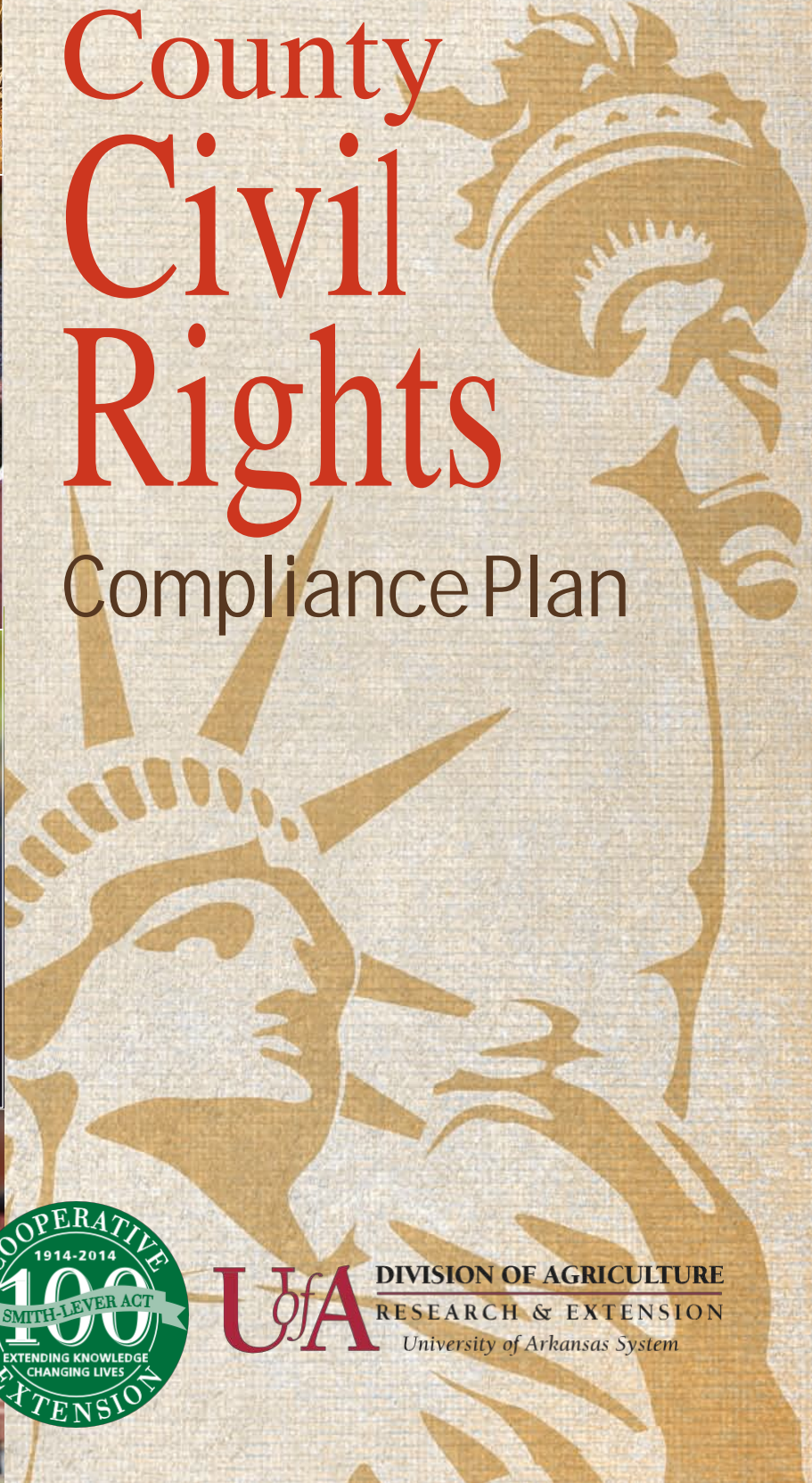




# 2014 Cooperative Extension Service

# County Civil Rights

# Compliance Plan



**DIVISION OF AGRICULTURE  
RESEARCH & EXTENSION**  
*University of Arkansas System*

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## Introduction

It is the policy of the University of Arkansas Division of Agriculture Cooperative Extension Service to provide equal employment opportunities and to offer all its programs to eligible participants without regard race, color, sex, gender identity, sexual orientation, national origin, religion, disability, marital or veteran status, genetic information, or any other legally protected status.

The organization commits itself to policies of affirmative action and diversity with respect to both employment opportunities and program participation. The Division complies with these policies not merely because of legal requirements, but because we believe that such practices are basic to human dignity. The Division strives to create work and educational environments that are inclusive, where fairness and mutual respect are valued and differences are welcomed. This plan is one way that we are demonstrating our commitment to these laws and policies.



This plan was developed in order to provide important resources relevant to civil rights compliance for the Cooperative Extension Service. It is intended as an operational guide to provide information on existing Civil Rights Laws, especially Titles VI and VII of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1967, as amended, and the Civil Rights Act of 1991. Most importantly, this plan will help Extension faculty, staff and volunteers understand their role and responsibilities in accomplishing our civil rights obligations in the four following civil rights program goals:

- Increase participation of people of underrepresented groups on the County Extension Council and on program planning and advisory committees;
- Modify educational programs to increase participation of people of underrepresented groups;
- Educate and involve staff in civil rights program planning; and
- Advise all potential recipients of program availability and Arkansas Cooperative Extension's policy of non-discrimination and equal access.

This plan must be kept in all county offices as part of their civil rights file. Updates will be done on an as-needed basis. When updates are received, they must be added to this plan.

## History

In the past, there were many groups who were purposely excluded from social institutions, including education and employment. Our current civil rights requirements are based on a series of laws passed after the great efforts of many people during the 1960's. This legislation created a framework to ensure people who were historically discriminated against, received equal opportunities under the law.



In addition, during the history of United States Department of Agriculture (USDA) and its programs, many allegations of discrimination were made and substantiated. Minorities were denied access to many of the USDA programs and services.

Because of this historical discrimination, many federal guidelines and laws have been implemented to insure discriminatory practices are not taken place in programs supported or funded by the USDA, including Extension services and programs.

These laws and guidelines that began breaking down barriers for those historically discriminated against are only fifty years old; and while there has been much progress, fifty years does not undo three centuries of unequal access to jobs, education, and services through segregation and discrimination. As such, we must develop an understanding of those who are different from us and appreciate and welcome those differences. This is where diversity comes in and plays a significant role. Diversity is inclusive; not divisive and recognizes all individuals bring a variety of skills and experiences, which can only make organizations stronger and more productive. As you read this plan, keep in mind that affirmative action, equal employment opportunity, and civil rights are a complement to diversity and the development of inclusiveness in our workplace and programs, which is critical to Extension's mission in the future.

## Civil Rights Laws

### [Title VI of the Civil Rights Act of 1964 \(Title VI\)](#)

Specifies that no person in the United States shall, on the grounds of race, color, religion, sex, 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.

<http://www.justice.gov/crt/about/cor/coord/titlevstat.php>

### [Title VII of the Civil Rights Act of 1964 \(Title VII\)](#)

Makes it illegal to discriminate against someone on the basis of race, color, religion, national origin, or sex. The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit. <http://www.eeoc.gov/laws/statutes/titlevii.cfm>

### [Title IX of the Education Amendments of 1972 \(Title IX\)](#)

Prohibits discrimination against individuals in federally-funded programs or activities, and in every aspect of employment because of their gender.

<http://www.justice.gov/crt/about/cor/coord/titleixstat.php>

### [Rehabilitation Act of 1974, Section 504 \(Section 504\)](#)

States no otherwise qualified individual with a disability in the United States, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

<http://www.justice.gov/crt/about/cor/byagency/usda504.php>

### [American with Disabilities Act of 1990 \(ADA\)](#)

Title I states that no entity shall discriminate against a qualified individual with a disability because of the individual's disability in regard to job application procedures, hiring, advancement, discharge, compensation, training and other terms, conditions and privileges of employment.

<http://www.eeoc.gov/laws/statutes/ada.cfm>

Title II of the Act states that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs or activities of a public entity, or be subjected to discrimination by any such entity.

### [Age Discrimination in Employment Act of 1967](#)

This law protects people who are 40 or older from discrimination because of age. The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

<http://www.eeoc.gov/laws/statutes/adea.cfm>

### **Pregnancy Discrimination Act of 1978**

This law amended Title VII to make it illegal to discriminate against a woman because of pregnancy, childbirth, or a medical condition related to pregnancy or childbirth. The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

<http://www.eeoc.gov/laws/statutes/pregnancy.cfm>

### **Equal Pay Act of 1963 (EPA)**

This law makes it illegal to pay different wages to men and women if they perform equal work in the same workplace. The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit. <http://www.eeoc.gov/laws/statutes/epa.cfm>

### **Civil Rights Act of 1991**

This law amends Title VII and the ADA to permit jury trials and compensatory and punitive damage awards in intentional discrimination cases. <http://www.eeoc.gov/laws/statutes/cra-1991.cfm>

### **Vietnam Era Veterans Readjustment Assistance Act (V.E.V.R.A.A.) of 1974**

Prohibits job discrimination and requires affirmative action to employ and advance in employment qualified Vietnam era veterans and qualified special disabled veterans.

<http://www.dol.gov/ofccp/regs/statutes/4212.htm>

### **The Genetic Information Nondiscrimination Act of 2008 (GINA)**

This law makes it illegal to discriminate against employees or applicants because of genetic information. Genetic information includes information about an individual's genetic tests and the genetic tests of an individual's family members, as well as information about any disease, disorder or condition of an individual's family members (i.e. an individual's family medical history). The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

<http://www.eeoc.gov/laws/statutes/gina.cfm>

### **Executive Order 11246**

Prohibits employment discrimination based upon race, color, religion, sex, gender identity, sexual orientation or national origin by contractors and subcontractors that receive federal contracts, grants, loans, insurance, or guarantee.

[http://www.justice.gov/crt/about/emp/documents/Exec\\_Order11246.pdf](http://www.justice.gov/crt/about/emp/documents/Exec_Order11246.pdf)

### **Executive Order 13166 (Limited English Proficiency) (LEP)**

Requires federal agencies or those receiving federal financial assistance to examine the services they provide, identify any need for services to those with limited English proficiency (LEP) to ensure that LEP applicants and beneficiaries have meaningful access to the services.

<http://www.justice.gov/crt/about/cor/Pubs/eolep.php>



## Extension Civil Rights Policies

### Non-Discrimination Policy

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing positive and discrimination-free working and learning environments where all individuals are treated fairly and with respect. The institution values inclusiveness and diversity and complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance.

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing equal opportunity in employment and in educational programs, activities, and services on a non-discriminatory basis and without regard to race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status. Moreover, the institution pledges to detect and eliminate any elements of discrimination which may be found to exist.

Employees will be trained to understand policies, procedures and regulations pertaining to non-discrimination. Administrative and supervisory staff will be held accountable for insuring that all actions within their assigned areas of responsibility are conducted in a non-discriminatory manner.

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to assuring that programs are accessible to all participants and that alternative means of communication is available to individuals with disabilities and those with limited English proficiency to the extent required to provide meaningful access to programs and services.

### Equal Access

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing positive and discrimination-free working and learning environments where all individuals are treated fairly and with respect. The institution values inclusiveness and diversity and complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance, including Title VI of the Civil Rights Act of 1964 and Title IX of the Educational Amendments of 1972.



The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing equal opportunity in employment and in educational programs, activities, and services on a non-discriminatory basis and without regard to race, color, sex, gender identity, sexual orientation, national origin, religion, disability, marital or veteran status, genetic information, or any other legally protected status. Moreover, the institution pledges to detect and eliminate any elements of discrimination which may be found to exist. Employees will be trained to understand policies, procedures and regulations pertaining to non-discrimination. Administrative and supervisory staff will be held accountable for insuring that all actions within their assigned areas of responsibility are conducted in a non-discriminatory manner.

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to assuring its programs are in compliance with the regulatory requirements of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. In doing so, the organization will provide, to the extent required, accessibility to all participants and alternative means of communication will be available to individuals with disabilities and those with limited English proficiency to provide meaningful access to our programs and services.

If you have any questions or need assistance, please contact the Office of Affirmative Action at [bbatiste@uaex.edu](mailto:bbatiste@uaex.edu) or 501-671-2213. (Dial 711 for Arkansas Relay).

## Sexual Harassment Policy

### 1. Policy

It is the policy of the University of Arkansas Cooperative Extension Service that sexual harassment in any form is inappropriate and unacceptable conduct and will not be tolerated. Sexual harassment is illegal, undermines the employee/employer relationship, interferes with productivity, and threatens the mental, emotional, and physical well-being of employees. Any employee engaging in sexual harassment is subject to disciplinary action. Supervisors are subject to disciplinary action if they tolerate sexual harassment, fail to take appropriate action on allegations or findings of sexual harassment, or retaliate against employees who report or file complaints of sexual harassment.

### 2. Definitions

Sexual harassment is a violation of Title VII of the Civil Rights Act of 1964 (as amended) which prohibits discrimination on the basis of sex. Sexual harassment is a prohibited personnel practice when it results in personnel decisions for or against an employee made on the basis of gender rather than job performance. The Equal Employment Opportunity Commission (E.E.O.) has defined sexual harassment as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as a basis for employment decisions affecting an individual; or
- Such conduct interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Sexual harassment is also defined as: Participating in coercive or repeated unsolicited and unwelcome verbal comments, gestures, or physical contacts of a sexual nature or by using implicit or explicit coercive sexual behavior in the process of conducting agency business or to control, influence or affect the career, salary, or job of an employee. Virtually any sexually-oriented language, conduct or behavior can be viewed as sexual harassment if it is unwelcome. It is the impact of the conduct or behavior on the

recipient (or on observers), not the intent of the harasser, which determines findings of sexual harassment.

Sexual harassment takes many forms and includes any or all of the following:

- Verbal – Unwelcome teasing, insults, innuendos, jokes, remarks, comments, questions or stories of a sexual nature; pressure for dates or sexual favors; promises of career advancement in return for sexual favors; turning work discussions to sexual topics; whistling at someone; kissing sounds; referring to an adult as "baby," "honey," "doll," or "hunk"; or asking about another person's sexual history or preferences.
- Physical – Unwelcome touching, leaning over, cornering, pinching, patting, rubbing against, stroking, neck massages, or other physical contact of a sexual nature.
- Visual – Posters, calendars, e-mail, cartoons, or other material of a sexual nature.
- Other behavior or conduct – Sexually suggestive looks and staring; gesturing; letters, e-mail, telephone calls, or giving of gifts or other material of a sexual nature; communicating in any manner that an employee will be adversely affected if sexual demands are not met.
- Sexual harassment may extend beyond the target of the harassment to other employees. Sexual harassment of one employee may create an intimidating, hostile, or offensive working environment for others or deny another employee a promotion or other career-related benefits.

### 3. Responsibility

Any employee, supervisor, or administrator who has experienced or witnessed sexual harassment is strongly urged to report it immediately to Office of Affirmative Action or the Human Resources Office. Extension Administration must know about incidents of sexual harassment in order to stop them, protect victims, and prevent future incidents. Individuals who make complaints of sexual harassment and those who are accused of sexual harassment are entitled to due process and to a fair and prompt resolution of the complaint.

