

We advocate.

We protect.

We negotiate.

We empower.

We guard.

We challenge.

We strive.

We dare.

We confront.

We urge.

We defend.

We sort out.

We support.

We dignify.

We persevere.

We prevail.



OLRS 2008 Annual Report

October 1, 2007 through
September 30, 2008



Ohio Legal Rights Service Commission

Ohio Legal Rights Service (OLRS) is governed by its Commission, with members appointed by the Chief Justice of the Supreme Court, the President of the Senate, and the Speaker of the House. The Commission appoints and advises the OLRS executive director; assists in developing the agency's budget and strategic plan; is part of the agency's grievance process; and establishes general policy guidelines, including guidelines for initiating litigation. Members of the OLRS Commission are:

Kalpana Yalamanchili, Chair
Hilliard

Wayne Cocchi
Columbus

Jerry Cohn
Columbus

Patrick Risser
Ashland

Ted Sipes
Bowling Green

FUNDING

OLRS is funded by:

The State of Ohio General Revenue Fund (GRF). GRF is the sole support of the OLRS Ombuds section, and also funds some administrative overhead. OLRS is also funded by federal grants from

- Client Assistance Program (CAP) - Rehabilitation Act of 1973 (PL 93-112) as amended; Office of Special Education and Rehabilitative Services of the United States Department of Education.
- Protection & Advocacy for Individuals with Developmental Disabilities (PADD) - Developmental Disabilities Assistance and Bill of Rights Act of 1975 (PL 94-103); Administration for Developmental Disabilities of the United States Department of Health and Human Services. Monies from State Councils on Developmental Disabilities are funded through formula grants authorized under Subtitle B of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act).
- Protection & Advocacy for Assistive Technology (PAAT) - Assistive Technology Act of 1998 (PL 105-394); Office of Special Education and Rehabilitative Services of the United States Department of Education.
- Protection & Advocacy for Individuals with Mental Illness (PAIMI) - Protection and Advocacy for Individuals with Mental Illness Act of 1986 (PL 99-319); Center for Mental Health Services United States Department of Health and Human Services.
- Protection & Advocacy for Beneficiaries of Social Security (PABSS) - Ticket to Work and Work Incentives Improvement Act of 1999 (PL 106-170).
- Work Incentives Planning and Assistance (WIPA) program - Office of Employment Support Programs Social Security Administration.
- Protection & Advocacy for Individual Rights (PAIR) - Rehabilitation Act of 1973 (PL 93-112) as amended; Office of Special Education and Rehabilitative Services of the United States Department of Education.
- Protection & Advocacy for Individuals with Traumatic Brain Injury (PATBI) - Children's Health Act of 2000 (PL 106-310); Maternal Child and Health Bureau of the United States Department of Health and Human Services.
- Protection & Advocacy for Voting Access (PAVA) - Help America Vote Act of 2002 (PL 107-252); Administration for Children and Families of the United States Department of Health and Human Services.

Ohio Legal Rights Service does not discriminate in provision of services or employment because of race, color, religion, sex, national origin, sexual orientation, disability, military service, or age.

2008 Year in Review 2009 Challenges Ahead

We celebrate the successes achieved in 2008, with people with disabilities as our partners. OLRs representation resulted in children and adults with disabilities having needed supports to be successful learners, staying in their homes and neighborhoods, moving out of institutions and into community homes, keeping their jobs and obtaining health care coverage and exercising their right to vote. OLRs fought discrimination and protected people's rights to accessible buildings and meaningful accommodations. OLRs represented people in prisons and jails, and worked to stop the school to prison pipeline.

In 2008, OLRs increased its support for self-advocacy organizations to amplify their voices to better assure that people with disabilities drive the policies that affect them and the services they receive. OLRs strengthened partnerships with Legal Aid Societies and other legal organizations to protect civil rights. These alliances keep OLRs on course to fulfill its mission.

As for most Ohioans, 2009 will be an extremely challenging year for OLRs clients and for the agency. Between July and December of 2008, OLRs' state funding was cut more than 19%. State funding is the only source of support for the OLRs Ombuds Section whose primary responsibility is to investigate allegations of abuse and neglect.

As always, OLRs will attend to its duty to efficiently manage federal and state funds, grants and gifts. With shrinking state funding for the agency, OLRs must remain vigilant to protect people from abuse and neglect, and assure that children and adults with disabilities have equal opportunities to participate in schools, neighborhoods and workplaces.

