Union County JFS/CSEA/PCSA/OMJ

CIVIL RIGHTS PLAN, ADA PLAN AND LEP PLAN

Job and Family Services (JFS)
Child Support Enforcement Agency (CSEA)
Public Children's Service Agency (PCSA)
Ohio Means Jobs (OMJ) Center

2026 - 2028

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Table of Contents

I. Introduction and Purpose
II. Authorities
III. Definition of Terms
IV. Civil Rights Plan
V. ADA Compliance Plan (ADAAA & Section 504)
VI. Limited English Proficiency Plan
VII. Complaint Procedures
VIII. County Authority Signatures

I. Introduction and Purpose

The Ohio Department of Job and Family Services (ODJFS) develops and supervises the state's public assistance, workforce development, unemployment compensation, child and adult protective services, adoption, childcare, and child support programs.

The Bureau of Civil Rights (BCR) within ODJFS is charged with the duty to ensure that each County Agency (Job and Family Services (JFS), Public Children's Service Agency (PCSA), Child Support Enforcement Agency (CSEA)), Ohio Means Jobs (OMJ) Centers, contractors, grantees, and subrecipients receiving federal funds are in compliance with all relevant federal, state and agency requirements involving applicants/recipients of program information, benefits and services that protect against discrimination based on a protected class: race, color, national origin, disability, age, sex (including pregnancy, gender identity and sexual orientation), religion, political affiliation, or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a WIOA program or activity. (Protected classes may vary depending on the program)

In addition to federal law, Ohio Administrative Code (OAC) Rule 5101:9-3-03 requires each county agency/OMJ to develop a Combined Plan which includes a civil rights plan, limited English proficiency (LEP) plan and Americans with Disabilities Act (ADA) plan, to ensure that county agencies and county contractors comply with this rule and all applicable federal and state civil rights laws, rules, and regulations.

The purpose of the Combined Plan is to provide assurances and demonstrate that customers of the County Agency/OMJ Center are receiving equal access to program services and information and that those programs are operated and provided in a nondiscriminatory manner.

The Combined Plan has a review schedule of every two (2) years. If there is a significant change in civil rights or ADA law, a change in the county agency such as a new civil rights coordinator, new county agency director, adding another agency, or any other changes that will impact the Combined Plan, then the county agency/OMJ will revise the plan.

If there are any significant assurance changes contained in the LEP plan in methods and/or changes in the LEP population, is it appropriate to update ODJFS/BCR with solely those changes at Civil_Rights@jfs.ohio.gov.

Copies of the Combined Plan are to be provided to ODJFS BCR.

II. Authorities

The Combined Plan and all programs, services, benefits administered, supervised, authorized and/or participated in by the **Union County JFS/CSEA/PCSA/OMJ**, and its contracted providers shall be operated in accordance with the nondiscriminatory provisions of the following Federal, State and agency statutes, regulations, and policies:

Statues/Laws

- Title VI of the Civil Rights Act of 1964, as amended;
- Age Discrimination Act of 1975;
- Amendments to the Americans with Disabilities Act (ADAAA) of 2008;
- Multiethnic Placement Act of 1994, as amended by the Interethnic Adoption Provisions of 1996;
- Omnibus Budget Reconciliation Act of 1981;
- Section 181 and 188 of the Workforce Innovation and Opportunity Act;
- Section 504 and 508 of the Rehabilitation Act of 1973, as amended;
- Section 1808 of the Small Business Job Protection Act (adoption);
- Title IX of the Education Amendments Act of 1972;
- Workforce Innovation and Opportunity Act (WIOA) of 2014.

Federal Regulations/Guidance

- 7 CFR Part 272.4: Program Administration and Personnel Requirements, (USDA)
- 7 CFR Part 272.6: Nondiscrimination Compliance, (USDA)
- 20 CFR Part 667.600: Grievance Procedures, Complaints, and State Appeals Processes, (DOL)
- 29 CFR Part 31: Nondiscrimination in Federally Assisted Programs, (DOL)
- 29 CFR Part 32: Nondiscrimination on the basis of handicap in Programs or Activities receiving Federal Financial Assistance, (Sec. 504, Rehabilitation Act of 1973)
- 29 CFR Part 33: Nondiscrimination on the basis of Handicap in Programs or Activities, (DOL)
- 29 CFR Part 35: Nondiscrimination on the basis of Age in programs or activities, (DOL)
- 29 CFR Part 38: Implementation of Nondiscrimination and Equal Opportunity Provisions, (WIOA)
- 67 FR 41455: Prohibition Against National Origin Discrimination, (DOJ)
- Department of Justice: Title VI Legal Manual, (1/11/01)
- Department of Labor: Training and Employment Guidance Letter No. 05-23, (11/3/23)
- Department of Labor: Unemployment Insurance Program Letter (UIPL): 02-16 (Change-1), (5/11/20)
- Department of Agriculture: Food and Nutrition Service Document # CRD 01-2022, (5/5/2022)

- Department of Agriculture: FNS Instruction 113-1: Civil Rights Compliance and Enforcement
- Department of Agriculture: Food and Nutrition Service: Subchapter C – Supplemental Nutrition Assistance and Food Distribution Program (SNAP) – Bilingual Requirements, 7 CFR 272.4 (b)(1) (6/08/2026)

Executive Order

- 13160: Nondiscrimination on the Basis of Race, Sex, Color, National Origin, Disability, Religion, Age, Sexual Orientation, and Status as a Parent in Federally Conducted Education and Training Programs.

State Guidance

- Ohio Administrative Code (OAC)
- 5101: 2-33-03 Multi-Ethic Placement Act (MEPA) Complaint Procedure
- 5101:4-1-15 Food Assistance: Nondiscrimination.
- 5101:9-2-01 Civil Rights Plan
- 5101:9-2-02 Americans with Disabilities Act Plan
- 5101:9-2-03 WIOA Programmatic Complaints
- 5101:9-2-05 WIOA Nondiscrimination Complaints
- 5101:9-3-01 Definitions
- 5101:9-3-02 Bureau of Civil Rights Jurisdiction
- 5101:9-3-03 County Responsibilities for Ensuring Civil Rights Compliance
- 5101:9-3-04 Complaints of Discrimination and Retaliation
- 5101:9-3-05 ADA

Agency Policy/Protocol

- ODJFS: Language Access Policy (1/8/23)

III. Definition of Terms

American Sign Language (ASL) Interpreter: An in-person interpreter that is physically present with ODJFS personnel to facilitate conversation for individuals who are hearing impaired.

ADA Compliance Plan: The portion of the Combined Plan that describes accessibility measures, accommodations, and procedures for ADA-related complaints.

Applicant: a person who on behalf of himself or herself, his or her family, or another individual makes an application for a benefit provided by the CDJFS/OMJ.