#### A. Supervisors

Each supervisor must:

- Know and enforce the University of Arkansas Cooperative Extension Service's policy on sexual harassment;
- Set a clear example of appropriate workplace behavior and communicate zero tolerance for sexual harassment;
- Be aware of what is going on in the workplace and actively monitor for signs of sexual harassment;
- Ensure that employees know Extension's policy on the prohibition against sexual

harassment and the proper reporting procedures;

- Take seriously all allegations of sexual harassment and be aware that claims of sexual harassment are not limited to women;
- Report the alleged incident to Office of Affirmative Action immediately so that an investigation may be initiated within five working days after the complaint is made;
- Ensure confidentiality by limiting disclosure of sexual harassment complaints and resolutions to the immediate parties and appropriate administrative officials; and
- Ensure that an employee reporting sexual harassment is protected from any form of reprisal.

## B. Employees

Every employee of the University of Arkansas Cooperative Extension Service must share the responsibility for preventing sexual harassment. Employees are responsible for their own conduct and must know and support the organization's policy on sexual harassment.

### 4. Consequences

The consequences to individuals accused of sexual harassment are significant. An employee or supervisor can be disciplined up to and including removal from employment and may be found personally liable. Additionally, the Civil Rights Act of 1991 provides further remedies for intentional discrimination such as sexual harassment, including compensatory damages up to \$300,000 and jury trials. Traditional remedies such as back-pay and reinstatement are also available.

### 5. Procedures

Employees of the University of Arkansas Cooperative Extension Service have a legal and ethical right to work in a work environment free from any form of sexual harassment or unwelcome sexual attention. Employees who have been sexually harassed may take any of the following actions:

- Confront the harasser directly. (This is not required. Review the publication "Sexual Harassment Prevention" at [http://www.uaex.edu/depts/HR/Sexual\\_Harassment\\_Prevention.pdf](http://www.uaex.edu/depts/HR/Sexual_Harassment_Prevention.pdf) for assistance).
- Discuss the matter informally with an E.E.O. counselor. (See C.E.S.P. 2-8.)
- Utilize the informal and/or formal E.E.O. complaint procedures. (See C.E.S.P. 2-8.)

### 6. Training

The publication "Sexual Harassment Prevention" is available to all employees on line at [http://www.uaex.edu/depts/HR/Sexual\\_Harassment\\_Prevention.pdf](http://www.uaex.edu/depts/HR/Sexual_Harassment_Prevention.pdf) and provided to new employees at the time of hire. Supervisors will be provided with periodic training on the subject of sexual harassment prevention.

## Equal Employment/Programmatic Complaint Procedures

It is the policy of the University of Arkansas Cooperative Extension Service to protect all employees and prospective employees from discrimination on the basis of race, color, sex, gender identity, sexual orientation, national origin, religion, disability, marital or veteran status, genetic information, or any other legally protected status. A complaint may be filed by an employee, a former employee, or by an applicant for employment who believes that discrimination in employment has been practiced against him or her or that an employment practice of the University of Arkansas Cooperative Extension Service has resulted or will result in discrimination in employment against him or her. Both informal and formal complaint procedures are available. Either or both may be used.

### Employment Complaint

#### A. Informal Procedure

1. Most complaints, grievances, and misunderstandings can be resolved satisfactorily in an informal conference between the employee and his or her immediate supervisor.
2. If, however, the employee does not wish to discuss the concern with the immediate supervisor, the employee may talk to an E.E.O. counselor. The role of the E.E.O. counselor is to serve as a bridge between employees and management and to resolve E.E.O. problems on an informal basis.
3. If a matter is not resolved through consultation with an E.E.O. counselor, an employee may request a conference with the supervisor of the employee's immediate supervisor.

E.E.O. Counselors are listed at the Little Rock State Office and each County Office.

#### B. Formal Procedure

If a matter is not resolved through the informal procedure, or if the complainant does not wish to use the informal procedure, a formal complaint may be filed.

A formal complaint must be made in writing and must give the name and address of the complainant, state the basis of the complaint, and indicate whether the alleged discrimination was based on race, color, sex, gender identity, sexual orientation, national origin, religion, disability, marital or veteran status, genetic information, or any other legally protected status. The complaint must be submitted within 180 days of the conduct giving rise to the complaint. A complainant will at all times be free from reprisal. A formal complaint may be directed to any of the following:

1. Office of Affirmative Action- Division of Agriculture  
2301 South University Avenue, Rm. 205B  
Little Rock, AR 72204

### Programmatic Complaint

Anyone who believes that he or she or any specific class of individuals has been denied program resources or services or subjected to discrimination with any Extension program because of race, color,

sex, genetic identity, sexual orientation, national origin, religion, gender, age, disability, genetic information, marital or veteran status, or any other legally protected status may file a complaint in writing no later than 180 days from the date of the alleged discrimination unless the time for filing is waived by the Cooperative Extension or the Director of the Office of Adjudication and Compliance, U.S.D.A. Complaints may be directed to any of the following:

1. County Extension Agent Staff Chair  
Local County Office
2. Office of Affirmative Action- Division of Agriculture  
2301 South University Avenue, Annex Rm. 106  
Little Rock, AR 72204
3. U.S.D.A., Director, Office of Civil Rights  
Room 326-W, Whitten Building  
14<sup>th</sup> and Independence Avenue, SW  
Washington, DC 20250-9410  
(202)-720-5964

## **Diversity**

Civil rights laws in the United States came about due to the way that we have reacted to diversity on our population. Diversity is defined as the differences among people with respect to age, socioeconomic status, gender, physical and mental abilities, race, national origin, political beliefs, sexual orientation, spiritual practices, and other human differences.

The idea of diversity is acceptance and respect for these individual differences. It means to understand that each individual is unique and appreciate our individual differences so that we move well beyond simple tolerance to embracing the rich dimensions of diversity.

The principle of inclusion and diversity are core values with respect to Extension's mission. We must respect and embrace the differences in people so that it will guide the organization in the development and delivery of Extension's educational programs to meet the needs of all the residents of Arkansas.

## **Program Design & Delivery**

A key initial step in the Extension programming process so that we are meeting our civil rights



responsibilities is the development of situation analysis, which includes a needs assessment. Therefore, it is important to include community members who represent specific underrepresented clientele in your advisory systems which will increase the relevance of programs offered for members of that group, leading to the achievement of compliance goals.

County Extension Councils and other community groups are used to provide input on issues and needs. Identifying the various individuals, particularly those that have been historically underrepresented, and involving them in the needs assessment process is a critical step in program design and delivery. We also rely a great deal on other Extension sponsored groups such as program advisory committees, expansion and review committees, 4-H leader associations, etc. to provide us with program planning advice. Therefore, it is vital to recruit and engage a diverse set of members of the community to serve as members of these committees.

### **County Extension Council**

The County Extension Council works with County Extension agents to plan, implement, evaluate, market, and support the local educational program. The effectiveness of a county's Extension program depends on the involvement of local citizens in program development. The basic unit of the County Extension Council is: 1) County Extension Council Members; and 2) Program/Issue Committees. The County Extension Council gives leadership, direction, coordination, and support to the Cooperative Extension program. The Council members serve as advocates for the Cooperative Extension program and assist in making decisions to guide the direction of Extension programming in the county.

The recommended size of the County Extension Council is nine to twelve members, depending on the population and complexity of county concerns. Membership entails representation of various economic, geographic, and social interest as well as the relevant county organizations. Council members will be appointed for a term of three (3) years. Please refer to County Extension Council Guide Publication – DIST06 for more detailed information.

### **Expansion and Review Committees**

Each county is required to have both a 4-H Expansion & Review Committee and EHC Expansion & Review Committee. The purpose or functions of the committees are to determine the needs and directions of the current 4-H and EH programs for the county; delineate club boundaries; assist in helping to identify and secure volunteer adults and youth; and identify opportunities to expand the programs to reach and increase the membership of those racial/ethnic minorities who have been traditionally underrepresented in these programs. These committees should be an integral part and critical to achieving these objectives. The minutes of these communities must be written and indicate the committees reviewed current maps and identified opportunities to expand the programs to reach and increase the membership of those racial/ethnic minorities. Please refer to the County Extension Council Guide, Publication – DIST06 for more detailed information.

## Potential Audience

Who makes up your potential audience? Your potential audience is persons or groups in a defined geographic area who might be interested in or benefit from an Extension educational program. Potential audience numbers are estimates that can come from a combination of demographic data sources and the Extension educators' own knowledge and research about the defined geographic area. (Note: Generally, this comes from several sources: relevant and current statistical abstracts (not completely from the U.S. Census, the Census can be a beginning, but may not be all inclusive; other appropriate advisory committees based on the program area, your State Extension Leadership, and your own research.)



### *Agriculture & Natural Resources – Commercial Audience*

This potential audience is comprised of those operators, farmers, ranchers, producers who are involved in commercial farming and ranching operations to generate income. To determine the potential audience numbers, the resource that should be utilized is the most recent Census of Agriculture. The National Agricultural Statistics Service (NASS) conducts the Census of Agriculture, which is a collection of information concerning all areas of farming and ranching operations, including operator characteristics. <http://www.agcensus.usda.gov/>

Other resources can be used such as data from that can be utilized to determine the potential audience, but such resources must be valid and documented.

### *Agriculture & Natural Resources - Other*

This audience consists of all those that would benefit from all agriculture and natural resources educational information, other than commercial activities. Potential audience members would consist of homeowners, small garden owners, etc. in the community. To determine the potential audience for this group, the most recent U.S. Census should be utilized. <http://quickfacts.census.gov/qfd/states/05000.html>

### *Community & Economic Development*

The primary audience for community development is those elected and appointed officials, including but not limited to mayors, city council members, quorum court members, city managers, members of public boards and commissions, and leaders of community organizations such as chambers of commerce, farm bureau, NAACP. Working with these officials and leaders in a community will benefit all of the residents of a county to from the mission of the Community & Economic Development program with is strengthening Arkansas communities and businesses. The Extension agent must use their own knowledge of the local communities in the county to determine the potential audience.



### ***Family & Consumer Sciences***

Individuals who will benefit from nutrition, health and wellness, finances, child care, parenting, and other areas that will enhance the quality of life and well-being are potential audience for family and consumer science. To determine the number for this audience, the most recent U.S. Census should be utilized.

<http://quickfacts.census.gov/qfd/states/05000.html>

### ***4-H Youth Development***

The targeted audience in this area is the youth from ages 5-19. To determine the potential audience, local school enrollment records should be utilized. This information can be obtained at the local level or on the Arkansas Department of Education website.

<https://adedata.arkansas.gov/statewide/Counties/EnrollmentByRaceGender.aspx>

## **Recognizing Potential Barriers**

Civil rights laws indicate that potential audiences must be determined at the time of program development so that information and educational programming are of interest to and appropriate for protected and underrepresented audiences as well as majority audiences. In addition, increasing participation by the underrepresented clientele requires designing and delivering of programs to overcome any barriers that might exist and interfere with participation of the underrepresented. Such barriers can include language barriers, cultural barriers, economic barriers and/or access barriers.

### ***Language Barriers***

Under federal law, “Improving Access to Services for Persons with Limited English Proficiency (LEP)”, the Extension Service must take reasonable steps to ensure meaningful access for LEP persons to our programs. It is critical that agents assess the county in regards to LEP populations and their needs. If your county has a potential audience is likely to include a significant population of non-English speaking participants, we must consider using alternative language when offering programs, which can include translation of materials in other languages.

### ***Cultural Barriers***

Cultural barriers are those conditions that can limit or even exclude participation of racial, minority, religious and ethnic groups. Such of these barriers may exclude clientele from initially attending a program or activity; or may persuade individuals from returning to other program or activity. Examples of such cultural barriers can include: scheduling events that conflict with major religious/ethnic holidays or events; having programs or events in potentially uncomfortable locations such as churches; or locations where minority groups were previously rejected or had unpleasant experiences; or using program announcements/promotional materials that only display White clientele.

### ***Economic Barriers***

Economic barriers are those conditions of an economic nature that can limit or exclude participation of disadvantaged, racial, minority, and ethnic groups. Examples include: programs, activities that require extensive purchases of equipment or supplies; programs that involve fees, meals, and travel; underrepresented audiences may not be able to participate during certain times of the day or certain days of the week; or underrepresented participates may not attend if required to drive to the program.

## Separation of Church and State

The United States Constitution Bill of Rights First Amendment, also referred to as the Establishment Clause, requires the separation of church and state. Therefore, government is restricted to secular purposes and must remain neutral and not advance nor impede religion. The United States Department of Agriculture (USDA), through the National Institute of Food and Agriculture (NIFA), provides leadership over all Extension programs. According to USDA and NIFA policies and guidelines, all Extension programs and activities must operate in a manner that is consistent with the First Amendment. The Cooperative Extension Service is required to comply with these federal laws and regulations.

As such, Extension faculty, staff, and volunteers may do educational programs for religious groups, but may not carryout programs or projects which advance or impede religion; conduct or incorporate into events any religious service or practice, (for example prayers); or adopt creeds that include sectarian references or language, (e.g. ideals of Christian life.)

## Notify the Public

Public notification is at the core of our civil rights efforts. The Cooperative Extension Service must take the necessary steps to inform the public that it does not discriminate, adheres to all civil rights laws, and most importantly, is open and available to everyone . In addition, public notification is used to advertise, particularly to minorities, the underrepresented and underserved, as well as the disabled, all of Extension’s programs and their benefits. Our public notification efforts include: having a nondiscrimination statement on all documents, brochures, flyers, announcements, etc., and prominently displaying the USDA “And Justice for All” poster in public areas.

1. The following statement has been approved and must be included on Extension letterhead, publications, job announcements, program announcements, and other printed material.

*"The University of Arkansas System Division of Agriculture offers all its Extension an Research programs and services without regard to race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status, and is an Affirmative Action/Equal Opportunity Employer."*

*"La Universidad de la División de Sistemas de Arkansas de Agricultura ofrece a todos sus programas y servicios de extensión e investigación sin importar la raza, color, sexo, identidad de género, orientación sexual, origen nacional, religión, edad, discapacidad, estado civil o de veterano, información genética, o cualquier otro estado legalmente protegido, y es una acción afirmativa / ofrece igualdad de oportunidades."*

2. Prominent display of the nondiscrimination poster "And Justice for All" in office locations, and all meeting rooms where programs or activities are being conducted by the Cooperative Extension Service.
3. All informational materials released to the public must contain the following statement when announcing a specific meeting or activity. Such statement indicates the organization is compliant with civil right laws and reasonable accommodations will be made for those

individuals with disabilities to have access to the program or activity; and materials may be available in alternative formats.

*“The University of Arkansas System Division of Agriculture is an equal opportunity/equal access/affirmative action institution. If you require a reasonable accommodation to participate or need materials in another format, please contact your (insert appropriate office) as soon as possible. Dial 711 for Arkansas Relay.”*

*“La Universidad de la División de Sistemas de Arkansas de Agricultura es un / igualdad de acceso institución acción de igualdad de oportunidades / afirmativa. Si necesita un ajuste razonable para participar o necesita materiales en otro formato, por favor, póngase en contacto con su (insertar la oficina apropiada) tan pronto como sea posible. Marque 711 para Arkansas relé.”*

4. The more comprehensive non-discrimination statement is preferred; however, the abbreviated statement below may be used when space is limited. Please remember, this statement cannot be used when announcing a specific meeting or activity.

