

COUNTY AGENCY CIVIL RIGHTS PLAN

July 01, 2015

Statement of Policy

All programs, services and benefits administered, supervised, authorized and/or participated in by the Franklin County Department of Job and Family Services and contracted providers shall be operated in accordance with the nondiscriminatory provisions of Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Title IX of the Education Act of 1972; the Omnibus Budget Reconciliation Act of 1981; the Americans with Disability Act of 1990 to Americans with Disability Act as amended; Section 1808 of the Small Business Job Protection Act (adoption); the Multi-Ethnic Placement Act of 1994 (MEPA); the Inter-Ethnic adoption Provisions of 1996 (IEP); sections 181 and 188 of the Workforce Investment Act of 1998; the Department of Labor's regulations at 20 CFR, Part 667.600 and 29 CFR, Part 37; and, the Department of Agriculture's regulations at 7 CFR §272.6.

No person or persons shall on the basis of race, color, national origin, disability, age, sex or religion, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or service authorized by the Franklin County Department of Job and Family Services. Persons who are receiving benefits/services under the Department of Agriculture regulation 7 CFR §272.3 and the Workforce Investment Act of 1998 may not be unlawfully, discriminated against on the basis of their political affiliation or belief; status as WIA participants or citizenship (for lawfully admitted immigrants, authorized to work in the United States).

The Director of the Franklin County Department of Job and Family Services shall implement the Civil Rights Plan within the service area through the following methods:

Delegated Authority

The Franklin County Department of Job and Family Services shall appoint a Civil Rights Coordinator. The Civil Rights Coordinator shall be responsible for monitoring the implementation of the Civil Rights Plan for the agency, including, but not necessarily limited to:

1. Receiving and, if necessary, assisting with the writing of discrimination complaints which are filed by county agency participants, clients and beneficiaries of job and family services programs. Such complaints are then referred to the ODJFS Bureau of Civil Rights for investigation and resolution.

2. Distributing civil rights pamphlets/brochures, posters and other information pertaining to civil rights laws to appropriate agency staff, beneficiaries and interested members of the public.

(The designated county Civil Rights Coordinator may also be delegated responsibility for implementing the requirements and provisions of WIA Complaint Procedures **or** the county agency involved in the administration of WIA programs/activities may elect to designate another individual for this purpose.)

Complaint Policy and Procedure

The Franklin County Department of Job and Family Services shall have in effect a complaint procedure which incorporates the elements of due process. The procedure follows the steps/process(es) identified below:

1. Any person who believes that he/she, or any specific class of persons, has been subjected to unlawful discrimination on the basis of race, color, national origin, disability, age, sex or religion may file a written complaint with the agency outlining the alleged discriminatory act(s). (complaints alleging sexual harassment *need not* be reduced to writing prior to an investigation being initiated) Written complaints are to be date stamped by the person who receives the complaint. Document receipts are to be provided to complainants who hand-deliver complaints.
2. Complaints must be filed with the agency within 180 days of the date the alleged discriminatory act or treatment occurred.
3. When complaints are received by the county Civil Rights Coordinator, they shall be referred to the ODJFS Bureau of Civil Rights within three (3) business days of the date of receipt. The Bureau of Civil Rights (BCR) shall conduct its inquiry and issue its Final Report within ninety (90) days of the date of filing of the complaint. *When individuals wish to file discrimination complaints about WIA-funded programs/activities, they may choose to have their complaints investigated by the County-level individual designated for that purpose **or** they may file their complaint with the ODJFS Bureau of Civil Rights **or** they may choose to file their complaint directly with the United States Department of Labor's Civil Rights Center.*
4. Any party dissatisfied with the BCR's Final Report will be advised of the right to file a complaint with the applicable federal agency (i.e., The U.S. Department of Health and Human Services; U.S. Department of Agriculture or U.S. Department of labor).
5. No person who has filed a complaint, testified, assisted or participated in any manner in an investigation of a complaint shall be intimidated, threatened, coerced or retaliated against.

A CIVIL RIGHTS COMPLAINT MAY BE INITIALLY FILED BY CONTACTING ANY OF THE FOLLOWING OFFICES/INDIVIDUALS: (It is recommended that individuals contact the ODJFS Bureau of Civil Rights before attempting to file their complaints directly with any of the federal agencies listed below. The reason for this is so that the filing will be with the correct agency, based upon the kind of program, service or benefit being complained about.)

The Franklin County Department of Job and Family Services Civil Rights Coordinator, Ms. Janel Theiss at: 1721 Northland Park Avenue, Columbus, Ohio 43229-5174.

The Ohio Department of Job and Family Services Bureau of Civil Rights, 30 East Broad, 30th Floor, Columbus, Ohio 43215. Telephone: (614) 644-2703; Toll Free: **1-866-227-6353**.

The United States Department of Health and Human Services, Office for Civil Rights, Region V, 233 N. Michigan Avenue, Suite 1300, Chicago, Illinois 60601. Telephone: (312) 353-5160

The United States Department of Agriculture (Food Stamps only), Civil Rights Office, Room 326-West, Whitten Building, 1400 Independence Avenue, S.W., Washington, D.C., 20251. Telephone: (202) 720-3808

The United States Department of Labor, Civil Rights Center, 200 Constitution Avenue, N.W., Room N-4123, Washington, D.C., 20210. Telephone: (202) 693-6500, 6502.