

# **AEM Quality Indicators with Critical Components for Workforce Development**

Workforce Development Agencies and Programs

V.2.0

By National AEM Center at CAST

Published: 2020

The contents of this document were developed under a cooperative agreement with the US Department of Education, #H327Z190004. However, those contents do not necessarily represent the policy of the US Department of Education and you should not assume endorsement by the Federal Government. Project Officer, Rebecca Sheffield, Ph.D.



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National Center on Accessible Educational Materials (2020). *AEM Quality Indicators with Critical Components for Workforce Development*. Wakefield, MA: National Center on Accessible Educational Materials.

# **Table of Contents**

<b>Preface .....</b>	<b>2</b>
<b>Quality Indicator 1: A Coordinated System .....</b>	<b>3</b>
<b>Quality Indicator 2: Provision in a Timely Manner .....</b>	<b>4</b>
<b>Quality Indicator 3: Written Guidelines .....</b>	<b>6</b>
<b>Quality Indicator 4: Learning Opportunities and Technical Assistance.....</b>	<b>9</b>
<b>Quality Indicator 5: Data Collection.....</b>	<b>10</b>
<b>Quality Indicator 6: Data Use .....</b>	<b>12</b>
<b>Quality Indicator 7: Resource Allocation .....</b>	<b>14</b>

## **Preface**

The purpose of the National AEM Center’s Quality Indicators with Critical Components for Workforce Development is to assist workforce development agencies and programs with planning, implementing, and evaluating dynamic, coordinated systems for providing accessible materials and technologies for all career seekers who need them. The ultimate goal of an AEM provision system is that accessibility becomes an essential criterion in the procurement and creation of high-quality educational materials and technologies. To that end, the Quality Indicators with Critical Components are a means to provide agencies and programs with consistent objectives, and to promote discussion around multiple methods to achieve those objectives.

The Quality Indicators are brief statements that point to exemplifying conditions and services for creating and sustaining a systemwide high-quality AEM provision system. Workforce development agencies and programs, both secondary and postsecondary, will find the Quality Indicators useful for implementing statutory requirements that mandate equitable access to learning opportunities for career seekers with disabilities, including equal access to printed materials, digital materials, and technologies. Beyond meeting legal obligations, users of the Quality Indicators will benefit from collaboration among cross-sector agency leaders and diverse stakeholder groups. Ideally, new partnerships will lead to systemic improvements in the provision and use of high-quality materials and technologies for all learners.

The Quality Indicators with Critical Components for Workforce Development are intended to be implemented in partnership with a state education agency (SEA) that is creating and sustaining a statewide AEM provision system for K-12. Workforce development agencies and programs should coordinate with the SEA to ensure that career seekers with disabilities are benefitting from that provision system, as well as its own best practices aligned

## **Quality Indicator 1: A Coordinated System**

**Statement:** The agency/program has a coordinated system for providing high-quality accessible materials and technologies for all career seekers who require them.

**Intent:** A coordinated system means that the agency/program has methodical and integrated means by which career seekers who need them receive accessible formats of instructional materials, accessible digital materials, accessible technologies, and the assistive technology (AT) needed to use them.

### **Critical Components for Quality Indicator 1**

To effectively address Quality Indicator 1, the following components should be present:

#### **1.1. Strategic collaborations for creating and sustaining a coordinated system for providing accessible materials and technologies**

- For career training programs in post high school settings
  - State Department of Labor leadership collaborates with workforce development agencies, programs, and services (e.g., career centers, Vocational Rehabilitation (VR) services, State transition program, apprenticeship programs) to ensure that programmatic accessibility is consistently of high quality and effective.
- For career training programs in secondary education
- Career & Technical Education (CTE) personnel coordinate with local education agency (LEA) personnel to ensure that students in the CTE program who need accessible materials and technologies are served (see K-12 Critical Component 1.1).

#### **1.2. A means for ensuring that digital materials and technologies purchased or created for use by all career seekers are accessible**

- All digital materials procured from commercial sources comply with Section 508 and the current applicable version of the Web All digital materials and

technologies purchased from commercial, open, and free sources comply with [Section 508 of the Rehabilitation Act](#) and the current version of the [Web Content Accessibility Guidelines \(WCAG\) at level AA](#).