*“The University of Arkansas System Division of Agriculture is an equal opportunity/equal access/affirmative action institution.”*

*“La Universidad de la División de Sistemas de Arkansas de Agricultura es un / igualdad de acceso institución acción de igualdad de oportunidades / afirmativa.”*

5. Program announcements to a specific, racially identifiable audience such as 4-H members, 4-H leaders, E.H.C. members, E.H.C. officers or Extension planning committee members are not required to contain the statement of nondiscrimination because the individuals addressed are already enrolled in an Extension program and are aware of Extension’s non-discrimination policies and have agreed to comply with such policies.

Our public notification efforts also include informing other organizations and groups which Extension works with of our non-discrimination policy and assuring that they also are non-discriminatory when they work with us. [See. C.E.S.P 2-3 Notification to Groups of Non-Discrimination](#)

### **Reasonable Accommodations**

Federal laws states that reasonable accommodations must be made for those individuals with disabilities to participate in Extension programs. There is no clear definition of reasonable accommodation, but it does include providing sign language interpreters for the hearing impaired, and providing materials in large print or audio as examples. In order that arrangements can be made to provide "reasonable accommodation", Extension is entitled to establish a time limit for special requests. This is done by advertising the program with the accommodation statement listed above. The office delivering the program is expected to bear the cost of any special needs that are requested. However, if

this cost may difficult for a county to bear; therefore, the Division’s Office of Affirmation Action should be contacted to assist with the accommodations.

In addition, Extension workplaces and facilities are required to be accessible to those individuals with disabilities. Facilities assessment must be used to determine the accessibility of existing facilities. See ADA Self-Evaluation and Compliance in the Appendix. If a facility is not accessible due to physical barriers, then programs and services must be provided through an alternative method or at an alternative location.

## **Program Compliance Policies**

### **Program Participation Data and Information Collection**

The Arkansas Cooperative Extension Service is committed to reaching all of the residents of the State of Arkansas with its programs and activities and recognizes the importance of diversity and inclusion. As such, collection of participation data is a tool to evaluate participation by various clientele groups in Extension educational programs and activities. This data must include racial-ethnic and gender data on all aspects of program participation including programs and activities in Agricultural and Natural Sciences, Family and Consumer Sciences, 4-H Youth Development, and Community and Economic Development.

#### **Direct Contact**

A direct contact is a face-to-face interaction with clientele where there is an exchange of educational information; an educational experience. Direct contact occurs in the office, field, home consultations, workshops, seminars, meetings, and similar activities in which the mission and business of the Extension Service is being carried out.

Direct contacts are reported by gender (male or female), race (American Indian or Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White) and ethnicity (Hispanic or Non-Hispanic).



#### **Indirect Contacts**

Indirect contacts are those other ways besides face-to-face contacts made by Extension staff members engaging clients in Extension programming; such as e-mail, circular letters; newsletters. The number of e-mails made in responses for requests for information, the number of newsletters distributed, and the number of telephone calls handled can be reported as indirect contacts. Indirect contacts may not be included with direct contacts.

#### **Collecting Guidelines**

Pursuant to federal guidelines for the collection of demographic information for direct contacts, Extension Services are authorized to utilize two methods.

### ***Participant Self-Reporting Method***

This method is the self-identification by the clientele. This is the most preferred method for collecting demographic information as it is the most accurate since the clientele are disclosing their racial-ethnic and gender information. This self-reporting format is accomplished by utilizing attendance/sign-in-sheet records participants complete. Please see the Appendix for current attendance/sign-in-sheets that can be utilized by Extension staff members.

Although, Extension staff members are not required to use these forms, it is strongly encouraged. If other methods are utilized, such documentation should conform to this policy and allow participants to self-report and must contain the following statement:

*“This information is requested solely for the purpose of determining compliance with federal civil rights law, and your response will not affect your eligibility to participate in Extension programs. By providing this information, you will assist us in assuring that this program is administered in a nondiscriminatory manner.”*

When a participant does not provide the requested demographic information, the Extension staff member may “visibly discern” the participants race-ethnic and gender information.

### ***Observer-Collected Method***

The second method for collection of direct contacts is called the Observer-Collected Method. Using this method, an Extension staff member collects the demographic data using direct observation of the clientele. If circumstances do not allow for the preferred method of self-reporting by participants, i.e. the staff member can choose the gender and race for each participant. The staff member should utilize the “Observer-Collected” form in the Appendix.

## **Reporting Guidelines**

Direct and Indirect contacts should be reported at least monthly into the AIMS data reporting system. Volunteers who conduct educational programming should be trained and are expected to record participant contacts. The volunteers should share the contact records with the appropriate Extension staff member to enter into AIMS.

## **Balanced Participation**

The overall goal for Extension programs is to meet parity. An Extension program is in parity when the participation of individuals of minority groups reflects the proportionate representation in the population of potential recipients. For example, if there is 20% minorities in a county, and an Extension program has an overall participation rate of 20% minorities, then the Extension program is in parity.

However, a program will be considered to have a balanced participation rate if the number of clientele is within 80% of parity. For example, if a county has 20% minority participation, and 16% of the program participants are minorities, then the program is in compliance and has a balanced minority participation rate. If a program does not have a balanced participation rate, all reasonable outreach efforts must be conducted.

## **Outreach Efforts**

### **All Reasonable Efforts**

“All reasonable efforts” consist of a series of approaches that are required of Extension staff to solicit participation of the underrepresented group in an Extension programs. These are documented efforts to target and solicit the particular underrepresented group that is not participating in the program. These are also known as affirmative action steps and are required when programs do not meet balanced participation requirements. A sincere effort must be made to encourage participation by minorities or the underrepresented. It is not enough to simply announce the program is open to all. Below are some of the situations that would require “all reasonable efforts” by Extension staff:

- an Extension sponsored group that does not have a balanced membership and is in a mixed racial/ethnic membership area;
- advisory groups that do not reflect the composition of the potential audience; and/or
- program participation in which certain groups are consistently underrepresented.

When these types of situations exist, Extension personnel must take responsibility for implementing the steps below to attain the goal of balanced participation. These steps must be repeated and documented until the goal of balanced participation is met and maintained. Steps include:

1. Use of media outlets that target the underrepresented group to announce programs and events, i.e. radio stations, newspapers and television. Because media outlets may eliminate the non-discrimination statements due to space limitations, it is important to include in your civil rights file the original copy that was sent to media attached to the copy that was actually printed.
2. Development diverse flyers, brochures, posters, announcements to be placed in locations frequented by the underrepresented group;
3. Write personal letters to and make personal contact members with members of the underrepresented group to encourage participation;
4. Make personal contact with leaders from the underrepresented group to seek their assistance in reaching this audience;
5. Seek assistance from other community groups to encourage participation.

### **Grassroots Organizations**

Grassroots organizations should be utilized in outreach efforts to solicit participation of underrepresented groups. These organizations are usually created at the local level with many volunteers supporting their political, social, and/or economic missions. Each county should have on file a list of all grassroots organizations in the county. Examples of grassroots organizations include: National Association for the Advancement of Colored People (NAACP), Minority Health Coalitions, Better Community Developers, Faith-Based Organizations, Arkansas Community Organizations, local food bank organizations; minority churches; women groups; local coalitions; civic, fraternal and social organizations whose membership reflects diversity; and local literary councils.

## 4-H and Extension Homemakers Clubs

If a 4-H or Extension Homemakers Club meets or is located in an interracial membership area, then the membership of the club should be reflective of the membership area. "Membership area" is defined as the specific area served by the club from which it might reasonably be expected to draw members. To be in compliance, a club must have a "balanced membership." Balanced membership is achieved when the number of members of the underrepresented race and/or ethnicity reaches 75% of the number of



the non-majority members the club would have if its racial composition were exactly proportional to that of the membership area. For example, a club with 20 members in a membership area where blacks comprise 20 percent of the population would be exactly proportional (in parity) if it had 4 black members. This club would be considered to have "balanced membership," however, if it had 3 black members (75 percent of the ideal goal).

If a 4-H or Extension Homemakers Club does not have a balanced membership, then "all reasonable efforts", Extension personnel must take the steps outlined above.

Location of all 4-H and Extension Homemakers Clubs must be identified on a county map and maintained in the county civil rights file.

## Documentation

"All reasonable efforts" must be documented by Extension personnel. When outreach efforts to underrepresented are not documented, the burden of proving nondiscrimination is on the agency or organization. Each county office should have an "all reasonable efforts" folder which contains the following outreach efforts:

- Flyers, press releases, personal letters, invitation letters and other outreach correspondence and program brochures sent to targeted individuals and organizations (including grassroots organizations) with notations of where and when the information was sent;
- Notes about all special targeted efforts to reach people from underrepresented group; and
- Notes from meetings and phone conversations that demonstrate your outreach to people from underrepresented groups.

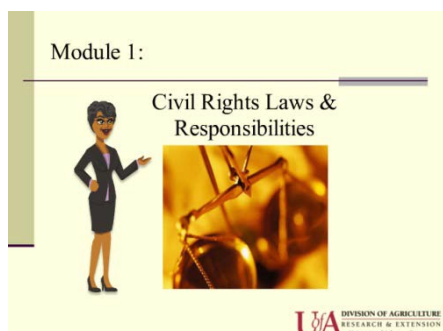
Examples of memos and documentation that would satisfy civil rights documentation requirements:

- "Telephone contacts were made with these potential Hispanic participants..."
- "Went to African American church, AME Episcopal Church, and shared information about our parenting program, passed out brochures ..."
- "Public announcement about EHC clubs made on 106.7 minority radio station..."
- "Personally invited 10 Asian seniors to Master Garden Open House and discussed the programs with them."

When conducting “all reasonable efforts” for 4-H or EH clubs, the AFFACT-343 must be completed, along with all documentation of efforts, and maintained in a separate file.

## Training

It is expected that staff routinely participate in civil rights training. For this reason, online training modules, along with assessments, have been developed for Extension staff. These modules provide



training to ensure that programs Extension offers are as inclusive as possible and the Extension continues to work toward civil rights goals. Staff is required to complete the modules and assessments every three years. New employees will be required to complete the training modules within the first thirty (30) days of employment as part of the new hire on-boarding process. Documentation of the completion of such training will be maintained at the Little Rock State Office with the Division’s Affirmative Action Office.

Other opportunities for civil rights training will be provided periodically as part of district conferences, staff meetings, in-service training events, newsletters, memos, etc.

Volunteers, advisory board members should also be provided civil rights training so they understand the important civil rights laws, Extension’s responsibilities in programming, what their roles are and what they can do to help Extension in their civil rights goals.

## Compliance and Internal Monitoring

USDA expects each Cooperative Extension Service to have an internal civil rights compliance review in process that assures a routine review. There are three different levels of civil rights reviews. These include annual compliance reviews, internal periodic reviews, and federal reviews.

### Annual Compliance Reviews

The annual compliance review is the process where county personnel complete a Civil Rights Yearly Assessment report annually at the end of each program year. By completing this report, county faculty and staff are assuring they are following through on the commitment to carry out civil rights goals and such efforts are documented in the county’s civil rights files. In addition, this report will also note the accomplishments by staff in achieving the goals of civil rights programming. The annual civil rights reviews must be submitted to the Districts Offices at the Little Rock State Office no later than November 15<sup>th</sup> of each year.

### Internal Civil Rights Review

An internal review is one that is conducted on-site at the county office. The internal review is conducted in each county every five (5) years on a rotating basis and is a more in-depth discussion about civil rights compliance. To prepare for an internal review, county staff should utilize the Civil Rights



Review Checklist, AFFACT – 347. The internal review will identify areas that need improvement, as well as noting the good work of Extension staff in the area of civil rights. This formal review will include:

- Discussion with county staff to determine the staff's commitment to carry out civil rights responsibilities; to address any concerns with the participation of underrepresented groups in the Extension programs in the county; help and identify opportunities to increase underrepresented groups if necessary; and
- Review civil rights files to make sure that all material required to be maintained in the county is current and that examples of programs, news releases, marketing brochures, etc. document efforts to serve a diverse population.

A written assessment of the internal review will be completed by the Civil Rights Compliance Officer or the District Director following the completion of the review. The report will include the findings and recommendations of the on-site review team and the response indicating corrective action. The report will be submitted to the County Staff Chair to implement such corrective action.

## Civil Rights County File Checklist

County faculty and staff are expected to document the efforts and activities used to reach out and expand access with underrepresented groups. The following information should be contained in the county's civil rights files.

### 2014 University of Arkansas Cooperative Extension County Civil Rights Compliance Plan

- Summaries of Civil Rights Laws
- University of Arkansas Non-Discrimination Policies

### County Demographic Information

- County Demographic Information - current
- Potential Audience Demographic Information- Each Program Area ( AFFACT-05) - current

### Civil Rights Yearly Assessment Reports (AFFACT-01) – last three (3) years

### Annual AIMS Civil Rights Contact Date Reports for Each Program Area

### Mailing Lists (Current Year) containing demographic information

### County Extension Council Membership List (All Committees/Advisory Groups) – (AFFACT-04)

- Attendance Records – last three (3) years
- Committee Minutes (Including 4-H and EHC Expansion and Review Committees) (AFFACT-04) - last three (3) years

### Internal Civil Rights Review and Findings (AFFACT-346) – most current

### Accessibility for the Disabled

- ADA Self-Evaluation and Compliance (AFFACT-345)
- Listing of all reasonable accommodations requested and provided (AFFACT – 345.1)

### 4-H and EH Clubs

- Location of 4-H Clubs identified on county map – current
- Annual summary of 4-H overnight/ day camp participants (AFFACT – 13) – last three (3) years
- Annual summary of 4-H Scholarships Awarded (AFFACT – 14)
- Annual summary of 4-H Awards, Competitive Events Participants (AFFACT – 15)
- Location of EH Clubs identified on county map - current

### “All Reasonable Efforts” File

- Contains documentation of all good faith efforts, including notes, invitation letters, interview records, list of grassroots organizations, copies of flyers, newspapers articles, records of personnel visits; minority media lists
- A separate file for “All Reasonable Efforts” for EH and 4-H Clubs should be maintained with all outreach documentation, along with the AFFACT-343
- List of materials and/or copies of information disseminated to the public in other languages
- Maintain these records for three (3) years

### Attendance Records

- Separate file for each program area, (Ag. Comm., Ag- Other, FCS, 4-H, EFNEP) (AFFACT-0.8, 08.1, 08.2)

- Maintain these records for three (3) years

#### Public Notification

- Copies of printed materials disseminated to the public announcing programs/events that contain the non-discrimination statement and/or ADA statement
- Maintain these records for three (3) years

#### Office Conference Minutes

- Must include discussions/strategies to increase underrepresented clientele
- Maintain these records for three (3) years

#### Non-Discrimination Assurances

- Annual Certification of Non-Discrimination for each EH and 4-H Club (AFFACT - 513, AFFACT – 662, AFFACT – 663)
- Annual Notification Letters to Organizations and Groups
- Determination of Non-Discrimination Status (AFFACT – 03)
- Maintain these records for three (3) years

#### Volunteers

- Certification of Child Maltreatment Training (Always Keep)
- Annual Summary of Master Gardner Volunteers and 4-H Volunteers – (AFFACT – 16) – Maintain these records for three (3) years

## Appendix

### Civil Rights Terms

- **Adequate Public Notification** - public notification plans are a part of the delivery mode in the affirmative action goals related to the Civil Rights Act of 1964. Extension program outreach should use the most diversified possible communications to attract persons of all races, colors, religions, genders, and national origins to participate. Examples include posters, flyers, minority organization bulletin board notices, or other public mailings.
- **Affirmative Action** - is a set of proactive measures to counteract the effects of past and present discrimination, intended or unintended. The law identifies affected groups who have been historically underserved or underrepresented. This includes, women, Blacks, Hispanics, Asians, Native Americans, and individuals with disabilities. By law, we must act affirmatively toward people of affected groups in both employment and program delivery.
- **All Reasonable Efforts** - Extension must be able to demonstrate that federally funded programs or activities have been made available to the maximum possible potential audience of a given locale or area. All reasonable efforts must be made when programming/clubs do not have balanced participation. The following three steps are required to demonstrate that all reasonable efforts have been made: (a) the use of all available mass media; (b) the use of personal letters and/or flyers or publications, both paper and electronic; and (c) the use of personal contacts (invitations to participate).
- **Balance participation** – A program will be considered in compliance when its participation has reached 80% of parity; a club will be considered in compliance when its membership has reached 75% of parity.
- **Equal Opportunity** – is the right of individuals to be judged on the basis of relevant education/training, skills, experience and previous performance, but not on the basis of race, color, religion, national origin, gender, disabilities, age, ethnicity, or other personal characteristics.
- **Ethnicity** – a self-identified group connected to specific groups of people who share a common linguistic, religious and/or cultural heritage. For civil right purposes, Hispanic is an ethnic group.
  - Hispanic – a person of Mexico, Puerto Rican, Cuban, Central or South America, or other Spanish culture or origin, regardless of race.
- **Parity** - an Extension program is in parity when the participation of individuals of minority groups reflects the proportionate representation in the population of potential recipients.
- **Potential Audience** - persons or groups within your defined geographic area who might be interested in or benefit from an Extension educational program. Potential audience numbers are

estimates that can come from a combination of demographic data sources and the Extension educators' own knowledge and research about the defined geographic area. (Note: Generally, this comes from several sources: relevant and current statistical abstracts (not completely from the U.S. Census, the Census can be a beginning, but may not be all inclusive; other appropriate advisory committees based on the program area, your State Extension Leadership, and your own research.)