BCR: The Bureau of Civil Rights (BCR) is the entity contained within the Ohio Department of Job and Family Services charged with the responsibility of overseeing compliance by County Agencies/OMJ Centers with relevant civil rights laws.

Bilingual Staff: A County Agency/OMJ Staff person who demonstrated proficiency in English and reading, writing, speaking or understanding at least one other language. For the purposes of this plan, bilingual staff are listed with a bilingual designation.

Civil Rights Plan: The portion of the Combined Plan outlines policies and procedures to prevent discrimination and ensure equal opportunity.

Combined Plan: The Ohio Department of Job and Family Services requirement of each county agency to have a Combined Plan that includes a Civil Rights Plan, an ADA Compliance Plan and a Limited English Proficiency (LEP) plan to ensure compliance with federal and state nondiscrimination laws.

County Agency: County Departments of Job and Family Services (CDJFS), County Child Support Enforcement Agencies, Public Children Services Agencies, WIOA funded Ohio Means Job (OMJ) Centers, Agencies standing alone or any combined agencies with a single administrative structure.

Disability:

i. A physical, mental impairment resulting from anatomical, physiological, genetic, or neurological conditions which prevents the exercise of a normal bodily function or is demonstrable by medically accepted clinical or laboratory diagnostic techniques; or
ii. A record of such an impairment; or
iii. A condition regarded by others as such an impairment, provided, however, that in all provisions of this policy dealing with employment, the term shall be limited to disabilities which, upon the provision of reasonable modifications, do not prevent the individual from performing in a reasonable manner the activities involved in the job or occupation sought or held.

Discrimination: Includes segregation and separation, also occurs when a policy or practice negatively impacts individuals with a disability, even though discrimination is not the intent or purpose of the policy or practice.

Effective Communication: In a human services, social services or job training/assistance setting; effective communication occurs when County Agency / OMJ Center staff have taken necessary steps to make sure that a person who is LEP is given adequate information in his/her language to understand the services, benefits or the requirements for services or benefits offered by the County Agency / OMJ Center. These necessary steps must allow an individual the opportunity to qualify for the benefits or services provided by that County Agency / OMJ Center without unnecessary delay due to the person's LEP. Effective communication also means that a person who is LEP is able to communicate the relevant circumstances of his/her situation to the County Agency / OMJ Center.

Employee: A person who is employed by the CDJFS/OMJ to work for the CDJFS/OMJ as a civil servant, pursuant to R.C. Chapter 124. This definition is not intended to apply to individuals who work for the CDJFS/OMJ as a part of any work or alternative assignment, as a means of maintaining eligibility for a federal or state benefit program.

Individual with a disability: An individual with physical or mental impairment that substantially limits one or more major life activities.

i. An individual who has a record of physical or mental impairment that substantially limits

one or more of the individual's major life activities.

ii. An individual who is regarded as having a physical or mental impairment that substantially limits one or more major life activity, regardless of whether or not that individual actually has the impairment. If the individual does not have the physical or mental impairment, no reasonable modification is required to be provided.

a. Physical impairments include physiological disorders or conditions; cosmetic disfigurement; or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs (which would include speech organs that are not respiratory such as vocal cords, soft palate, tongue, etc.); respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine.

b. Mental impairments include mental or psychological disorders, such as intellectual disabilities, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Interpretation: Interpretation means the oral or spoken transfer of a message from one language into another language.

Interpreter: A person who transfers a message from one language into another in spoken form.

ODJFS Language Access Program: Is responsible for ensuring compliance with relevant regulations governing access to program information, benefits, and services for applicants and recipients. The program seeks to alleviate communication barriers for individuals who face challenges in effectively exchanging information due to various obstacles; to include but are not limited to language hurdles, deaf and hard of hearing, speech, cognitive, and developmental disabilities.

Limited English Proficiency (LEP): A person with limited English proficiency or “LEP” does not speak English as their primary language and is not able to speak, read, write, or understand the English language well enough to allow him/her to interact effectively with a County Agency / OMJ Center.

Limited English Proficiency (LEP) Plan: The portion of the Combined Plan that details language assistance services, interpreters, and other accommodations for members of the LEP community.

Major Bodily Functions: Include, but are not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

Major Life Activities: Include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Meaningful Access: Language assistance must result in accurate, timely, and effective communication at no cost to the LEP individual and is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals. Meaningful access is the standard of language accessibility and is determined by the following four factors:

Number/Proportion of LEP individuals, Frequency of Contact, Nature and Importance of the program, Resources/Costs. This assistance includes but is not limited to providing bilingual staff, interpreters, translated materials, and many other strategies to ensure meaningful access. Meaningful access to benefits, programs and services is required of the County Agencies / OMJ Centers since they receive federal funding through the state of Ohio. Meaningful access requires compliance with state and federal LEP requirements as set out in relevant state and federal laws.

Ohio Department of Job and Family Services (ODJFS): Is responsible for developing and supervising the state's public assistance, workforce development, unemployment compensation, child and adult protective services, adoption, childcare and child support programs. The agency seeks to improve the well-being of Ohio's workforce and families by promoting economic self-sufficiency and ensuring the safety of Ohio's most vulnerable citizens.

On-Site Interpreter: An in-person interpreter that is physically present with ODJFS personnel to facilitate conversation.

Over-the-Phone (OPI) Interpretation: Transforming a spoken or signed message from one language into another over the telephone.

Primary Language: The language in which an individual most effectively communicates when interacting with the agency. An individual's primary language may be a language variant.

Reasonable Modification: Actions taken which permit a program applicant or participant with a disability access to CDJFS/OMJ programs or to perform the essential activities involved in the job or occupation sought or held and include, but are not limited to, provision of an accessible worksite, acquisition or modification of equipment, support services for persons who are deaf, hard of hearing or who have issues with vision, job restructuring and modified work schedules. Modification will not be considered reasonable if it imposes an undue hardship on the CDJFS/OMJ or fundamentally alters the program.

Service Animal: A dog that is individually trained to do work or perform tasks for a person with a disability. Emotional support animals (ESAs) refer to dogs and other pets that provide emotional support and comfort to their owners on a daily basis.

Participant: A person who participates in a program administered by the CDJFS/OMJ.

Promotional/Outreach Documents: County Agency / OMJ Center designed documents utilized by the County Agency / OMJ Center to provide information to the general public but targeting individuals who are eligible or may be eligible for county benefits/services or programs.

Translation: The written transfer of a message from one language into another language.

Translator: A person who transfers a written message from one language into another.

Video Remote/Virtual Interpreter: An interpreter that is virtually present with ODJFS personnel to facilitate conversation.

