



# Ohio Expo Center & State Fair

## **TITLE II STAND-ALONE POLICY FOR OHIO EXPOSITIONS COMMISSION**

### **Purpose**

To establish standards and guidelines for those seeking and obtaining reasonable accommodations to obtain employment and/or gain public access. These guidelines are to ensure all are afforded equal employment opportunities and equal access for Americans with disabilities when applying for employment and public access at the Ohio Expositions Commission (EXP).

### **Applicability**

This policy applies to persons employed by the Ohio Expositions Commission (EXP), EXP applicants, contractors, volunteers, and individuals desiring to gain public access for EXP meetings, trainings, hosted events, etc.

### **ADA Title II-State and Local Governments**

Title II of the ADA protects qualified individuals with disabilities and requires state/local governments to give people with disabilities an equal opportunity to benefit from each of their programs, services, and activities.

### **Accessibility**

EXP will endeavor to ensure accessibility for all employees, individuals seeking employment, customers, clients, and patrons in accordance with applicable ADA standards and HR-54. Ensuring accessibility includes, but is not limited to, the following:

- a. Physical space, all agency-specific employment forms, and information, including internal and external facing websites, are accessible and/or available in alternative formats.
- b. Any agency-sponsored meeting and/or event, including interviews for employment, are held in an accessible location for all participants to include virtual meetings.
- c. Notices for Agency Sponsored meetings, events, and training open to the public will include instructions on how and to whom to request reasonable accommodation.

### **Reasonable Accommodation**

A qualified individual with a disability seeking modifications to policies, procedures, or facilities for equal opportunity to enjoy (agency's) programs, services and activities should contact the ADA Coordinator, Jo Ellen Albanese, 614-644-4015 or [j.albanese@expo.ohio.gov](mailto:j.albanese@expo.ohio.gov). Such requests should include the specific program, service, or facility that the individual is unable to access, and the accommodation(s) requested.

A qualified individual with a speech, hearing or vision impairment may request an accommodation to the ADA Coordinator, Jo Ellen Albanese, 614-644-4015 or [j.albanese@expo.ohio.gov](mailto:j.albanese@expo.ohio.gov), and shall be furnished with appropriate auxiliary aids and services so that the individual can participate equally in EXP programs, services, and activities. Such auxiliary aids may include qualified sign language interpreters, documents in Braille and other ways of making information and communication accessible. To obtain auxiliary aids or services contact the ADA Coordinator, Jo Ellen Albanese, 614-644-4015 or [j.albanese@expo.ohio.gov](mailto:j.albanese@expo.ohio.gov), as soon as possible but no later than fourteen (14) calendar days before the scheduled event.

EXP will provide qualified individuals with disabilities reasonable accommodations upon request unless:

- a. The Requestor is not a qualified individual.
- b. Accommodating would fundamentally alter the nature of the agency's service, program, or activity (undue burden).
- c. Providing accommodation poses a direct threat to the health or safety of the individual with a disability or others.

## **Self-Evaluation**

EXP will conduct a self-evaluation, per Title II of the ADA, to assess our services, policies, practices, and facilities to identify and correct any barriers for people with disabilities.

## **ADA Title II Grievance Process**

### **a. Internal**

Any customer, patron/client, guest, or visitor who believes they have been discriminated against, harassed, or retaliated against based on disability has a right to file a Grievance/Complaint. A grievance can also be filed to report an allegation that a service, program, or activity is not equally accessible to people with disabilities. The grievance should contain information about the alleged discrimination. Per Title II of the ADA, EXP has established a Grievance process to encourage prompt and equitable resolution of the reported issue at the agency level. The grievance should be submitted in writing to the ADA Coordinator, Jo Ellen Albanese, [j.albanese@expo.ohio.gov](mailto:j.albanese@expo.ohio.gov) or 717 E. 17th Ave., Col., OH 43211, by the grievant and/or his/her designee as soon as possible but no later than 30 calendar days after the alleged violation (link agency customized form). [Title II Grievance Form Instructions.pdf](#)

### **b. External**

In the alternative, a customer or client may file an external complaint by contacting: U.S. Department of Justice- Civil Rights Division - Disability Rights Section Website: [ada.gov/complaint](http://ada.gov/complaint) 800-514-0301 (voice) or 800-514-0383 (TTY)

## **Employment**

ADA provisions and policy for employees and individuals with disabilities seeking employment can be obtained via the agency ADA Title I Policy provided in the [online employee manual for the Ohio Expo Center](#) as well as at the [Ohio Expo Center website](#). Additionally, all employees will receive a paper copy of the policy during on-boarding as well as when inquiries are made to the policy.

## **Public Notice**

This policy and the Disability Inclusion Poster will be available on EXP's public website, and notice will be posted in EXP facility for public access.

## **Definitions**

- a. Accessibility – Compliance with access guidelines required under the ADA and any other applicable federal or state law, including executive orders.
- b. Direct Threat – When there is significant risk of substantial harm to the health or safety of the individual employee with a disability or others.
- c. Disability – A physical or mental impairment that substantially limits one or more of the major life activities that include but are not limited to walking, breathing, seeing, hearing, etc.
- d. Essential Duties – Those job duties that are so fundamental to the position that the individual holds or desires that he or she cannot do the job without performing them. A function may be essential if, among other things, the position exists specifically to perform that function; there are a limited number of other employees who could perform the function; or the function is specialized, and the individual is hired based upon his or her ability to perform it.
- e. Interactive Process – The Interactive Process is used to determine whether an effective and reasonable accommodation is available for an employee or applicant under the ADA. The Interactive Process is required and simply means the employee or applicant with a disability and the employer work together to develop and discuss accommodations.

- f. Qualified Individual with a Disability – an individual with a disability that meets the essential eligibility requirements for the receipt of services or participation in programs, services, or activities of an agency.
- g. Reasonable Accommodation – Any change or adjustment to a job or work environment that permits a qualified applicant or employee with a disability to participate in the job application process or perform the essential functions of their position. There are three categories of "reasonable accommodations": a. modifications or adjustments to a job application process that enable a qualified applicant with a disability to be considered for the position such qualified applicant desires; or b. modifications or adjustments to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or c. modifications or adjustments that enable a covered entity's employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by its other similarly situated employees without disabilities.
- h. Reasonable Modification – Modification of policies, practices, and procedures when necessary to assure a person with a disability an equal opportunity, unless to do so would fundamentally alter the nature of the service, program, or activity.
- i. Site Manager – Director (or designee) for Central Office, Superintendent for Institutions, or Regional Administrator for Regional Offices.
- j. Undue Burden – Is a significant difficulty or expense imposed on (agency) if carried out. This means that (agency) does not have to provide an auxiliary aid or service, or a modification, if providing it would cause a significant administrative or financial burden or difficulty.
- k. Undue Hardship – Undue hardship exists if an accommodation would be unduly costly, extensive, substantial, or disruptive, or would fundamentally alter the nature or operation of the business.

## **Authority**

This policy is issued in compliance with Ohio Revised Code 5139.01, which delegates to the Executive Director of the Ohio Expositions Commission the authority to adopt rules for the governance of the agency (EXP), the conduct of its commissioners and employees, the performance of its business, and the custody, use, and preservation of the department's records, papers, books, documents, and property.

## **Suggested Links**

- HR 54 [HR-54](#)
- Agency EEO Policy [EXP EEO](#)
- Title II Grievance Form [Grievance Form](#)
- ODI DI Poster [ODI Poster](#)
- Link Title I ADA Policy

