



CIVIL RIGHTS COMMISSION AGENDA:

September 11, 2025

Municipal Building 15 South College Ave. Oxford, Ohio 45056 Second Floor Conference Room
4:00 PM

Approval of Agenda

Introduction of New Members

Approval of Minutes

1. Minutes from the March 14, 2024, Civil Rights Commission Meeting
2. Meeting Summary from the August 15, 2024, Civil Rights Commission Meeting

Old Business

1. Role of the Civil Rights Commission

New Business

1. Title VI Plan Discussion

Adjournment



MINUTES
OXFORD CIVIL RIGHTS COMMISSION
MUNICIPAL BUILDING 15 SOUTH COLLEGE AVE. OXFORD, OHIO 45056
SECOND FLOOR CONFERENCE ROOM
THURSDAY, MARCH 14, 2024 AT 4:00 PM

Approval of Agenda

Motion – To Approval of the Agenda
(Voice Vote) 1st Ms. Howard 2nd Mr. Revalee
AYE # 4
NAY # 0
ABS # 0

Members Present: Ms. Suzanne Zazycki, Ms. Cathryn Loucas, Mr. Brian Revlaee, and Ms. Rebecca Howard

Staff Members Present: Mr. Douglas Elliott, City Manager/Director; Ms. Jessica Greene, Assistant City Manager; Mr. Chris Conard, Law Director; and Ms. Heather Barbour, Clerk of Council

Public Present: Four students, including two reporters

A regular meeting of the Civil Rights Commission was called to order by Director Mr. Douglas Elliott on Thursday, March 14, 2024, at 4:02 pm.

Approval of Minutes

1. Minutes from the September 8, 2022, meeting.

Motion – To Approval of the Minutes after correcting Ziolkowski in two places.
(Voice Vote) 1st Ms. Loucas 2nd Ms. Howard
AYE # 3
NAY # 0
ABS # 1

Old Business

1. None.

None.

New Business

1. Introduction and Welcome of New Member Suzanne Zazycki

Mr. Elliott welcomed the new member and started with a round of introductions.

2. Discussion of Complaint Received on January 12, 2024 and Withdrawn on February 14, 2024

Mr. Elliott gave a brief history of the past complaints filed within the past 17 years. Mr. Elliott reviewed the information submitted from the most recent complaint and provided a handout of OCR 143.05 Complaint Procedure (handout included in minutes). Ms. Loucas asked about what authority the commission has over private companies? Ms. Howard had concerns about the ease of the filing process. Ms. Howard mentioned needing clear instructions on the City's website. Ms. Greene shared an update on the newly added fillable form, which is now live on the city's website. Ms. Zazycki asked if the complaint could be refiled.

3. Discussion of EEOC and Enforcement of Sexual Orientation and Gender Identity (SOGI) Employment Discrimination

Mr. Elliott and Mr. Conard provided an update and began the discussion.

4. Role of City of Oxford Civil Rights Commission

Mr. Elliott and Mr. Conard reviewed the creation of the Civil Rights Commission. Mr. Elliott asked the commissioners what they think the role of the Civil Rights Commission should be. Mr. Revalee mentioned providing resources to those in need by helping people file claims with bigger organizations that have more authority. Ms. Howard shared educating the public and the power of public perception are ways the CRC can get involved. Ms. Howard noted that those who need help might not know how to file a complaint. Ms. Zazycki mentioned an educational campaign and the need for more information. Ms. Loucas mentioned the role as being more of a mediator not an advocate. Ms. Greene will work with an intern over the summer to gather information from other cities similar in size and scale and then report back in August. Mr. Conard asked the commissioners to create a policy/purpose statement and the next steps for how to file with more prominent organizations. Mr. Conard mentioned this could be added to the Commission's web page. The next meeting is scheduled for August 15th, 2024.

Adjournment

Motion – To Adjourn at 5:00 p.m.