We welcome your financial support to strengthen Ohio's protection of the legal, civil and human rights of individuals with disabilities. OLRs Commissioners and staff are profoundly grateful for your generosity.



*Kalpana Yalamanchili
Chair, OLRs Commission*



*Michael Kirkman
Executive Director*

Michael Kirkman
Executive Director

Kalpana Yalamanchili
Chair, OLRs Commission

Ombuds Section Protection from Abuse and Neglect

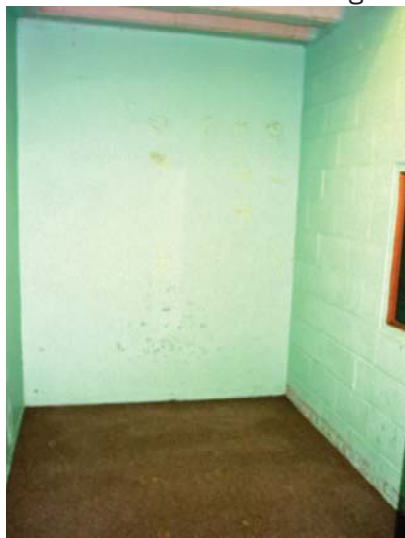
OLRS' non-legal Ombuds Section was created by state law and is sustained by state General Revenue Funds. The Ombuds Section investigates complaints regarding health and safety, abuse and neglect and rights violations. Complaints are resolved through mechanisms such as mediation and negotiation.

In Fiscal Year 2008, the Ombuds Section continued investigations of children and adults who died in facilities, complained about conditions in nursing homes and other places, were abused and neglected in schools and institutions or were victims of theft.

Abuse and Neglect Investigations

The Ombuds Section issued reports to resolve abuse, neglect and conditions regarding a behavior modification program operating as a boot camp, and two children's residential treatment facilities. The reports included documentation of problems with licensure, restraint and other abuse, and failure to guarantee children the right to participate in an appropriate educational program.

Ombuds staff investigated a complaint that a school restrained a seven-year-old with a "humane body wrap" and placed the child in a locked basement room for several hours. OLRS' investigation revealed that the



Children were left alone, sometimes restrained by a Humane Body Wrap, in this cinderblock room.

room and mechanical restraints had been used with students, and staff were not trained to use positive behavioral interventions. The school discontinued the use of the room and mechanical restraints, and trained staff to use positive behavioral supports. Since the Ohio Department of Education (ODE) provides no guidance or administrative oversight on this serious matter, OLRS recommended that

ODE enact administrative rules on the use of emergency behavioral interventions before more children are injured, traumatized or die in Ohio's schools.

Death Investigations

An investigation into the death of a resident prompted the Ohio Department of Mental Retardation and Developmental Disabilities (ODMRDD) to resume the

licensure revocation process for an intermediate care facility for the mentally retarded (ICF/MR). The facility has a history of citations from the Ohio Department of Health (ODH) and ODMRDD covering medical, program and environmental issues.

The Ombuds Section issued a formal report in response to the death of a resident who died of a perforated bowel. The investigation found a pattern of inadequate care and the report recommended ODMRDD revoke the facility's license to operate, place monitors in the facility, conduct a facility survey and impose other sanctions as appropriate. The report also included recommendations to other agencies responsible for oversight of the facility.

OLRS provided ODMRDD with information gathered from on-site monitoring and on-going review of facility records, major unusual incident reports and licensure surveys. OLRS identified problems for ODMRDD and ODH to look for during their surveys of the facility.

The Ombuds report also recommended that ODH and ODMRDD conduct investigations of the death, and that ODMRDD review current care and services provided to all residents. Both state agencies responded with investigations.

Nursing Home Investigations

As in past years, the Ombuds Section has responded to complaints from residents housed in nursing home behavioral units. Ombuds reports were issued to facilities, ODH and the Ohio Department of Job and Family Services (ODJFS). In its reports, OLRS advocated for the completion of resident reviews to determine the need for specialized services and for referrals to local mental health and MRDD boards for evaluation of services. Ombuds staff also met with representatives of ODH and ODJFS in an attempt to resolve the issues, including the placement of younger people with disabilities on behavioral units, length of stay, lack of Preadmission Screening and Resident Reviews (PASRR), locked units and the completion of quality assurance/utilization reviews.

