • Are TTD/TDD or Relay Services available for use? Explain • How often are contractor's facilities monitored to ensure accessibility? 	Yes	No	<p>DOE and its contractors and host sites (i.e. schools and community sites) are accessible to individuals with disabilities.</p>
<p>Describe efforts to prohibit discrimination on the basis of disability in employment practices by the DOE and its partners?</p> <ul style="list-style-type: none"> • Requiring the provision of reasonable accommodations in employment when appropriate. • Reviewing job qualifications to ensure that it does not use selection criteria that screens out or tends to screen out an individual with a disability on the basis of that 	Yes	No	<p>New job descriptions are reviewed by multiple staff to ensure non-discrimination. New hires are only asked to self-identify upon hiring.</p> <p>This is an on-going training area and included in various reviews including support service (looking for accommodation).</p>

<p>disability unless the criteria is job related for the position in question and consistent with business necessity.</p> <ul style="list-style-type: none"> Prohibiting pre-employment inquiries regarding disability except to ask for individual to self-identify himself or herself as a person with a disability on a voluntary basis for reporting purposes and will be maintained confidentially. 			
<p>How does the DOE ensure that it does not aid or perpetuate discrimination by providing significant assistance to a person or entity that discriminates on the basis of disability?</p>	Yes	No	<p>Neither DOE nor its contractors aid or perpetuate discrimination. Personnel reviews employee applications to determine if they meet the job description requirements and then referred for an interview.</p> <p>Individuals with disabilities are a focus population for WIOA Youth services.</p>
<p>How does the DOE ensure that programs and activities are administrated in the most integrated settings possible?</p>	Yes	No	<p>There are no non-integrated settings within DOE or its Contractors' sites. Contractors are located in the communities they serve. Youth programs are operated in separate sites but are connected and work closely with the extensive NH Works partner system.</p>
<p>How does the DOE ensure that, in determining the site or location of a facility, selections are not made that have a discriminatory effect?</p>	Yes	No	<p>DOE ensures that its contractors' sites are in close proximity to the populations eligible for our training programs.</p>
<p>How does the DOE ensure that eligibility criteria that screen out or tend to screen out an individual with a disability or class of individuals with disabilities are not imposed unless such criteria can be shown to be necessary for the provision of the aid, benefit, service, training, program or activity being offered?</p>	Yes	No	<p>The WIOA Youth program does outreach to target groups and individuals with disabilities are identified as a target population.</p> <p>PY18 Demographic Data reflects that 74 (38.14%) participants had a self-disclosed disability. In PY17 there were 92 (47.42%) participants that had a self-disclosed disability.</p>
<p>How does the DOE ensure that an individual with a disability is not required to accept an accommodation, aid, benefit, service,</p>	Yes	No	<p>Multiple options are offered to best address the accommodation need for an individual with a disability,</p>

training, or opportunity that the individual chooses not to accept?			but the individual is not required to accept it. The individual has input in deciding what type of accommodation is needed.
How does the DOE ensure that, for employment-related training, the selection criteria are reviewed to ensure that they do not screen out, or tend to screen out, an individual with a disability or any class of individuals with disabilities from fully and equally enjoying the training unless the criteria can be shown to be necessary for the training being offered?	Yes	No	<p>The assessment, Individual Service Strategy, and training process require participants to be referred to employment-related training and employers that align goals and objectives.</p> <p>Furthermore, all training providers registering for the Eligible Training Provider list program must answer yes to the question, "Is your institution (or the location where your programs are to be held) accessible for individuals with disabilities," to be eligible for the program.</p>
Please describe the availability of assistive equipment for individuals with disabilities.	Yes	No	Assistive equipment is available through support services and/or through partnering with Vocational Rehabilitation or other NH Works partners.
Please describe the DOE web site in regards to its ADA accessibility.	Yes	No	As part of the State, the Employee Policies and Procedures has information on ADA at https://das.nh.gov/hr/policy.html
<p>Please describe any reasonable accommodations that have been provided for applicants, participants, or employees with disabilities.</p> <p>How are reasonable accommodations provided regarding the registration for, and the provision of, aid, benefits, services or training--including core and intensive training--and support services to qualified individuals with disabilities?</p>	Yes	No	<p>An example:</p> <ul style="list-style-type: none"> • Larger print CASAS test and referral to Voc. Rehab. <p>These reasonable accommodations were offered but not accepted.</p> <p>The State of NH has accommodation policies that can be found at https://das.nh.gov/hr/policy.html</p>