Vital Documents: Forms or documents designed and utilized by the County Agency / OMJ Center that are critical for accessing federally funded services or benefits or are required by law. Vital

documents can include but are not limited to applications for county designed programs; consent forms designed by the County Agency / OMJ Center; letters designed by the County Agency / OMJ Center requesting eligibility documentation.

IV. Civil Rights Plan

A. Statement of Policy

No person(s) shall, in violation of state or federal law, on the grounds of race, color, national origin, disability, age, sex (including pregnancy, gender identity and sexual orientation), religion, political affiliation, or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a WIOA program or activity (Protected classes may vary depending on the program) be excluded from participation in be denied or delayed the benefits or services of, or be otherwise subjected to discrimination under any program, service, or benefit authorized or provided by **Union County JFS/CSEA/PCSA/OMJ**, or its contractors.

The **Union County JFS/CSEA/PCSA/OMJ** shall implement the Civil Rights Plan within their service area through the following methods:

B. Delegated Authority

The **Union County JFS/CSEA/PCSA/OMJ** 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 **Union County JFS/CSEA/PCSA/OMJ** participants, clients, and beneficiaries of **Union County JFS/CSEA/PCSA/OMJ** 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.

C. Delegated Authority (For WIOA Funded Programs Only)

The **Union County JFS/CSEA/PCSA/OMJ** shall appoint an Equal Opportunity (EO) Officer Coordinator. The EO Officer shall be in charge of the obligations detailed in the Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act.

1. Responsibilities can be found at 29 CFR Part 38 Subpart B - Equal Opportunity Officers.
2. At combined agencies (Job and Family Services and OMJ Centers), duties for the Civil Rights Coordinator and the Equal Opportunity Officer can be performed by the same designated authority.

OMJ Center: **Union County JFS/CSEA/PCSA/OMJ**

Equal Opportunity Officer: **Maggie Brown**

Phone: **937-644-1010 ext. 2231**

Email: **maggie.brown@jfs.ohio.gov**

V. ADA Compliance Plan (ADAAA & Section 504 of Plan)

A. Statement of Policy

This policy is to establish clear requirements and guidelines regarding how the **Union County JFS/CSEA/PCSA/OMJ** County Department of Job and Family Services (CDJFS) or Ohio Means Jobs (OMJs) centers will deliver services to individuals with disabilities.

B. General requirements of the ADAAA/504

The general requirements of the ADAAA/504 require the CDJFS/OMJ to:

- Provide an equal and meaningful opportunity to all individuals with disabilities to participate in, and benefit from, the CDJFS/OMJ's programs.
- Not operate its programs in a way that has a discriminatory effect on individuals with disabilities.
- Make reasonable modifications, where necessary, to avoid discrimination.
- We will at the same time apply state and federal criteria for program eligibility and provide services and programs using finite staffing and fiscal resources. For some programs and services, demand may exceed, or fiscal resources may limit, our ability to provide or continue same, regardless of disability.

C. Effective Date

Effective immediately, all **Union County JFS/CSEA/PCSA/OMJ** staff will adhere to this policy.

D. Application

The ADAAA and 504 of the Rehabilitation Act and this policy apply to the operations of our CDJFS/OMJ as well as to federal and state programs we administer, although specific requirements may vary from program to program. The ADAAA and 504 of the Rehabilitation Act and this policy apply to many of our programs, including, but not limited to Ohio Works First (OWF) and the Supplemental Nutrition Assistance Program (SNAP). This policy will be provided to all our contractors and subcontractors who are also required to follow the ADAAA and 504. A copy of this plan will be provided to all of the current contractors or upon the formation of the contract.

E. ADAAA and Section 504 of the Rehabilitation Act

The ADAAA and Section 504 of the Rehabilitation Act apply to all individuals who have a physical or mental impairment which substantially limits a major life activity. This is a very broad definition that covers many individuals, including many who do not otherwise receive and/or do not qualify for disability benefits, such as Supplemental Security Income (SSI) or Social Security Disability (SSD) benefits.

Examples of physical impairments: Blindness, low vision, deafness, hearing limitations, arthritis, cerebral palsy, HIV, AIDS, traumatic brain injury, asthma, irritable bowel syndrome, quadriplegia,

cancer, diabetes, multiple sclerosis, anatomical loss, alcoholism, and past illegal use of drugs. This list is meant to provide examples of physical impairments, but it is not intended to be a complete list of physical impairments subject to this policy.

Examples of mental impairments: Clinical depression, bi-polar disorder (manic depression), anxiety disorder, post-traumatic stress disorder, learning disabilities (e.g., dyslexia), attention deficit disorder, intellectual disabilities. This list is meant to provide examples of mental impairments, but it is not intended to be a complete list of mental impairments subject to this policy.

Examples of major life activities: Engaging in manual tasks, walking, standing, lifting, bending, speaking, hearing, seeing, breathing, eating, sleeping, taking care of oneself, learning, reading, concentrating, thinking, and working. Major life activities also include major bodily functions such as bladder, bowel, digestive, immune system, cell growth, brain, neurological, circulatory, endocrine, and reproductive functions.

The ADAAA and Section 504 protect individuals inquiring, applying, or receiving benefits and services that are provided by our CDJFS/OMJ. For example, an individual with a disability who wants information about CDJFS/OMJ programs who has not yet applied for benefits has a right to access that information and a right to reasonable modifications that make it possible to do so. We will not discriminate against family members and others who accompany someone applying for benefits.

The individual must meet essential program eligibility requirements: Individuals who do not meet essential program eligibility requirements are not victims of discrimination when the CDJFS/OMJ excludes them from a program. "Essential program eligibility requirements" include, but are not limited to, residency, income, and citizenship.

Past history of a disability: The ADAAA and 504 also protect individuals from discrimination who previously had a disability.

Regarded as having a disability: The ADAAA and 504 protects individuals who are not actually disabled from discrimination that results from a perception by our staff that they are disabled. For example, the CDJFS/OMJ cannot treat someone unfavorably based upon a belief that a minor condition is much more limiting than it is.

F. **ADAAA/504 Coordinator**

Karla Martinez is the ADAAA Coordinator for our CDJFS/OMJ. It is the ADAAA Coordinator's responsibility to oversee and monitor ADAAA/504 compliance, train and advise our staff on how to accommodate individuals, and to recommend policy and procedure changes to improve ADAAA compliance, and take the other actions specified in this policy. The ADAAA Coordinator has the authority to instruct staff to modify internal **Union County JFS/CSEA/PCSA/OMJ** CDJFS/OMJ rules and procedures to accommodate individuals with disabilities. The ADAAA Coordinator is also responsible for investigating and resolving ADAAA/504 grievances. However, it is the responsibility of all our staff to comply with the ADAAA and to provide reasonable modifications to individuals.