Theft Investigations

Ombuds staff assured that money was restored to individuals that had been stolen by an employee entrusted with managing funds and other property of the group home they lived in. The investigation revealed that nearly \$25,000 had been misappropriated. Following the investigation, the provider repaid the full amount owed to the individuals, developed a staff training and significantly improved procedures to ward off future theft. The staff person responsible for the theft was criminally charged. ■

Advocating and Protecting Rights

OLRS Successfully Appeals MBI Decision

Crisi Warner is a drafting technician, a job she loves. Her group of technicians and engineers produce road and bridge plans. Warner could not work full-time because she could not afford the payments she had to make to keep Medicaid coverage. George Cronheim, staff attorney at OLRs, won an administrative appeal, and Warner is now enrolled in the Medicaid Buy-In for Workers with Disabilities (MBI-WD) program. She now works full-time because her Medicaid premiums are affordable.

Problems with keeping Medicaid coverage surfaced shortly after Warner finished college eight years ago and was hired full-time. During her annual Medicaid review, Warner was informed that, because of her income, she had to pay a patient liability. Warner, who is paid twice a month said, "The State got one paycheck, and I got one." Her take home pay was exactly the amount that Social Security would have paid her in disability income to stay at home.

Warner and her husband could not afford the Medicaid liability payments, and she was forced to ask her employer if she could work part-time. Her employer agreed to the accommodation, although both the employee and employer preferred that she work full-time.

She used her spare time to advocate with legislators to pass the Medicaid Buy-In program so that people like her, who wanted to work, could keep critical Medicaid coverage. Warner testified before the Senate Finance Committee, and has been active with the Olmstead Task Force. MBI-WD became a reality on April 1, 2008.

Warner was among the first applicants for the MBI-WD program. After being told she was eligible, she was later denied because her husband's assets were wrongly counted. Warner asked for representation from OLRs. Cronheim represented her at a Medicaid hearing and argued that spousal resources, according to state agency Medicaid rules, are not counted when determining MBI-WD eligibility. However, the hearing officer upheld the decision to deny the application.

OLRS appealed the hearing officer's decision, and the administrative appeal officer agreed that only the individual's resources are considered when determining resource eligibility. Warner says that Cronheim did "an absolutely phenomenal job. For a lay person like me to weed through the jargon, I don't think I could have done it."

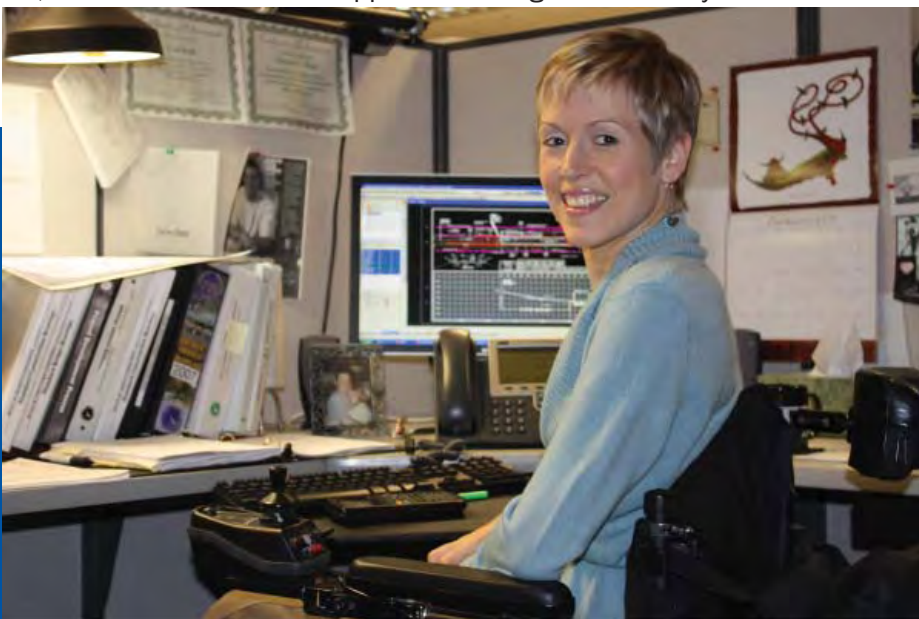
Warner is now employed full-time with the Ohio Department of Transportation, planning Ohio bridges and roads. ■

"Medicaid had always been a very big blessing until I started employment."