- **Race** – a group identity historically related to a local geographic or global human population traditionally distinguished as a group by genetically transmitted physical characteristics, i.e., skin, color, facial characteristics, color, texture of hair, etc. For civil right purposes, racial categories are:
  - **White** - A person having origins in any of the original people of Europe, North Africa, or the Middle East. It includes people who indicate their race as "White" or report entries such as Irish, German, Italian, Lebanese, Near Easterner, Arab, or Polish
  - **Black, African American** - A person having origins in any of the black racial groups of Africa. It includes people who indicate their race as "Black, African Am., or Negro," or provide written entries such as African American, Afro American, Kenyan, Nigerian, or Haitian.
  - **American Indian or Alaskan Native** - A person having origins in any of the original peoples of North and South America (including Central America) and who maintain cultural identification through tribal affiliation or community recognition.
  - **Asian** - A person having origin in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. It includes "Asian Indian," "Chinese," "Filipino," "Korean," "Japanese," "Vietnamese," and "Other Asian."
  - **Native Hawaiian or Other Pacific Islander** - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands. It includes people who indicate their race as "Native Hawaiian," "Guamanian or Chamorro," "Samoan," and "Other Pacific Islander."
  - **Two or more races.** People may select this category if they believe they belong to two or more races.
- **Race/Ethnicity** – race/ethnicity demographic information will be collected as a whole for civil rights purposes. A program participant may be included in the group to which he/she appears to belong, identifies with, or is regarded in the community as belonging to. No person should be counted in more than one racial-ethnic category.

## USDA Federal Civil Rights Compliance Review Guide – Extension Guide

### 2012 USDA Civil Rights Review Recommendations & University of Arkansas Cooperative Extension Service’s Responses

#### Forms

*Civil Rights Yearly Assessment – (AFFACT-01)*

*Sample Documentation of Radio/TV Release – (AFFACT – 02)*

*Determination of Non-Discrimination Status – (AFFACT – 03)*

*County Extension Council Membership List – (AFFACT – 04)*

*Gender and Racial-Ethnic Composition Potential Audience – (AFFACT-05)*

*Attendance Records/Sign-In Sheets – (AFFACT 08, 08.1, 08.2, 08.3)*

*AIMS Direct Individual Contact Data – (AFFACT – 9)*

*Sign-up Cards – (AFFACT – 10)*

*Program Compliance Calculator (AFFACT – 12)*

*Annual Summary of 4-H Overnight/ Day Camp Participants – (AFFACT – 13)*

*Annual List of 4-H Award/Scholarship Recipients – (AFFACT – 14)*

*Annual Summary of Master Gardner Volunteers and 4-H Volunteers (AFFACT – 15)*

*4-H and EHC Club List and Certification of All Reasonable Efforts – (AFFACT – 343)*

*Civil Rights Review Checklist (AFFACT – 347)*

#### Other Civil Rights Policies

*C.E.S.P. 2-3: Notification to Groups of Nondiscrimination Policy*

*C.E.S.P. 2-6: Membership Areas for E.H.C. and 4-H Units*

*C.E.S.P. 2-16: Annual Certification of Nondiscrimination (E.H.C. and 4-H)*

#### Samples

*Sample 4-H/EH Club Map*

*Sample Annual Non-Discrimination Letter to Organizations*



United States  
Department of  
Agriculture



Cooperative State  
Research, Education,  
and Extension Service

Washington, DC 20210

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# **CIVIL RIGHTS COMPLIANCE REVIEW GUIDE**

## *Extension Programs*

## **Civil Rights Compliance Review Guide**\*

*This civil rights compliance review guide is for the use of CSREES-USDA equal opportunity specialists in conducting State Extension Reviews. The guide, also serves as the primary document to help Extension administrators, faculty and staff prepare for a civil rights review. Equally important, the guide serves as an educational document that reminds us of what is necessary to assure that we are working in compliance with equal opportunity policies in the implementation of our Extension programs, that every customer and colleague is treated with fairness, equality, and respect, and that we are inclusive and have adequate diversity. Compliance reviews are regular, systematic, inspections required by USDA and the Department of Justice civil rights regulations.*

*CSREES Equal Opportunity Specialist will use the guide as the basis for a Civil Rights review. Additional information, data and/or documentation will be requested as needed. State partners should not send program information and data prior to an on-site review without consulting with the Director of CSREES-Equal Opportunity staff.*

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\* The review guide was developed with input, direction, guidance, and technical assistance from State land-grant universities faculty members and administrators, including representatives from ECOP.



**Cooperative State Research, Education, and Extension Service  
Guide for Civil Rights Review of  
Extension Programs**

**For CSREES-USDA Administrative Use Only**

**Preamble**

**General**

Cooperative State Research, Education, and Extension Service (CSREES) and its land-grant partners recognize the importance of diversity and inclusion in the development and implementation of Extension programs. These Extension programs must be handled in a manner that treats every customer and employee with fairness, equality, and respect. This applies to all aspects of the Extension programs including identifying needs, setting priorities, allocating resources, selecting and assigning staff, conducting programs, and getting feedback.

*In accordance with United States Department of Agriculture civil rights regulations 7 CFR 15 any recipient of federal financial assistance, regardless of the amount, is subject to civil rights reviews. Further, the primary recipient of federal financial assistance is responsible for civil rights administration where the primary recipient has extended the financial assistance to another recipient.*

Civil Rights program reviews, conducted by CSREES, are intended as part of a proactive effort to determine how well Extension programs and operations are being done on an equal opportunity basis by recipients in compliance with Federal civil rights laws, rules and regulations. Reviews are planned and organized jointly between CSREES and the institutions. The review process has flexibility to recognize differing demographic makeup of State partners. Whenever possible, reviews will be conducted with participation from Extension in 1862 and 1890 Land-Grant Institutions and as appropriate including 1994 and Hispanic Serving Institutions, as well as other relevant organizations receiving Extension funding.

**Purpose and Relevant Legislation**

The USDA Civil Rights regulations require CSREES to determine whether or not recipient institutions are in compliance with the nondiscrimination and equal opportunity provisions contained therein. To implement these provisions, CSREES is required to carry out regular compliance review inspections designed to measure the overall status of compliance of Extension recipients. The CSREES review will focus on those aspects that are covered by the Federal statutes prohibiting discrimination based on race, color, national origin, sex, age, and disability.

CSREES Civil Rights compliance reviews are conducted consistent with the following major statutes and Departmental Regulations:

- Title VI of the Civil Rights Act of 1964, as amended, 42 USC 2000d.
- Section 504 of the Rehabilitation Act of 1973, as amended, 19 USC 794.
- Americans with Disabilities Act of 1990, 42 USC 12101 et. seq.
- Age Discrimination Act of 1975, 42 USC 601 et. seq.
- Title IX of the Education Amendments of 1972, et. seq.
- Civil Rights Restoration Act of 1987, P. L. 100-259, as amended by, Civil Rights Restoration Act of 1991, P.L. 102-166.
- USDA DR 4330-2, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA, dated March 3, 1999.

The complete list of statutes and Departmental regulations are located on the Department's website: <http://www.usda.gov/da/directives.htm>. The Department of Justice (DOJ) regulations, contained in 28 CFR 42.401, coordinate civil rights compliance activities for USDA programs. DOJ evaluates the Department's compliance operation to determine if the applicable nondiscrimination laws, rules and regulations are being fully implemented. DOJ's compliance regulations are located at website: <http://www.usdoj.gov>. EEO/Civil Rights information on program compliance reviews can also be accessed from the Civil Rights button on the CSREES homepage.

The Office of Civil Rights, within the Department of Agriculture, is assigned responsibility, by the Secretary of Agriculture, for conducting compliance reviews of recipients of USDA financial assistance. The Office of Civil Rights develops standards for USDA agencies' civil rights compliance review procedures and reviews agencies proposed directives, guidelines, and procedures.

CSREES is responsible for assuring that its Extension partners are meeting the specific obligations of nondiscrimination and equal opportunity associated with the USDA civil rights rules and regulations. CSREES is responsible for reviewing of recipient institutions activities on a continuing basis to assess their compliance with the Department's civil rights rules and regulations. CSREES Equal Opportunity Staff (EOS) plan, organize, and conduct such civil rights reviews.

Each State Extension institution is responsible for establishing internal policies and guidelines to ensure that Extension programs and operations do not discriminate and that research projects and activities are done without regard to race, color, national origin, sex, age, or disability. Land-Grant and other institutions are expected to have available the appropriate documentation, records, and source of information related to the items included in this guide.

## **Process**

There are a variety of circumstances which may prompt CSREES-EOS to schedule a civil rights compliance review of a State Extension program.

- The Secretary may direct CSREES to conduct a compliance review of a State Extension program.
- The Department of Justice may conduct a review of CSREES and/or a State Extension program.
- Reviews may also be requested by a State Extension program or initiated by CSREES at any time.
- Once a State Extension program has been selected and scheduled for review, by CSREES, a letter is sent to the head of the State Extension program advising him/her of the anticipated date for commencement of the review.

The CSREES reviews will be initiated by the Equal Opportunity Staff contacting the Extension Directors/Administrators in the State to discuss the process, any special issues, and to establish the schedule and locations for the review.

In conducting a program compliance review, the CSREES review team will need adequate information about the Extension operations. Such information includes plans of work and program participation data, which are viewed as the State's commitment to carry out Extension programs. Compliance review specialists, in particular instances, may also need specific information pertinent to programmatic and employment decisions to determine the impact on Extension programs and activities.

The review will seek to gain a comprehensive understanding what State Extension officials are doing to ensure nondiscrimination in program delivery; the conduct of educational programs for staff on civil rights topics; the conduct of innovative programs; and the corrective action taken when discrimination occurs.

The purpose of the guide is to serve as a tool that identifies the extent of full implementation and compliance with the various USDA regulations. It provides the opportunity for the presentation of specific program accomplishments impacting diverse audiences. The format includes both quantitative and qualitative information. Moreover, it offers the opportunity for comments and explanations to better reflect accomplishments. All statements made and data cited by Extension should be based upon verifiable records and/or documentation at Extension locations.

The following sections identify the basic components and the process for a review.