G. **Physical Accessibility**

The entrance and public areas of the building meet requirements for physical accessibility. If a building or part of a building where services are provided becomes physically inaccessible, we will ensure that an individual is provided meaningful access to services through other means (e.g., holding appointments with individuals in another office in the building or at a different location, conducting appointments over the phone, allowing an authorized representative to attend the appointment for the individual).

H. **Reasonable Modifications**

If there is an identified need, we will provide reasonable modifications without cost or reduction in benefits to individuals with disabilities. A reasonable modification is any reasonable change in the way we do something for an individual with a disability or which would allow the individual to participate in or enjoy equal access to programs we administer. All staff, not just supervisors and administrators, have authority to make reasonable modifications as appropriate. Supervisory staff will ensure that all our employees understand their obligations to make reasonable modifications for disabled individuals and to assist staff in resolving complicated situations.

Possible modifications: We will consider the unique facts and circumstances presented by each individual with a disability so that the modification will truly result in full access to the program or service being offered. The following is a list of modifications; this list is not meant to reflect the only modifications we may provide:

- Help filling out an application for benefits and help gathering documents showing eligibility for benefits or for an accommodation of a disability.
- Modifications in appointments, including scheduling appointments at time of day that will prevent long waits; seeing individuals who cannot wait on a priority basis; scheduling appointments so they do not conflict with doctor's appointments, rehabilitation, or therapy; combining appointments to reduce travel; home visits for individuals who have difficulty traveling to the CDJFS/OMJ or attending appointments at the CDJFS/OMJ for disability-related reasons; allowing individuals to reschedule appointments when a disability prevents attendance.
- Giving an individual a reasonable amount of time to submit documents in addition to any regulatory or statutory timeframe.
- Allowing an individual to bring a friend, relative, neighbor, or advocate with them during appointments and during the application process.
- Sending copies of notices to a third party, such as a relative, friend, neighbor, or advocate.
- Reading notices and other program materials to the individual or providing more explanation of the program rules or forms.
- Providing notices, applications, and other program materials in different formats (e.g., Braille, or audiotape, etc.).
- Advising individuals with low vision that notices received via email or in the Ohio Benefits portal can be enlarged.
- Providing modifications to assist individuals in their workplace assignments. Some options may include providing auxiliary aids, services, or equipment to be used to assist the individual to participate in work activities, flexible schedules (including reducing the number of hours assigned when necessary), and longer periods of on-the-job training.

- Allowing individuals with disabilities to communicate and submit documents with a staff member via e-mail, fax, etc.
- Allowing a disabled individual access to the staff bathroom if the public bathroom will not permit wheelchair access.
- Granting a hardship extension of time-limited benefits to provide the individual with additional time to achieve self-sufficiency, when appropriate.

It may be necessary for our staff to modify local rules for individuals with disabilities if doing so would provide a needed reasonable modification. For example, rules requiring staff to see individuals in the order in which they arrive, rules requiring individuals to come to the CDJFS/OMJ for appointments, and rules requiring individuals applying for benefits to come to the CDJFS/OMJ on particular days of the week or times of day, may need to be modified for individuals with disabilities when necessary to provide an equal and meaningful opportunity to participate in programs we administer. Our staff cannot modify rules to the extent that the modification would fundamentally alter the nature of the service, program, or activity.

We will accommodate family members with a disability so that an individual has meaningful access to the program. For example, if a parent receives SSI and is applying for cash assistance for her child, the CDJFS/OMJ must accommodate the parent, so her child has an equal and meaningful opportunity to participate in the cash assistance program. The Job Accommodation Network, a free internet website, provides good information on accommodations of many different types, go to: http://askjan.org/

I. Reasonable Modifications in OWF, SNAP, WIOA, or CCMEP

We will ensure equal access to program applicants and participants with disabilities by delivering services that are: (a) appropriate in view of their particular physical or mental impairment; and (b) provide an equal opportunity to benefit from the CDJFS/OMJs' job placement, education, skills training, employment, food assistance employment and training programs, and other program activities.

In ensuring equal access to people with disabilities, we will use a comprehensive and effective screening tool for disability assessments. When an applicant discloses, has, or appears to have a disability, we will offer to conduct additional screening. We will, however, inform applicants and participants that their participation in screening and disclosure of a disability is voluntary. The screening tool will be administered by trained staff.

Sometimes people with disabilities may be unable to complete job placement, education, skills training, employment, food assistance employment and training programs, and other program activities without modifications to local policies, practices, and procedures. One size does not fit all in regard to modifications. We will assess the needs of the individual applicant or recipient to make reasonable modifications tailored to those needs. Modifications may be needed in the: (1) application process; (2) procedures related to notifying the applicant or recipient of their rights; and (3) policies and practices that aid the individual in sustaining program participation.

We will explain to applicants and recipients that they do not have to disclose a disability, but it will also be made clear that unless the disability is obvious, a modification cannot be granted unless we know what the disability is and how it limits the applicant or recipient's ability to perform work or

engage in activities.

The determination of whether an individual has a disability under the ADAAA is not intended to take a lot of research or analysis by our staff member. The key role of our staff is determining whether a modification is necessary to provide meaningful access to the programs for which the individual is eligible.

We can require documentation if an individual has a disability and asks for modification. However, if a disability is obvious (e.g., blindness, quadriplegia), we will not require documentation of the disability.

If an individual seems to have a disability and may need a modification, but has no documentation supporting the disability, and does not have Medicaid coverage or other means to pay for doctor's visits, lab tests, etc., we will accommodate the individual until there are means to obtain disability documentation.

Individuals saying a disability limits their ability to engage in work activities, cannot be assigned to a work activity until after the results of the evaluation are available, unless it is an activity that is consistent with the individual's claimed limitations or unless it is an activity in which the individual agrees to participate. Information confirming a disability, whether by disclosure, screening, appraisal, or assessment, will be used in making appropriate assignments to allow for the pursuit of self-sufficiency.

- **Modifications**

Many modifications are needed on an on-going basis. If a modification is necessary, both the need for the modification and the actual modification made should be indicated prominently in the case records so other staff who interact with the individual are aware of it. In addition, we will take the steps needed to make sure that the modification is provided without request in the future (until the individual's condition changes or the modification is no longer needed), so the individual does not have to ask for it each time. For example, an individual who needs an interpreter in order to communicate with staff should not have to request the interpreter each time the individual has contact with staff.

An individual's self-sufficiency contract and/or employability plan will also include information about the need for modifications and the modifications provided.

Time frame for providing modifications: Many modifications (such as help with completing an application) must be provided on the same day they are requested. Other modifications should be provided in time to prevent a denial of equal and meaningful access to programs and services. For example, if a modification is required to permit an individual to perform an assignment, our staff should ensure that the work activity site is aware of the need for the modification prior to the first day of the assignment.