<p>Describe how you meet the obligation of a recipient to operate programs or activities so that, when viewed in their entirety, they are readily accessible to qualified individuals with disabilities, through means such as: redesign of equipment; reassignment of classes or other services to accessible buildings; assignment of aides to beneficiaries; home visits; delivery of services at alternative accessible sites; alteration of existing facilities and construction of new facilities in conformance with standards for new construction; or any other method that results in making its program or activity accessible to individuals with disabilities?</p> <p>Does the Local Workforce Investment Area have a written reasonable accommodation policy? If so, please provide a copy.</p>			<p>It was requested that the State of NH accommodation policy be adopted on the contractor level as well at My Turn and JAG.</p>
<p>Describe how medical condition information is maintained separate from other files and secured.</p>	Yes	No	<p>DOE would maintain medical information on its employees in personnel in separate secured file. Contractors also maintain medical information in separate files and secured drawers. A review training on this was conducted by DOE on December 11, 2019.</p>
<p>Do you need technical assistance in this element?</p>	Yes	No	<p>No technical assistance was requested or provided.</p>

Element 6: Data and Information Collection and Maintenance

<p>Please explain how EO data has been collected (race/ethnicity, sex, age, and where known, disability status)?</p>	Yes	No	<p>The EO data is collected through case management system at the intake stage for its applicants for services.</p>
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			For staff, it is collected through voluntary post hiring provided at new hire intake – self describing survey.
<p>Please explain how statistical/quantifiable analysis with regards to the population being served has been conducted?</p> <ul style="list-style-type: none"> • How are these data maintained under safeguards that will restrict access to authorized personnel only? Please explain. • Are records kept for a period of three years? • How is staff made aware that data must be collected on race, sex, age, disability, etc.? • How is the data collected by staff? 	Yes	No	<p>Data is provided by the State OWO office as a result of an Eteams report. Material is maintained by authorized personnel with access codes (specific contractor case manager, DOE personnel and OWO personnel).</p> <p>Records are kept for three years after completion of follow-up services. If the file is selected for data validation review or EO complaint, it would be kept for an additional three years.</p> <p>Staff are aware that data is collected via the client’s application requirements in e-teams (or some data is self-reporting (i.e. disability))</p>
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 7: Monitor Recipients for Compliance

<p>List the EO Officer monitoring visits conducted for One-Stops, Affiliates and service providers?</p> <p>How often is on-site monitoring conducted?</p> <p>Please provide a record and/or summary report of the EO monitoring visits (dates, locations, entities and findings) since your last WIOA Monitoring Review.</p>	Yes	No	<p>DOE is not responsible for monitoring of the one-stops; this task is the responsibility of the Consortium or OWO staff.</p> <p>DOE conducts quarterly desk reviews of its contractors and annual on-site reviews for each of the contractors’ sites which include EO requirements.</p>
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Do you need technical assistance in this element	Yes	No	No technical assistance was requested or provided.
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Element 8: EO Complaint Processing Procedures

What discrimination complaint policies and procedures are used?	Yes	No	<p>WIOA Youth DOE has complaint process and procedures similar to OWO and would follow should there be a need.</p> <p>The Complaint process would follows the Equal Opportunity – Civil Rights complaint process and it would be handled by the EO Officer.</p> <p>If it was a non-civil rights programmatic grievance the WIOA Youth Administrator could handle the grievance.</p>
Explain how customers and employees obtain a copy of the discrimination complaint policy and procedures and/or discrimination complaint form?	Yes	No	The discrimination complaint policy and procedures are provided at eligibility for participants and through orientations for newly hired WIOA Youth staff. This information is reviewed as part of annual training.
<p>Does the discrimination complaint log for formal discrimination complaints include the following:</p> <ul style="list-style-type: none"> • Name and address • Basis of complaint • Brief description of complaint • Date filed • Disposition <p>Please provide a copy of the discrimination complaint log for review.</p>	Yes	No	The EO Officer, Lisa Hinson-Hatz, would hold a log; however, there has never been an EO related complaint.
Please list any formal complaints that have been filed with the Department of Education since the last EO monitoring visit.	Yes	No	Not applicable – there has not been any EO complaints.

<p><u>Please respond to the following concerning each complaint:</u></p> <ul style="list-style-type: none"> • Was the complaint filed within 180 days? • Was the complainant provided a written notification of receipt of the complaint within 10 days? • Was the complainant provided a written statement of each of the issues raised in the complaint and whether you would accept or reject each issue? • Was the complainant sent a written notice of lack of jurisdiction when the Department of Education determined that it did not have jurisdiction over a complaint? • Was the complainant notified that they have the right to representation in the complaint process? • Was the complainant offered Alternative Dispute Resolution as an effort to resolve the complaint? • Was the complainant provided a written Notice of Final Action within 90 days of the date the complaint was filed? • Did the Notice of Final Action contain your decision on each issue and an explanation of the reason underlying the decision? 			
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<ul style="list-style-type: none"> • Did the Notice of Final Action inform the complainant that he/she has a right to file a complaint with CRC within 30 days of the date in which the Notice of Final Action is issued if he/she is dissatisfied with your final action on the complaint? • Has the State EO Officer been advised of the complaint? 			
Describe the process established to keep the discrimination complaint records for a period of three years?	Yes	No	The process would include maintaining the files for three years – following the regular record retention process.
Describe the process for keeping the identity of the complainant or any individual who furnishes information relating to, or assisting in, an investigation confidential to the extent possible, consistent with a fair determination of the issues.	Yes	No	DOE WIOA Youth would follow the related policies pertaining to confidentiality and grievance handling.
How is an individual who filed a complaint, opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA, or assisted or participated in any manner in an investigation protected from discharge, intimidation, retaliation, threat or coercion?	Yes	No	Through policy, the individual would be protected from discharge, intimidation, retaliation, threat and coercion.
Describe the policy for handling discrimination complaints from contractors regarding participants.	Yes	No	They would handle the complaints in the same manner as for individuals.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested.