Crisi Warner

"The benefits of Crisi being full-time are her expanding role as a bridge detailer and roadway designer. Working with Crisi allows me to concentrate on the design and planning of bridge projects while she handles the drafting and details of the project. Her additional time at work has allowed the department to produce more plans and expanded her role as a project designer/detailer."

J.P. Barnhouse, P.E., Supervisor



Crisi Warner at work where, as a drafting technician, she produces road plans and bridge plans utilizing CADD software.

Protecting the Right to Medically Necessary Services

Receiving needed services can mean the difference between life in the community or life in an institution. OLRs took legal action after receiving complaints from families about proposed administrative rule changes that would have discontinued services to children in inclusive settings.



Federal Judge James L. Graham issued a preliminary injunction to prevent the implementation of proposed state rules that would have eliminated Medicaid reimbursement for medically necessary services to children with autism and other conditions that cause severe or intense behavior. "Without these critical services, the children were at risk for regression in their skills, increased unwanted behavior and an increased chance of being placed in an institution or segregated classroom," said OLRs attorney Michelle Atkinson. "The injunction was a necessary legal protection for them, so they

could stay at home in their communities," added OLRs chief legal counsel Sue Tobin.

OLRS filed the lawsuit on behalf of three children with autism and the Parents' League for Effective Autism Services (PLEAS), an association of parents and families who are receiving Medicaid services. A motion and complaint was filed in the U.S. District Court, Southern District of Ohio, seeking a temporary restraining order and declaratory and permanent injunctive relief prohibiting the defendants, officials at the Ohio Department of Job and Family Services (ODJFS), the agency responsible for the administration of the Medicaid program in Ohio, and the Ohio Department of Mental Health (ODMH), from enforcing the proposed rules. The Centers for Medicare and Medicaid Services, per the judge's orders, was also added as a defendant in the case.

OLRS requested the injunction, an extraordinary remedy that courts use in special cases, to prevent the harm that would occur to the children if the defendants implemented the rules and discontinued payment for the children's services. A court hearing was held where parents of children with autism and a psychologist familiar with the children gave powerful testimony about the children's need for intensive behavioral services and the harm they would suffer without such services. They

told the court the children had no other options for services and risked substantial regression in their behavior and skills.

Judge Graham viewed the proposed rules as an effort to avoid having to pay for certain services under the federal Early Periodic Screening, Diagnosis and Treatment requirement, and concluded that the defendants had interpreted the federal Medicaid law too restrictively. The court also denied the defendants' motion to dismiss the case and ruled that the plaintiffs had properly brought a claim under federal law for violations of their rights under Medicaid, that OLRs lawyers could represent the PLEAS association, and that the association has standing to sue as a plaintiff.

ODJFS and ODMH have appealed the case to the U.S. Court of Appeals for the Sixth Circuit. Judge Graham denied their request to stay the injunction during the pendency of the appeal, and also stayed the proceedings of the district court during that time. OLRs continues its work on this case to ensure that children with disabilities continue receiving needed services in inclusive settings.

Doe v. State of Ohio

OLRS represents eight students with disabilities, their parents, and a plaintiff class of over 250,000 Ohio students with disabilities in *Doe v. State of Ohio*. OLRs brought the case to ensure that state officials were meeting their obligations of ensuring that children with disabilities receive a free appropriate public education (FAPE) under the Individuals with Disabilities Education Improvement Act (IDEIA), and because of the impact that inequities in Ohio's school funding scheme have on the education of these children. Plaintiffs seek relief under IDEIA, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973 and the U.S. Constitution.

The central claim advanced by the *Doe* plaintiffs is that Ohio's system of special education does not provide eligible children a FAPE, and that the state fails to exercise its general supervisory responsibilities to monitor and enforce school districts' compliance with federal law.

Settlement discussions between representatives of the Ohio Department of Education and the plaintiffs is ongoing. These discussions are addressing the state monitoring and complaint systems but discussions regarding funding have been deferred.