(Voice Vote) 1st Ms. Zazycki 2nd Ms. Howard

AYE # 4

NAY # 0
ABS # 0

143.05 COMPLAINT PROCEDURE.

- (a) Whenever it is charged in writing, by a person or aggrieved organization, hereinafter referred to as "complainant", that any person, employer, employment agency and labor organization, hereinafter referred to as the "respondent", has engaged in or is engaged in any unlawful discriminatory practices as defined in this chapter, or upon its own initiative, in matters relating to such discriminatory practices, the Civil Rights Director may initiate a preliminary investigation. Such charge shall be filed with the Director within six months after the alleged unlawful discriminatory practices are committed. If the Director determines after such investigation, that it is not probable that unlawful discriminatory practices have been or are being engaged in, the Director shall notify the complainant of the determination and recommendation to not pursue further action on the matter.
- (b) If the Director determines, after such investigation, that it is probable that unlawful discriminatory practices have been or are being engaged in, he shall endeavor to eliminate such practices by informal methods of conference, conciliation and persuasion. If after such investigation and conference, the Director is satisfied that any unlawful discriminatory practice of the respondent will be eliminated, it may treat the complaint as conciliated and notify the complainant that it will not initiate prosecution of the matter.
- (c) If the Director fails to effect the elimination of such unlawful discriminatory practices or to obtain conciliation of the matter, or, if the circumstances warrant, in advance of or during any such preliminary investigation or endeavors to conciliate the matter, the Director shall issue and cause to be served upon the respondent a notice of an investigative hearing, notifying the respondent of an investigative hearing before the Civil Rights Commission, at a time and place therein fixed to be held not less than ten days after the service of such notice and stating the charges specified in the original charge against the respondent.
- (d) Any such charge may be amended by the Director or complainant at any time prior to or during the hearing based thereon. The respondent shall have the right to file an answer or to amend an answer to the original or amended charge, and to appear at such hearing in person, by attorney or otherwise to examine and cross-examine witnesses.
- (e) The complainant shall be a party to the proceeding, and any person who is an indispensable party to a complete determination or settlement of the question involved in the proceeding shall be joined. Any person who has or claims an interest in the subject of the hearing and in obtaining or presenting relief against the acts or practices complained of, may be, in the discretion of the Civil Rights Commission, permitted to appear for the presentation of oral or written argument.
- (f) In any proceeding the Civil Rights Commission shall not be bound by the rules of evidence prevailing in the courts of law or equity, but shall in ascertaining the practices followed by the respondent, take into account all reliable, probative and substantial evidence, statistical or otherwise, produced at the hearing, which may tend to prove the existence of an unlawful discriminatory practice or a predetermined pattern of unlawful discriminatory practice under this chapter, provided that nothing contained in this section shall be construed to authorize or require any person to observe the proportion which persons of any race, color, religion, national origin, ancestry, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status bear to the total population or in accordance with any criterion other than the individual qualifications of the applicant.
- (g) The testimony taken at the hearing shall be under oath and shall be reduced to writing, and filed with the Civil Rights Commission. Thereafter, in its discretion, the Commission upon notice to the plaintiff, Civil Rights Director and to the respondent with an opportunity to be present may take further testimony or hear arguments.
- (h) No person shall be compelled to be a witness against himself in any hearing, formal or informal, before the Civil Rights Director or Civil Rights Commission.
- (i) In conducting any hearing as provided herein, the Commission may subpoena as witnesses any person believed to have knowledge of facts relevant to such hearing, may compel the production of books, papers, records or other evidence relative to such hearing by the person having custody or control thereof and may administer oaths, take testimony and issue such rules as shall be necessary to effectuate an investigatory hearing under this section.
- (j) Upon written application of the respondent, complainant or Director, the Civil Rights Commission shall issue subpoenas as if issued on its own motion.
- (k) If upon all the reliable, probative and substantial evidence the Commission determines that the respondent has engaged in, or is engaging in, any unlawful discriminatory practice under this chapter, whether against the complainant or others, the Commission may endeavor to eliminate such practices by informal methods of conference, conciliation and persuasion. If the Commission fails to effect the elimination of such unlawful discriminatory practices or to obtain conciliation of the matter, or, if the circumstances warrant, in advance of or during such investigative hearing, or endeavors to conciliate the matter, the Commission may direct the Civil Rights Director to guide the complainant in the prosecution of this matter in the appropriate court of record.
- (l) If the Commission finds that no probable cause exists for crediting the charges, or if upon all the evidence the Commission finds that the respondent has not engaged in any unlawful discriminatory practice under this chapter, against the complainant or others, it shall state its findings or fact, and shall notify the complainant and respondent that it will not prosecute the matter further. (Ord. 3399. Passed 4-4-17.)



MINUTES OXFORD CIVIL RIGHTS COMMISSION

Municipal Building 15 South College Ave. Oxford, Ohio 45056 Second Floor Conference Room

THURSDAY, AUGUST 15, 2024 AT 4:00 PM

Approval of Agenda

Quorum not reached - Meeting Summary

Members Present: Ms. Rebecca Howard and Ms. Gretchen Ziolkowski

Staff Members Present: Mr. Douglas R. Elliott, Jr., City Manager/Director; Ms. Jessica Greene, Assistant City Manager; and Ms. Heather Barbour, Clerk of Council

A regular meeting of the Civil Rights Commission was called to order by Director Mr. Elliott on Thursday, August 15, 2024, at 4:06 pm. Mr. Elliott explained that since a quorum was not reached, the meeting would be a discussion, and no actions would be taken.