A request for a reasonable modification is the first step in an informal, interactive process between our staff and an individual. As part of the interactive process, the individual may suggest a particular modification and we may offer alternatives. If, after engaging in an interactive process, the individual refuses a reasonable modification and as a result, fails to perform or meet a program requirement, our staff can initiate an adverse action. Our staff will document all modifications

offered and refusals of same.

J. **Recording Information**
When an individual has disclosed a disability and requests a modification, the staff member providing service will, with the individual's consent, document the disability and need for the modification prominently in the case record (alternatively, the modification, but not the diagnosis, can be listed on case file).

If an individual's request for modification is denied, the staff member making that decision must notify the ADAAA Coordinator, who will maintain record of the denials. The notice must contain a description of the individual's disability, the type of modification requested, and the reason the request was denied.

K. **Disability-related information should be kept confidential**
Our staff will comply with all applicable state and federal confidentiality laws regarding disability-related information. HIPAA rules must be strictly adhered to whenever protected health information (PHI) is collected, maintained, or transmitted by the CDJFS/OMJ. At the same time, our staff must inform other relevant staff or contractors about an individual's need for a modification, so they can arrange for and/or provide modifications. Our staff will obtain written consent before sharing information about an individual's disability with contractors or other agencies.

L. **Integrated Setting**
If an applicant or participant meets eligibility requirements for a program, there is a right to participate in that program. Therefore, we will provide services to individuals with disabilities in the most integrated setting appropriate to their needs.

Modifications should be made to allow individuals with disabilities to fully participate in group activities with other participants. Separate trainings and educational programs are only appropriate if they are specifically designed to confer a particular benefit for disabled individuals. Individuals with disabilities cannot be given separate training and education programs just because they have disabilities.

M. **Some disabled individuals need to use service animals**
We will not exclude individuals requiring guide dogs, hearing dogs or service dogs from our programs, or impose limits on access to programs and services. Animals whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADAAA. The service animal must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices. In that case, the individual must control the animal at all times through voice, signal, or other effective controls. Individuals with disabilities cannot be required to provide certification proving the animal is a service animal.

If it is obvious that an individual has a disability and a service animal has been trained to perform a task for the individual, staff cannot ask about the person's disability or whether the dog is a service animal. If it is not obvious, staff can only ask (1) whether the animal is needed for a disability, and (2) what task or work the animal is trained to perform.

An individual with a disability will not be asked to remove his service animal from the premises

unless (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. Allergies and/or fear of dogs are not valid reasons for denying access or refusing service to individuals using service animals. When there is a legitimate reason to ask that a service animal be removed, the staff member must offer the opportunity to obtain services without the animal's presence.

N. **Effective Written Communication: Deaf or Hard of Hearing Individuals**

We will ensure communication with individuals with disabilities is as effective as communications with others. This includes communications with applicants, participants, members of the public, and companions with disabilities. A "companion" is a family member, friend, or associate of an individual seeking or receiving services or information. We will provide, at no cost, a qualified sign language interpreter for deaf or hard of hearing individuals who need them to communicate effectively about their social services benefits. This includes, at minimum, discussions about eligibility for benefits, program rules, the individual's rights and responsibilities, development of self-sufficiency plans, individuals' disabilities, and their effect on the ability to comply with work requirements or other program requirements.

ADAAA regulations prohibit public entities from relying on an accompanying adult to interpret or facilitate communication, except:

- In an emergency involving an imminent threat to the safety or welfare of the individual or the public where there is no interpreter available, or
- Where the individual with a disability specifically requests that the accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance under the circumstances is appropriate.

A family member or friend may not be an appropriate person to interpret if he lacks sufficient fluency in ASL and/or English, or if the subject matter of the communication makes it inappropriate for the family member or friend to interpret. Minor children will be used to interpret only in emergency circumstances, where there is no interpreter available and immediate communication is needed to prevent physical harm to the disabled individual and/or public.

For re-certifications or other on-going appointments, our staff will make appropriate sign language arrangements through a sign language interpretation service prior to the appointment.

If the deaf or hard of hearing individual can read and write English sufficiently well, our staff are permitted to write notes to communicate with the person, but only for brief, simple interactions (such as making an appointment with the CDJFS/OMJ or submitting a document).

To arrange for an interpreter, employees should contact **Karla Martinez** or one of the other sign language interpretation services at the phone numbers listed above. To the extent possible, delays in providing interpreters cannot count against the individual. When an appointment is rescheduled for an individual with a disability because reasonable modifications cannot be made on the date the application is filed or the date an attempt is made to file an application, the delay will not affect the application filing date or any other dates relevant to processing of applications. We will address emergency/immediate needs such as impending homelessness, emergency food

needs or utility shut offs of such applicants.

O. **Effective Phone Communication: Deaf or Hard of Hearing Individuals**

Some individuals with speech impairments or who are deaf or hard of hearing may use the following technology/procedures to make and receive phone calls.

TTY (teletext typewriter): If one party to the call doesn't have a TTY (e.g., the CDJFS/OMJ), the two parties communicate through a relay operator, who has a TTY and can read the TTY text to the party without the TTY and type responses.

To make a call to a TTY user: Dial 711 (Ohio Relay) and give the relay operator the phone number you want to call. The relay operator will type your message into the TTY and transmit it to the TTY user. The TTY user can then reply to the operator, who will read the response to you.

To receive a call from a TTY user: Just answer the call and communicate through the relay operator. Video relay: The caller uses a video phone (a computer or TV monitor) and uses sign language to communicate. If one party to the call doesn't have video relay equipment, the two parties communicate through a video relay operator who uses American Sign Language to facilitate communication between the deaf or hard of hearing person.

To make a call to a video relay user: Dial the number given by the individual.

To receive a call from a video relay user: Pay attention to the number of the message. The number may be the individual's direct number, or it may be the number of a relay operator. If the individual uses voice or video relay, you may need to call a relay operator and give the operator the number.

Speech to speech relay: Specially trained relay operators serve as the voice of the individual with a speech disability that may be difficult to understand.

P. **Effective Communication: Individuals with Vision Impairments**

In appropriate cases, oral communication may be used to assist visually impaired individuals. However, simply reading documents to an individual, without more, may not always provide an effective opportunity to participate. Commonly used important documents (e.g., know-your-rights materials, materials describing CDJFS/OMJ programs, appointment notices, adverse action notices, hearing notices, etc.) should be converted into alternate forms of communication when necessary.

Examples of alternative formats include Braille, large print, computer disc in a format that can be accessed by an individual with a computer using assistive technology (such as a screen reader), audiotape, or other formats. Staff should contact the ADAAA Coordinator for assistance with assessing how best to meet individual needs for materials in alternative format.

