



U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

Via Certified Mail

November 27, 2012

Director Theodore E. Wymyslo, M.D.
Ohio Department of Health
246 N. High Street
Columbus, OH 43215

Re: Compliance Review Report for the Ohio Department of Health
Docket No. 12-OCR-0492

Dear Director Wymyslo:

On July 20, 2012, the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) initiated a compliance review of the Ohio Department of Health (ODH), as part of our compliance review of all State Administering Agencies, in accordance with federal regulation 28 C.F.R. § 42.206. The focus of the review was on the ODH's compliance with applicable federal civil rights laws along with the ODH's monitoring procedures for ensuring the compliance of subrecipients with these laws. Of particular interest to the OCR was the ODH's implementation and monitoring of the DOJ's regulations, Equal Treatment for Faith-Based Organizations, 28 C.F.R. pt. 38 [hereinafter Equal Treatment Regulations].

On September 28, 2012, the OCR conducted an onsite visit to the ODH's offices to meet with you and your staff and to conduct a training program on the federal civil rights laws that the OCR enforces. The OCR would like to thank ODH staff, especially General Counsel Lance Himes, for assisting OCR attorney Shelley Langguth during her onsite visit.

Based on the ODH's responses to our data request and the information that the OCR gathered during our onsite visit, the OCR sent the ODH a draft Compliance Review Report on October 17, 2012. In a November 16, 2012, email to Ms. Langguth, ODH General Counsel Lance Himes indicated that the ODH does not have any factual corrections to the draft report.

In regard to the limited scope of our review, the OCR concludes that the ODH has taken steps to substantially comply with the federal civil rights laws that the OCR enforces. Nonetheless, we have reservations about whether the ODH has adequate complaint procedures in place to respond to discrimination complaints from beneficiaries of the ODH and from employees and beneficiaries of subrecipients, whether it is sufficiently notifying and training its subrecipients on

the federal civil rights laws that the OCR enforces, and whether it is sufficiently monitoring for compliance. The following Compliance Review Report includes recommendations for improving the ODH's methods for ensuring the civil rights compliance of subrecipients.

Compliance Review Report: Overview and Recommendations

I. Overview

This Compliance Review Report first examines the ODH's procedures for monitoring whether subrecipients are meeting their obligations to comply with the federal civil rights laws that are a condition for receiving federal financial assistance. The Report then focuses on the ODH's implementation of the DOJ's Equal Treatment Regulations.

A. General Monitoring Procedures to Ensure Subrecipient Compliance with Applicable Federal Civil Rights Laws

Recipients of federal financial assistance from the OJP are responsible for certifying that contractors and subrecipients under DOJ grant programs comply with applicable federal civil rights laws. In reviewing the ODH's general efforts to ensure subrecipients' compliance with their civil rights obligations, the OCR examined how the ODH used the following four tools: (1) standard assurances; (2) onsite visits and other monitoring methods; (3) training programs and technical assistance; and (4) procedures for receiving, investigating, and resolving complaints alleging discrimination.

1. Standard Assurances

The ODH currently administers subawards under one DOJ grant program, the Sexual Assault Services Formula Grant Program (SASP) authorized by the Violence Against Women Act and funded by the DOJ's Office on Violence Against Women (OVW).

When a subrecipient receives SASP funding, it must enter into a Personal Service Contract with the ODH. This standard contract contains the following provisions regarding federal civil rights requirements:

ARTICLE VI Equal Employment Opportunity

- A. In carrying out this agreement, the CONTRACTOR shall not discriminate against any employee or applicant for employment because of race, color, religion, sex, age, handicap, disability, national origin, ancestry, veteran status, or any other factor**

specified in section 125.111 of the O.R.C., in the Civil Rights Act of 1964, as amended, or in section 504 of the Rehabilitation Act of 1973, as amended, and in any subsequent legislation pertaining to civil rights.

- B. The CONTRACTOR shall incorporate the foregoing requirements of ARTICLE VI, Section A in all of its contracts for performance of any of the work prescribed herein, and shall require all of its subcontractors for any part of such work to incorporate such requirements in all subcontracts for such work.