Approval of Minutes

1. Minutes of the March 14, 2024, meeting.

Old Business

Mr. Elliott mentioned at the March 14th meeting that the commission was asked to define the role of the CRC. Ms. Ziolkowski shared that educating the public and providing links to the organizations that can help is what she thinks the role of the CRC is. Ms. Greene reported on the summer project; an intern researched other cities to see if they had a CRC and what the role of the CRC is in that municipality. Ms. Greene shared that most municipalities don't have CRC's; they have DEI Committees, or if they have a CRC, the role is more DEI-focused.

New Business

1. Discussion Item - Role of the Civil Rights Commission - Review proposed changes to Section 143 Civil Rights Commission

Mr. Elliott presented information on the proposed changes to Section 143 of the Oxford Codified Ordinances entitled Civil Rights Commission (handout included in meeting summary). Ms. Howard mentioned that even with these changes, the CRC still doesn't have teeth. Ms. Howard asked if individuals would still be able to submit complaints. Mr. Elliott replied that individuals would still be able to submit complaints, and he would investigate and make recommendations to the commission. Ms. Ziolkowski shared that she liked the proposed verbiage change found in section b on page 3 of the handout: "may study and investigate other issues of discriminatory practices and make recommendations to City Council for policy changes".

Adjournment

Mr. Elliott ended the discussion at 4:23 pm.

ORDINANCE NO. ~~3399~~

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AN ORDINANCE REPEALING CURRENT CHAPTER 143 OF THE OXFORD CODE OF ORDINANCES ENTITLED CIVIL RIGHTS ~~COMMISSION~~; ~~COMMUNITY RELATIONS COMMISSION~~; AND ADOPTING NEW CHAPTER 143 OF THE OXFORD CODE OF ORDINANCES ENTITLED CIVIL RIGHTS COMMISSION.

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BE IT ORDAINED BY THE COUNCIL OF THE CITY OF OXFORD, BUTLER COUNTY, STATE OF OHIO, THAT:

SECTION 1: Council hereby finds that it is necessary to repeal Chapter 143 of the Oxford Code of Ordinances entitled Civil Rights ~~Commission~~; ~~Community Relations Commission~~ and adopt new Chapter 143 of the Oxford Code of Ordinances entitled Civil Rights Commission. It is the legislative determination of this Council that it is in the best interest of the City of Oxford to ~~amend Section 143.011 Civil Rights Commission~~ ~~rename Chapter 143 of the Oxford Code of Ordinances entitled Civil Rights; Community Relations Commission to Civil Rights Commission~~ to better ~~state~~ ~~reflect the role~~ ~~purpose~~ of the commission ~~in its title~~.

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SECTION 2: Council hereby repeals Chapter 143 of the Oxford Code of Ordinances entitled Civil Rights; ~~Community Relations Commission~~; and adopts new Chapter 143 of the Oxford Code of Ordinances entitled Civil Rights Commission attached hereto and incorporated herein as Exhibit "A".

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SECTION 3: This ordinance shall take effect at the earliest time allowed by law.

MAYOR

ADOPTED: ~~April 4, 2017~~ ~~September 17, 2024~~

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ATTEST:

CLERK OF OXFORD CITY COUNCIL

INTRODUCED BY: KATE ROUSMANIERE, MAYOR

PREPARED BY: LAW (STAFF)

CHAPTER 143

Civil Rights Commission

143.01 DEFINITIONS.

As used in this chapter, the following terms shall have the meanings ascribed in this section, unless the context requires otherwise:

- (a) "Commission" shall refer to the Oxford Civil Rights Commission.
- (b) " Civil Rights Director" means an employee of the City appointed to these duties by Council.
- (c) "Discriminate" and "discrimination" include segregate or separate and any difference in treatment based on race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.
- (d) "Employer" means any person who employs four or more persons, within the City, including the City of Oxford, its departments, boards, commissions and authorities.
- (e) "Employment agency" means any person regularly undertaking with or without compensation, to procure opportunities for employment or to procure, recruit, refer or place employees.
- (f) "Housing accommodations" includes any building or structure or portion thereof which is used or occupied or intended, arranged or designed to be used or occupied as a home residence or sleeping place of one or more individuals, groups, or families, whether or not living independently of each other; and any vacant land offered for sale or lease. It also includes any housing accommodation held or offered for sale or rent by a real estate broker, salesman or agent, or by any other person pursuant to authorization of the owner, by the owner himself, or by his legal representative. Owner-occupied dwellings which consist of not more than four units are exempt from the rental portions of this chapter.
- (g) "Labor organization" includes any organization which exists for the purpose, in whole or in part, for collective bargaining or of dealing with employers concerning grievances, terms or conditions of employment, or for other mutual aid or protection in relation to employment.
- (h) "Person" includes one or more individuals, partnerships, associations, organizations, corporations, legal representatives, trustees, trustees in bankruptcy, receivers and other organized groups of persons. It also includes, but is not limited to, any owner, lessor, assignor, builder, manager, broker, salesman, agent, employee and lending institution, and the City of Oxford and all political subdivisions, authorities, agencies, boards and commissions thereof.