Element 9. Corrective Actions/Sanctions

Describe the procedures for obtaining voluntary compliance when equal opportunity violations are found. What is the follow up policy for violations?	Yes	No	There have been no equal opportunity/sanctions.
Describe any corrective actions/sanctions taken against contractors since the last monitoring review.	Yes	No	There have been no equal opportunity/sanctions.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested.

DOE EO SUMARY PY18 REPORT

Data Analysis: 70.49% of all potential female customers were enrolled and 80.56% of all potential male customers were enrolled. 72.97% of all potential customers with a disability were enrolled, 75.16% of potential white customers were enrolled, 91.3% of potential black customers were enrolled, and 75% of Hispanic/Latino potential customers were enrolled. Since the sample size is so small both DOE and OWO staff will continue to monitor demographics.

DOE EO SUMARY REPORT PY18

Ages

Criteria	Totals Counts	Ages												
		Female	Male	14	15	16	17	18	19	20	21	22	23	24
Potential Customers	194	122	72	0	16	15	21	40	23	17	12	14	19	17
Percent of Total		62.89%	37.11%	0.00%	8.25%	7.73%	10.82%	20.62%	11.86%	8.76%	6.19%	7.22%	9.79%	8.76%
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Enrolled	144	86	58	0	9	11	14	29	18	13	10	9	18	13
Percent of Potential	74.23%	70.49%	80.56%	0.00%	56.25%	73.33%	66.67%	72.50%	78.26%	76.47%	83.33%	64.29%	94.74%	76.47%
o														
Did not Enroll	50	36	14	0	7	4	7	11	5	4	2	5	1	4
Percent of Potential	25.77%	29.51%	19.44%	0.00%	43.75%	26.67%	33.33%	27.50%	21.74%	23.53%	16.67%	35.71%	5.26%	23.53%

VET	Disabled	White	Hispanic / Latino	Black / AA	Asian	Amer Ind / Alask Nat	Hawaiin / Pacific Isl
3	74	153	12	23	5	1	4
1.55%	38.14%	78.87%	6.19%	11.86%	2.58%	0.52%	2.06%
u							
1	54	115	9	21	4	1	3
33.00%	72.97%	75.16%	75.00%	91.30%	80.00%	100.00%	75.00%
o							
2	20	38	3	2	1	0	1
66.67%	27.03%	24.84%	25.00%	8.70%	20.00%	0.00%	25.00%

**DOE EO SUMMARY
REPORT PY17**

Ages

Criteria	Totals Counts	Ages												
		Female	Male	14	15	16	17	18	19	20	21	22	23	24
Potential Customers	244	148	96	6	13	24	38	45	31	27	22	11	15	12
Percent of Total		76.29%	49.48%	3.09%	6.70%	12.37%	19.59%	23.20%	15.98%	13.92%	11.34%	5.67%	7.73%	6.19%
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Enrolled	190	113	77	6	10	18	25	34	24	22	19	10	12	10
Percent of Potential	77.87%	76.35%	80.21%	100.00%	76.92%	75.00%	65.79%	75.56%	77.42%	81.48%	86.36%	90.91%	80.00%	83.33%
o														
Did not Enroll	54	35	19	0	3	6	13	11	7	5	3	1	3	2
Percent of Potential	22.13%	23.65%	19.79%	0.00%	23.08%	25.00%	34.21%	24.44%	22.58%	18.52%	13.64%	9.09%	20.00%	16.67%

	VET	Disabled	White	Hispanic / Latino	Black / AA	Asian	Amer Ind / Alask Nat	Hawaii / Pacific Isl
	0	92	189	13	33	4	0	3
	0.00%	47.42%	97.42%	6.70%	17.01%	2.06%	0.00%	1.55%
o								
	0	82	149	12	27	3	0	2
	0.00%	89.13%	78.84%	92.31%	81.82%	0.00%	0.00%	66.67%
o								
	0	10	40	1	6	1	0	1
	0.00%	10.87%	21.16%	7.69%	18.18%	0.00%	0.00%	33.33%