- Personnel who create digital materials (e.g., videos, web pages, and slide decks) use the [accessibility practices afforded by common software tools](#), such as web authoring software, Google Suite, Microsoft Office, iWork, and YouTube.

### **1.3. A means for ensuring that accessible formats of training materials are provided for career seekers who need them, with appropriate copyright protection**

- For career training programs in post high school settings
  - Some career seekers with disabilities have difficulty using print and text-based materials because these formats present physical, sensory, or perceptual barriers for them. Under [criteria set by the National Library Service \(NLS\)](#), eligible individuals can receive accessible formats of materials under copyright (e.g., braille, large print, digital text, or audio formats of a textbook). Sources of accessible formats of copyrighted materials for eligible career seekers include restricted libraries, such as [Bookshare](#), [Louis Database](#), and [Learning Ally](#). Additionally, accessible formats of copyrighted materials can be requested on behalf of eligible career seekers directly from the publisher or via [AccessText](#).
- For career training programs in secondary education
  - CTE personnel coordinate with LEA personnel to ensure procedural alignment for CTE students who need accessible formats (see K-12 Critical Component 1.3).

## **Quality Indicator 2: Provision in a Timely Manner**

**Statement:** The agency/program provides high-quality accessible materials and technologies in a **timely manner**.

**Intent:** In general, “timely manner” means youth and adults in career training programs who require accessible materials and technologies receive them at the same time that materials and technologies are distributed to all career seekers in a program. Attention is given to identify and address factors that could delay timely manner.

## **Critical Components for Quality Indicator 2**

To effectively address Quality Indicator 2, the following components should be present:

## 2.1. An agency/program definition of timely manner

- For career training programs in post high school settings
  - A definition of “timely manner” is consistent with stipulations in the [Americans with Disabilities Act \(ADA\)](#) and [Section 504 of the Rehabilitation Act](#), and [Section 188 of the Workforce Innovation and Opportunity Act \(WIOA\)](#).
- For career training programs in secondary education
  - Career & Technical Education (CTE) personnel collaborate with the local education agency (LEA), which uses the state definition of timely manner as required by the [Individuals with Disabilities Education Act \(IDEA\)](#) (see K-12 Critical Component 2.1).

## 2.2. Strategic collaborations for timely delivery of accessible materials and technologies

- For career training programs in post high school settings
  - State Department of Labor convenes appropriate personnel to establish and communicate a programmatic definition of timely manner (e.g., ADA or 504 Coordinator, Rehabilitation Services personnel, [State Assistive Technology \(AT\) Program](#) personnel).
  - Procurement departments at the state and program level prioritize the purchase of accessible digital materials and technologies (e.g., career centers, Vocational Rehabilitation (VR), apprenticeship programs).
  - Procurement departments at the state and program level collaborate with vendors to ensure understanding of accessibility requirements in the bidding process, contracts, and purchase orders.
  - Instructors, trainers, and other personnel who create instructional/training materials collaborate with accessibility specialists or related trainers to apply best practices for creating accessible content.
  - Disability resource coordinators collaborate with agency/program communications personnel to ensure that procedures for requesting accommodations, including accessible formats and AT, are widely communicated.
  - Disability resource coordinators collaborate with career seekers to identify delays in the provision of accessible materials and technologies, and then collaborate with appropriate staff or service providers to find solutions.
- For career training programs in secondary education
  - CTE personnel collaborate with LEA personnel to ensure procedural alignment for timely manner (see K-12 Critical Component 2.2).

## 2.3. Multiple means for timely delivery

- Examples of actions that can be taken to optimize timely provision
  - Procuring the most accessible and high-quality digital materials and technologies that are available for purchase.
  - Including timelines and/or roadmaps for providing accessible materials and technologies in purchase agreements.
  - Purchasing organizational subscriptions to third party media conversion and captioning services.
  - Creating organizational accounts with services that provide accessible formats of copyrighted materials for eligible career seekers, such as [Bookshare](#) and [Learning Ally](#). Postsecondary career and technical schools can also join [AccessText](#).
  - Coordinating with the state Instructional Materials Center or [American Printing House \(APH\)](#) for braille, large print, and tactile materials.
  - Identifying and correcting delays to timely manner when they happen.