## Areas for Review for Extension Programs

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>1.</b></p> <p><b>■ Resource and Structure;</b></p> <p><b>■ Knowledge of Laws, Rules, and Regulations;</b></p> <p><b>■ Staff Training ;</b></p> <p><b>and</b></p> <p><b>■ Staff Conferences</b></p>	<ul style="list-style-type: none"> <li>* Organizational structure and functions of Extension related to the public interests and needs are in place.</li> <li>* There is a diverse workforce with skills, knowledge, and ability to carry out those duties assigned for Extension programs.</li> <li>* A performance work statement or plan of work identifies essential functions to be performed, determined performance factors, including location of Extension work, the county units of work, quality of county work, and the quality and timelines of the county work units.</li> <li>* Ensure that all Extension officials and employees are held accountable for achieving the requirements in civil rights rules and regulations.</li> <li>* Management is providing full-time impetus to an equal opportunity diversity program.</li> <li>* All staff members are expected to be knowledgeable and skilled in implementing equal opportunity requirements in Extension programs.</li> <li>* Extension civil rights plan includes written procedures for staff members participation in equal opportunity/diversity training. Training information is disseminated annually to all staff members.</li> <li>* Extension staff has equal access to programmatic training.</li> <li>* Annual educational events such as in-service training programs and/or orientation programs for new staff members address equal opportunity requirements.</li> <li>* Periodic meetings at the county, regional, and State levels reflect discussions regarding civil rights compliance and civil rights planning.</li> </ul>	<ul style="list-style-type: none"> <li>• Review organizational structure and position assignment of employees.</li> <li>• Determine if current structure and/or assignment of employees are having a favorable civil rights impact on the delivery of services to minority clientele.</li> <li>• Determine if there are sufficient resources assigned to carry out and monitor implementation of equal opportunity program.</li> <li>• Determine if there are personnel principles, policy, or practice which restricts or tends to limit outreach to minority communities.</li> <li>• Are there budget constraints making the delivery of service to minority clientele favorable or unfavorable.</li> <li>• Determine the extent to which staff members are knowledgeable and skilled in the implementation of the objectives of equal opportunity regulations relative to the consideration and treatment of customers for participation in Extension programs regardless of their race, color, national origin, sex, age, or disability.</li> <li>• Review staff development plan and interview staff members to determine equal access and opportunity to participate in training program for professional improvement.</li> <li>• Review staff conference plans and proceedings, training agenda(s), training opportunity announcements, and interview staff members to determine the extent to which civil rights matters were included in these sessions.</li> <li>• Reviewer will determine if staff conferences are held periodically, for determining the status of civil rights implementation and compliance in Extension programs.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of organizational chart and line functions within the land-grant institution and connectivity with regional and county Extension unites.</li> <li>• Provide information on leadership and support in the administration of program decisions, including the assignment of programs and employees.</li> <li>• Provide information on overall leadership, coordination, and direction for the Extension EEO/Civil Rights program.</li> <li>• Provide information on the allocation of personnel and resources to carry out Extension equal opportunity/diversity program.</li> <li>• Provide a copy of the civil rights plan for the State Extension program.</li> <li>• Provide notification to staff in program locations for the impending review and expected dates to be cleared to work with the reviewers.</li> <li>• Provide a list of Extension personnel by locations with names, race, gender, ethnicity, title, and program area of assignments.</li> <li>• Provide a copy of the State employee's staff development plan, including State procedures for staff to participate in training.</li> <li>• As appropriate, State will provide relevant copies of staff meeting agendas and training information.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>2.</b> <b>Extension Staff Members Assigned in Areas being Reviewed</b></p>	<p>*Position assignments of employees provides opportunity for them to work with all persons, regardless of race, gender, age, color, national origin or disability.</p> <p>* Secretarial and clerical employees are not limited to working with members of the same race.</p> <p>* Minority hiring is not limited to filling vacancies created by the departure of other minority Extension employees.</p>	<ul style="list-style-type: none"> <li>• Determine if staff members are placed in positions and provided functional assignments which do not limit them to work exclusively with customers or employees of their own race.</li> <li>• Determine if staff members are not limited to working in subject matter or geographical areas which tend to maintain a strict racial identity between staff members and customers.</li> <li>• Review job descriptions and assignments and interview staff to determine if employees are limited to working in subject matter or geographical areas which tend to maintain a strict racial identity between the employees and minority customers.</li> <li>• Review a representative sample of minority and non-minority staff members' weekly activity reports or printout of each agent contact participation data to determine the extent which services are provided across race and gender lines.</li> <li>• Review present position assignments of secretarial and clerical staff to determine if they work across racial/gender lines.</li> <li>• Review previous staffing changes to determine if a pattern of employment exists whereby minorities are replacing minorities.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a listing of staff members by title, program assignments, race, and gender for the counties being reviewed.</li> <li>• Make position descriptions available to the reviewers, for their review.</li> <li>• Make activity reports/participation data available to reviewers for their review.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>3.</b></p> <p><b>Advisory Committees, Boards and other relevant committees</b></p>	<ul style="list-style-type: none"> <li>* Internal and external advisory boards and committees are diverse, and/or are representative of the population of the county in relation to geographic areas being served.</li> <li>* Plans to solicit diverse nominations for committees and advisory boards are established.</li> <li>* Selection and appointment processes are used to staff local committees and advisory boards.</li> </ul>	<ul style="list-style-type: none"> <li>• Determine whether any qualifying mandatory or discretionary membership criteria that are imposed and their impact on diversity.</li> <li>• Identify each existing committee/board by race, ethnicity and gender.</li> <li>• Determine the percentage of county population by location and race, ethnicity and gender in the identified geographic areas.</li> <li>• Determine needed changes in the organizational structure and planning procedures to assure representation of minorities on the committees and boards.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide copy of policy and procedures to solicit diverse nominations for committees and advisory boards.</li> <li>• Provide a copy of the selection and appointment process used to staff committees/boards.</li> <li>• Copy of any procedures that effect planning and advisory committee membership.</li> <li>• Provide list of advisory committees/boards by race, ethnicity and gender.</li> </ul>		
<p><b>4.</b></p> <p><b>Procedure for processing program and employment discrimination complaints</b></p>	<ul style="list-style-type: none"> <li>* Review procedures for program and employment complaints are established for customers and ensured their fair treatment where discrimination is alleged.</li> <li>* Published program and employment complaint procedures are available to all employees, volunteers, and to the public. All staff members and volunteers have received training in program complaint concerns.</li> <li>* Staff members understand the complaint process and those issues of compliance and noncompliance.</li> <li>* Staff members and volunteers, understand the bases on which program discrimination is prohibited in Extension programs.</li> <li>* The USDA "...And Justice for All" poster showing the nondiscrimination policy statement and how to file a civil rights complaint is properly displayed in areas of institutional facilities visited by the public.</li> </ul>	<ul style="list-style-type: none"> <li>• Interview staff to determine their knowledge of program and employment complaint procedures.</li> <li>• Review records to determine the prompt, fair, and impartial processing of complaints, including the adequacy of complaint procedures.</li> <li>• Determine the extent to which Extension staff members, leaders, clientele, and the general public are informed of the procedures for filing program and/or employment complaints.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of State Extension program and employment complaint procedures.</li> <li>• Provide access to complaint receipts and dispositions, including any current complaints.</li> <li>• Provide name of contact person for the Director/Administrator's office handling complaints.</li> <li>• Verify the use and display of the "...And Justice for All" poster.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>5.</b> <b>Statewide Equal Opportunity/ Diversity Plan</b></p>	<ul style="list-style-type: none"> <li>* State plan is in place which ensures that educational benefits are provided to a diverse audience of the State on a nondiscriminatory basis.</li> <li>* Plan expresses the organization's intent to maintain compliance with equal opportunity non-discrimination rules and regulations applicable to Extension programs.</li> <li>* Plan clearly states the organization's commitment in valuing diversity within its staff, volunteers, and citizens.</li> <li>* Plan describes how it will secure and utilize citizen input through lay committees (include all collaborative boards used to determine clientele needs) on program priorities and needs assessments. Lay committees will be diverse and reflect the diversity in the communities being served.</li> <li>* Plan identifies the frequency of conducting internal civil rights reviews with all program units, including plans for taking appropriate corrective measures, and Extension's recognition of staff members' successes in addressing equal opportunity issues.</li> <li>* Plan includes written policy and procedures for informing the public of the University and Extension's responsibility for implementing the requirements for equal opportunity.</li> <li>* Established procedures guide staff in insuring that education assistance is not provided to any organization or group that excludes individuals because of their race, ethnicity or gender.</li> <li>* Established system to collect program participant data.</li> </ul>	<ul style="list-style-type: none"> <li>• Determine technical sufficiency of equal opportunity requirements.</li> <li>• Determine the extent to which educational methods used are accessible to all interested customers including outreach to individuals, groups, and communities not being served or underserved. Examine plans and procedures for publicizing and encouraging attendance or enrollment in Extension programs and activities.</li> <li>• Determine the extent to which the membership of each committee reflects the racial composition of the community or area which is served by Extension staff members.</li> <li>• Determine if Extension maintains a review and evaluation system for measuring the overall status of compliance by employees.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of the Civil Rights Plan for the State program.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>6.</b>  <b>■ Accessibility for the disabled</b></p>	<ul style="list-style-type: none"> <li>* A self-evaluation conducted to provide an assessment of those programs and work facilities that must be made fully accessible to disabled people.</li> <li>* There is equality, fairness, and respect in the use of Extension work facilities, including support for educators, paraprofessionals, secretarial and support staff in the dissemination and use of office equipment.</li> <li>* Office quarters and related facilities are assigned and available to all staff on a nondiscriminatory basis.</li> <li>* Supplies, educational materials, electronic technology (computers, telephones, etc.) are available to all staff on a nondiscriminatory basis.</li> <li>* Office entrances, routing of clients are such that discrimination on the basis of race, color, national origin, sex, age, or disability does not occur.</li> <li>* Secretarial help and other support resources are available on a nondiscriminatory basis.</li> <li>* Work facilities are consistent with rehabilitation regulations and are fully accessible to disabled people.</li> <li>* Work facilities and programs are accessible to disabled employees, volunteers, customers, clients, and visitors.</li> </ul>	<ul style="list-style-type: none"> <li>• Reviewer will determine if Extension work facilities are fully accessible to disabled people.</li> <li>• Determine what steps are taken, by responsible officials, to eliminate barriers for disabled people to fully participate in Extension programs.</li> <li>• Determine if reasonable accommodations are being made for the known eligible disabled customers to participate in Extension educational programs.</li> <li>• Determine if office space and the use of equipment and office supplies are done in a nondiscriminatory manner.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide information on steps taken to eliminate barriers and make programs and facilities more accessible to disabled people.</li> <li>• Provide name(s) of person(s) responsible for ensuring that programs are fully accessible to disabled people.</li> <li>• Provide copy of a self-evaluation plan for determining program and facility accessibility for disabled audiences.</li> <li>• As appropriate, provide policy statements on: <ul style="list-style-type: none"> <li>a) accessibility of physical facilities that employees, volunteers, customers, or visitors are expected to use;</li> <li>b) use of office equipment, supplies, etc. for educational presentations;</li> <li>c.) assignment of office space for employees.</li> </ul> </li> </ul>		



AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>7.</b></p> <p><b>■ Program Areas (State and Local)</b></p>	<p>* Formulated Civil Rights/Equal Opportunity plans ensure that Extension education benefits are provided to the citizens of the State on a nondiscriminatory basis.</p> <p>* All reasonable efforts are carried out to insure equal access and integration of clubs.</p> <p>* Where program delivery methods is by club:</p> <p><i>a.</i> In cooperation with Extension staff members, clubs are responsible for their own public notification efforts, i.e., existence of the club, dates, time, and location of organizational meetings.</p> <p><i>b.</i> In cooperation with Extension staff members, clubs are responsible for inviting all potential members without regard to race, ethnicity, or gender.</p> <p><i>c.</i> Extension staff members have communication with club members, officers, leaders, and volunteers regarding the value of diversity and the expectations for equal opportunity requirements.</p> <p><i>d.</i> Equal opportunity requirements will apply to any setting where clubs meet collectively within a county, region, state, or nationally.</p> <p><i>e.</i> Club officers and volunteer leaders are provided written guidelines on civil rights and equal opportunity requirements. Volunteers are expected to affirm and note an assurance statement of nondiscrimination.</p> <p><i>f.</i> The membership of all clubs operating in interracial and non-interracial communities is open to all individuals regardless of race and gender.</p>	<ul style="list-style-type: none"> <li>• Determine the compliance review efforts and accomplishments for the State Extension program.</li> <li>• Determine for each major Extension subject matter program (e.g., agriculture, nutrition, food safety, etc) the total number of persons by race, ethnicity and gender who are potential recipients of Extension programs</li> <li>• Determine whether there is discrimination on the basis of race, color, national origin, gender, age or disability.</li> <li>• Review program participant data, review records, circular letter, newspaper articles, and membership rolls etc. and interviews with extension staff as part of the review.</li> <li>• Where program delivery is by club or identifiable group that meets through the year such as Extension Homemakers, Family Community Education. 4-H, Master Gardners, Farm Management groups, pesticide scouting, the Expanded Food and Nutrition Education Program, etc., the following should be reviewed: <ul style="list-style-type: none"> <li>a. Review data on the total number of clubs and membership by race, ethnicity and/or gender, the number of clubs in interracial communities and membership by race, ethnicity and/or gender and the number for clubs in non-interracial communities and membership by race, ethnicity and/or gender.</li> <li>b. Review records of the extent to which “all reasonable efforts” have been made to integrate clubs in non-interracial communities.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Provide a list of all programs disseminated by county staff (traditional, non-traditional, new/innovative, and grant-based programs.)</li> <li>• Provide guidance procedures used by Extension and names and information of the club/group. Include: <ul style="list-style-type: none"> <li>• Public Notification efforts</li> <li>• Outreach Procedures</li> <li>• Diversity levels by race, ethnicity, and gender</li> <li>• Advisory council/committees</li> </ul> </li> <li>• Provide club participation data by race, ethnicity, and gender with geographic breakdown.</li> <li>• Provide information and data by race, ethnicity, and gender on 4-H committees’ outreach recruitment efforts to increase the enrollment of underrepresented youth in clubs.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>7.</b> <b>...Continued</b></p> <p><b>Program Areas</b> <b>(State and Local)</b></p>	<p><i>g.</i> All reasonable efforts are carried out to insure equal access and integration of clubs.</p> <p><i>h.</i> Geographic boundaries established for program planning and implementation are done in a nondiscriminatory manner.</p> <p><i>i.</i> Membership in all clubs is open to both males and females.</p> <p><i>j.</i> 4-H recruitment committees are diverse by race and gender.</p> <p>* Camp participants, including resident instructors are diverse by race, ethnicity, and gender</p> <p>* Procedures are in place to mainstream participants into other Extension programs to ensure total inclusion.</p> <p>* 4-H expansion and review committee is diverse by race, ethnicity and/or gender.</p>	<p><i>c.</i> Review the geographic boundaries of clubs/groups to determine whether they are established based on race.</p> <p><i>d.</i> Review to the extent to which club/group participation and membership is open to males and females with respect to "Title IX, Nondiscrimination on the Basis of Sex," including any recognition program.</p> <p><i>e.</i> Review the records to determine the extent to which 4-H recruitment/outreach committees have functioned to increase minority participation in the program and related activities including, enrollment in 4-H clubs.</p> <p><i>f.</i> Review and evaluate audience participation in 4-H camps or other resident workshops. Determine if housing at 4-H camps are integrated by race and ethnicity.</p> <p><i>g.</i> Review the extent to which participants in these groups are "mainstreamed" into other Extension programs.</p> <ul style="list-style-type: none"> <li>• Determine if Extension provides assistance to any organization that excludes any individual from participation because of their race, color, national origin, sex, age or disability.</li> </ul>			