Additionally, as part of the application process, SASP applicants must agree to abide by the Rape Prevention Standards developed and disseminated by the ODH. These Rape Prevention Standards contain a section entitled “Federal, State and Local Laws” which states the following:

- The Agency is in compliance with Titles VI and VII of the 1964 Civil Rights Act if it has the following:
 - a. On file the Agency’s non-discrimination assurances signed by the governing body or CEO
 - b. A non-discrimination policy against any person (i.e. recruitment, examination, hiring, training, promotion, retention, discipline or any other aspect of personnel administration)¹ because of:
 - race
 - color
 - creed (religion)
 - national origin
 - age
 - gender
 - disabled
 - veteran status

This section also states that the “[a]gency is in compliance with regulations for Section 504 of the 1973 Rehabilitation Act” if it maintains on file a policy for non-discrimination on the basis of handicap and has provisions to accommodate handicapped individuals which include elevators, ramps, special facilities in bathrooms, door widths, and emergency exits, and that if the facility is not handicapped accessible that it makes provisions to serve this population.

¹Please be advised that Title VI of the Civil Rights Act of 1964 (Title VI) generally does not cover employment discrimination, but does prohibit discrimination in the delivery of services. Please also be aware that Title VI is limited to prohibiting discrimination on the bases of race, color, and national origin.

All applicants of ODH funding, including SASP applicants, must also agree to abide by the ODH's *Grants Administration Policies and Procedures* (GAPP) which is located on the ODH's website. Section 107.0 of the GAPP is entitled "Civil Rights Requirements" and provides the following:

The policy of ODH is to ensure that ALL people have equal access to our programs and are not treated differently because of race, color, national origin, age, sex (including sexual harassment), disability or veteran status.

Acceptance of grant funds from the ODH constitutes an agreement that the subgrantee agency and its contractors comply with Title VI/Title VII of the Civil Rights Act, and any amendments thereto, which prohibits discrimination because of race, sex, national origin, age, or color;² and with Section 504 of the 1973 Rehabilitation Act, and any amendments thereto, which prohibits discrimination in any facet of the agency's operation due to handicap, and with the 1967 Age Discrimination in Employment Act and the 1990 Americans with Disabilities Act.

The subgrantee agency, its contractors and its sub-contractors must adopt and implement personnel management policies and procedures that meet the guidelines of the Civil Rights Act and the Rehabilitation Act, and provide to the ODH, upon request, data, statistics, and other information not prohibited by law to enable ODH to ascertain compliance.

Section 107.1 of the GAPP, entitled "Summary of Major Laws," lists a number of federal statutes, including two statutes that the OCR enforces and which apply to SASP subgrantees, Title VI of the Civil Rights Act of 1964 and the Rehabilitation Act of 1973. The explanation of Title VI states that this statute "[f]orbids that anyone be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination on the basis or race, color, and national origin throughout expenditure of federal monies. Title VI is enforced by the appropriate federal grantor." The explanation of the Rehabilitation Act of 1973 states that it "[r]equires that governmental agencies receiving federal monies be non-discriminatory toward the disabled. The pertinent section is enforced by guidelines of the respective federal grantors." The ODH also provides an explanation of the Americans with Disabilities Act, stating that this statute "[i]ncorporates portions of the Rehabilitation Act of 1973, but forbids employment

² Please see footnote 1 regarding the scope of Title VI.

discrimination for the disabled whether or not the employer receives Federal funds. Enforcement is by the Equal Employment Opportunity Commission, the Attorney General, and the Office of Federal Contract Compliance Programs."³