G.D. v. Riley

OLRS is engaged in active mediation of *G.D. v. Riley*, a class action lawsuit OLRs filed against the Ohio Department of Job and Family Services (ODJFS). The case is in the U.S. District Court for the Southern District of Ohio and seeks to require the state to comply with federal laws related to the Early Periodic Screening, Diagnosis, and Treatment (EPSDT) program.

EPSDT, known in Ohio as Healthchek, is a required Medicaid program covering children under age 21. The program requires state officials to periodically screen Medicaid eligible children for health problems. If a child's screening identifies health problems, the law also requires the EPSDT program to provide necessary health care, diagnostic services and treatment. Those services include medical, vision, hearing and lead testing. However, any service that will correct or improve a child's health problems must be provided, if the service is included in a list of federal Medicaid services.

OLRS alleges that ODJFS violates federal law because it does not have a system in place that allows Medicaid eligible children to apply for and receive necessary treatment services from the EPSDT program. At the request of the judge hearing the case, OLRs continues to meet with the defendants under the supervision of the mediator for the U.S. District Court for the Southern District of Ohio.

OLRS continues to monitor complaints from families about obtaining EPSDT services for their children with disabilities. In a recent complaint, a family was unable to get Medicaid funding for equipment needed by a young child with significant developmental disabilities. The child's physician determined that the equipment was necessary for the child's safe transportation and self-care. Medicaid denied the equipment as not medically necessary, a decision that was overturned on appeal. However, the equipment was denied a second time when a subsequent review required by the appeal determined again that the equipment was not medically necessary. Frustrated by the delay, the family is now seeking other sources of funding for the equipment.

The lawsuit and any settlement seeks to address the barriers encountered by this family and a multitude of others, by ensuring that Ohio's EPSDT program complies with federal Medicaid law, including applying the appropriate standard of medical necessity to EPSDT requests, and ensuring that ODJFS is responsive to families in its administration of the EPSDT program.

Martin v. Strickland

The *Martin* litigation has been a significant priority for OLRs and its clients. While many changes in Ohio's mental retardation and developmental disabilities system have occurred since the original filing, the overarching goal of the litigation, allowing people with disabilities to choose services in a home-like setting rather than an intermediate care facility for the mentally retarded (ICF/MR) or nursing facility (NF), has remained vital. The thrust of the case has been related to the community integration mandate of Title II of the Americans with Disabilities Act, and later the interpretation of that mandate by the United States Supreme Court in the case of *Olmstead v. L.C.*

In the last biennium, the state provided funding for 1,500 additional individuals who are currently in an institution and who choose to move, or those who will be at risk of being institutionalized but who would choose to be served in a community setting to receive home and community based services through an Individual Options (IO) waiver. The settlement also required surveys of those residing in ICFs/MR and NFs to assist in evaluating the need for additional community based services.

OLRS successfully advocated for an individual with a traumatic brain injury (TBI) who wished to live in the community to receive a Martin IO waiver. The IO waiver will enable him to move out of the nursing home and into a home in the community. The plan is for him to return to the county where he lived prior to his injury.

OLRS also represented an individual living in a state developmental center who wanted to move to the community. At an administrative appeal, OLRs attorney Jane Perry successfully argued that he met the level of care necessary to get the IO waiver that would make it possible for him to live in the community. The Ohio Department of Mental Retardation and Developmental Disabilities (ODMRDD) previously determined that he did not meet the eligibility requirements for an IO waiver. The individual received a Martin IO waiver from his county board of MRDD and moved into an apartment in his community.

OLRS continues to monitor the enrollment of individuals on Martin waivers and policy issues that impact the implementation of the *Martin* Consent Order. ■

Advocating and Protecting Rights

Access to Recreation

Joshua Stack uses a power wheelchair and now has easy access to participate in his favorite activities at an Ohio state park. His typical mode of transportation at the park was a golf cart which can traverse beaches and other rough terrain that his power wheelchair cannot safely do. However, rules in state parks prohibit a motor vehicle off-road and when the park manager started to enforce the law, he stopped using the golf cart.

Monica Burgi, OLRs disability rights advocate, and Stack sought a reasonable accommodation from the Ohio Department of Natural Resources (ODNR) permitting him to continue to use the golf cart. ODNR did not grant the golf cart exemption but through negotiations, agreed to build paths to accommodate wheelchair use, increase the number of accessible parking spaces and make shelter houses, docks and restrooms more accessible and safe.