(i) "Place of public accommodation" means any inn, restaurant, eating house, barbershop, public conveyance by air, land or water, theater, store or other place for the sale of merchandise, or any other place of public accommodation or amusement where the accommodation, advantages, facilities or privileges thereof are available to the public.

(j) "Restrictive covenant" means any specification in a deed, land contract or lease limiting the use of any housing because of race, color, religion, national origin, ancestry, sexual orientation or any limitation based upon affiliation with or approval by any person, directly or indirectly, employing race, color, religion, national origin, ancestry, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status as a condition of affiliation or approval.

143.011 CIVIL RIGHTS COMMISSION.

(a) The Civil Rights Commission shall consist of five greater Oxford area residents selected by Council to serve three-year ~~overlapping terms; one member shall be appointed for one year, two members shall be appointed for two years, and two members shall be appointed for three years.~~ Thereafter, members shall be appointed for three year terms of office.

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(b) The Commission, in addition to the powers and duties set forth elsewhere in this chapter, ~~shall have the power and responsibility of studying, investigating, conducting public meetings and public hearings relative to any and all matters of factual situations wherein there is the possibility of the existence of discriminatory practices or prejudice or discrimination which in any manner could conceivably result in any degree of deprivation of the civil rights of any person within the City of Oxford.~~ may study and investigate other issues of discriminatory practices and make recommendations to City Council for policy changes.

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(c) ~~Said Commission may initiate action pursuant to these powers upon its own motion and shall have the duty of initiating such action whenever a majority of the members of said Commission deem action necessary and appropriate.~~

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(d) ~~No provision of this section shall be construed so as to limit the power or authority of the Commission in the area of discriminatory practices or civil rights violations, and this section shall be construed broadly to permit the Commission great latitude in these areas.~~

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(e) ~~In addition to other purposes contained in this chapter, it shall be a primary purpose of the Commission to become acquainted with any and all discriminatory practices, civil rights violations or matters of similar nature existing within the City of Oxford, and to acquaint both the public and Council, as well as other persons, as to the nature thereof, as well as to make findings of fact, determinations and recommendations.~~

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(f) ~~he City of Oxford, and to acquaint both the public and Council, as well as other persons, as to the nature thereof, as well as to make findings of fact, determinations and recommendations.~~

(g) The Commission may accept its own rules of procedure and whenever the Commission shall convene a hearing, said Commission may administer oaths and take such testimony as shall be deemed necessary by the Commission to effectuate such hearing.

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143.02 FAIR HOUSING.

It shall be unlawful discriminatory practice for any person to do any of the following:

- (a) Refuse to sell, transfer, assign, rent, lease, sublease, finance or otherwise deny or withhold housing accommodations from any person because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status of any prospective owner, occupant or user of such housing accommodation.
- (b) Represent to any person that housing accommodations are not available for inspection when in fact they are so available.
- (c) Refuse to lend money, whether secured by mortgage or otherwise, for the acquisition, construction, rehabilitation, repair or maintenance of housing accommodations or otherwise withholding financing of housing accommodations from any person because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status of any present or prospective owner, occupant or user of such housing accommodation, provided such person, whether an individual, corporation or association of any type, lends money as one of the principal aspects of his business and not only as a part of the purchase price of an owner-occupied residence he is selling nor merely casually or occasionally to a relative or friend.
- (d) Discriminate against any person in the terms or conditions of selling, transferring, assigning, renting, leasing or subleasing any housing accommodations or in furnishing facilities, services or privileges in connection with the ownership, occupancy or use of any housing accommodations, because of race, color, religion, ancestry, national origin sexual orientation, gender identity, sex, disability, age, pregnancy, height, weight, or veteran status of any present or prospective owner, occupant or user of such housing accommodation.
- (e) Discriminate against any person in the terms or conditions of any loan of money, by mortgage or otherwise, for the acquisition, construction, rehabilitation, repair or maintenance of any housing accommodations, because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status of any present or prospective owner, occupant or user of such housing accommodations.
- (f) Print, publish or circulate any statement or advertisement relating to the sale, transfer, assignment, rental, lease, sublease or acquisition, construction, rehabilitation, repair or maintenance of any housing which indicates any preference, limitation, specification or discrimination based upon race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.
- (g) Make any inquiry, elicit any information, make or keep any record, or use any form of application containing questions or entries concerning race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status in connection with the sale or lease of any housing accommodations or the loan of

any money, whether or not secured by a mortgage or otherwise for the acquisition, construction, rehabilitation, repair or maintenance of housing accommodations.

(h) Include in any deed, land contract or lease of any housing accommodations any restrictive covenant, or honor or exercise or attempt to honor or exercise, any such restrictive covenant, provided that the prior inclusion of a restrictive covenant in the chain of title shall not be deemed a violation of this provision.