2. Onsite Visits and Other Monitoring Methods

During the OCR's onsite visit, ODH staff indicated that the ODH currently does not conduct onsite monitoring visit of SASP subrecipients, but that it intends to start conducting annual onsite visits. When agencies apply for ODH funding, including SASP applicants, they must complete and submit a Civil Rights Review Questionnaire. This Questionnaire requests information pertaining to various civil rights matters, including whether the applicant has adopted a Title VI non-discrimination policy and how the applicant's Title VI officer distributes information regarding Title VI protections to staff, recipients of services, and sub-contractors; whether the applicant has a policy for communicating with the deaf or hard of hearing and with people with limited English proficiency; whether service recipients have been informed of their right to file a discrimination complaint directly with the U.S. Department of Health and Human Services' Office of Civil Rights, the U.S. Department of Agriculture's Office of Civil Rights, or the U.S. Department of Education's Office of Civil Rights;⁴ whether the agency has complaint procedures for investigating complaints of discrimination; whether the applicant has taken steps to ensure that its facilities are accessible to individuals with disabilities in compliance with Title II of the ADA; whether the applicant has made provisions for equal employment opportunity and agency policies for prohibiting discrimination in the workplace pursuant to Title VI;⁵ and whether the applicant has a written policy that prohibits discrimination in hiring and discusses other terms and conditions of employment. During the OCR's onsite visit, ODH staff stated that the ODH does not follow up on an applicant's responses to this Questionnaire.

3. Training and Technical Assistance

Based on the information gathered during the OCR's review, it does not appear that the ODH currently provides any training to SASP subrecipients on applicable civil rights requirements. In its response to the OCR's Data Request, the ODH said that it will begin to require subrecipients to view the online training programs developed by the OCR.

³ Please be advised that the Americans with Disabilities Act prohibits discrimination in both employment practices and the delivery of services. Please further note that the OCR's jurisdiction in regard to the Americans with Disabilities Act is limited to Title II of this Act, which applies to state and local governments and is not applicable to SASP subrecipients.

⁴ The ODH should add a reference to the U.S. Department of Justice, Office of Justice Programs, Office for Civil Rights, and should add the phrase "as applicable, depending on the funding source" to the end of this sentence.

⁵ Please see footnote 1 in regard to the scope of Title VI.

4. Complaint Procedures

If an ODH employee wishes to file an employment discrimination complaint against the ODH, the procedures are set forth in ODH Directive 5E, *Workplace Non-Discrimination and Anti-Harassment*. During the OCR's onsite visit, ODH staff indicated that Directive 5E is limited to employees of ODH, but if a client or beneficiary of the ODH wished to file a complaint against the ODH the ODH would follow the procedures set forth in Directive 5E.

The ODH does not have any written procedures in place governing complaints filed by employees or beneficiaries of SASP subrecipients. According to ODH staff, the ODH has never received a discrimination complaint from an employee or beneficiary of a SASP subrecipient, but if it should receive such a complaint it would follow the procedures set forth in Directive 5E.

B. Monitoring Compliance with Equal Treatment Regulations

The purpose of the Equal Treatment Regulations is to ensure that "[r]eligious organizations are eligible, on the same basis as any other organization, to participate in any [Justice] Department program for which they are otherwise eligible." 28 C.F.R. § 38.1(a). The Regulations prohibit the DOJ and DOJ funding recipients from discriminating either for or against an organization on the basis of the organization's religious character or affiliation. *Id.* In evaluating the ODH's equitable treatment of faith-based organizations, the Compliance Review focuses on two issues: (1) the review process for making awards to applicant faith-based organizations; and (2) procedures for ensuring that funded faith-based organizations comply with applicable federal civil rights laws.

1. The Process for Making Awards to Applicant Faith-Based Organizations

As discussed in Section I.A.1 of this Compliance Review Report, the ODH currently administers SASP awards funded by the DOJ's OVW. Based on the information contained in the OVW's fiscal year 2012 funding solicitation for the SASP, *available at www.ovw.usdoj.gov/closed-solicitations.htm*, the OCR understands that SASP funds may be used by state administering agencies to fund rape crisis centers and other nonprofit, nongovernmental organizations that provide core services, direct intervention, and related assistance to victims of sexual assault.

According to information contained in the ODH's response to the OCR's Data Request and information provided during the OCR's onsite visit, to solicit applications from potential subrecipients, the ODH sends an announcement via email seeking letters of interest to all agencies within the State of Ohio identified as serving as rape crisis centers during a survey conducted prior to applying for SASP funds, and to all recipients of statewide sexual assault and domestic violence email lists managed by state organizations. The ODH also distributes the funding announcement through the criminal justice bulletin of the Ohio Office of Criminal

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Justice Services (OCJS), which is disseminated to victim service organizations. The ODH also requested that OCJS and the Ohio Office of the Attorney General (OAG) distribute the funding announcement to their funded projects, and all recipients of the funding announcement were encouraged to share the announcement in their communities. During the OCR's onsite visit, ODH staff said that no faith-based organizations received the funding announcement directly.