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>8.</b></p> <p><b>Extension Program Participation Data</b></p>	<ul style="list-style-type: none"> <li>* Data collection system provides for the identification of eligible population and ensures delivery of program benefits to minority and non-minority customers.</li> <li>* Establish and maintain a system for collecting and reporting data on potential and actual clientele participation in Extension programs.</li> <li>* Data system obtains racial, ethnic and gender data on all significant aspects of program participation.</li> </ul>	<ul style="list-style-type: none"> <li>• Determine the total number of persons by race, ethnicity and gender who are potential Extension customers and determine the percentage of potential customers attributable to each racial, ethnic and gender group.</li> <li>• Determine the total number of actual customers by racial, ethnic and gender groups and determine, the percentage of actual participants for each racial, ethnic and gender group.</li> <li>• Determine whether any racial, ethnic or gender group's percentage of actual participants is less than its percentage of potential customers. Reviewer will determine the extent to which disabled people and elderly (senior citizens) individuals are receiving the benefits of Extension programs and services.</li> <li>• Review program actual participation and potential clientele using CSREES-EOS forms (see attachments).</li> </ul>	<ul style="list-style-type: none"> <li>• Provide plans and procedures for program participation data and information collection in the State Extension system.</li> <li>• Provide copies of reports reflecting actual program participation data in ALL Extension programs, including club/group enrollment/membership by race, ethnicity and gender. Reports should clearly identify potential clientele</li> <li>• As appropriate, provide copies of program information reports evaluating clientele participation and the extent of conformance to equal opportunity objectives.</li> <li>• As appropriate, provide copies of information reports and/or program participation on data on disabled and elderly customer participation in Extension programs.</li> </ul>		
<p><b>9.</b></p> <p><b>Public Notification</b></p>	<ul style="list-style-type: none"> <li>*A public notification policy is in use informing the public, particularly minorities, the underrepresented/underserved and the disabled of all Extension program benefits and of the protection against discrimination.</li> <li>*A nondiscrimination statement is used on Extension printed publications, including bulletins, leaflets, circulars, fact sheets, program announcements, and miscellaneous publications.</li> <li>*A public notification policy informing the public of assistance for the disabled.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine the extent to which Extension staff members are informing the public of equal access to Extension programs and activities.</li> <li>• Verify the use of a nondiscrimination statement on printed publications.</li> <li>• Examine notification statement(s) staff members use with newspaper, news releases, radio/television programs, etc. that communicate nondiscrimination requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• As appropriate, provide a copy of public notification plans and procedures.</li> <li>• Provide a copy of official nondiscrimination statement used on printed publications.</li> <li>• List of media outlets.</li> <li>• Provide documentation of notice for individuals with special needs.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<b>10.</b> <b>Mailing Lists</b> <b>(Electronic and Non-Electronic)</b>	<ul style="list-style-type: none"> <li>* Established written instructions guide staff members on the maintenance, protection and use of clientele mailing lists.</li> <li>* The various mailing lists are representative of the diversity of the population in the geographic areas being served.</li> <li>* Racial minority group members are on the mailing lists</li> </ul>	<ul style="list-style-type: none"> <li>• Review instructions on the maintenance and use of mailing lists. Review the makeup of mailing lists and determine that racial/ethnic minorities and both sexes are appropriately included.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide policy statements and procedures dealing with mailing lists use and protection.</li> <li>• Provide compilation/copy of mailing lists by race, ethnicity and gender.</li> </ul>		
<b>11.</b> <b>Title IX Non-discrimination on the Basis of Sex</b>	<ul style="list-style-type: none"> <li>* Extension programs, methods, content, and places of services are implemented in a manner that ensures nondiscrimination on the basis of sex for all participants.</li> <li>* Removal and elimination of sex-stereotype language, and illustrations, from Extension publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.</li> </ul>	<ul style="list-style-type: none"> <li>• Determine the process through which administrative guidelines for implementation of Title IX, “Nondiscrimination on the Basis of Sex,” were issued, and the extent which the guidelines are being implemented and consistently followed.</li> <li>• Determine if any programs and/or recognitions are sex separate.</li> <li>• Determine if there are sex separate activities, contests, or awards in Extension programs and related events.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide State policy and State and county procedures for ongoing implementation of the objectives of Title IX.</li> </ul>		
<b>12.</b> <b>Internal Compliance Reviews</b>	<ul style="list-style-type: none"> <li>* Internal civil rights review plans are in place for assuring program compliance by Extension staff members, on an equal opportunity basis.</li> </ul>	<ul style="list-style-type: none"> <li>• Review written policy and procedures for the conducting of internal compliance reviews.</li> <li>• Review compliance review records and reports for technical sufficiency, findings, recommendations, and follow-up.</li> <li>• Review latest civil rights compliance review.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide policy statements, procedures, and copy of Extension instrument for conducting internal reviews.</li> <li>• Provide a copy of the review plan and schedule of reviews conducted and planned.</li> <li>• Provide a copy of the results of the internal civil rights review and follow-up action by State Extension officials.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>13.</b></p> <p><b>Limited English Proficiency (LEP)</b></p>	<ul style="list-style-type: none"> <li>* Improve access to services for persons with Limited English Proficiency (LEP)</li> <li>* Program methods and content are planned to reach potential LEP persons for participation in Extension programs.</li> <li>* Educational materials are published in a language other than English.</li> <li>* Educational workshops, person-to-person teaching, counseling, and other educational methods are provided to LEP persons.</li> <li>* Self-evaluation to assess services to potential program recipients with LEP, including the eligible LEP population.</li> <li>* Written or oral communication are used in servicing LEP individuals.</li> </ul>	<ul style="list-style-type: none"> <li>• Interview staff to determine their knowledge of LEP requirements.</li> <li>• Determine steps taken to ensure that LEP persons have access to the programs and services provided by Extension employees.</li> <li>• Examine records to determine if meaningful access to educational programs is provided to LEP persons.</li> <li>• Determine if Extension staff has knowledge of the Size of the eligible LEP population it serves. The frequency with which languages are encountered; the frequency with which LEP persons come into contact with Extension programs.</li> <li>• Determine if Extension has translated Extension educational materials into other languages.</li> <li>• Determine LEP areas or communities which are being served by county Extension program.</li> <li>• Verify the use of oral language services for LEP persons.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide copy of LEP policy as appropriate.</li> <li>• Provide copy of documents noting reasonable steps taken to provide meaningful access to eligible LEP individuals.</li> <li>• Provide copy of technical materials published in languages other than English.</li> <li>• Provide information on frequency of contacts between the Extension program or activity and LEP individuals.</li> </ul>		

AREA	STANDARDS	REVIEWER WILL	STATE WILL	FINDINGS	RECOMMENDATIONS CORRECTIVE ACTION
<p><b>14.</b></p> <p><b>■ Ongoing Administration of Programs</b></p> <p><b>and</b></p> <p><b>■ Interaction of 1862 and other Minority Land-Grant Institutions</b></p>	<p>* Persons with leadership responsibility in the civil rights area receive administrative support and direction sufficient enough to maintain a high level of visibility for compliance with civil rights laws, rules, and regulations.</p> <p>* Establishing, where appropriate, a mutually developed, coordinated, implemented comprehensive program of Extension work between land grant and/or minority serving institutions.</p> <p>* Maintain a forum for continuing mutual consultation among top officials of the institution.</p>	<ul style="list-style-type: none"> <li>• Determine the administrative structure currently in place to carry out Extension programs. Gain an understanding of the formal and informal lines of authority and responsibility for civil rights matters.</li> </ul> <p>Review:</p> <ul style="list-style-type: none"> <li>• Organizational Chart</li> <li>• Civil Rights Policy Statement</li> <li>• Names of persons responsible for civil rights</li> <li>• Communication structure for the system</li> <li>• Funding source</li> <li>• Determine the extent to which persons with leadership responsibility in the civil rights area are receiving administrative support and direction for compliance with civil rights laws, rules, and regulations.</li> <li>• Review the working relationships and administrative structure for civil rights concerns.</li> <li>• Determine if there is planned interactions between the institutions, including a review of areas where minority institutions are participating effectively in Extension work.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide documentation of Equal Opportunity efforts, i.e., meetings, guidelines, directives, etc. from the Extension director and/or administrator.</li> <li>• Provide letter of compliance, civil rights directives from Extension Director/1890 Administrator and provide documentation of civil rights review coverage by Extension leadership (internal and USDA reviews).</li> <li>• As appropriate, provide information a memorandum of agreement/cooperation with 1890 and 1994 institutions, including other minority serving institutions.</li> <li>• Provide listing of committees and membership with identification of participation from 1862 and minority institutions.</li> <li>• Provide a listing of joint Extension programs being carried out by the respective institution.</li> </ul>		



April 26, 2013

Dr. Sonny Ramaswamy, Director  
Office of the Director  
United States Department of Agriculture  
National Institute of Food and Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250-2201

Dear Dr. Ramaswamy:

Please find enclosed the University of Arkansas Division of Agriculture, Cooperative Extension Service Responses to the Civil Rights Compliance Review Report. We would like to thank you and your staff for the report, especially the noted and applauded statements made in regards to our support and commitment for equal opportunity and civil rights. I would also like to say that it was a pleasure to work with your review team. All of the review team members were very professional and courteous.

I hope that you find our responses are specific actions that have been and will be implemented in the near future. Such actions include increasing Title VI training for all employees; increasing the racial and ethnic diversity of Extension staff and volunteers, along with addressing the needs of access for those with limited English proficiency and persons with disabilities. We believe such actions will supplement our efforts to assure that we are offering Extension programs to the people of Arkansas on a nondiscriminatory basis.

We appreciate your continued support, and if you have any questions, please feel free to contact my office.

Sincerely,

Tony E. Windham, Ph.D.  
Associate Vice President for Agriculture Extension  
And Director of the Cooperative Extension Service

cc: Curt Deville

# University of Arkansas Cooperative Extension Service USDA Civil Rights Compliance Review Responses (2013)





## 2013 University of Arkansas Cooperative Extension Service (ACES) Responses

### 1862 AND 1890 COLLABORATION (PAGE 7)

#### Recommendations

- UA and UAPB must update the 2002 MOU as needed for current program needs.
- UA and UAPB are strongly encouraged to develop joint planning and advisory relationships/bodies for programs and consider a joint Plan of Work.
- UA and UAPB are strongly encouraged to share resources and personnel where program needs are similar such as in requirements to serve limited English proficient audiences.
- UA and UAPB are strongly encouraged to develop operating procedures where UAPB employees are housed in UA facilities, especially at the county level.

#### Response

- The ACES will update the 2002 MOU between ACES and UAPB Research regarding collaboration of joint efforts. The new MOU will include the development of joint planning and advisory relationships for programs, sharing of resources, where applicable, and operating procedures where UAPB employees are housed in UA facilities. This updated MOU will be handled at the Division level by the Vice President of Agriculture and the Chancellor of UAPB. At this time, UAPB has just completed its search for a new Chancellor, effective start date of July 1, 2013. When the new Chancellor is onboard, an MOU will be entered into that will also incorporate AES and UAPB Research. The target date to have the new MOU in place is October 1, 2013.

### EXTENSION STAFF MEMBERS ASSIGNED IN AREAS REVIEWED (PAGE 9)

#### Recommendations

- ACES must make efforts to recruit and hire racial and ethnic minorities at the local level where data shows underrepresentation of such groups.
- ACES at the local level should consider reviewing positions to assure males are not excluded from hiring opportunities in positions traditionally held by females.

#### Response

- ACES will continue to monitor and utilize its annual Affirmative Action workforce analysis and availability reports that identify those occupational categories at the local level that show an underrepresentation of racial and ethnic minorities and females. The Affirmative Action Office will begin working immediately with ACES Employment Manager and District Administration to develop strategies for recruitment and hiring those minorities and females, ensuring that barriers do not exist in the recruitment or males into positions that have been traditionally held by females. Strategies and plans of action will be reviewed and documented on a quarterly basis by the Executive Team meeting. Strategic planning will include the review and identification of minority recruitment resources and identify where job announcements can be distributed locally, especially in locations frequented by underrepresented individuals; and any other potential recruitment areas and channels that have been previously uncultivated. All efforts will be documented to ensure all reasonable efforts were made to include males and minorities in the applicant pools.

## **STAFF KNOWLEDGE OF CIVIL RIGHTS LAWS, RULES, & REGULATIONS (PAGE 10)**

### Recommendations

- Sexual Harassment Prevention training and other civil rights training must be available and required during the on-boarding process or within the first few months for UA and UAPB faculty and staff.
- CES training should increase the practical knowledge of staff, specifically as to how to apply 7 CFR Part 15 in the Extension program delivery environment. Training should include relevant and meaningful day-to-day real-life examples and be implemented regularly to ensure compliance to Title VI by all Extension staff.
- CES Administrators (UACES and UAPB) should put in place procedures to ensure sufficient frequency of face-to-face (In-service trainings and other short formats) or webinar-meeting-type exposure to immediately applicable Title VI concepts such as "parity," "disparate treatment," "limited English proficiency," "direct contact," "program accommodation," "targeted program," "sensory disability," etc.

### Responses

- In-Service training will be available for all employees through a variety of formats, including interactive face-to-face meetings, online workshops, and webinars on an annual basis. New employees will receive training during the on-boarding process. Training will include all equal employment policies, harassment, complaint procedures, and diversity. Documentation of such training will be kept by the ACES Employment Manager. Training should be available by January 1, 2014.
- Title VI training for all employees through a variety of formats through face-to-face or webinar meetings will also be delivered for all employees. Such Title VI concepts will include "parity," "disparate treatment," "limited English proficiency," "direct contact," "program accommodation," "targeted program," "sensory disability," etc. Documentation of employees participating in such training will be kept by the Department or County Office. Training should be available by January 1, 2014.
- ACES personnel will be able to demonstrate a working knowledge of the requirements of all civil rights rules and regulations in their everyday work activities.

## **INTERNAL COMPLIANCE REVIEW (PAGE 11)**

### Recommendations

- The Compliance Officer and District Directors should ensure that the annual assessment does not become simply a paper exercise by convening mandatory district training meetings on Title VI topics related to compliance (annually) as a follow up to the assessments.

### Response

- Beginning January 1, 2014, the Compliance Officer and District Directors will conduct mandatory district trainings for employees at district meetings regarding Title VI concepts that include "parity," "disparate treatment," "limited English proficiency," "direct contact," "program accommodation," "targeted program," "sensory disability," etc. Documentation of employees participating in such training will be kept by the District Offices. The District Directors and the Compliance Officer will

ensure this is not simply a paper process and agents will be held accountable through annual performance evaluations.

#### **TITLE IX NONDISCRIMINATION ON THE BASIS OF SEX (PAGE 12)**

##### Recommendations

- UACES staff must assure barriers are not present that clientele may view as impeding their participation in Extension programs based on their gender.
- Volunteers should be expressly trained on Title IX requirements of nondiscrimination in programs based on gender.
- UACES must collect gender data in all program activities including data on male contacts.

##### Responses

- Staff Chairs, District Directors, and the UA Compliance Officer will review contact records, client data and feedback to ensure there are no barriers that impede participation in Extension programs based upon gender. Such reviews will take place during program reviews of each county.
- Required annual training for volunteers regarding Title VI and other federal and state regulations will be implemented beginning January 1, 2014.
- ACES will continue to collect male contact data in all programs and activities on attendance records, sign-in-sheets, mailing lists, etc.

#### **PUBLIC NOTIFICATION & MAILING LISTS (PAGE 12)**

##### Recommendations

- The ACES must develop short and long public notification/nondiscrimination and accommodation statements in other languages as pertinent utilizing the fourfold Department of Justice Criteria<sup>7</sup> including a statement that materials can be made available in Spanish (disponible en español, or Hmong in certain areas); and, use a Relay number (711-xxx-xxxx) or other contact modes that will be answered by a person who speaks the client's target language.

##### Responses

- ACES will develop short/long public notification/nondiscrimination and accommodation statements in other languages for use immediately. Such notifications will contain a Relay number or other contact modes that will be answered by a person who speaks the client's target language.
- Compliance will be checked in periodic program reviews.

#### **CIVIL RIGHTS POLICY PLAN (PAGE 13)**

##### Recommendations

- ACES's Director should consider developing an overall Civil Rights plan that should include, but not be limited to, those elements noted in this report.

##### Response

- ACES will develop a comprehensive Civil Rights Plan. The plan will include all civil rights policy and procedures with employment and program compliance and will incorporate elements implemented

in response to the 2012 USDA Civil Rights Audit report. Such plan will be implemented by October 1, 2014.

## **PROGRAM ACCESS FOR PEOPLE WITH DISABILITIES (PAGE 15)**

### Recommendations

- ACES's Director and UA Division of Agriculture Vice-President should consider establishing funds/budget for providing program accommodations for people with disabilities, including public notification and planning/implementing targeted programs, producing publications and materials in accessible formats, public contact points (TDD/TDY), etc.
- Arkansas Cooperative Extension must include information on how to secure accommodation via accessible contact information (email address, TDD/TDY or 711 Relay) for persons with disabilities on all program announcements. Program announcements should be in formats (not only print) accessible to people with sensory disabilities. Ensure all UACES websites conform to UA accessibility requirements as per Section 508.
- CES Extension Administrators should update online reference and internal training materials (and curricula designs) to incorporate communication accommodation elements related to the requirements of the ADA Amendments Act of 2008; ADA, Title II and Section 508 of the Rehabilitation Act. Include information on how to obtain materials in other formats and/or languages.
- UACES and UAPB Extension should use accessible web pages to publicize Extension programs to deaf and hard of hearing and blind and partially-sighted people in Arkansas by linking to popular websites and associations serving these groups with UACES program information; and, recruit members of these communities as volunteers and advisors.