Office of Workforce Opportunity
NH Department of Business and Economic Affairs (DBEA)
Contract Monitoring
PY 19 EO Modified O-Site Monitoring Review
Workforce Innovation Opportunity Act Formula Funds (CFDA 17.258 and 17.278)

Contract Agency: Southern New Hampshire Services

Phone Interview/Desk Date: June 5, 2020

Reviewer: Bonnie St. Jean, WIOA Administrator, OWO

Review Attendees: Greg Schneider, EO Officer

 Matt Russell, Director of WIOA Programs

Report Date: June 5, 2020

Note: The Office of Workforce Opportunity Monitoring Plan for PY19 had planned an on-site Equal Opportunity Review. With the challenges of COVID-19, a modified review process was used. The review was conducted via phone call.

Purpose of Review: To ensure Contractor complies with Equal Opportunity requirements

Corrective Action: There are no corrective action issues.

Areas of Concern: There are no areas of concern.

Color Code Definitions

YES	Meeting Performance		
NO	Not Applicable	Performance Improvement is Needed	Not meeting performance, corrective action required

Element 1: Designation of EO Officer(s)

Name of Local EO Officer:	Yes	No	Greg Schneider
To whom does the EO Officer report? Please provide a job description for the EO Officer.	Yes	No	Executive Director of Southern NH Services. Job Description is on file from earlier reports.
Describe any non-EO related job functions that may create a conflict of interest or the appearance of a conflict of interest.	Yes	No	Mr. Schneider’s other duties include grant writer and managing budgets for three non-WIOA funded grants. If there was a conflict, the matter could be handled by their Personnel Manager or referred to OWO for handling.
How do participants and service providers know the EO Officer’s identity made?	Yes	No	The EO position in made known through handbooks for employees and through grievance forms given to applicants for services as part of the intake process.
On what internal and external communication concerning the nondiscrimination and equal opportunity programs does the EO officer’s identity and contact information appear? Please provide examples.	Yes	No	The EO position in made known through handbooks for employees and through grievance forms given to applicants for services as part of the intake process
Does this person <ul style="list-style-type: none"> • Process complaints? • Review participant reports for equality of service? • Provide EO training to staff and contractors? • Review written policies to make sure they are non-discriminatory? 	Yes	No	Should there be an EO compliant they would be responsible for processing the complaint or referring to OWO. Mr. Schneider and or Mr. Tabor review reports for equality of services for employees. The WIOA Director reviews reports for services. All parties review written

<ul style="list-style-type: none"> Develop and publish discrimination complaint procedures? 			<p>policies to make sure they are non-discriminatory as well as staff from OWO.</p> <p>Staff and clients may follow the OWO EO complaint procedures.</p>
What equal opportunity training has been provided to staff (please specify date and locations)	Yes	No	EO training was provided by OWO Staff In Fall, 2019. In addition, an EO training PowerPoint was developed and distributed to the NH Works partners to ensure on-going annual training.
What training has been provided to service providers and contractors? Please be specific.	Yes	No	SNHS's service providers and contractors do not have a large enough cumulative WIOA funding to warrant training. Should that occur, they would attend the OWO sponsored trainings.
What professional training has the Local EO Officer attended? Identify the training received and dates.	Yes	No	Mr. Schneider attends the annual trainings conducted by OWO. He reviewed the power point materials in PY19.
Describe staffing support for the EO Officer, if any.	Yes	No	Mr. Schneider has access to all WIOA funded staff as well as other personnel resources within the agency.
Do you need technical assistance in this element?			No technical assistance was requested or provided.

Element 2: Notice and Communication

<p>Where are the WIOA "Equal Opportunity is the Law" posters displayed and which versions are displayed – English, Spanish or both?</p> <p>Are they posted in reasonable numbers and places?</p> <p>Are the posters centrally located and in plain sight?</p>	Yes	No	<p>The poster is in English, French, and Spanish and posted outside of the Personnel Office. In addition, they are posted at each of the NH Works offices where staff is providing services to individuals. They are in reasonable number and placed located in plain sight.</p>
How is it ensured that participants are notified of their rights to file a complaint? Does the form include the required WIOA "Equal Opportunity is the Law" language? Please provide applicable copies of applicable documents.	Yes	No	As part of the intake process, clients sign a grievance form that includes the EO is the law language after review with the Career Navigator.