(i) Induce or solicit or attempt to induce or solicit any housing accommodations listing, sale or transaction by representing that a change has occurred or may occur with respect to the racial, religious, or ethnic composition of the block, neighborhood or area, in which the property is located, or induce or solicit or attempt to induce or solicit such sale or listing by representing that the presence or anticipated presence of persons of persons who are pregnant or of any race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, height, weight, or veteran status in the area will or may have results such as the following:

- (1) The lowering of property value.
- (2) A change in the racial, religious or ethnic composition of the block, neighborhood or area in which the property is located.
- (3) An increase in criminal or anti-social behavior in the area.
- (4) A decline in the quality of schools serving the area.

(j) Discourage or attempt to discourage the purchase by prospective purchasers of any housing accommodations by representing that any block, neighborhood or area has or might undergo a change with respect to the religious, racial, national or sexual composition of the block, neighborhood or area.

(k) Nothing in this section shall bar any religious or denominational institution or organization, or any charitable or educational organization, which is operated, supervised or controlled by or in connection with a religious organization, or any bona fide private or fraternal organization, from giving preference to persons of the same religion or denomination, or to members of such private or fraternal organization, or from making such selection as is calculated by such organization to promote the religious principles or the aims, purposes or fraternal principles for which it is established or maintained, unless membership in such organization is restricted on the basis of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(l) Discriminate in any manner against any other person because he has opposed any unlawful practice defined in this chapter, or because he has made a charge, testified, assisted or participated in any manner, in any investigation, proceeding or hearing under the provisions of this chapter.

(m) Nothing in this chapter shall require any person to offer housing or business accommodations for sale or lease or to show such accommodations to any person if such person is not negotiating for the purchase or lease thereof in good faith.

143.03 UNLAWFUL EMPLOYMENT PRACTICES.

It shall be an unlawful discriminatory practice, except where based upon applicable national security regulations established by the United States:

(a) For any employer to refuse to hire any person or otherwise to discriminate against any person with respect to hiring, tenure, compensation, promotion, discharge or any other terms, conditions or privileges directly or indirectly related to employment because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(b) For any employer, employment agency or labor organization to establish, announce, or follow a policy of denying or limiting, through a quota system or otherwise, the employment or membership opportunities of any person or group of persons because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(c) For any employer, labor organization or joint labor management committee controlling apprentice training programs to discriminate against any person because of race, color, religion, national origin, ancestry, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status in admission to or employment in any program established to provide apprentice training.

(d) For any employer, employment agency or labor organization to publish or circulate or to cause to be published or circulated any notice or advertisement relating to employment or membership which indicated any preference, limitation, specifications or discrimination based upon race, religion, color, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(e) For any employment agency to fail or refuse to classify properly or refer to employment or otherwise discriminate against any person because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(f) For any employer to substantially confine or limit recruitment or hiring of employees with intent to circumvent the provisions of this chapter, to any employment agency, employment service, labor organization, training center, training school or any other employee referring source known to discriminate against persons because of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(g) For any labor organization to discriminate against any person or limit his employment opportunities or otherwise adversely affect his status as an employee, or his wages, hours or employment conditions because of his race, color, religion, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status.

(h) For any employer, employment agency or labor organization to discriminate against any person because he has opposed any practice forbidden by this chapter, or because he has made a complaint or testified or assisted in any manner any investigation or proceeding under this chapter.

(i) For any person, whether or not an employer, employment agency or labor organization, to aid, incite, compel, coerce or participate in the doing of any act declared to be an unlawful discriminatory practice by this chapter, or to obstruct or prevent any person from enforcing or complying with the provisions of this chapter, or to attempt directly or indirectly to commit any act declared by this chapter to be an unlawful discriminatory practice.

(j) Nothing in this chapter shall require any person, company or business to offer employment to any person not applying for such employment in good faith.

143.04 UNLAWFUL PUBLIC ACCOMMODATION PRACTICES.

It shall be an unlawful discriminatory practice:

(a) For any proprietor or his employee, keeper or manager of a place of public accommodation to deny to any person, except for reasons applicable alike to all persons regardless of race, color, religion, national origin, ancestry, sexual orientation, gender identity, sex, disability, age, pregnancy, height, weight, or veteran status the full enjoyment of the accommodation, advantages, facilities or privileges thereof.

(b) For any proprietor or his employee, keeper or manager of a place of public accommodation to publish, circulate, issue, display, post or mail, either directly or indirectly, any printed or written communication notice or advertisement to the effect that any of the accommodations, advantages, facilities, goods, products, services and privileges of any such place shall be refused, withheld, or denied to any person on account of race, color, religion, ancestry, national origin, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status or that such person is unwelcome, objectionable or not acceptable, desired or solicited.