## Quality Indicator 3: Written Guidelines

**Statement:** The agency/program develops and implements guidelines on the provision and use of high-quality accessible materials and technologies and **disseminates these guidelines to all stakeholders.**

**Intent:** Guidelines, informed by agency policies, document the roles and responsibilities for timely provision and use of high-quality accessible materials and technologies. Guidelines are communicated in multiple formats and broadly disseminated to ensure that all responsible parties can understand and apply them.

## Critical Components for Quality Indicator 3

To effectively address Quality Indicator 3, the following components should be present:

### **3.1. Guidelines that specify laws and policies relevant to the provision and use of accessible materials and technologies, including assessment**

- Relevant laws and policies for career training programs in post high school settings
  - Federal

- [Section 188 of the Workforce Innovation and Opportunity Act \(WIOA\)](#), as related to the provision of accessible materials and technologies for career seekers and employees who need them.
- [Section 504 of the Rehabilitation Act of 1973](#) as related to the provision of auxiliary aids and services in a timely manner to career seekers in postsecondary programs that receive federal funding.
- [Americans with Disabilities Act \(ADA\)](#) as related to Titles I and II, and the provision of auxiliary aids and services described in Section 504, regardless of federal funding provided to the career training agency/program.
- [Section 508 of the Rehabilitation Act of 1973](#) as related to federal technology accessibility standards in the procurement of digital materials and technologies.
- State
  - Accessibility policy (e.g., disseminated by the Office of Information Technology (OIT))
- Relevant laws and policies for career training programs in secondary education
  - [Strengthening Career and Technical Education Act for the 21st Century \(Perkins V\)](#)
  - Career & Technical Education (CTE) personnel collaborate with local education agency (LEA) personnel to ensure that other relevant federal and state law and policies are specified (see K-12 Critical Component 3.1)

### **3.2. Guidelines for procuring accessible digital materials and technologies for all career seekers**

- Inclusion of [accessibility requirements in purchase agreements](#) with curriculum developers and vendors
- Best practices for [evaluating the accessibility of curricula and educational products](#)

### **3.3. Guidelines for decision-making processes for providing accessible formats of training materials for career seekers who need them**

- For career training programs in post high school settings
  - Procedures for career seekers to request accessible formats and assistive technology (AT) from disability resources personnel
  - Procedures for disability resources personnel to follow in the process of providing accessible formats for career seekers who require them (i.e., in compliance with [section 121 of U.S. Copyright Act/Chafee Amendment](#))

- For career training programs in secondary education
  - CTE personnel collaborate with LEA personnel to ensure procedural alignment in the decision-making process (see K-12 Critical Component 3.3)

### **3.4. Guidelines that delineate roles and responsibilities of personnel at all levels**

- Roles and responsibilities should be identified for all areas related to the timely provision and use of accessible materials and technologies.

Examples include

- In the procurement of accessible digital materials and technologies, the responsibilities of the personnel assigned to evaluate for accessibility (e.g., request and validate [Voluntary Product Accessibility Templates \(VPATs\)](#)/Accessibility Conformance Reports (ACRs)), communicate accessibility requirements with vendors, and ensure that required accessibility language is included in purchase agreements
- In instructor/trainer selection of course materials (e.g., textbooks, articles, video, Open Educational Resources (OER)), the responsibilities of the instructor/trainer, technology personnel, program administrators, and others to ensure that materials will be accessible in a timely manner
- In instructor/trainer creation of digital content (e.g., documents, slide decks, video, podcasts, web pages) the responsibilities of the instructor/trainer, technology personnel, third party vendors (e.g., captioning and transcription services), and others to ensure that materials meet accessibility requirements
- In the provision of accommodations for career seekers who require accessible formats and AT, the responsibilities of the career seeker, disability resources personnel, and instructors/trainers
- In addition to providing guidelines, an agency/program may consider including responsibilities related to the timely provision of accessible materials and technologies within job descriptions

### **3.5. Guidelines that are made available in multiple formats and widely disseminated through varied means to reach all stakeholders**

- Examples of formats for conveying guidelines
  - Print
  - Large print
  - Accessible digital text
  - Closed-captioned and audio described video

- Audio with transcript
- Braille
- Examples of varied means for disseminating guidelines to all stakeholders
  - Program orientation materials
  - Websites
  - Reference cards
  - Infographics
  - Pamphlets
  - Handouts
  - Email

## **Quality Indicator 4: Learning Opportunities and Technical Assistance**

**Statement:** The agency/program provides or arranges for **comprehensive learning opportunities and technical assistance (TA)** that address all areas of the provision and use of high-quality accessible materials and technologies.