Stack and his family were invited by ODNR to assist in the discussion and selection of placement of the new paths. Accessible paths are now available for him to enjoy recreational activities in the park, including watching his younger cousins while they play at the playground. ■



Joshua Stack points out his favorite fishing spot. He also enjoys watching boats and people from this area.



Pictured to the left is the new accessible path to the shelter house.

From Nursing Home to Neighborhood Home

Living in her own apartment — that was the desire of a woman who had spent a year in a nursing facility. OLRs negotiated with staff and the client's guardian to permit her discharge. However, the HUD subsidized building manager of the place where she chose to live denied her application based on presumptions about her disability.

OLRS represented the client at an informal hearing to challenge the denial of her application. The management reversed its decision and accepted the woman's application for residency. She was discharged from the nursing home and moved into her apartment with necessary community supports and services. OLRs successfully protected the client from discrimination based on disability, her fair housing rights and right to accommodations.

Protecting the Rights of Students with Disabilities

In response to a complaint by OLRs to the Ohio Department of Education (ODE), a school that provides on-line educational services has changed its policy on the appointment of surrogate parents.

The complaint alleged that students living in a residential treatment center did not have individualized education programs (IEPs) that were signed by a parent as required by federal special education law. Instead, the IEPs were signed by caseworkers from children's services boards who had custody of the students, a violation of law and a conflict of interest. ODE found the school in violation of the surrogate parent requirement of the Individuals with Disabilities Education Improvement Act (IDEIA) which requires the appointment of a surrogate parent to advocate for the student whenever the student does not have a parent available to ensure the student's rights in the special education process.

In response to the finding from ODE, the school developed a corrective action plan. The corrective action plan included the assignment of trained surrogate parents for current students who were the subject of the complaint and a change in the school's written policy on surrogate parents.

The change in the written policy requires the school to assign a trained surrogate parent for all students who are in the custody of children's services and who do not have a parent acting on their behalf. ■

Protecting Voting Rights

OLRS surveyed a sampling of Ohio's polling sites and found that some voters cannot exercise their right to vote at their designated polling place. A preliminary review of 32 selected polling sites revealed that it is difficult or impossible for people with disabilities to vote at their precinct.

Barriers to voting at polling places included inadequate parking spaces and parking surfaces, inaccessible stairs or steps into polling stations, inaccessible entrance doors, and insufficient space to maneuver within the voting area. Many locations had gravel or grass parking lots that did not provide a person with a disability a safe, slip resistant surface path of travel from the parking lot to the polling place. Some polling stations did not have marked, designated accessible parking spaces and/or proper signage.

OLRS observed entrances into polling places that were not accessible to people with disabilities. To enter these places, a person was required to navigate over a 2 or 3 inch threshold, or to use a single step or a full stairway. No alternative, accessible entrances were available to voters at these sites.

Attempts to improve the accessibility of polling places were often lacking and did not demonstrate improvement. Ramps into voting sites either were too steep, were not constructed from non-slip materials or did not include a level landing every 30 feet. One polling place constructed a ramp to the main entrance to bypass a set of steps. The slope exceeded the Americans with Disabilities Act (ADA) standard, and the doorway at the top of the ramp included a 4½ inch threshold step, making the location inaccessible.

The handles on entry doors at polling locations were not accessible to people who have limited hand strength and manual dexterity. Nearly two-thirds of the polling sites OLRs visited did not have door handles that met ADA standards.

Once inside the voting area, OLRs found insufficient spacing between voting machines, and limited space in aisles and pathways for a person using a wheelchair to maneuver. Aisles between voting machines and the space between a voting machine and a wall were often less than the required 36 inches.

OLRS Will Continue Monitoring

OLRS' preliminary review of the 32 polling places reveals that all 32 locations present obstacles to people with disabilities and none meet accessibility standards under the ADA Accessibility Guidelines and



An inaccessible polling place in rural Ohio. The polling place is up the stairs.

the Ohio Revised Code. OLRs will continue monitoring voting sites to improve accessibility for people with disabilities in Ohio. ■

Educating and Informing Voters

During FY 2008 OLRs:

- Co-sponsored a Presidential Forum
- Provided a Comparison Chart of non-partisan information about presidential candidates' policies on disability-related issues
- Disseminated the following Voter Alerts:
 - Register to Vote - Frequently Asked Questions
 - Are You Prepared to Vote?
 - Protect Your Right to Vote
 - Is Your Polling Place Accessible?
 - Vote Before Election Day: Early Voting and Absentee Voting
 - Is Your Polling Location Accessible?
 - OLRs Special Voting Edition Newsletter

Ohio Legal Rights Service - Services and Priorities

OLRS is an independent state agency, created by state law to protect and advocate the rights of people with disabilities. OLRs is Ohio's federally designated Protection and Advocacy system for people with disabilities.