<p>What steps are taken to see that continuing notice is provided in the appropriate language when a significant number or proportion of the population eligible to be served, or likely to be directly affected, need service or information in a language other than English.</p>	Yes	No	<p>There are discussions with Career Navigators and Managers to determine if there are new language populations being served. In conjunction with the NH Works partners, the babel would be updated. If the populations were to increase, the State Interagency Group would update the EO is the law poster accordingly.</p>
<p>What equal opportunity tagline is included in brochures, pamphlets and flyers? In which is it included? What other forms of communications is the tagline included in? (I.e. materials distributed or communicated in written, oral or electronic form to applicants, staff and the general public). Is the tagline included in program announcements and broadcasts? The appropriate tagline indicates that the WIOA Title I- financially assisted program is an “equal opportunity employer/program” and that “auxiliary aids are services are available upon request to individuals with disabilities”. Please provide examples.</p>	Yes	No	<p>The tagline is in all WIOA funded brochures as well as the Rockingham Community Action (though does not include statement “auxiliary aids upon request” nor TTD/TTY relay information. The annual report has the USDA Nondiscrimination Statement. The Personnel Policies Handbook has six pages pertaining to Equal Employment Opportunity.</p>
<p>How does the Contractor ensure that continuing notice is provided to the following applicable groups that it does not discriminate on any prohibited ground:</p> <ul style="list-style-type: none"> • Applicants, registrants, participants • Employees and applicants for employment • Other recipients of WIOA funds • Members of the public • Members of the public with disabilities, including impaired vision and hearing • Unions or professional organizations that hold collective bargaining or professional agreement with your organization 	Yes	No	<p>The Personnel Policies Handbook has a section on Equal Employment Opportunity.</p> <p>Applicants receive a Grievance form that is explained by the Career Navigator and a copy is included in their program files.</p> <p>Vendors receive an assurance in each of their contracts about non-discrimination.</p> <p>The Contractor and its staff are not part of a union or collective bargaining unit.</p>
<p>Describe how photographs and other pictorial displays include and portray positive images of women, minorities, and individuals with disabilities and persons of varying age groups engaged in a variety of workplace and skilled training capacities.</p>	Yes	No	<p>The WIOA program has limited pictures in their publications. Should there be a need; participants’ pictures would be used with appropriate release of</p>

			information. There is conscience concern for diversity when selecting pictures for promotional materials.
How has the Contractor communicated the requirement not to discriminate on the basis of disability and the obligations to provide reasonable accommodations to its sub recipients?	Yes	No	The Contractor dos not have any WIOA subrecipients.
What efforts does the Contractor make to ensure that communications with individuals with disabilities are just as effective as communication with others? In all communications indicating that the Agency may be contacted by telephone, is the telephone number for the TDD/TTY or relay service provided?	Yes	No	There are several resources available including TTY/TTD and Relay NH, interpreters, and collaborating with Vocational Rehabilitation.
How is the Equal Opportunity Notice provided in alternate formats for individuals with visual impairments?	Yes	No	The notice can be accessed through software at the staff's office; accessing braille reader at NH Works or through partner resources (Vocational Rehabilitation).
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 3: Assurances

Do contracts contain the approved equal opportunity assurance language?	Yes	No	All the contracts utilized by the Contractor were developed by OWO (OJT and ITA) and tracked through the computerized case management system (Eteams).
How the contractor or service provider is made aware that the EO assurances are incorporated by operation of law whether or not it is physically incorporated in the contract or agreement?	Yes	No	EO assurances are in the Request for Proposal, signed off by the Contractor, as well as following state and federal laws pertaining to EO.
How do you insure equal opportunity and nondiscrimination for employees? What equal opportunity and nondiscrimination policies are in place for employees? Please provide a copy.	Yes	No	The Personnel Policies Handbook has policy information contained within the handbook.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 4: Universal Access

Describe efforts to conduct a demographic analysis of the population to be served using labor market information?	Yes	No	The contractor looks at labor market information and population trends to ensure both the hiring of staff and
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			services to participants compliments the community. Monthly demographic review
What reasonable steps has the Contractor taken to ensure services and other information is provided to Limited English Proficient persons?	Yes	No	For participants, use of interpreters and language line as well as for staff. Examples include an interpreter regarding a family medical leave need; working with Adult Education to provide services to their ESL clients within WIOA funded training.
In what languages is information provided, other than English?	Yes	No	French and Spanish; other languages available through language line.
What documents have been determined “vital” and translated into languages designated as essential? Please provide examples.	Yes	No	Grievance forms – Forms are on file in the SNHS Operations Manual.
What brochures, pamphlets and flyers include a TTY/TDD or Relay Service telephone number for the hearing impaired?	Yes	No	All brochures are developed in conjunction with OWO and contain appropriate tag line(s).
How are the required notifications provided in alternative forms for the visually impaired?	Yes	No	They are available through braille, computer software programs, and/or a reader.
How do training providers provide programmatic and architectural accessibility for individuals with disabilities?	Yes	No	All training providers, to be eligible, need to be licensed by the State of NH, Post-Secondary Education Commission or other appropriate licensing board (i.e. Nursing Department, Cosmetology, etc.). As part of their licensing requirements, they need to be handicapped accessible.
What outreach plans, strategies, and activities have been identified for various groups (members of both sexes, various racial and ethnic groups, individuals with disabilities, individuals in differing age groups) served?	Yes	No	There are several avenues including promotion to community outreach groups promoting the program; working with NH Works partners for referrals especially Adult Education ESL classes for program enrollment.
Do these measures include: Advertising? Notices to schools and community service groups? Consultation with community service groups?	Yes	No	These measures do include meeting and working with community service groups.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 5: Compliance with Section 504