**Intent:** Comprehensive learning opportunities and TA are ongoing, draw from multiple sources, and offered in different forms that benefit all stakeholders.

### **Critical Components for Quality Indicator 4**

To effectively address Quality Indicator 4, the following components should be present:

#### **4.1. Content that is targeted at the differentiated roles and responsibilities of all stakeholders**

- In identifying content, the needs of all stakeholders are systematically addressed, including but not limited to:
  - Career seekers with disabilities who need to know the process for receiving accessible materials and how to use them with related assistive technology (AT) in all applicable settings
  - Training coordinators who need to know how accessibility relates to the selection of high-quality curriculum, instruction, and assessment
  - Coaches and counselors who need to know how to support career seekers who use accessible materials with related AT
  - Transition coordinators who need to ensure that career seekers who use accessible materials and technologies experience continuity of services as they transition to new settings

- Technology personnel who need to develop a technology infrastructure that supports interoperability with AT
- Procurement/purchasing decision makers who need to know how to communicate accessibility requirements to vendors, both orally and in written contracts and purchase agreements

#### **4.2. Learning opportunities and TA that are designed and delivered using evidence-based practices**

- Examples of evidence-based practices include those that
  - Are job-embedded for personnel
  - Are job training- and learning-embedded for career seekers
  - Address learner variability, including the accessibility of the training and TA materials (e.g., using the [Universal Design for Learning](#) framework)
  - Build upon state and local initiatives for improving teaching and learning with technology in multiple settings (e.g., in-person, hybrid, or remote)
  - Are informed by data collection and use (see Quality Indicators 5 & 6)

#### **4.3. Use of federally-, state-, and locally-funded sources of high-quality content, training, and TA**

- Examples of State-level services
  - [State AT Program](#)
  - Vocational Rehabilitation (VR) services
- Examples of national services
  - [National Center on Accessible Educational Materials for Learning \(National AEM Center\)](#)
  - [National Technical Assistance Center on Transition \(NTACT\)](#)
  - [Job Accommodation Network \(JAN\)](#)
  - [Partnership on Employment & Accessible Technology \(PEAT\)](#)
  - [LEAD Center](#)
  - [AccessATE](#)
  - [Bookshare](#)
  - [Institute for Educational Leadership \(IEL\)](#)

### **Quality Indicator 5: Data Collection**

**Statement:** The agency/program develops and implements a **secure, systematic data collection process** to monitor and evaluate the equitable, timely provision and use of high-quality accessible materials and technologies.

**Intent:** Data collection processes target the provision and use of high-quality accessible materials and technologies through both agency/program procurement for all career seekers and through the accommodations process for career seekers with disabilities.

## **Critical Components for Quality Indicator 5**

To effectively address Quality Indicator 5, the following components should be present:

### **5.1. Methods for collecting data on the procurement of accessible digital materials and technologies for use by all career seekers**

- Ongoing inventory of digital materials and technologies that comply with [Section 508 of the Rehabilitation Act](#) and the applicable version of the [Web Content Accessibility Guidelines \(WCAG\) at level AA](#)
- Ongoing inventory of digital materials and technologies that do not comply with Section 508 and the applicable version of the Web Content Accessibility Guidelines (WCAG) at level AA
- Ongoing record of communications with vendors regarding product accessibility

### **5.2. Methods for collecting satisfaction data from all career seekers on the quality and effectiveness of course materials and technologies, including accessibility**

- Anonymous post-course evaluation surveys include an item related to the usability and accessibility of course materials and technologies

### **5.3. Methods for securely collecting data on the extent to which career seekers with disabilities receive and effectively use accessible formats of copyrighted materials, including assessments, in a timely manner**

- Individual privacy is maintained while keeping records of the timeliness and quality of the accessible formats and related assistive technology (AT) provided to career seekers through the disability accommodations process
  - Tracking and recording the timely delivery of accessible formats for career seekers who require them
  - Inspecting and recording the quality of accessible formats received by those career seekers
  - Observing and recording the effective use of accessible formats by those career seekers

- Surveying and conversing with career seekers on their experience with receiving and using accessible formats of materials

#### **5.4. Methods for securely collecting data to ensure that career seekers who are provided an accessible format accommodation proportionally represent the demographics of all career seekers enrolled in the program**

- Number of career seekers with an accessible (or alternative) format accommodation
- Disability categories of those career seekers
- Demographic categories of those career seekers

### **Quality Indicator 6: Data Use**

**Statement:** The agency/program **securely uses data to guide changes that support continuous improvement** in all areas of the systemic provision and use of high-quality accessible materials and technologies.