In 2008 OLRs:

- represented 5,252 individual clients
- represented 154 groups of clients
- provided information and referral to 789 individuals
- effected change through 162 policy cases
- provided 74 speaking engagements

With the involvement of people with disabilities, OLRs established these priority areas for services:

- Abuse and Neglect
- Community Integration
- Children
- Access to Courts/Criminal Justice
- Employment
- Self Advocates / Peer Support

The mission of OLRs is to protect and advocate, in partnership with people with disabilities, for their human, civil, and legal rights.

Financials

2008 Income

Federal P&A programs:

Developmental Disabilities (PADD).....	1,369,870
Mental Health (PAIMI).....	1,037,241
Individual Rights (PAIR).....	517,668
Employment, SSA (PABSS).....	177,910
Assistive Technology (PAAT).....	127,779
Voting Rights (PAVA).....	121,977
Brain Injury (PATBI).....	65,138

Federal employment programs:

Client Assistance (CAP).....	376,699
Work Incentives (WIPA).....	285,000

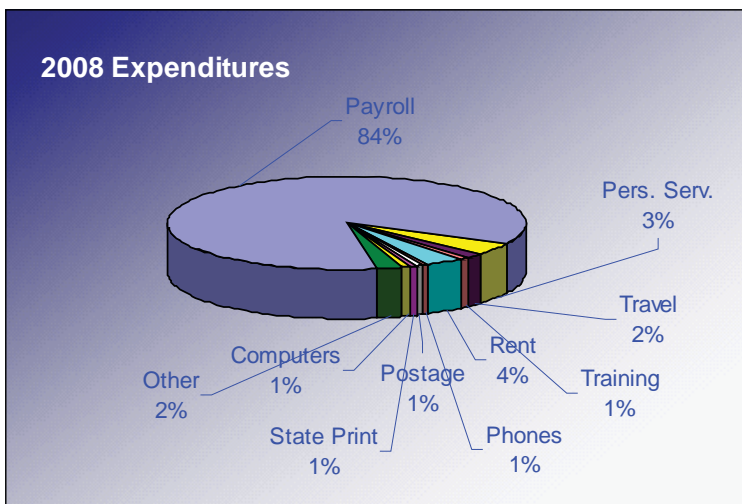
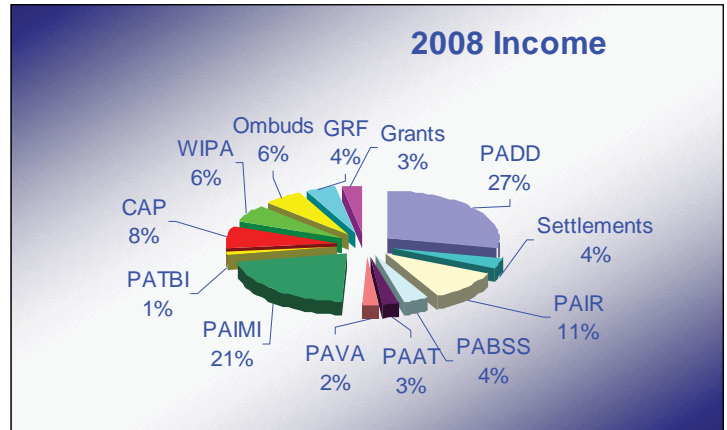
State funding:

Ombuds.....	291,247
General Revenue.....	198,075

Other:

Settlements.....	182,303
Grants.....	152,500

Total.....\$4,903,407



2008 Expenditures

Payroll.....	3,959,404
Personal Services.....	195,062
Rent.....	172,524
Travel.....	73,805
Computers.....	38,923
Training.....	29,487
Other.....	103,184
State Printing.....	26,659
Postage.....	26,598
Phones.....	24,808
Total.....	\$4,650,455



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