(c) For any person, whether or not included in subsections (a) and (b) hereof, to aid, incite, compel, coerce or participate in the doing of any act declared to be an unlawful discriminatory practice under this chapter.

143.05 COMPLAINT PROCEDURE.

(a) Whenever it is charged in writing, by a person or aggrieved organization, hereinafter referred to as "complainant", that any person, employer, employment agency and labor organization, hereinafter referred to as the "respondent", has engaged in or is engaged in any unlawful discriminatory practices as defined in this chapter, or upon its own initiative, in matters relating to such discriminatory practices, the Civil Rights Director may initiate a preliminary investigation. Such charge shall be filed with the Director within six months after the alleged unlawful discriminatory practices are committed. If the Director determines after such investigation, that it is not probable that unlawful discriminatory practices have been or are being engaged in, the Director shall notify the complainant of the determination and recommendation to not pursue further action on the matter.

(b) If the Director determines, after such investigation, that it is probable that unlawful discriminatory practices have been or are being engaged in, he shall endeavor to eliminate such practices by informal methods of conference, conciliation and persuasion. If after such investigation and conference, the Director is satisfied that any unlawful discriminatory practice of the respondent will be eliminated, it may treat the complaint as conciliated and notify the complainant that it will not initiate prosecution of the matter.

(c) If the Director fails to effect the elimination of such unlawful discriminatory practices or to obtain conciliation of the matter, or, if the circumstances warrant, in advance of or during any such preliminary investigation or endeavors to conciliate the matter, the Director shall issue and cause to be served upon the respondent a notice of an investigative hearing, notifying the respondent of an investigative hearing before the Civil Rights Commission, at a time and place therein fixed to be held not less than ten days after the service of such notice and stating the charges specified in the original charge against the respondent.

(d) Any such charge may be amended by the Director or complainant at any time prior to or during the hearing based thereon. The respondent shall have the right to file an answer or to amend an answer to the original or amended charge, and to appear at such hearing in person, by attorney or otherwise to examine and cross-examine witnesses.

(e) The complainant shall be a party to the proceeding, and any person who is an indispensable party to a complete determination or settlement of the question involved in the proceeding shall be joined. Any person who has or claims an interest in the subject of the hearing and in obtaining or presenting relief against the acts or practices complained of, may be, in the discretion of the Civil Rights Commission, permitted to appear for the presentation of oral or written argument.

(f) In any proceeding the Civil Rights Commission shall not be bound by the rules of evidence prevailing in the courts of law or equity, but shall in ascertaining the practices followed by the respondent, take into account all reliable, probative and substantial evidence, statistical or otherwise, produced at the hearing, which may tend to prove the existence of an unlawful discriminatory practice or a predetermined pattern of unlawful discriminatory practice under this chapter, provided that nothing contained in this section shall be construed to authorize or require

any person to observe the proportion which persons of any race, color, religion, national origin, ancestry, sexual orientation, sex, gender identity, disability, age, pregnancy, height, weight, or veteran status bear to the total population or in accordance with any criterion other than the individual qualifications of the applicant.

(g) The testimony taken at the hearing shall be under oath and shall be reduced to writing, and filed with the Civil Rights Commission. Thereafter, in its discretion, the Commission upon notice to the plaintiff, Civil Rights Director and to the respondent with an opportunity to be present may take further testimony or hear arguments.

(h) No person shall be compelled to be a witness against himself in any hearing, formal or informal, before the Civil Rights Director or Civil Rights Commission.

(i) In conducting any hearing as provided herein, the Commission may subpoena as witnesses any person believed to have knowledge of facts relevant to such hearing, may compel the production of books, papers, records or other evidence relative to such hearing by the person having custody or control thereof and may administer oaths, take testimony and issue such rules as shall be necessary to effectuate an investigatory hearing under this section.

(j) Upon written application of the respondent, complainant or Director, the Civil Rights Commission shall issue subpoenas as if issued on its own motion.

(k) If upon all the reliable, probative and substantial evidence the Commission determines that the respondent has engaged in, or is engaging in, any unlawful discriminatory practice under this chapter, whether against the complainant or others, the Commission may endeavor to eliminate such practices by informal methods of conference, conciliation and persuasion. If the Commission fails to effect the elimination of such unlawful discriminatory practices or to obtain conciliation of the matter, or, if the circumstances warrant, in advance of or during such investigative hearing, or endeavors to conciliate the matter, the Commission may direct the Civil Rights Director to guide the complainant in the prosecution of this matter in the appropriate court of record.

(l) If the Commission finds that no probable cause exists for crediting the charges, or if upon all the evidence the Commission finds that the respondent has not engaged in any unlawful discriminatory practice under this chapter, against the complainant or others, it shall state its findings or fact, and shall notify the complainant and respondent that it will not prosecute the matter further.

