

Next Review Date: 03/23
Last Reviewed: 03/20
Review Responsibility: Client Rights Officer

FCCS PROCEDURE

NO.: 6G

SUBJECT: Civil Rights Plan for Clients

Approved by: Executive Council
Effective Date: August 2, 2016
Date(s) of Revision: Mar 3, 2020
Responsible for Implementation: All Staff

Introduction

All programs, services and benefits administered, supervised, authorized and/or participated in by Franklin County Children Services and contracted providers shall operate 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); and the Inter-Ethnic adoption Provisions of 1996 (IEP).

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 Franklin County Children Services.

1) RESPONSIBILITIES

- a) The Office of Client Rights shall implement the Civil Rights Plan within the service area through the following methods:

- i) The Client Rights Officer shall serve as the 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:
- Receiving and, if necessary, assisting with the writing of discrimination complaints which are filed by county agency participants, clients and beneficiaries of children and family services programs. Such complaints are then referred to the ODJFS Bureau of Civil Rights for investigation and resolution.
 - 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.

2) COMPLAINT PROCESS

- a) Allegations of discrimination made by an employee regarding the violation of the above laws and classifications should be referred to the Employee Relations Department for review and investigation.
- b) Any person (except agency employees-see above) 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). 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.
- c) Complaints must be filed with the agency within 180 days of the date the alleged discriminatory act or treatment occurred.
- d) When complaints are received by the Client Rights Officer/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) should conduct its inquiry and issue its Final Report within one-hundred twenty (120) days of the date of filing of the complaint.

- e) 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.)
- f) 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.
- g) A civil rights complaint may be initially filed by contacting any of the following offices/individuals:

- i) The Franklin County Children Services Client Rights Officer:

Client Rights Office
Franklin County Children Services
855 West Mound Street
Columbus, Ohio
Telephone: (614) 275-2621

- ii) The Ohio Department of Job and Family Services:

Bureau of Civil Rights
30 East Broad Street, 30th Floor
Columbus, Ohio 43215
Telephone: (614) 644-2703
Toll Free: 1-866-227-6353

- iii) The United States Department of Health and Human Services,
Region V

Office for Civil Rights
233 N. Michigan Avenue, Suite 240
Chicago, Illinois 60601
Telephone: (312) 886-2359
Fax: (312) 886-1807