Does the Contractor have an Americans with Disability Act (ADA) self-survey on file? If yes, provide a copy.	Yes	No	The Contractor has a Facilities Supervisor on staff to ensure the self-survey and accessibility is occurring at all their properties. If the facility (i.e. Pine Street second floor) is not accessible, alternative arrangements are made for staff and/or guests.
Have ADA assessments been completed for One-stops and affiliates. If so, please explain the shortfalls. If not, when are they anticipated?	Yes	No	The Contractor is not responsible for the One-Stops or affiliates.
If structural changes are needed, does the Contractor have transition plans on file? If so, please provide a copy. If not, please explain when they are anticipated to be completed.	Yes	No	Not Applicable
<p>Are contractor and service provider sites accessible to individuals with disabilities?</p> <ul style="list-style-type: none"> • Is there at least one entrance to the buildings that are wheel chair accessible? If yes, does it have the international symbol for accessibility for individuals with disabilities posted? If no, where are these participants directed to go? Explain. • Do inaccessible entrances have signs indicating the location of the nearest accessible location? Explain • Are there designated restrooms with appropriate signage available for individuals with disabilities? Explain • Are TTD/TDD or Relay Services available for use? Explain • How often are contractor's facilities monitored to ensure accessibility? 	Yes	No	<p>Contractor and service providers are accessible to individuals with disabilities.</p> <p>Participants receive services from the Career Navigator at the NH Works Office; accommodations would be made for staff with disabilities.</p> <p>Parking signage and electronic access is provided.</p> <p>The Facilities Supervisor monitors accessibility on an on-going basis.</p>
<p>Describe efforts to prohibit discrimination on the basis of disability in employment practices by the Contractor?</p> <ul style="list-style-type: none"> • Requiring the provision of reasonable accommodations in employment when appropriate. • Reviewing job qualifications to ensure that it does not use selection criteria that screens out or tends to screen out an individual with a disability on the basis of that 	Yes	No	<p>Contractor provides reasonable accommodations to its staff as appropriate including alternate space, software, readers, etc.</p> <p>Job descriptions are reviewed to ensure that do not screen out a person with a disability.</p> <p>An applicant is asked if they need an accommodation, no</p>

<p>disability unless the criteria is job related for the position in question and consistent with business necessity.</p> <ul style="list-style-type: none"> Prohibiting pre-employment inquiries regarding disability except to ask for individual to self-identify himself or herself as a person with a disability on a voluntary basis for reporting purposes and will be maintained confidentially. 			<p>other Pre-employment inquiries pertaining to disability occur.</p> <p>The information is maintained in a confidential manner.</p>
How does the Contractor insure that it does not aid or perpetuate discrimination by providing significant assistance to a person or entity that discriminates on the basis of disability?	Yes	No	If clients are eligible for training and they continue to seek services, they will be provided. They do not discriminate on the basis of disability.
How does the Contractor insure that programs and activities are administrated in the most integrated settings possible?	Yes	No	The Contractor and NH Works partners do not separate groups, all services and training is provided through an integrated setting.
How does the Contractor insure that, in determining the site or location of a facility, selections are not made that have a discriminatory effect?	Yes	No	Contractor does not make the decision pertaining to site location for a NH Works office where participants are receiving services.
How does the Contractor insure that eligibility criteria that screen out or tend to screen out an individual with a disability or class of individuals with disabilities are not imposed unless such criteria can be shown to be necessary for the provision of the aid, benefit, service, training, program or activity being offered?	Yes	No	Eligibility criteria for the programs are determining through federal statues and followed by the Career Navigators.
How does the Contractor insure that an individual with a disability is not required to accept an accommodation, aid, benefit, service, training, or opportunity that the individual chooses not to accept?	Yes	No	A person with a disability may be offered an accommodation but is not required to accept the accommodation.
How does the Contractor insure that, for employment-related training, the selection criteria are reviewed to ensure that they do not screen out, or tend to screen out, an individual with a disability or any class of individuals with disabilities from fully and equally enjoying the training unless the criteria can be shown to be necessary for the training being offered?	Yes	No	Eligible training providers are aware of EO and disability requirements. They have been willing to provide training to all individuals seeking training services.
Please describe the availability of assistive equipment for individuals with disabilities.	Yes	No	The availability may be resources within the Contractor or partnering with Vocational Rehabilitation or other NH Works partner.