The ODH's funding announcement set forth the criteria for an agency to be eligible for funding, including a requirement that the applicant be a non-profit organization as determined by Section 501(c) of the Internal Revenue Code, and that the applicant is currently funded by the OCJS, the OAG, or the ODH. During the OCR's onsite visit, ODH staff explained that the latter requirement is designed to ensure that the applicant agency is already under the monitoring and supervision of a state agency. Agencies that believed they met the funding criteria and were interested in receiving funding submitted a letter of interest to the ODH. The ODH's SASP program administrator then reviewed the information submitted by interested agencies to determine eligibility, and funding was equally divided among those applicants determined to satisfy the eligibility criteria.

According to the information contained in the ODH's response to the OCR's Data Request and the information provided onsite, the ODH has never received a letter of interest from a faith-based organization. In the ODH's data response, it said that a faith-based organization would have been equally considered with any other applicant.

2. Procedures for Ensuring that Faith-Based Organizations Comply with Applicable Federal Civil Rights Laws

Currently, none of the ODH's documentation associated with the SASP contains any reference to the Equal Treatment Regulations. Based on the information provided to the OCR, the ODH does not provide any training to employees or subrecipients on the Equal Treatment Regulations.

II. Recommendations

The ODH currently has some procedures in place for monitoring the civil rights compliance of its SASP subrecipients, such as referencing some of the laws that the OCR enforces in its standard contract and GAPP and requiring applicants to complete a Civil Rights Review Questionnaire. To strengthen the ODH's monitoring efforts, the OCR offers the following recommendations: (1) develop written complaint procedures for addressing discrimination complaints from beneficiaries/clients of the ODH and from employees and beneficiaries of subrecipients; (2) revise the ODH's standard contract with subrecipients, the GAPP, and the Rape Prevention Standards to accurately discuss the laws that the OCR enforces, including the Equal Treatment Regulations; (3) conduct onsite monitoring visits of subrecipients and specifically monitor for compliance with civil rights requirements; (4) develop a training program to train subrecipients

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on the applicable civil rights requirements; and (5) allow applicants to demonstrate nonprofit status by any of the means set forth in the Equal Treatment Regulations and omit one eligibility criteria.

A. Develop Comprehensive Complaint Procedures

While the ODH has written procedures in place for receiving and investigating discrimination complaints from ODH employees, it does not have any procedures in place for addressing discrimination complaints from beneficiaries of ODH or from employees and beneficiaries of SASP subrecipients. Accordingly, the ODH should adopt a policy for addressing discrimination complaints that includes at a minimum the following elements:

- 1) designating a coordinator who is responsible for overseeing the complaint process;
- 2) notifying employees and subrecipients of prohibited discrimination in funded programs and activities and the ODH's policy and procedures for handling discrimination complaints;
- 3) establishing written procedures for receiving discrimination complaints from beneficiaries of the ODH and from employees and beneficiaries of SASP subrecipients;
- 4) a process for investigating the complaint internally, or referring the complaint to the appropriate agency for investigation and resolution, such as the OCR or the Ohio Civil Rights Commission;
- 5) notifying the complainant that he or she may also file a complaint directly with the OCR at 810 Seventh Street NW, Washington, DC 20531; and
- 6) training ODH program staff on their responsibility to refer discrimination complaints, or potential discrimination issues, to the ODH's complaint coordinator for processing as soon as the alleged discrimination comes to their attention.

Information about the applicable laws, complaint forms, and the investigative process is available at the OCR's website at www.ojp.usdoj.gov/ocr/crc. The OCR is attaching some template complaint procedures that we have developed that the ODH may find helpful in developing its complaint procedures.