Staff working with the customer must document in the case record any modification provided so that it may be available for future appointments and necessary auxiliary aides and services can be scheduled in advance of the appointment.

Q. **Notice of ADAAA/504 rights**

In addition to mandatory notices provided to applicants, participants, employees, and members of

the public with information about the ADAAA and Section 504, we may make available printed materials such as pamphlets, fliers and posters that contain current basic information about the ADAAA and Section 504. This material will be in the languages required in rule 5101:4-1-05 of the Administrative Code and will include the food assistance program nondiscrimination statement; the phone number of the ADAAA coordinator; and information on filing ADAAA complaints.

We will display a notice of ADAAA rights alongside or near posters required by rule 5101:4-1-13 of the Administrative Code.

R. **Staff training**

We will provide annual training on the ADAAA and on this Plan in accordance with rule 5101: 9-2-01(I)(2)(b)(v) of the Administrative Code, to all staff that interact with the public, including clerical staff. This training will be done either electronically or in live training sessions. The ADAAA Coordinator will ensure that staff receive this training. The training will include, at minimum, the following topics:

1. General information about Title II of the ADAAA;
2. Detailed information about this Plan; and
3. Information about providing reasonable modifications in waiting room and reception area procedures.

VI. Limited English Proficiency Plan

A. **Statement of Policy**

It is the policy of **Union County JFS/CSEA/PCSA/OMJ** to provide meaningful access to all individuals applying for, participating in programs, or receiving services/benefits administered by, supervised by, authorized by and/or participated in by **Union County JFS/CSEA/PCSA/OMJ**, its contractors and/or vendors. Meaningful access involves **Union County JFS/CSEA/PCSA/OMJ** promoting effective communication to LEP individuals seeking or receiving services, benefits or participation in programs funded in whole or in part by federal funds. Meaningful access is determined by the analysis of the following four factors: the number or proportion of LEP persons eligible to be served or likely to be encountered by the recipient's program, activity, or service; the frequency with which LEP individuals come in contact with the program, activity or service; the nature and importance of the program, activity, or service provided by the recipient; and, the resources available to the recipient and cost. This plan specifically provides necessary assurances and identifies tools being used to effectively implement this policy.

B. **County LEP Population**

Union County JFS/CSEA/PCSA/OMJ has determined that the language(s) other than English that is/are most likely to be encountered by employees of the **Union County JFS/CSEA/PCSA/OMJ** is/are:

Akan, American Sign Language, Arabic, Gujarati, Haitian Creole, Hindi, Kinyarwanda,

Laotian, Mandarin, Nepali, Punjabi, Russian, Spanish, and Telugu.

NOTE: Each County agency/OMJ should include at least Spanish as one of the languages or the only language}. The methodology used to make this determination is as follows: (explanation by the County agency: e.g., use of census, County agency encounters, school system data, primary language indicator from Ohio Benefits, community agency data, data from client files, etc.)

Union County JFS/CSEA/PCSA/OMJ will periodically monitor the LEP population of those served or those who could be served by **Union County JFS/CSEA/PCSA/OMJ**. If it is determined that other LEP language groups are seeking benefits/services or are potentially eligible to receive benefits/services within **Union County JFS/CSEA/PCSA/OMJ**, the **Union County JFS/CSEA/PCSA/OMJ** will adjust its methods and services to serve the new population accordingly. Any new LEP populations will be reflected in the next LEP plan.

As this LEP Plan contains regulations from different federal agencies that contain different LEP guidelines, to create uniformity among all counties, **Union County JFS/CSEA/PCSA/OMJ** will seek to follow the bilingual requirements established by USDA FNS as they are more stringent and will hopefully captures eligible and potentially eligible populations. (Requirements can be in found in the Translation of Documents section.)

Select One:

Your selection is - **There are no LEP language groups meeting this criterion.**

C. **Interpretation Services**

Union County JFS/CSEA/PCSA/OMJ, at no cost to the LEP individuals or families, provides interpreter services to all LEP individuals or families applying for, participating in programs or receiving services/benefits through the **Union County JFS/CSEA/PCSA/OMJ** by the means designated in section (Methods) of this plan. Interpretation services are provided in an efficient and timely manner so as not to delay a determination of eligibility for an individual or family, receipt of eligible services/benefits or participation in a county run program beyond that of an English-speaking individual or family. The **Union County JFS/CSEA/PCSA/OMJ** makes this policy known to the LEP through the following methods (e.g., posters in other languages, Babel cards, etc.).

Union County JFS/CSEA/PCSA/OMJ addresses phone calls and voice mail by LEP individuals in the following manner: (describe County Agency / OMJ Center phone services for LEP individuals. If addressed through something checked in Section E. can reference that portion).

Upon determination that we have a customer with limited English proficiency on the telephone, we would communicate with them that we will be obtaining an interpreter for them. We would ask them to hold, contact the vendor and then connect to a conference call to aide in determining what language is being spoken and what services they may be inquiring about to determine the next steps in assisting the customer.

Union County JFS/CSEA/PCSA/OMJ addresses walk-ins who are LEP individuals in the following manner: LEP walk-in method(s).

First contact is with the front desk lobby case managers, whom have access to the interpreter services information, Language Line posters and Babel cards. They may also

call on other case managers or supervisors to assist them to set up interpreter services for the customer. All employees have access to the current LEP plan, language cards, and knowledge on how to use the language line services.

Union County JFS/CSEA/PCSA/OMJ does not require, suggest, or encourage LEP individuals or families to use friends, family members or minor children as interpreters. If an LEP individual or family insists that a friend or family member serve as interpreter, **Union County JFS/CSEA/PCSA/OMJ** will inform the customer that the family may stay but will not be able to serve as the interpreter. Only on rare occasions when there is no other strategy, such as interpretations over the phone, the **Union County JFS/CSEA/PCSA/OMJ** will then, on a case by case basis, consider factors such as: competence of the family or friend used as the interpreter; the appropriateness of the use in light of the circumstances and ability to provide quality and accurate information, especially if the interview could result in a negative effect on the individual or family's eligibility for benefits/services; potential or actual conflicts of interest; and confidentiality of the information being interpreted to determine whether **Union County JFS/CSEA/PCSA/OMJ** should provide its own independent interpreter for itself. In no case does, **Union County JFS/CSEA/PCSA/OMJ** allow a minor child to act as interpreter for an LEP individual or family.

D. **Translation of Documents**

Union County JFS/CSEA/PCSA/OMJ should provide translated vital documents and interpretation services for county designed vital documents that provides service to an area containing approximately 100 single- language minority low-income households; and in each project area with a total of less than 100 low-income households if a majority of those households are of a single-language minority. (Single-language minority refers to households which speak the same non-English language, and which do not contain adult(s) fluent in English as a second language.)