**Intent:** While protecting individual privacy, data are systematically analyzed to measure effectiveness of all areas of the current system and are used to inform actions needed to improve practice, program planning, and resource allocation.

### **Critical Components for Quality Indicator 6**

To effectively address Quality Indicator 6, the following components should be present:

#### **6.1. Analysis of procurement data (Critical Component 5.1) to monitor practices for ensuring digital material and technology accessibility in contracts, purchase agreements, and in communications with vendors**

- Data are used to increase and sustain the proportion and range of market-available accessible digital materials and technologies procured by the agency/program.

## **6.2. Analysis of course satisfaction data (Critical Component 5.2) to monitor the usability and accessibility of course materials and technologies**

- Data are used to prioritize improvements in the procurement, selection, and creation of accessible course materials and technologies used by all career seekers.

## **6.3. Analysis of disability accommodations data (Critical Component 5.3) to monitor the quality and timely provision of accessible formats of copyrighted materials for career seekers who require them**

- Data are used to increase and sustain the consistency with which career seekers who require them receive and effectively use materials in high-quality accessible formats.

## **6.4. Analysis of disability accommodations data (Critical Component 5.4) to monitor the proportional representation of career seekers receiving accessible formats**

- Data are used to determine the extent to which the agency/program is equitably serving career seekers from all demographics and disability categories who may need accessible formats of copyrighted materials.

## **6.5. A means for the agency/program to consider the potential impact of barriers for career seekers with disabilities when analyzing state- and federally-required data (e.g., WIOA and IDEA Part B)**

- For data indicating low retention and program completion rates, the agency/program investigates whether the formats of curriculum materials or the design of technologies used for teaching, learning, and assessment are presenting functional barriers, such as physical, sensory, or perceptual, for some career seekers.

## **6.6. A systematic approach that supports effective data analysis and use**

- Parts of a systematic approach include:
  - Training for personnel conducting analyses to ensure accuracy and consistency
  - Alignment of analyses with purposes of the quantitative and qualitative data collected

- Methods that protect the identity of career seekers
- Timelines for implementation of data driven decisions
- Identification of target audiences with whom aggregated summaries of the data analysis will be shared

### **6.7. A team consisting of personnel with the combined expertise and authority to synthesize the data, make recommendations, and implement necessary changes**

- For career training programs in post high school settings
  - ADA and Section 504 Coordinator
  - Personnel responsible for providing disability accommodations
  - Equal Opportunity Officer
- For career training programs in secondary education
  - CTE personnel collaborate with local education agency (LEA) personnel to ensure that CTE is represented on the LEA data team (see K-12 Critical Component 6.7)

### **6.8. Dissemination of aggregated summaries of data analysis results to all stakeholders, in user-friendly formats**

## **Quality Indicator 7: Resource Allocation**

**Statement:** The agency/program **allocates resources sufficient to ensure the delivery and sustainability of quality services** to career seekers with disabilities who need high-quality accessible materials and technologies.

**Intent:** Sufficient fiscal, human, and infrastructure resources are committed to ensure that the needs of career seekers are appropriately addressed.

### **Critical Components for Quality Indicator 7**

To effectively address Quality Indicator 7, the following components should be present:

#### **7.1. Resources that are provided for fiscal, human, and infrastructure needs**

- Fiscal (e.g., funds for third party vendor subscriptions that can create system- or agency-wide efficiencies in media conversion, closed captioning, audio description, and transcripts)

- Human (e.g., training and technical assistance resources required to fulfill roles and responsibilities of personnel)
- Infrastructure (e.g., coordination across technology systems to ensure interoperability with career seekers' assistive technologies)

**7.2. Resources that are used to address the needs of all stakeholders, including all career seekers being served by the agency/program**