Please describe the Contractor's web site in regards to its ADA accessibility.	Yes	No	There was no technical assistance in this area requested or provided.
<p>Please describe any reasonable accommodations that have been provided for applicants, participants, or employees with disabilities.</p> <p>How are reasonable accommodations provided regarding the registration for, and the provision of, aid, benefits, services or training--including core and intensive training--and support services to qualified individuals with disabilities?</p> <p>Describe how you meet the obligation of a recipient to operate programs or activities so that, when viewed in their entirety, they are readily accessible to qualified individuals with disabilities, through means such as: redesign of equipment; reassignment of classes or other services to accessible buildings; assignment of aides to beneficiaries; home visits; delivery of services at alternative accessible sites; alteration of existing facilities and construction of new facilities in conformance with standards for new construction; or any other method that results in making its program or activity accessible to individuals with disabilities?</p>	Yes	No	<p>Accommodations have included:</p> <ul style="list-style-type: none"> • Computer software (enlarged reading) • Adjusted schedules • Magnifier screens • Replace chairs and standing desks • Glasses for participants
Describe how medical condition information is maintained separate from other files and secured.	Yes	No	Medical information is maintained in a separate file in personnel.

Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.
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Element 6: Data and Information Collection and Maintenance

Please explain how EO data has been collected (race/ethnicity, sex, age, and where known, disability status)?	Yes	No	Participant applicant data is collected by the Career Navigator at intake and reported within the Eteams Case Management System. For employees, it is self-reported at point of hiring.
<p>Please explain how statistical/quantifiable analysis concerning the population being served has been conducted?</p> <ul style="list-style-type: none"> • How are these data maintained under safeguards that will restrict access to authorized personnel only? Please explain. • Are records kept for a period of three years? • How is staff made aware that data must be collected on race, sex, age, disability, etc.? • How is the data collected by staff? 	Yes	No	<p>OWO provides an annual report reflective of the demographics of participants served. It is reviewed by appropriate Contractor and OWO personnel (copy can be found at end of this report under data analysis.</p> <p>All participant files are maintained for three years after completion of follow-up. Should the file be selected for data validation or if an EO compliant occurred, it would be maintained for an additional three years.</p> <p>Staff are aware the data must be collected (or in some cases provided by the applicant voluntarily) for input into the Eteams case management system.</p>
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 7: Monitor Recipients for Compliance

<p>List the EO Officer monitoring visits conducted for One-Stops, Affiliates and service providers?</p> <p>How often is on-site monitoring conducted?</p> <p>Please provide a record and/or summary report of the EO monitoring visits (dates, locations, entities and findings) since your last WIOA Monitoring Review.</p>	Yes	No	This is not applicable for this Contractor.
Do you need technical assistance in this element	Yes	No	There was no technical assistance requested or provided.

Element 8: Complaint Processing Procedures

What discrimination complaint policies and procedures are used? Please provide copies.	Yes	No	For WIOA programs, they follow the OWO policy.
Explain how customers and employees obtain a copy of the discrimination complaint policy and procedures and/or discrimination complaint form?	Yes	No	All customers and WIOA employees obtain a copy of the grievance procedure.
<p>Does the discrimination complaint log for formal discrimination complaints include the following:</p> <ul style="list-style-type: none"> • Name and address • Basis of complaint • Brief description of complaint • Date filed • Disposition 	Yes	No	Yes – there have not been any EO complaints.
<p>Please list any formal complaints that have been filed with the Contractor since the last EO monitoring visit.</p> <p><u>Please respond to the following concerning each complaint:</u></p>	Yes	No	There have not been any EO complaints.

<ul style="list-style-type: none"> • Was the complaint filed within 180 days? • Was the complainant provided a written notification of receipt of the complaint within 10 days? • Was the complainant provided a written statement of each of the issues raised in the complaint and whether you would accept or reject each issue? • Was the complainant sent a written notice of lack of jurisdiction when the Contractor determined that it did not have jurisdiction over a complaint? • Was the complainant notified that they have the right to representation in the complaint process? • Was the complainant offered Alternative Dispute Resolution as an effort to resolve the complaint? • Was the complainant provided a written Notice of Final Action within 90 days of the date the complaint was filed? • Did the Notice of Final Action contain your decision on each issue and an explanation of the reason underlying the decision? • Did the Notice of Final Action inform the complainant that he/she has a right to file a complaint with CRC within 30 days of the date in which the Notice of Final Action is issued if 			
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<p>he/she is dissatisfied with your final action on the complaint?</p> <ul style="list-style-type: none"> Has the State EO Officer been advised of the complaint? 			
Describe the process established to keep the discrimination complaint records for a period of three years?	Yes	No	Should there be a complaint it would be kept for three years. If there were a subsequent review of complaint by OWO or US DOL Civil Rights Center, the file would be kept for an additional three years after the review occurred.
Describe the process for keeping the identity of the complainant or any individual who furnishes information relating to, or assisting in, an investigation confidential to the extent possible, consistent with a fair determination of the issues.	Yes	No	There are clear policies by both the Contractor and OWO to keep the identity of the complainant and those involved in the investigation confidential.
How is an individual who filed a complaint, opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA, or assisted or participated in any manner in an investigation protected from discharge, intimidation, retaliation, threat or coercion?	Yes	No	There are clear policies by both the Contractor and OWO to keep the identity of the complainant confidential and prevent any subsequent retaliation.
Describe the policy for handling discrimination complaints from contractors regarding participants.	Yes	No	The process would be the same as for participants or employees.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Element 9. Corrective Actions/Sanctions