143.06 VALIDITY AND SEVERABILITY.

This chapter and each part of any section thereunder are hereby declared to be independent sections and parts of sections and, notwithstanding any other evidence of legislative intent, it is hereby declared to be the controlling legislative intent that if any provisions of any section or the application thereof to any person or circumstance is held to be invalid, the remaining sections or parts of sections and the application of such provision to any person or circumstances other than those to which it is held invalid, shall not be affected thereby, and it is hereby declared that such

sections and parts of sections would have been passed independently of such section or parts of such sections so known to be invalid.

143.99 PENALTY.

(a) Any person who fails to comply with a subpoena issued by the Civil Rights Commission as provided in this chapter shall, upon conviction thereof, be fined not more than fifty dollars (\$50.00).

(b) Any person convicted of a violation under this chapter shall be fined not more than one hundred dollars (\$100.00) for a first offense and not more than five hundred dollars (\$500.00) for any subsequent offense.



TITLE VI PLAN

Revised and approved by Council: 03/18/2025

RESOLUTION 7686

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1. INTRODUCTION

The City of Oxford is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related statutes to ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Policy Statement: It is the policy of the City of Oxford to uphold and enforce the provisions of Title VI and all related regulations. The City ensures that no person shall face discrimination in programs, services, or activities on the basis of race, color, national origin, sex, age, disability, or income status.

Authorities: This plan is established in accordance with:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.)
- Civil Rights Restoration Act of 1987
- Americans with Disabilities Act (ADA)
- Section 504 of the Rehabilitation Act of 1973
- Executive Order 13166 (Limited English Proficiency)
- Other relevant federal and state laws

2. TITLE VI COMPLIANCE POLICY

The City of Oxford operates its programs and provides services without regard to race, color, national origin, sex, age, disability, or low-income status in accordance with Title VI of the Civil Rights Act of 1964 and its related statutes. Title VI of the Civil Rights Act of 1964 (Title VI) provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance” See 42 USC § 2000(d).

In addition to Title VI, there are laws that prohibit discrimination on other grounds. Those laws include: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324), which prohibits discrimination based on sex; Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, which provide protections for disabled persons; and, the Age Discrimination Act of 1975, which applies to age.

The City of Oxford values each individual’s civil rights and wishes to provide equal opportunity and equitable service for the citizens. As a recipient of federal funds, the City of Oxford conforms to Title VI and all related statutes, regulations, and directives.

Title VI Implementation Plan

Any person who believes they have been aggrieved by any unlawful discriminatory practice by the City of Oxford under Title VI may file a signed, written complaint with the City of Oxford Title VI Coordinator. All complaints must be filed in writing no later than 180 days after the date of the last instance of the alleged discrimination. All complaints must be signed by the complainant and include the name of the individual or department alleged to have engaged in the discriminatory conduct as well as the dates, and an explanation of the facts giving rise to the claims.

For purposes of this Plan, the following individual has been identified as the City of Oxford Title VI Coordinator:

City Manager
City of Oxford
15 S. College Ave.
Oxford, OH 45056

The City of Oxford affirms its commitment to nondiscrimination by publishing its Title VI Implementation Plan on the City's website, which may be accessed at the following link:

www.cityofoxford.org

3. **TITLE VI ASSURANCES & IMPLEMENTATION**

This Title VI Implementation Plan has been adopted, implemented and is being adhered to by the City of Oxford. The City of Oxford has implemented this plan by Resolution No. ____7686_____, adopted on March 18, 2025.

4. OVERVIEW OF THE CITY OF OXFORD TITLE VI PROGRAM

A. Complaint of Discrimination: Complaint Policy

1. How to File A Complaint

To initiate a Title VI complaint with the City of Oxford, a signed, original copy of the complaint must be delivered or mailed to the Title VI Coordinator to officially begin the complaint process. Any person with a disability may request to file his or her complaint using an alternative format. A Complainant shall utilize the City of Oxford Title VI complaint form when submitting his or her complaint.

All complaints shall be directed to

City of Oxford
City Manager/Title VI Coordinator
15 S. College Ave.
Oxford, OH 45056

A person may also file a complaint directly with the Federal Highway Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Federal Transit Administration (for transit-related issues), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Ohio Department of Transportation, Office of Equal Opportunity, Attention: Aisha Powell, Title VI Program Manager, 1980 W. Broad Street, 2nd Floor, Mail Stop: 3270, Columbus, OH 43223.

2. Elements of a Complete Complaint

A complaint shall be filed utilizing the City of [Oxford Title VI complaint form](#) and shall be written and signed by the Complainant in order to be considered complete. Verbal complaints will not be accepted. The City of Oxford Title VI complaint form is available [online](#) or for pick up at the City of Oxford Municipal Building at:

City of Oxford Municipal Building
15 S. College Ave.
Oxford, OH 45056

To be considered complete, a complaint must include the following information:

- The full name and address of the Complainant.
- The full name and address of the Respondent, the individual, agency, department, or program that allegedly discriminated against Complainant.
- A description of the alleged discriminatory act(s) that violated Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, national origin, sex, age, or disability) and the date of occurrence.