B. Revise the ODH's Grant Documents to Accurately Cite the Laws that the OCR Enforces, Including the Equal Treatment Regulations

The OCR should revise the civil rights language contained in its standard contract with SASP subrecipients to accurately discuss and cite the federal civil rights laws that the OCR enforces and which are binding on SASP subrecipients. The OCR recommends that the ODH replace the existing Article VI, paragraph A, with the following language or substantially similar language:

CONTRACTOR will comply (and will require any subcontractor) to comply) with any applicable federal nondiscrimination requirements, which may include Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d); Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681); the Age Discrimination Act of 1975 (42 U.S.C. § 6102); 28 C.F.R. pt. 42 (U.S. Department of Justice Regulations – Nondiscrimination; Equal Employment Opportunity; Policies and Procedures); 28 C.F.R. pt. 54 (U.S. Department of Justice Regulations – Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance); 28 C.F.R. pt. 38 (U.S. Department of Justice Regulations – Equal Treatment for Faith-Based Organizations); and Ex. Order 13279 (Equal Protection of the Laws for Faith-Based and Community Organizations). In accordance with these laws, CONTRACTOR shall not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.

In the event a federal or state court or federal or state administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, national origin, religion, sex, or disability against a recipient of funds, the recipient will forward a copy of the finding to the U.S. Department of Justice, Office of Justice Programs, Office for Civil Rights, and the Ohio Department of Health.

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI

of the Civil Rights Act of 1964, recipient must take reasonable steps to ensure that LEP persons have meaningful access to its programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. The recipient is encouraged to consider the need for language services for LEP persons served or encountered both in developing its budgets and in conducting its programs and activities. Additional assistance and information regarding your LEP obligations can be found at www.lep.gov.

The OCR also recommends that the ODH revise the language in Section 107.0, "Civil Rights Requirements," of the GAPP, which the OCR understands also applies to grant programs funded by other agencies, to generally state the following:

The policy of ODH is to ensure that ALL people have equal access to our programs and are not treated differently because of race, color, national origin, age, sex (including sexual harassment), disability or veteran status.

Acceptance of grant funds from the ODH constitutes an agreement that the subgrantee agency and its contractors comply with all relevant civil rights laws, which may include Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act of 1990, the Age Discrimination Act, the Age Discrimination in Employment Act, Title IX of the Education Amendments of 1972, and the Department of Justice's regulations on the Equal Treatment for Faith-Based Organizations, 28 C.F.R pt. 38.

The subgrantee agency, its contractors and its sub-contractors must adopt and implement personnel management policies and procedures that meet the guidelines of applicable civil rights statutes and provide to the ODH, upon request, data, statistics, and other information not prohibited by law to enable ODH to ascertain compliance.

In Section 107.1, "Summary of Major Laws," the OCR recommends that the ODH add a reference to the Age Discrimination Act, which prohibits agencies receiving federal financial assistance from discriminating in their programs and activities on the basis of age, along with a reference to Title IX of the Education Amendments of 1972, which prohibits agencies receiving federal financial assistance from discriminating on the basis of sex in their training and education programs. The ODH should also include a reference to the DOJ's Equal Treatment Regulations,

which state that the Department of Justice and its state administering agencies can not discriminate either in favor of or against faith-based organizations when making funding decisions and that agencies receiving Justice Department funding can not discriminate in the delivery of services based on religion and can not use Justice Department funds on inherently religious activities.

The OCR understands that the ODH is in the process of revising its current Rape Prevention Standards that SASP subrecipients are required to abide by. When making any revisions to the discussion of federal civil rights requirements, the ODH should ensure that it is accurately describing the requirements that the OCR enforces; for example, as we have discussed in this Compliance Review Report, Title VI is limited to prohibiting discrimination on the basis of race, color, and national origin in the delivery of services by recipients of federal financial assistance. The OCR is always available to provide the ODH with technical assistance as it revises its Rape Prevention Standards.

C. Conduct Onsite Monitoring Visits to Monitor for Compliance with Relevant Civil Rights Laws

Currently, the ODH does not conduct onsite monitoring visits of SASP subrecipients, although it told the OCR that it intends to begin doing so on an annual basis. The ODH should fulfill this intention to conduct annual onsite monitoring visits of SASP subrecipients and should specifically monitor for compliance with applicable federal civil rights requirements. During the onsite visit, the ODH may wish to follow up on the information that the subrecipient provided on the Civil Rights Review Questionnaire, or may wish to develop a new civil rights checklist to monitor for compliance with the laws that the OCR enforces. The OCR has developed the attached Federal Civil Rights Compliance Checklist that contains questions regarding civil rights compliance which the ODH may find helpful. If the ODH decides to rely upon the Civil Rights Review Questionnaire as a monitoring tool, it should ensure that all of the relevant requirements discussed in the attached Federal Civil Rights Compliance Checklist are contained in the Civil Rights Review Questionnaire.⁶