For program informational activities (outreach) in the appropriate language the **Union County JFS/CSEA/PCSA/OMJ** has to have less than 2,000 low-income, if approximately 100 or more of those are single language minority; or in a County Agency / OMJ Center with 2,000 or more low-income household, if approximately 5% or more of these household are single language minorities.

For the purpose of the LEP Plan a low-income household refers to as a household at or below 125% of the poverty level.

For any LEP individuals applying or receiving services from **Union County JFS/CSEA/PCSA/OMJ** where vital documents are not available in the LEP individual's language, **Union County JFS/CSEA/PCSA/OMJ** provides a notice in the LEP individual's language that the LEP individual may bring any document into the **Union County JFS/CSEA/PCSA/OMJ** office and an interpreter (face to face or telephonic interpretation) will be provided free of charge to interpret the document for the LEP individual.

State Designed Vital Documents

The ODJFS Office/Program Area who owns the vital document will conclude if there is a statewide need to translate and respond accordingly. The decision to translate JFS Forms will be at the discretion of the ODJFS Office/Program Area. If it is determined that there is no statewide need,

the ODJFS Office/Program Area can grant permission to translate locally.

Translation Engines and Auto Translation Tools

The use of translation engines and/or auto translation tools such as Google Translate, through the internet or language applications can be very useful, however they should not be used to translate vital information nor used by any other persons outside of a native language speaker or a certified bilingual staff as an assistance guide. A native language speaker/certified bilingual staff is able to make the appropriate adjustment and/or corrections to the translation. A non-native language speaker will have difficulty making the proper adjustment to the syntax, meaning, and vocabulary. One example we found using one of the translation engines was: e.g., Spanish- dos burritos por favor; the English translation - two donkeys please, instead of two burritos please. The computer does not know that you are referring to food. The computer translates literally. Therefore, to avoid any misunderstandings we do not recommend the use of engine translations or auto translation tools for vital information.

E. **Methods of Providing Services to LEP Population**

(Check all that are applicable)

Bi-lingual Employee(s) (if checked provide employee(s) names and language(s) with brief description of method of determining competence as interpreter(s))s).

Staff Interpreter(s) (if checked provide name(s) and language(s) with brief description of method of determining competence as interpreter(s).).

X Interpreter Contract (if checked, provide name(s) of contractor(s), list service(s) provided, language(s) covered, and brief description of how vendor(s) was/were chosen. Also attach copy of agreement or contract to this plan)

Language Line Services-provides interpreting for over 240 languages, 24-hours a day, 7-days a week. It was chosen for the ability to interpret several languages and the ease in which it is to use. Deaf Services Center is a local service that is reliable and accommodating for our customers. Contracts are attached.

X Telephonic Interpreting Services (if checked provide name of vendor with brief description of how vendor was chosen. Attach copy of contract to this plan)

Language Line and Deaf Services-*see above interpreter contract info.

Agreement with Educational Institution (if checked provide name of institution, name(s) of interpreters, brief description of method of determining competence of interpreter. Attach copy of agreement, MOU, or another written document to this plan. If there is nothing in writing, describe arrangement).

X Translation contracts (if checked provide name(s) of contractor(s), list service(s) provided, language(s) covered and brief description of how vendor was chosen. Also attach copy of agreement or contract to this plan).

Language Line and Deaf Services-*see above interpreter contract info.

Other (if checked explain arrangement and attach any relevant documents explaining the arrangement to this plan).

F. **Dissemination of Information to Union County JFS/CSEA/PCSA/OMJ Personnel**

Union County JFS/CSEA/PCSA/OMJ makes its personnel aware of its LEP policies, methods of providing services to LEP individuals and other information contained within this plan through the following: (explain in some detail, e.g., training by civil rights coordinator, on-line training, new employee orientation, personnel handbook, hand-outs, etc.).

List method(s) of information to personnel here:
Information is shared by way of emails, updated plan on SharePoint, posters located at the front desk lobby area, Babel cards, new employee on boarding, and annual employee training for Civil Rights, LEP, and ADA.

G. **Optional**

Any other information, explanation, or assurances connected to LEP issues provided at the option of the County Agency.

Optional Comments:

VII. Complaint Procedures

A. **Grievance Procedures for Individuals with Disabilities**
Individuals who believe that they were denied a reasonable modification may file a grievance with the CDJFS/OMJ.

Each CDJFS/OMJ has a grievance form that individuals can use to file a grievance regarding the requested modification. The CDJFS/OMJ also has the complaint form that can be used to file other claims of discrimination. Those documents are attached to this policy as Attachments A and B. No one is required to use the provided forms, and grievances can be made orally. Helping a disabled individual completes a grievance or complaint form may be a reasonable modification that CDJFS/OMJ staff must undertake.

If a grievance is submitted to CDJFS/OMJ staff, it must be forwarded to the ADAAA/504 Coordinator upon receipt. Staff shall explain to those whose requested modifications have been denied, as well as those individuals who believe they were treated unfairly because of a disability, about the right to file a grievance. Additionally, these individuals must be offered a grievance form and a copy of this plan.

Grievances must be filed within 10 business days of an alleged denial of a modification. All grievances received by the ADAAA/504 Coordinator must be investigated and resolved within 10 business days of receipt, unless good cause exists. Good cause may include circumstances that are beyond the CDJFS/OMJ's control. The ADAAA Coordinator shall submit copies of ADAAA/504 grievances and decisions on those grievances to ODJFS's Bureau of Civil Rights.

The ADAAA Coordinator should consider whether one or more grievances on a given issue indicates the need for changes or reviews of CDJFS/OMJ policies and/or practices, or reflect

intervening changes in rules, regulations, or law and if so, take necessary and appropriate steps to address same, including implementing changes in policy or practices.

An individual's decision to file a grievance with the ADAAA Coordinator does not replace the individual's right to request a hearing in accordance with Division 5101:6 of the Administrative Code.

Complaints of ADAAA/504 violations should be referred to:

Karla Martinez, ADAAA Coordinator
Union County JFS/CSEA/PCSA/OMJ County Department of Job and Family Services/Ohio Means Jobs Center
Phone: **937-645-2018**
By mail at:

940 London Ave. Suite 1800
Marysville, Ohio 43040

By email at: **karla.martinez@jfs.ohio.gov**

Anyone who could file a grievance with the ADAAA Coordinator may also file a complaint with the Ohio Department of Job and Family Services, Bureau of Civil Rights, 30 East Broad Street, 30th Floor, Columbus, Ohio 43215.

Complaints that a reasonable modification has been denied or that the CDJFS/OMJ has discriminated against an individual on the basis of a disability may be made to the Ohio Department of Job and Family Services, Bureau of Civil Rights.

