



**CITY OF DUBLIN  
ADMINISTRATIVE ORDERS  
OF THE CITY MANAGER**

**ADMINISTRATIVE ORDER 1.16**

**TO:** City of Dublin Employees

**FROM:** Megan D. O'Callaghan, City Manager *Megan O'Callaghan*

**SUBJECT:** Americans With Disabilities Act (ADA) Coordinator and Grievance Procedure

**DATE:** January 1, 2026

*This Administrative Order supersedes and replaces Administrative Order 1.15, dated November 1, 1993, and Administrative Order 1.16 dated December 15, 2006, regarding the same subject.*

**PROPOSER:** Division of Human Resources

## **1. INTRODUCTION & PURPOSE**

The Americans with Disabilities Act prohibits discrimination against individuals with disabilities in employment, public services and transportation, public accommodations and services, and telecommunications. The ADA is divided into four main titles, each addressing a broad area where discrimination on the basis of disability is prohibited. These titles include:

- Title I – Employment
- Title II - Public Services
- Title III - Public Accommodations and Services
- Title IV – Telecommunications

There is also a fifth title containing miscellaneous provisions related to enforcement, insurance, and other such topics. It should be noted that Title III - Public Accommodations and Services - is applicable only to private entities and therefore has little if any impact on local governmental entities.

The focus of this Administrative Order is the requirement under Title II - Public Services - to designate an ADA Coordinator. Title II places special affirmative obligations on public sector employers and applies to all programs, activities, and services provided or operated by public entities. Furthermore, Title II prohibits the

exclusion of qualified individuals with disabilities from participating in or being denied the benefits of a public service offered by a department, agency, special purpose district, or other instrument of state or local government.

Title II outlines several affirmative obligations applicable to public entities:

- to conduct a written self-evaluation of their services, policies, and practices to determine whether they meet the requirements of Title II;
- to disseminate information to the public regarding rights and protections under the ADA;
- to adopt and publish a grievance procedure that provides for a prompt resolution of complaints alleging non-compliance with Title II of the ADA; and,
- for public entities with 50 or more employees, to designate at least one employee to coordinate compliance efforts under Title II.

The purpose of this Administrative Order is to formally designate an ADA Coordinator to guide the City's efforts to obtain compliance with the aforementioned affirmative obligation requirements; to outline the duties and responsibilities of said Coordinator; to delegate formal authority to said Coordinator to coordinate and monitor compliance efforts; to provide direction and guidance to Department/Division Heads & Assistants regarding compliance efforts; and to establish such a grievance procedure designed to promptly resolve complaints alleging non-compliance with Title II of the Act and to confer authority upon the designated ADA Coordinator to administer said grievance procedure.

## **2. DESIGNATION OF ADA COORDINATOR**

As outlined previously, Title II establishes an affirmative obligation to designate an ADA Coordinator for the purpose of guiding compliance efforts under Title II. To fulfill this requirement, the Director of Human Resources is hereby designated as ADA Coordinator and authorized to select additional employees as may be necessary to assist them in all compliance efforts.

## **3. FUNCTION & DUTIES OF ADA COORDINATOR**

The function of the ADA Coordinator will be to implement and guide the City's compliance efforts with Title II. The specific duties of the ADA Coordinator shall include the following:

- A. Guide and direct a self-evaluation process of all City facilities, programs, services, policies, and practices governed by Title II of the Act which is designed to identify areas of non-compliance and outline modifications necessary to achieve compliance.
- B. Develop and administer a grievance procedure for resolving complaints alleging that the City is not complying with the provisions of Title II of the ADA; take such actions as may be necessary to address deficiencies identified through the grievance procedure.
- C. Guide and direct a process of notifying the public, participants, beneficiaries, and all other interested persons that information is available as to how City programs are complying with ADA.
- D. Guide and direct a process of posting and maintaining signage at all municipal facility entrances indicating whether or not the entrance is accessible and if not accessible, directing individuals to alternative access points.
- E. Guide and direct a process of providing any other services within the City as are mandated by the terms and provisions of the ADA.

#### **4. GRIEVANCE PROCEDURE POLICY**

- A. This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Dublin.
- B. Any individual wishing to file a complaint alleging that the City of Dublin has violated Title II of the Americans with Disabilities ACT (ADA) (42 USC Section 12131 et seq.) or the regulations implementing Title II of the Act (28 CFR Part 35), shall adhere to the following procedure:

- (1) All complaints alleging non-compliance must be addressed to the City of Dublin ADA Coordinator:

Director of Human Resources, ADA Coordinator  
Dublin City Hall  
5555 Perimeter Drive  
Dublin, Ohio 43017  
(614) 410-4400

(2) The complaint must be filed in writing as soon as possible, but not later than 60 calendar days after the alleged violation. The Complaint must briefly describe the nature of the alleged ADA violation, and must include the complainant's name, address, and telephone number and the location, date, and description of the alleged violation. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

(3) The ADA Coordinator shall then investigate the complaint. The complainant and/or their representative may submit relevant information for review during the investigation; however, such information must be submitted within ten (10) calendar days after the complaint has been filed.

(4) Within 15 calendar days after receipt of the complaint, unless otherwise extended in writing to the complainant, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Dublin and offer options for substantive resolution of the complaint.

(5) If the complaint is not resolved to the complainant's satisfaction by the ADA Coordinator, the complainant may appeal the decision within 15 calendar days after receipt of the response to the City Manager or their designee. Within 15 calendar days after receipt of the appeal, unless otherwise extended in writing to the complainant, the City Manager or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, unless otherwise extended in writing to the complainant, the City Manager or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. Once a decision has been communicated by the City Manager, no further administrative appeal shall be permitted. The City Manager is the last step in the grievance procedure.

C. A record of action taken on each complaint shall be maintained at each level of this grievance procedure. All written complaints received by City Manager or their designee, appeals to the City Manager or their designee, and responses from these two offices will be retained by the City of Dublin for at least three years.

D. An individual's right to prompt and equitable resolution of their complaint shall not be impaired by the pursuit of other remedies, nor shall use of this grievance procedure be a prerequisite to the pursuit of other remedies.