### Responses

- Division Administration including the Director and the Vice-President of Agriculture will establish funds and an annual budget to provide financial assistance to counties and departments for providing program accommodations, publications, and materials for people with disabilities. The Civil Rights Compliance Officer will be charged with the responsibility of oversight of the expenditure of funds. Such funds shall be available on October 1, 2013, the beginning of the 2014 ACES financial fiscal year.
- ACES will update its public notification statements accommodation to include information on how to secure accommodation via contact information for persons with disabilities. Such announcements will be available in other formats than print. The statement will also including information directing clients on how to access the Arkansas Telecommunications Relay System for assistance for the deaf and hard of hearing by dialing 711. Clients will be advised that more information on the relay system is available at: <http://www.arkansasrelay.com/>
- ACES is currently undergoing a major overhaul, redesign of its website, working with outside consultants. The website will be tested to ensure it has accessible web pages to publicize Extension programs to deaf and hard of hearing and blind and partially blind people in Arkansas. The website

will also contain links to those groups that serve this audience. The new website is scheduled to launch in September 2013. The website will also provide links to groups that serve this audience.

#### **LIMITED ENGLISH PROFICIENCY (PAGE 19)**

##### Recommendations

- ACES must devise a limited English proficiency policy: a LEP plan and a budget for LEP materials and program accommodation are recommended.
- ACES should analyze counties and population centers to identify pockets of LEP need: focus "startup" efforts and pilot programs; collect data on the number of LEP persons who receive program accommodations; track budget expenditures; and, use successful outcomes of pilot projects to obtain grants for new projects.
- ACES should train Extension faculty on the four Department of Justice criteria used to determine when to produce programs and materials in another language and develop internal procedures for producing or procuring materials to suit its needs.
- ACES Agents should seek partnerships with agencies and entities that have cultural knowledge and insight into limited English proficient populations (especially Hispanic populations).

##### Responses

- ACES will develop and adopt a comprehensive LEP Plan that will apply to all ACES activities and programs. The Division of Agriculture will develop a budget to support the LEP plan. The LEP Plan will be implemented by January 1, 2014. The Division's Civil Rights Compliance Officer will manage the funds and track all expenditures.
- ACES will conduct an analysis of need related to LEP to guide decisions with regards to development of pilot programs or projects, staffing needs, collecting data of the number of LEP persons benefiting from the new programs or pilots, and future funding opportunities. Such analysis should be completed by the end of the October 1, 2013. Based on such results, a plan should be in place for such pilot programs/projects by January 1, 2014.
- ACES will develop partnerships with other agencies and entities that have knowledge of cultural practices and insights into groups with limited English proficiency, with an emphasis on Hispanic populations, including the Hispanic Consulate of Arkansas and other Hispanic agencies.

#### **ADVISORY COMMITTEES AND COUNCILS (PAGE 26)**

##### Recommendations

- ACES Director and UAPB Director and 1890 Administrator in accordance with US and USDA civil rights regulations must assure racial and ethnic minorities are not denied participation on advisory groups and staff must determine if barriers exist to the inclusion of individuals from underrepresented groups on advisory boards.
- ACES Director and UAPB Administrator, managers and staff must assure all reasonable efforts are made to assure racial and ethnic minorities are encouraged to participate on ACES advisory groups and staff must assure the groups are representative of the eligible clientele for Extension programs.

- ACES administrators and county staff must make efforts and develop plans to include racial and ethnic minorities on all advisory groups.
- Where applicable, and in accordance with Plans of Work and MOUs, ACES and UAPB should review the current advisory committee structure.
- UACES and UAPB executives and program staff should develop a plan to improve the level of racial and ethnic minority participation on all advisory groups, especially where the groups are not diverse overall. This plan should include methods to accurately analyze participation rates, methods to identify barriers to minority participation, means and methods to recruit minorities for advisory groups, including working with external community groups, processes to train staff and volunteers as needed, and methods to fully implement the civil rights requirements for inclusion of minorities on advisory groups.

#### Responses

- UACES Administration and staff will develop a plan that will be included its overall Civil Rights Plan, as mentioned herein. The plan will include ways to improve the level of racial and ethnic minority participation on all advisory groups, including how participation rates of minorities will be captured and reported; all reasonable efforts in recruiting of minorities (including possible methods and means to contact such minorities to serve); and an annual process to follow-up and determine if efforts are working to increase the minority participation on all advisory groups. In addition, Administration and staff will review such data and continue to determine if any barriers exist for minority participation, and if such exist, removal of such barriers.
- As stated earlier, training materials are being developed for all volunteers and current members of all advisory boards. Such training will include Title VI requirements and Extensions' policies and commitment to diversity in all its programs. Training will begin as soon as possible, but no later than January 1, 2014. All volunteers will be required to participate in such training as a condition of becoming a volunteer. In addition, subsequent training will be required on an annual basis.

#### **ACES PROGRAM DATA COLLECTION (PAGE 35-36)**

##### Recommendations

- It is recommended that the Extension Director and Accountability Manager configure the AIMS application to use the Office of Management and Budget U.S. Census categories for collecting data so that it is possible to determine how many racial minority clientele are being served by UACES and so that direct comparisons may be made to the U.S. Census for purposes of analysis.
- Extension staff members, who are collecting participant data by gender on program login sheets, should enter both male and female data they collect into AIMS. Gender data must be collected discretely for each sex.
- The ACES Director, 1890 Administrator, managers and staff must assure that data collected is sufficient to make a determination if minorities are receiving the benefits of Extension programs; particularly in program areas that have reported large numbers or percentages of "other" ( in this case Two or More/Multi/Other)participants.

- AIMS must be revised to allow staff to directly report "male" contacts.

#### Response

- ACES will begin using the Office of Management and Budget U.S. Census categories in collecting demographic information on clientele beginning at the start of the new programmatic year, October 1, 2013. ACES will no longer combine the two racial categories of "Two or More Races/Some Other Race"; both categories will be separate and discrete racial categories. In addition, the AIMS software application will be modified to allow staff to directly report "male" contacts; thereby allowing staff to report both male and female data into the system.

### **ACES PROGRAMS (PAGE 76-78)**

#### Recommendations (All Program Areas)

- ACES Director must assure that data collected is of sufficiency to make a determination of the extent to which minorities are involved in all ACES programs, including participants who are more than one race.
- ACES Agents must invite minorities and people with disabilities to serve on ACES committees and boards and to serve as volunteers or advisors; and invite them to consult or present to committees on areas in which they have knowledge or expertise.
- ACES should use expansion committees whenever feasible to bring minorities and clientele from underserved or underrepresented populations into the program planning process (and expansion committees should have diverse membership).
- Public notification statements and contact Information (such as 711, TDD, TDY) must be included in Spanish and other target languages (based on DOJ criteria) on program announcements with a note that materials may be available in other formats on request where applicable.

#### Responses

- As stated earlier, ACES will use the Office of Management and Budget U.S. Census categories in collecting demographic information on clientele beginning at the start of the new programmatic year, October 1, 2013.
- ACES will require its agents to continue to work with each county's Expansion and Review Committees and expand their efforts in recruitment of more minorities and people with disabilities to serve as volunteers or advisors or becoming a part of the program planning process. At the end of each program year, the District Directors and Civil Rights Compliance Officer will continue to review the make-up of the county boards and committees and efforts taken and accomplishments achieved. Agents will be evaluated on such progress as part of their annual performance evaluation.
- As stated earlier, ACES will develop public notification statements that will include information directing clientele to the Arkansas Telecommunications Relay System and materials may be available in other formats on request, where applicable.

#### Recommendations (Agriculture)

- UACES Agents must make all reasonable efforts to achieve parity on program outreach to racial and ethnic minorities and women; and to collect contact data on these participants; program planning

should include anticipating the diversity of the potential audience in terms of race, ethnicity, gender, disability, and national origin.

- Horticulture Agents must increase the numbers of minorities and males in Master Gardener volunteer ranks to better reflect their communities.
- Master Gardener volunteers should receive training on Title VI program data collection, as part of their volunteer commitment ; such as procedures on how to resolve unknown participants that walk-in and do not self-identify, and when and how to record direct educational and indirect contacts by race and ethnicity.

#### Responses

- Agents will receive training as outlined herein regarding Title VI requirements, “all reasonable efforts”, and their outreach efforts to increase the number of minorities and males in the Master Gardener program, along with participation of minorities in all of the Agriculture programming. In addition, the District Directors and the Civil Rights Compliance Officer will review and analysis program delivery methods to identify any barriers that may exist for participation of minorities and/or males in Agriculture programs, including the Master Gardener program. Agents will be evaluated on such progress as part of their annual performance evaluation. District Directors will also meet with the Master Gardener coordinator and emphasize the need for finding ways to involve minorities and males, including specific activities to target minorities and males.
- Currently, training materials are being developed for all volunteers that include Title VI requirements and Extensions’ policies and commitment to diversity in all of its programs. Training will begin as soon as possible, but no later than January 1, 2014. All volunteers will be required to participate in such training as a condition of becoming a volunteer. In addition, subsequent training will be required on an annual basis.

#### Recommendations (FCS)

- ACES must ensure that agents and staff (even volunteers when applicable) involved in program delivery receive data collection training and that policy and policy communication are clear on how to ensure program contact data is recorded under various circumstances.
- FCS Agents must ensure that there are contact points (711 Relay, etc.), for Spanish-speaking and other limited English proficient clientele and that a schedule of classes en espanol is available.
- ACES and UAPB executives and staff at the local levels must assure the Homemaker Council and Clubs adhere to the requirements under Title VI of nondiscrimination in program activities.
- Single race clubs must assure all reasonable efforts are made to integrate such clubs and councils and document efforts made to integrate clubs.
- UACES and UAPB must assure training is provided to EHC members on UACES and UAPB civil rights requirements, including maintaining rosters with race, gender, and ethnicity of their club members.
- CES must work to diversify leadership roles to minority members or assure barriers do not exist to minority members serving in leadership roles.



### Responses

- As stated earlier, ACES will develop public notification statements that will include information directing clientele to the Arkansas Telecommunications Relay System. As part of ACES Limited English Proficiency plan, materials will be made available in Spanish and other formats for other limited English proficient clientele, including schedule of classes.
- ACES will continue to conduct all reasonable efforts to integrate all single-race clubs and such efforts will be documented. As stated earlier, agents will receive training as outlined herein regarding Title VI requirements, “all reasonable efforts”, and their outreach efforts. In addition, training will include proper data collection is recorded accurately.
- As stated earlier, training materials are being developed for all volunteers, which will include EHC members. Such training will include Title VI requirements and Extensions’ policies and commitment to diversity in all its programs. Training will begin as soon as possible, but no later than January 1, 2014. All volunteers will be required to participate in such training as a condition of becoming a volunteer. In addition, subsequent training will be required on an annual basis.

### Recommendations (Community Economic Development)

- CED Program Leader in partnership with the Director of Extension (both UA and UAPB) should, using the Department of Justice's four fold criteria, develop a list of disaster-related publications (i.e., the ones in the UA Disaster Response Handbook) to make available in other formats for people with disabilities and in other languages for people who are limited English proficient. This includes, making the web pages devoted to disaster information and recovery accessible as per Section 508 of the Rehabilitation Act of 1976. Any related training should also be available in formats (and languages or links) accessible to these populations.
- ACES and UAPB should continue collaborative efforts in CED particularly involving assistance to historically underserved and disadvantaged populations particularly in the areas of emergency preparedness and disaster assistance.

### Responses

- As stated earlier, in response to “Access to People with Disabilities” and “Limited English Proficiency” recommendation areas, CED publications will be included as those publications that will be made available in other formats for people with disabilities and other languages for people who are limited English proficient. In addition, as with all of the web pages on the ACES new website, the information on the web pages will be accessible to those who have disabilities.
- ACES and UAPB will continue to collaborate on efforts involving CED, especially involving assistance to historically underserved and disadvantaged populations in the areas of emergency preparedness and disaster assistance.

### Recommendations (4-H)

- CES staff must assure all reasonable efforts are made to recruit minority volunteers, particularly Hispanics, into the 4-H program, and document recruitment efforts.
- ACES 4-H State Program Leader and Agents must make efforts to integrate clubs that are non-integrated and located in mixed race communities: documenting all reasonable efforts and barriers

that exist; developing recruitment plans to include minority youth in clubs; conducting joint club activities, and conducting diversity and civil rights training for volunteers and club members to increase diversity in club membership.

- ACES 4-H State Program Leader and district and county leadership must examine organizational barriers to minority youth moving into competitive, leadership and award activities and seek to remove barriers; documenting these efforts as part of UACES's internal compliance review and all reasonable efforts mechanisms, reporting to the Director of Extension and the civil rights compliance officer, and collecting data on these efforts.
- ACES Extension 4-H Agents must demonstrate all reasonable efforts to inform youth, parents, and care-giving adults of opportunities for youth to participate in 4-H programs; particularly, public notification to historically underserved and racial and ethnic minorities, including limited English proficient and people with disabilities who may require notification in accessible formats.
- ACES should track distribution of information concerning 4H award and competition eligibility and rules, stipends, applications for awards and benefits, scholarship announcements and similar program benefits. ACES 4H must ensure and demonstrate that equal access to information about these opportunities is available to all regardless of race, ethnicity, gender, national origin, disability, or other protected status; and further, to show all reasonable efforts that racial and ethnic minority youth (and their parents) are encouraged to participate.
- ACES 4-H must develop materials such as scholarship announcements, applications, and other information for parents and caregivers in Spanish and other target languages as determined by analysis to comply with Title VI limited English proficiency and national origin nondiscrimination requirements.

### Responses

- Agents will continue to receive training as outlined herein regarding Title VI requirements, “all reasonable efforts”, and their outreach efforts in recruitment of minorities, especially Hispanics, to serve as volunteers in the 4-H program. Such effort will be documented and reviewed by District Directors and the Civil Rights Compliance Officer on an annual basis during program reviews. Agents will also be required to demonstrate all reasonable efforts including public notification to those with limited English proficiency and people with disabilities in other languages or in other accessible formats. Recruitment and program information is being translated to expand outreach efforts.
- A 4-H mentoring program will be developed as an outreach effort to reach youth that have limited resources and in an urban setting.
- As stated earlier, all volunteers, including 4-H volunteers, will receive training that will include Title VI requirements and Extensions’ policies and commitment to diversity in all of its programs. Training will begin as soon as possible, but no later than January 1, 2014. All volunteers will be required to participate in such training as a condition of becoming a volunteer. In addition, subsequent training will be required on an annual basis.

- As stated earlier, in response to the “Limited English Proficiency” recommendation area, ACES will develop 4-H materials such as scholarship announcements, applications, and other information in Spanish and other target languages for people who are limited English proficient.
- ACES will begin tracking demographic data in regards to all 4-H award recipients as of October 1, 2013 by using the ACES 4-H Online enrollment program. In addition, ACES will track the distribution of information regarding 4-H award and competition eligibility and rules, stipends, applications for awards and benefits, scholarship announcements and similar program benefits to ensure that these opportunities are available for everyone and will ensure all reasonable efforts are being implemented to encourage racial and ethnic minorities are encouraged to participate. Agents will be required to document distribution of such materials during annual program reviews. District Directors and the Civil Rights Compliance Officer, along with the State Program Leader will review this information and determine if any barriers exist for minorities to participate in these program benefits. If such exists, remedial action will be implemented for the next program year to eliminate such barriers. The Civil Rights Compliance Officer will review annually the makeup of all scholarship, award committees to ensure committee membership is diverse including racial and ethnic diversity. In addition, information has been developed regarding awards and leadership opportunities to be placed on the ACES website as well as being distributed statewide by Extension agents.

