

**DELAWARE COUNTY DEPARTMENT OF JOB AND FAMILY
SERVICES
CIVIL RIGHTS PLAN**

Statement of Policy

All programs, services and benefits administered, supervised, authorized and/or participated in by the Delaware County Department of Job and Family Services (DCDJFS) and contracted providers shall be operated in accordance with the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975; the Multiethnic Placement Act of 1994, as amended by the Interethnic Adoption Provisions of 1996; Americans with Disability Act Amendment Act of 2008; Title 1X of the Education Amendments of 1972 and the Workforce Innovation Opportunity Act (WIOA) of 2014.

No person or persons shall, in violation of state or federal law, on the grounds of race, color, national origin, disability, age, sex or religion, political affiliation or belief, Workforce Innovation and Opportunity Act (WIOA) participation status, or for beneficiaries only, citizenship status (not all bases apply to all programs) 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 the DCDJFS and county agency contractors.

The Director of the DCDJFS shall implement the Civil Rights Plan within the service area through the following methods:

Delegated Authority

The DCDJFS 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. Attending Ohio Department of Job and Family Services (ODJFS) approved civil rights training within six months of becoming the civil rights coordinator, and attending training updates as required by ODJFS.
2. Providing input to management to improve the civil rights in service delivery, and to discuss civil rights complaints, issues, and reports of compliance activities within the county agency or with county agency contractors.
3. Maintaining essential compliance records and files, including client analysis data, staff training records, confidential complaint files, and accommodation requests.
4. Reviewing written policies to make sure that those policies are nondiscriminatory.
5. Providing technical assistance or referring staff to appropriate resources for technical assistance.

Providing annual training on civil rights in service delivery to staff. New staff shall receive training as part of their initial orientation. Maintain records of rosters of training.

6. The Civil Rights Coordinator shall disseminate civil rights information to county agency staff and county agency contractors, vendors, beneficiaries, and other interested parties.
7. Acting as Civil Rights liaison between ODJFS, the county agency, county agency contractors, beneficiaries, and community groups or other organizations concerning civil rights in the delivery of services.

Complaint Policy and Procedure

The DCDJFS 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 may file a written complaint alleging discrimination within 180 days from the date of the alleged discriminatory act. Complaints can be filed with the ODJFS Bureau of Civil Rights (BCR) or DCDJFS. Assistance in drafting and filing complaints shall be made available. A complaint is deemed filed when the county agency or ODJFS BCR receives a written statement sufficiently precise to identify the parties and to describe generally the action of practices for which there is a complaint. ODJFS discrimination complaint forms may be obtained from the ODJFS BCR or the county agency, but the use of any particular form is not required for the proper filing of a complaint.

Any complaint alleging discrimination filed with ODJFS BCR or a county agency shall contain the following information:

- a) The full name and address of the person making the complaint.
 - b) The full name and address of the covered entity against whom the complaint is made.
 - c) The basis on which complainant believes the discrimination has occurred (not all bases apply to all programs): race, color, religion, national origin, disability, age, sex, political affiliation or belief (WIOA and Food and Nutrition Services (FNS)). WIOA participation status or for beneficiaries only, citizenship status apply to WIOA only.
 - d) A statement of the facts that the complainant believes indicates an unlawful discriminatory practice is of continuing nature, the dates between which said continuing acts are alleged to have occurred. A statement as to any other grievance, action or proceeding in any other forum based upon the same facts as are alleged in the complaint, together with a statement as to the status or disposition of such other action.
2. The complainant and respondent shall be advised of the results of the investigation, after the

completion of the investigation, which includes referral to Food and Nutrition Services Regional Office (FNSRO) and its concurrence with OD.P [5' action, The complainant shall also be advised of the right to file a complaint with any appropriate state or federal civil rights enforcement agency.

3. Upon receiving a complaint alleging discrimination, the county agency shall forward the complaint to the ODJFS BCR within three working days of date of receipt; make all persons or paper pertaining to a case being handled by the ODJFS BCR available at the ODJFS BCR's request unless doing so would violate state or federal law; submit any information requested by the ODJFS BCR not later than fourteen working days from date of receipt of request unless otherwise agreed upon: cooperate fully with the ODJFS BCR during the course of any investigation: not initiate, conduct or run concurrent investigations and not retaliate against the complainant or any person(s) associated with any inquiry conducted by the ODJFS BCR.
4. The county agency shall agree to post in conspicuous places available to employees and applicants for employment, notices stating that the county agency complies with all applicable federal and state nondiscrimination laws. The county agency shall, in all solicitations or advertisements for employees placed by or on its behalf state that all qualified applicants shall receive consideration for employment without regard to race, color, national origin, disability, sex, religion, political affiliation or belief. WIOA participation status, or for beneficiaries only, citizenship status (not all bases apply to all programs).

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 DCDJFS Civil Rights Coordinator Katheryn Adams at: 145 North Union Street, Delaware, Ohio, 43015, 740-833-2360.

The Ohio Department of Job and Family Services Bureau of Civil Rights. 30 East Broad. 30th Floor. The United States Department of Health and Human Services, Office for Civil Rights, Region V. 233 N. Michigan Avenue. Suite 240, Chicago. Illinois 60601.

The United States Department of Agriculture (Food Stamps only). Civil Rights Office, *Room 326-West*. Whitten Building. 1400 independence Avenue, SW. Washington, D.C. 20251.

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

This Civil Rights Plan, including provisions for Limited English Proficiency as a separate plan is hereby approved as a guiding policy for the DCDJFS.

Robert Anderson, Director

Date