D. Train Subrecipients on Federal Civil Rights Laws

Currently, the ODH does not train SASP subrecipients on the federal civil rights laws that the OCR enforces, although it stated that it intends to begin having subrecipients review the online training videos that the OCR developed. At a minimum, the ODH should require all SASP subrecipients to review the relevant civil rights training videos found on the OCR's website at www.ojp.usdoj.gov/about/ocr/assistance.htm at least once during a grant cycle. The ODH may

⁶ Please note that questions 1 and 2 on the attached checklist relating to the Equal Employment Opportunity Plan requirements do not pertain to subrecipients under the SASP.

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also wish to provide in-person training for SASP subrecipients on relevant civil rights requirements, perhaps using the OCR's civil rights PowerPoint presentation as a template.

E. Allow Subrecipients to Demonstrate Nonprofit Status by Any of the Means Identified in DOJ's Equal Treatment Regulations and Remove One Eligibility Criteria

As discussed in Section I.B.1 of this Compliance Review Report, the ODH currently requires nonprofit organizations to obtain federal tax exempt status under 26 U.S.C. § 501(c)(3) to be eligible for SASP funding. Unless 501(c)(3) status is required under the particular grant program (e.g., programs funded under the federal Juvenile Justice and Delinquency Prevention Act) or by state rules or regulations, the ODH should be mindful that applicants can also demonstrate nonprofit status by any of the following means identified in the DOJ's Equal Treatment Regulations: (1) proof that the Internal Revenue Service recognizes the organization as being tax exempt under 501(c)(3) of the Internal Revenue Code; (2) a statement from a state taxing body or state secretary of state certifying that the organization is a nonprofit organization and that no part of the organization's net earnings may benefit any private shareholder or individual; (3) a certified copy of a certificate of incorporation or similar document establishing nonprofit status; and (4) any of the above, if it applies to a state or national parent organization, with a statement by the state or national parent organization that the applicant is a local nonprofit affiliate. 28 C.F.R. § 38.1(g). The ODH should revise the eligibility criteria for the SASP to allow applicant subrecipients to demonstrate nonprofit status by any one of the these four means.

Additionally, the ODH currently requires SASP applicants to be funded by the OCJS or the OAG in order to be eligible for SASP funds. The ODH explained that this requirement is designed to ensure that the applicant agency is already under the monitoring and supervision of a state funding agency. The OCR has concerns that this criteria may result in excluding otherwise eligible agencies that have not had the opportunity to receive funding from the OCJS or OAG, including faith-based organizations, from receiving SASP funds. Accordingly, the OCR recommends that the ODH consider no longer utilizing this criteria to determine eligibility.

Conclusion

Except for the concerns we have raised in Section II of this Compliance Review Report, we find that the ODH has taken steps to substantially comply with the federal civil rights laws that the OCR enforces. The OCR is always available to provide technical assistance to the ODH in addressing the concerns raised in this Report.

On a related matter, as the OCR discussed during our onsite visit, beginning in this fiscal year the ODH's SASP award contains a special condition that requires the ODH to develop written Methods of Administration (MOA) summarizing the policies and procedures that it has in place

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to ensure civil rights compliance of its SASP subrecipients. The ODH is required to submit the MOA to the OCR within 90 days of receiving the SASP award, and the required elements of the MOA are set forth at http://www.ojp.usdoj.gov/funding/other_requirements.htm. The ODH should prepare its MOA summarizing the policies and procedures that it currently has in place and intends to develop, and the OCR will work with the ODH to modify the MOA as necessary as the ODH takes actions to implement the recommendations contained in this Compliance Review Report.

Thank you for your cooperation and the assistance of your staff throughout the compliance review process. If you have any questions, please contact Ms. Langguth at (202) 305-2353.

Sincerely,

/s/

Michael L. Alston
Director

Attachments