3. **Processing Complaints**

The Title VI Coordinator will process all complaints and review their findings with the Civil Rights Commission, a commission of appointees made by the Oxford City Council.

The Title VI Coordinator, or designee is responsible for and will proceed as follows.

- Will review the complaint upon receipt to ensure that all required information is provided and that the complaint meets the filing deadline date, which is not more than 180 days from the date the alleged discriminatory act occurred.
- Shall verify that the alleged discriminatory activity is attributable to, and subject to the jurisdiction of the City.
- Will then investigate the complaint, and shall further forward the complaint to the City Solicitor, and Human Resources Manager for concurrent review and investigation. If the complaint is filed against the City's Title VI Coordinator, the City Solicitor shall forward the complaint to Human Resources Manager for concurrent review and investigation.
- The Title VI Coordinator, or designee in conjunction with the City Solicitor, City Manager, and/or Human Resources Manager, may conduct interviews or other fact-finding investigations to determine the veracity of the complaint, and to ascertain specific information relative to the alleged discriminatory practice or activity.
- Upon concluding the investigation of the complaint, the Title VI Coordinator, or designee shall share their findings with the Civil Rights Commission in a public meeting.

Title VI Implementation Plan

- After this meeting, the Complainant will be notified in writing regarding the disposition of the complaint, as well as any specific actions taken by the City responsive thereto. The determination of the Title VI Coordinator shall be final, and not subject to appeal.

B. Environmental Justice

The City of Oxford is committed to ensuring that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.

The three fundamental environmental justice (EJ) principles are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

The City of Oxford is committed to these three environmental justice principles in all work that the City performs.

C. Limited English Proficiency (LEP)

On August 11, 2000, the President signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency (LEP), to clarify Title VI of the Civil Rights Act of 1964. Its purpose is to ensure meaningful access to programs and services to otherwise eligible persons who are not proficient in the English language.

To accommodate these individuals, the City of Oxford provides, upon request, services to assist the LEP population.

D. Non-Discrimination & Accessibility Training

At the time of hire, the City's Title VI policy will be provided to all City of Oxford employees. Employees will be provided with updated education and literature as the City of Oxford deems necessary.

E. Public Involvement

The Civil Rights Commission is charged with the responsibility of studying, investigating, and conducting public meetings and public hearings relative to any and all matters of factual situations wherein there is the possibility of the existence of discriminatory practices or prejudice or discrimination which in any manner could conceivably result in any degree of deprivation of the civil rights of any person within the City of Oxford.

The Commission consists of five greater Oxford area residents selected by Council to serve three-year overlapping terms: one member shall be appointed for one year, two members shall be appointed for two years, and two members shall be appointed for three years. Thereafter, members shall be appointed for three-year terms of office.

The Civil Rights Commission is responsible for:

1. Data Collection

The City of Oxford shall track Title VI complaints and shall retain those complaints and any investigatory files pursuant to the adopted Records Retention Policy for the City of Oxford, Ohio.

2. Community Involvement & Outreach

The City of Oxford is committed to ensuring that community involvement and outreach is done in a respectful and appropriate manner that will allow for diverse involvement. Public meetings, programs and activities provide equitable opportunities for participation.

Other Public Involvement Options:

The City of Oxford hosts meetings twice a month and those meetings are open to the public. Any meetings that are open to the public are published on the City of Oxford website. All City of Oxford public meetings are held in locations accessible to individuals with disabilities.

Also published on the City of Oxford website are various meeting agendas, meeting minutes, notices, events, and news. Some departments within the City of Oxford utilize signage, media, and social media websites as another avenue to communicate with the community.

F. ADA Coordination and Transition Plan

The City has adopted a Self Evaluation and Transition Plan as outlined in Resolution 7302 to ensure compliance with the Americans with Disabilities Act and other civil rights obligations.

The **ADA/504 Coordinator** is responsible for ensuring compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act, overseeing accessibility initiatives, and addressing disability-related concerns within the organization. This individual serves as the primary contact for ADA-related grievances, accommodations, and policy implementation.

Self-Evaluation and Transition Plan is conducted every 3 years to assess existing facilities, programs, and services for compliance with accessibility standards. The self-evaluation will identify barriers to access, and the transition plan will outline necessary modifications, timelines, and responsible parties to ensure full compliance with ADA/504 regulations, promoting an inclusive and equitable environment for all individuals.

The City of Oxford ADA/504 Coordinator is assigned as:

City of Oxford
City Manager- ADA/504 Coordinator
15 S. College Ave.
Oxford, OH 45056