



CIVIL RIGHTS PLAN

December 1, 2022

Statement of Policy

All programs, services and benefits administered, supervised, authorized and/or participated in by the Cuyahoga County Department of Health and Human Services (CCDHHS), including Cuyahoga Job and Family Services (CJFS), Office of Child Support Services (OCSS), Division of Children and Family Services (DCFS), and Division of Senior and Adult Services (DSAS) 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 IX 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, including sexual orientation and gender identity, religion, political affiliation or belief, 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 CCDHHS, including county agency contractors.

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

Delegated Authority

The CCDHHS or its division administrators shall appoint a Civil Rights Coordinator to cover the following agencies: DCFS, CJFS, OCSS and DSAS. The Civil Rights Coordinator shall be responsible for monitoring the implementation of the Civil Rights Plan for the department, 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 staff training records, confidential complaint files and accommodation requests.
4. Reviewing written policies to make sure that those policies are nondiscriminatory.

5. Providing 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 employees, county agency contractors, vendors, beneficiaries, and other interested parties.
7. Acting as Civil Rights liaison between ODJFS, the county division/ department, county division/ department contractors, beneficiaries, and community groups or other organizations concerning civil rights in the delivery of services.

COMPLAINT POLICY AND PROCEDURES

Each Agency under CCDHHS has its own complaint procedures which incorporates the elements of due process. Please follow the instructions relative to each Agency.

**CUYAHOGA COUNTY JOB AND FAMILY SERVICES
CUYAHOGA COUNTY OFFICE OF CHILD SUPPORT SERVICES (including The
Fatherhood Initiative)
CUYAHOGA COUNTY DIVISION OF SENIOR AND ADULT SERVICES
CUYAHOGA COUNTY DIVISION OF CHILDREN AND FAMILY SERVICES**

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 the County division/department (See *contact information below*). Assistance in drafting and filing complaints shall be made available. A complaint is deemed filed when the county division/ department 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 form is not required for the filing of a complaint.
2. Any complaint alleging discrimination filled with ODJFS-BCR or a county division/ department 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, including sexual orientation and gender identity, political affiliation,

- or belief (WIOA and Food and Nutrition Services). WIOA participation status or for beneficiaries only, citizenship status (WIOA) only).
3. A statement of the facts that the complainant believes indicates an unlawful discriminatory practice is of a 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 alleged in the complaint, together with a statement as to the status or disposition of such other action.
 4. The complainant and respondent shall be advised of the results of the investigation, after the completion of the investigation, which includes referral to the US Food and Nutrition Service Regional Office (FNSRO) and its concurrence with ODJFS' action. The complainant shall also be advised of the right to file a complaint with any appropriate state or federal civil rights enforcement agency.
 5. Upon receiving a complaint alleging discrimination, the county division/ department shall forward the complaint to the ODJFS-BCR within three (3) 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 (14) 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 of any person (s) associated with any inquiry conducted by the ODJFS-BCR. The BCR shall conduct its inquiry and issue its Final Report within one hundred, twenty (120) 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.
 6. 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.) 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.
 7. The CCDHHS shall agree to make notices visibly available to employees and applicants stating that the department complies with all applicable federal and state nondiscrimination laws. The CCDHHS 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, including sexual orientation and gender identity, 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:

The Cuyahoga Job and Family Services Civil Rights Coordinator at:
1641 Payne Avenue Room 360, Cleveland, Ohio 44114, Aída C. Idiáquez (216) 987-8433
or aida.idiaquez@jfs.ohio.gov

The Cuyahoga County Office of Child Support Services (which includes The Fatherhood Initiative) Civil Rights Coordinator at:
1640 Superior Avenue, Cleveland, Ohio 44114. Robin Belcher 216-443-5218.
Robin.belcher@jfs.ohio.gov

The Cuyahoga County Division of Children and Family Services Civil Rights Coordinator at:
3955 Euclid Avenue, Cleveland, Ohio 44115. Stephen Rusnak (216) 881-4028.
Stephen.Rusnak@jfs.ohio.gov

The Cuyahoga County Division of Senior and Adult Services Civil Rights Coordinator at:
13815 Kinsman Road, Cleveland, OH 44120. Lauren B. Forbes (216) 698-4844.
Lauren.forbes@jfs.ohio.gov

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 involved.

STATE OF OHIO AGENCY

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.

UNITED STATES FEDERAL AGENCIES

The United States Department of Health and Human Services, Office for Civil Rights, Region V. 233 N. Michigan Avenue Suite 240 Chicago Illinois 60611.

The United States Department of Agriculture (**Supplemental Nutrition Assistance Program only**). Civil Rights Office, room 326-West, Whitten Building 1400 Independence Avenue S.W. Washington D.C. 20251

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 ext. 6502

The Civil Rights Plan, including provisions for Limited English Proficiency as a separate plan, is hereby approved as a guiding policy for the Cuyahoga County Department of Health and Human Services. Cuyahoga County, Ohio is an equal opportunity employer.



Director's Signature

12/06/2022
Date

David Merriman
Print Name (Director)

(CCDHHS 100-1, 12/01/2022)