A complaint does not need to be made on a specific form, but it must contain all information necessary to allow an investigator to understand the reason for the complaint and provide enough contact information to permit someone from the Bureau to contact the individual making the complaint. The Bureau of Civil Rights will investigate the complaint and issue a response within 90 days of receipt of the complaint.

An individual's decision to file a complaint with the Bureau of Civil Rights does not replace the individual's right to request a hearing in accordance with Division 5101:6 of the Administrative Code.

B. **Civil Rights Procedures**

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 (including pregnancy, gender identity and sexual orientation), religion, political affiliation, or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a WIOA program or activity (Protected classes may vary depending on the program) may file a complaint outlining the alleged discriminatory act(s).

The **Union County JFS/CSEA/PCSA/OMJ** shall have in effect a complaint procedure which incorporates the elements of due process. 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. (It is not necessary for an individual to submit a complaint in writing about alleged sexual harassment before starting an investigation.)

1. Complaints must be filed with the **Union County JFS/CSEA/PCSA/OMJ** within one-hundred and eighty (180) business days of the date the alleged discriminatory act or treatment occurred.
2. When complaints are received by the local area Civil Rights Coordinator, they shall be referred to the ODJFS, Bureau of Civil Rights within three (3) business days of the date of receipt. ODJFS BCR shall conduct its inquiry and issue its Final Report of the complaint.
3. Any party dissatisfied with the ODJFS BCR's Final Report will be advised of the right to file a complaint with the applicable federal agency.
4. 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 by the agency's staff or its contractors.

Union County JFS/CSEA/PCSA/OMJ Department of Job and Family Services/OMJ Center
Civil Rights Coordinator(s): **Nedra Baetz**
Phone: **937-644-1010 ext. 2226**
Email: **nedra.baetz@jfs.ohio.gov**
Website: **https://www.unioncountyohio.gov/departments/HumanServices**

County Civil Rights Coordinator Name:
County Civil Rights Coordinator Phone Number:
County Civil Rights Coordinator Mailing Address:
County Civil Rights Coordinator Email Address:

C. **Civil Rights Procedures (For MEPA Complaints Only)**

Any individual may file a complaint alleging a discriminatory act, policy or practice involving Race, Color, National Origin (RCNO) in the foster care or adoption process of a PCSA, PCPA, PNA or the Ohio Department of Job and Family Services (ODJFS).

Any person, including but not limited to, an employee or former employee of a PCSA, PCPA, or PNA or a member of a family which has sought to become a foster caregiver or adoptive parent, may also file a complaint alleging that he or she was intimidated, threatened, coerced, discriminated against or otherwise retaliated against in some way by a PCSA, PCPA, PNA or by ODJFS, due to the individual making a complaint, testifying, assisting, or participating in any manner in an investigation, proceeding, or hearing in connection with an allegation that a PCSA, PCPA, PNA or ODJFS engaged in discriminatory acts, policies, or practices as it applies in the foster care or adoption process.

The individual filing a complaint shall use the JFS 02333 "Discrimination Complaint." The complaint shall be filed within two (2) years from the date of the occurrence of the alleged discriminatory act; or two (2) years from the date upon which the complainant learned or should have known of a discriminatory act, policy, or practice. The complaint may be filed with:

1. Any PCSA, PCPA or PNA; or,
2. The ODJFS BCR.

When any complaint alleging discrimination involving RCNO in the foster care or adoption process is received by:

1. A PCSA, PCPA or PNA, the agency shall forward the complaint to ODJFS BCR within three (3) working days of date of receipt of the complaint.
2. ODJFS BCR, the department shall notify the PCSA, PCPA, PNA that is the subject of the complaint within three (3) working days of the receipt of the complaint.

ODJFS BCR shall conduct an investigation of the complaint. The PCSA, PCPA or PNA that is the subject of the complaint shall not initiate, conduct, or run concurrent investigations surrounding the complaint or take any further action regarding the complainant or the subject of the complaint until the issuance of the final investigation report by ODJFS BCR, unless approved by ODJFS BCR.

MEPA Coordinator Name: **Garret Rudasill**
MEPA Coordinator Phone Number: **937-644-1010 ext. 2357**
MEPA Coordinator Email Address: **garret.rudasill@jfs.ohio.gov**

State Enforcement Agency
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 as ODJFS BCR can assist in determining the correct filing agency bases upon the program, service, or benefit.

Ohio Department of Job and Family Services, Bureau of Civil Rights
30 East Broad Street, 30th Floor, Columbus, Ohio 43215
Phone: (614) 644-2703; Toll Free: 1-866-227-6353
Email: Civil_Rights@jfs.ohio.gov
Website: How to File a Complaint | Job and Family Services (ohio.gov)

Federal Enforcement Agencies

United States Department of Health and Human Services, Midwest Region
Mail: Steven Mitchell, Regional Manager, Office for Civil Rights, U.S. Department of Health and Human Services
233 N. Michigan Ave., Suite 240, Chicago, IL 60601
Phone: Customer Response Center: (800) 368-1019, TDD: (800) 537-7697
Fax: (202) 619-3818
Email: OCRComplaint@hhs.gov or OCRMail@hhs.gov
Website: https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf

United States Department of Agriculture, Food and Nutrition Service (Supplemental Nutrition Assistance Program)
Mail: Food and Nutrition Service, USDA
1320 Braddock Place, Room 334, Alexandria, VA 22314
Phone: (833) 620-1071
Fax: (833) 256-1665 or (202) 690-7442
Email: FNSCIVILRIGHTSCOMPLAINTS@usda.gov
Website: ad-3027.pdf (usda.gov)

United States Department of Labor (Unemployment and WIOA Programs)
Mail: Director, Civil Rights Center, ATTENTION: Office of External Enforcement, U.S. Department of Labor
200 Constitution Avenue, N.W., Room N-4123, Washington, D.C., 20210
Phone: Toll Free: 1-866-487-2365
Email: CRCExternalComplaints@dol.gov
Website: How to File a Complaint with External Enforcement | U.S. Department of Labor (dol.gov)

VIII. County Authority Acknowledgement

By checking below, the County Agency/OMJ Center acknowledges the accuracy, receipt and completion of the 2026-2028 Combined Plan (Civil Rights Plan, ADA Plan and LEP Plan). I confirm that I have read the plan in its' entirety and a copy of this plan has been provided to and approved for submission by the following entities:

X County Director

X County ADAAA Coordinator

X County Civil Rights Coordinator(s)

X County Equal Opportunity Officer

The 2026-2028 Combined Plan has been completed by:

Name: **Nedra Baetz**
Title: **Deputy Director**
Email Address: **nedra.baetz@jfs.ohio.gov**