Describe the procedures for obtaining voluntary compliance when equal opportunity violations are found. What is the follow up policy for violations?	Yes	No	There have not been any corrective actions/sanctions imposed on the Contractor.
Describe any corrective actions/sanctions taken against contractors since the last monitoring review.	Yes	No	There have not been any corrective actions/sanctions imposed on the Contractor.
Do you need technical assistance in this element?	Yes	No	No technical assistance was requested or provided.

Data Analysis – PY18

As in previous years, the numbers are too small for any real cause for concern. However, in looking at the changes that are emerging over the past year, there are areas for review and possible action:

- The recruited Black/African American population percentage decreased from 6.5% in PY17 to 3.83% in PY18 though enrollment percentages remained stable. In looking at receiving training, the Black/African American Received Training data for PY17 reflects 78.38% yet in PY18, the corresponding percentage is 36.36%.
- The Success Rate for Placement in Employment fell in all race categories.

Furthermore, marked improvement was found:

That a greater balance between males and females recruited occurred in PY18. In PY17 58.33% of recruited individuals were females compared to 47% in PY18.

- Greater percentages of Veterans, Disabled and Hispanic/Latino populations were enrolled in PY18.

PY18 to PY19 (YTD 6/5/20)

Eteams Demographic Report shows a decrease in males being serviced (10%) and a 7% increase in self-reporting disabled participants. The gender variance may result from increased TANF referrals with very low unemployment rate the first half of P19. In addition, COVID-19 has an impact on enrollments for the past three months.

	PY18	PY18 Percentage	PY19 YTD (6/5/20)	PY19 YTD Percentage
<u>Total Participants</u>	<u>685</u>		<u>612</u>	
Males	<u>312</u>	46%	<u>223</u>	36%
Females	<u>372</u>	54%	<u>388</u>	63%
White	<u>603</u>	88%	<u>532</u>	87%
Black or African American	<u>34</u>	5%	<u>34</u>	6%
Asian	<u>26</u>	4%	<u>19</u>	3%
American Indian or Alaskan	<u>5</u>	1%	<u>5</u>	1%
Hawaiian Native or Pacific Islander	<u>2</u>	0%	<u>2</u>	0%
Not Reporting	<u>20</u>	3%	<u>26</u>	4%
More than one Race	<u>0</u>	0%	<u>0</u>	0%
Hispanic Latino	<u>30</u>	4%	<u>15</u>	2%
Ages 18-21	<u>23</u>	3%	<u>14</u>	2%
Ages 22-24	<u>41</u>	6%	<u>27</u>	4%
Ages 25-54	<u>440</u>	64%	<u>415</u>	68%
Ages 55-64	<u>160</u>	23%	<u>133</u>	22%
Ages 65-72	<u>18</u>	3%	<u>19</u>	3%
Ages 73+	<u>3</u>	0%	<u>4</u>	1%
Self Disclosed Disability	<u>56</u>	8%	<u>94</u>	15%
ESOL	<u>31</u>	5%	<u>36</u>	6%

CAP EO SUMMARY REPORT

Criteria	Totals Counts	Female	Male	18-21	22-24	25-54	55-64
Potential Customers	493	300	193	16	22	336	106
Percent of Total		60.85%	39.15%	3.25%	4.46%	68.15%	21.50%
Enrolled in WIOA	438	269	169	11	19	300	96
Percent of Potential	88.84%	89.67%	87.56%	68.75%	86.36%	89.29%	90.57%
Did not Enroll	55	31	24	5	3	36	10
Percent of Potential	11.16%	10.33%	12.44%	31.25%	13.64%	10.71%	9.43%

65-72	73+	VET	Disabled	White	Hispanic / Latino	Black / AA	Asian	Amer Ind / Alask Nat	Hawaii / Pacific Isl
12	1	20	84	415	14	28	11	5	0
2.43%	0.20%	4.06%	17.04%	84.18%	2.84%	5.68%	2.23%	1.01%	0.00%
11	1	20	80	378	14	27	10	3	0
91.67%	100.00%	100.00%	95.24%	91.08%	100.00%	96.43%	90.91%	60.00%	0.00%
1	0	0	4	37	0	1	1	2	0
8.33%	0.00%	0.00%	4.76%	8.92%	0.00%	3.57%	9.09%	40.00%	0.00%