#### **MANAGEMENT ORGANIZATION (PAGES 98-104)**

##### Recommendations

- UACES must continue to take aggressive steps in its recruitment efforts to increase racial and ethnicity diversity of its workforce, in particularly Hispanic, as they are expected, in general, to reflect the diversity in the State of Arkansas.

##### Management

- UACES should review its hiring practices to ensure that barriers do not exist for Hispanic representation in Management positions.

##### Faculty

- UACES should continue to monitor its hiring practices of female and racial/ethnic minorities to ensure that they are provided the same opportunities for selection and procession in Extension total workforce.

##### Professional

- UACES should examine its overall recruitment practices, in particularly positions of direct program delivery, to recruit racial/ethnic minorities for Extension vacancies as they are represented in the State's CLF. UACES should search in areas and channels previously uncultivated.

##### County Employees

- UACES should ensure that MOUs with each county and with the UAPB are current.
- ACES should train Extension faculty on the four Department of Justice criteria used to determine when to produce programs and materials in another language and develop internal procedures for producing or procuring materials to suit its needs.

- ACES Agents should seek partnerships with agencies and entities that have cultural knowledge and insight into limited English proficient populations (especially Hispanic populations).

Response

- ACES will continue to take aggressive steps in recruitment efforts to increase racial and ethnicity diversity of its workforce. ACES will continue to analysis through its Affirmative Action Plan availability and placement goal reports on an annual basis to identify and target those job groups that are underrepresented by minorities and women, particularly Hispanics. ACES will develop a recruitment team of diverse employees to assist in searching areas and channels that have been previously uncultivated. Efforts will be documented and reviewed by Administration on an annual basis.

**SEPARATIONS AND RETENTION (PAGE 107)**

Recommendations

- ACES should examine and evaluate current separation practices to ensure the employment decisions surrounding separations are neutral on their face and have a non-discriminatory effect on employees, particularly females.

Response

- ACES will continue, through its Office of Affirmative Action to ensure employment decisions are neutral on their face and based upon legitimate non-discriminatory business, in particularly with females.

**STAFF DEVELOPMENT AND TRAINING (PAGE 109)**

Recommendations

- ACES administrators and those responsible for civil rights and EEO training should increase civil rights training to ensure that all levels of Extension, including field staff are routinely trained In all elements of civil rights, ADA, and EEO laws and regulations.
- ACES should also examine the delivery of civil rights and EEO training periodically.

Response

- In-Service training will be increased for all of ACES employees who are responsible for civil rights through a variety of formats, including interactive face-to-face meetings, online workshops, and webinars on an annual basis.

**STAFF DEVELOPMENT AND TRAINING (PAGE 110)**

Recommendations

- ACES administrators and those responsible for civil rights and EEO policies should ensure that all employees understand their legal rights, duties, and responsibilities as outlined in its policies.
- ACES should consider having a summary of their AAP that does not contain proprietary information, available to all employees and to the public.

Responses

- In-Service training will be available for all employees through a variety of formats, including interactive face-to-face meetings, online workshops, and webinars on regarding civil rights and EEO

policies. Documentation of employees participating in such training will be kept by the ACES Employment Manager. Training should be available by January 1, 2014.

- ACES continues to post its annual AAP online at [http://division.uaex.edu/policy\\_management/pmgs\\_09P1.pdf](http://division.uaex.edu/policy_management/pmgs_09P1.pdf)

#### **EXTENSION EMPLOYMENT COMPLAINTS AND COUNSELING (111)**

##### Recommendations

- UACES should conduct civil rights and EEO training throughout Extension to include county, field, and area offices to ensure that training is implemented consistently throughout Extension.

##### Responses

- In-Service training will be available for all employees through a variety of formats, including interactive face-to-face meetings, online workshops, and webinars on regarding civil rights and EEO policies. Documentation of employees participating in such training will be kept by the ACES Employment Manager. Training should be available by January 1, 2014.
- ACES personnel will be able to demonstrate a working knowledge of all civil rights and EEO policies and procedures.

## Attendance Record/Sign-In Sheets

Name of Activity/Event: \_\_\_\_\_

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Conducted by: \_\_\_\_\_

	Name	Mailing Address	Location		*Ethnicity (Please Check One)		* Race (Please Check One)						* Gender	
			County		Hispanic/ Latino	Non- Hispanic/Latino	White	Black	Hawaiian/ Pacific Islander	American Indian / Alaskan Native	Asian	Two or More Races	Female	Male
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***\* This information is requested solely for the purpose of determining compliance with federal civil rights law, and your response will not affect your eligibility to participate in Extension programs. By providing this information, you will assist us in assuring that this program is administered in a nondiscriminatory manner.***

The Arkansas Cooperative Extension Service offers its programs to all eligible persons regardless of race, color, national origin, religion, gender, disability, marital or veteran status, or any other legally protected status, and is an Affirmative Action/Equal Opportunity Employer.

## Attendance Record/Sign-In Sheets

Name of Activity/Event: \_\_\_\_\_

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Conducted by: \_\_\_\_\_

	Name	E-Mail Address	Location		* Ethnicity (Please Check One)		* Race (Please Check One)						* Gender	
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**\* This information is requested solely for the purpose of determining compliance with federal civil rights law, and your response will not affect your eligibility to participate in Extension programs. By providing this information, you will assist us in assuring that this program is administered in a nondiscriminatory manner.**

# YOUTH ATTENDANCE RECORD/SIGN-IN SHEETS

Name of Program/Event: \_\_\_\_\_

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Conducted by: \_\_\_\_\_

	Youth Name	Age	Grade	*Ethnicity (Please Check One)		* Race (Please Check One)						* Gender	
				Hispanic/ Latino	Non- Hispanic/Latino	White	Black	Hawaiian/ Pacific Islander	American Indian / Alaskan Native	Asian	Two or More Races	Female	Male
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													

**\* This information is requested solely for the purpose of determining compliance with federal civil rights law, and your response will not affect your eligibility to participate in Extension programs. By providing this information, you will assist us in assuring that this program is administered in a nondiscriminatory manner.**



## Observer-Collected Contacts Log

This form is to document demographic information of program participants when circumstances do not allow for self-reporting by clientele.

Program Event: \_\_\_\_\_

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Conducted by: \_\_\_\_\_

		Race or Ethnicity				
Gender	American Indian/ Alaskan Native	Asian	Black/ African American	Hispanic or Latino	Native Hawaiian/ Pacific Islander	White
Female						
Male						

**American Indian or Alaskan Native:** A person having origins in any of the original peoples of North America, and maintains cultural identification through tribal affiliations or community recognition

**Asian:** A person having origin in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**Black or African American:** A person having origins in any of the black racial groups of Africa.

**Hispanic or Latino:** A person of Mexico, Puerto Rican, Cuban, Central or South America, or other Spanish Culture or origin, regardless of race.

**Native Hawaiian:** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**White:** - A person having origins in any of the original people of Europe, North Africa, or the Middle East.

## AIMS DIRECT INDIVIDUAL CONTACT DATA

AFFACT-09

**Type of Contact:** O = Office, S = Site,

**Race:** W = White, B = Black, Asian = Asian, AI/ALN = Amer Indian/Alaska Native, H/PI = Hawaiian/Pacific Islander, 2 More/Other = 2 or More Mixed Races/Other Race

**Ethnicity:** Hisp = Hispanic/Latino

CONTACT NAME & NOTES	DATE	TIME (mins)	TYPE OF CONTACT (Circle one)	ETHNICITY	RACE (Circle one)	SEX (Circle one)	PROGRAM NAME
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/AL N Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/AL N Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/AL N Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/AL N Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/AL N Asian H/PI	M F	
			O S	Hisp	W B 2 More AI/ALN Asian H/PI	M F	

County: Arkansas

Program: AG-Comm.

### PROGRAM COMPLIANCE\* CALCULATOR

	Ethnic Group	Race						Gender	
	Hispanic/ Latino (of any race)	American Indian or Alaska Native	Asian	Black or African American	Hawaiian or Pacific Islander	White	Two or More Races	Total Data by Gender	
								F	M
Potential Audience (%)									
AIMS #'s									
Contact Numbers Needed To Be in Compliance	0	0	0	0	0	0	0	0	0
Actual Contact %	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Contact % Needed	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
In Compliance?	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

\*An Extension program is in parity when the participation of individuals of the underrepresented group reflects the proportionate representation in the population of the potential audience. **A program will be in compliance when its participation has reached 80% of parity.**







## Volunteers

Year: 2013

	Master Gardeners					4-H Volunteers			
White									
Black									
Hawaiian/Pacific Islander									
American Indian/Alaskan Native									
Asian									
Two or More Races									
Hispanic									
Total	0	0	0	0	0	0	0	0	0
Male									
Female									
Total	0	0	0	0	0	0	0	0	0

County Arkansas  
 Program Year 2013

**List of all 4-H and EH Clubs and Certification of All Reasonable Efforts**

(1)	(2)	(3) Racial/Ethnic Composition Club/Unit					(4) Racial/Ethnic Composition of Membership Area					(5)	(6)	(7)	(8)
Club or Unit Name (List all Clubs in the County)	Type	White	Black	Other	Total # Members	# Minority/ Undreprsnted	White	Black	Other	Total	% of Minorities in Area	# of Contacts Required	Personal Contacts	Direct Mail Contacts	Mass Media Releases
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
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					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					
					0	0				0					

The above list of is an accurate summary of the clubs and members of each club in the county. I hereby certify that if "all reasonable efforts" were needed to achieve balanced membership in any club, such efforts have been made and are documented in the county's civil rights files.

County Staff Chair: \_\_\_\_\_

Date: \_\_\_\_\_



# Civil Rights

## C.E.S.P. 2-3: Notification to Groups of Nondiscrimination

**Date Revised:** 7-27-2014

**Supersedes:** 11-11-2004

**Summary:** Establishes policy requiring annual notification to organizations of Extension's policy of nondiscrimination and documentation of nondiscrimination status of organizations and groups requesting Extension assistance.

U.S.D.A. regulations issued pursuant to Title VI of the Civil Rights Act of 1964 require that Extension can provide assistance only to those organizations that do not exclude any person from membership or participation in any activities of the organization or subject any person to discrimination because of race, color, or national origin. Pursuant to Title IX of the Education Amendments of 1972, Extension cannot provide significant assistance to organizations that exclude any person from membership or participation on the basis of sex. Section 504 of the Rehabilitation Act of 1973 prohibits significant assistance to organizations that exclude persons from membership or participation on the basis of disability. Pursuant to the Age Discrimination Act of 1975, Extension cannot provide assistance to organizations which illegally exclude persons from membership or participation on the basis of age. The Extension faculty members involved are responsible for assuring that an organization or group is nondiscriminatory in these areas before rendering Extension assistance. Such assurances must be documented.

All county extension offices are required to maintain in the county civil rights file the annual notification to all organizations worked with concerning Extension policy relating to discriminatory practices. When state Extension faculty members assist an organization or group at the request of an area or county Extension faculty member, the responsibility for assuring nondiscrimination rests with the requesting faculty member. When a state Extension faculty member works directly with an organization or group, the responsibility for assuring nondiscrimination rests with the faculty members involved.

All organizations and groups with which Extension works regularly on a continuing basis (except governmental agencies) are to be notified annually concerning regulations related to nondiscriminatory practices that are conditional to Extension assistance. Organizations receiving this letter of notification might include:

- Garden Clubs
- Farm Organizations
- Commodity Organizations or Groups
- Chambers of Commerce
- Fair Organizations
- Others as Appropriate

See suggested letters for use by state and county faculty members listed below:

[State](#)  
[County](#)

Often, the requirements of the annual notification are confused with the requirements of the Public Notification Plan. (See [C.E.S.P. 2-4.](#)) For example, it is not necessary to send the annual notification letter to a grass roots organization unless the Extension Service is also working with the grass roots organization on a continuing basis in one or more of the program areas. The grass roots organizations should be notified of new programs and program changes on an as needed basis, which might be several times a year or less than once a year.

Before rendering assistance to any organization or group, it is the responsibility of the county Extension agent to determine that the organization or group is nondiscriminatory. The agent must document this determination and maintain this documentation in the county files for a period of three years.

**Forms:**

[A.F.F.A.C.T. - 03:](#) Determination of Nondiscrimination Status Organizations and Groups

# Civil Rights

## C.E.S.P. 2-6: Membership Areas for EHC and 4-H Units

**Date Revised: 7-27-2014**

**Supersedes: 5-3-2002**

**Summary: Establishes policy for designation of geographic membership areas for Extension Homemakers Clubs (E.H.C.) and 4-H units.**

Federal regulations require preparation of maps identifying geographic areas in the county to be used as a base in planning and implementing Extension programs in Family, Youth and 4-H Education work. Maps should be updated regularly. New maps should be prepared when needed.

Areas defined on the maps must include each E.H. Club and 4-H unit membership boundary. In interracial membership areas, the racial composition must be determined in order to document that either (1) membership in the E.H. Club or 4-H unit reflects the racial composition of the membership area or that (2) "all reasonable efforts" have been made to achieve integration.

Geographic areas determined for legal purposes should be designated on the county map even though those areas are usually larger than are practical for use as 4-H / E.H.C. membership boundaries. Where census data (by race) is available, these geographic areas may be:

1. U.S. census areas such as townships or census tracts
2. Election districts
3. School districts
4. Justice of the Peace districts (county)
5. Alderman districts (city)
6. Community service areas

The advantage of designating these areas is that official data is provided which:

Defines areas where the population is of one race and therefore 4-H / E.H.C. membership in these areas does not require "all reasonable efforts."

Defines areas where the population is interracial and indicates the racial profile of the areas. (The racial profile of a 4-H / E.H.C. membership area within a census area must be determined for "all reasonable efforts" compliance.)

Reflects changes in population and race which provide a guide to major shifts in Extension programs.

Although population data by race may seldom be available based on natural boundaries, these boundaries are sometimes important in determining a 4-H / E.H.C. membership boundary and should be considered. With modern means of transportation, caution should be used to avoid

discrimination by using natural boundaries to determine membership areas. A road, highway, or railroad track, for example, is not a barrier to commuting to a meeting place. A long stretch of river without a bridge or a mountain range, for example, could be a barrier to travel to a particular meeting place.

The 4-H / E.H.C. membership areas should be based on distance, population density, and interest in 4-H / E.H.C. When practical, the membership area should include the residences of most of the present members of the club. Careful consideration should be given to potential and future members who reside within a reasonable distance from the meeting place.

Although membership areas may be changed, they should be drawn so that there are logical reasons to believe the areas to be semi-permanent. Boundaries should never be drawn to separate membership areas for the purpose of giving special advantage to groups based on race, color, national origin, or gender.

An 4-H / E.H.C. membership area may be as small as an apartment building, one floor, or the wing of one floor of a housing unit, or it may cover several square miles. Membership areas may include all or any part of the areas where official population data by race is available. If official population data by race is not available, Extension personnel are responsible for determining the data. Sources include, but are not limited to, city or county officials, mail carriers, school bus drivers, local residents, and other individuals knowledgeable of a given area.

Members may not be restricted from moving across membership area boundaries to be a member of an E.H. Club or 4-H unit of their choosing. A "mass" movement of E.H.C. or 4-H members from one area to another to avoid integration could result in Extension assistance being withdrawn from the club.

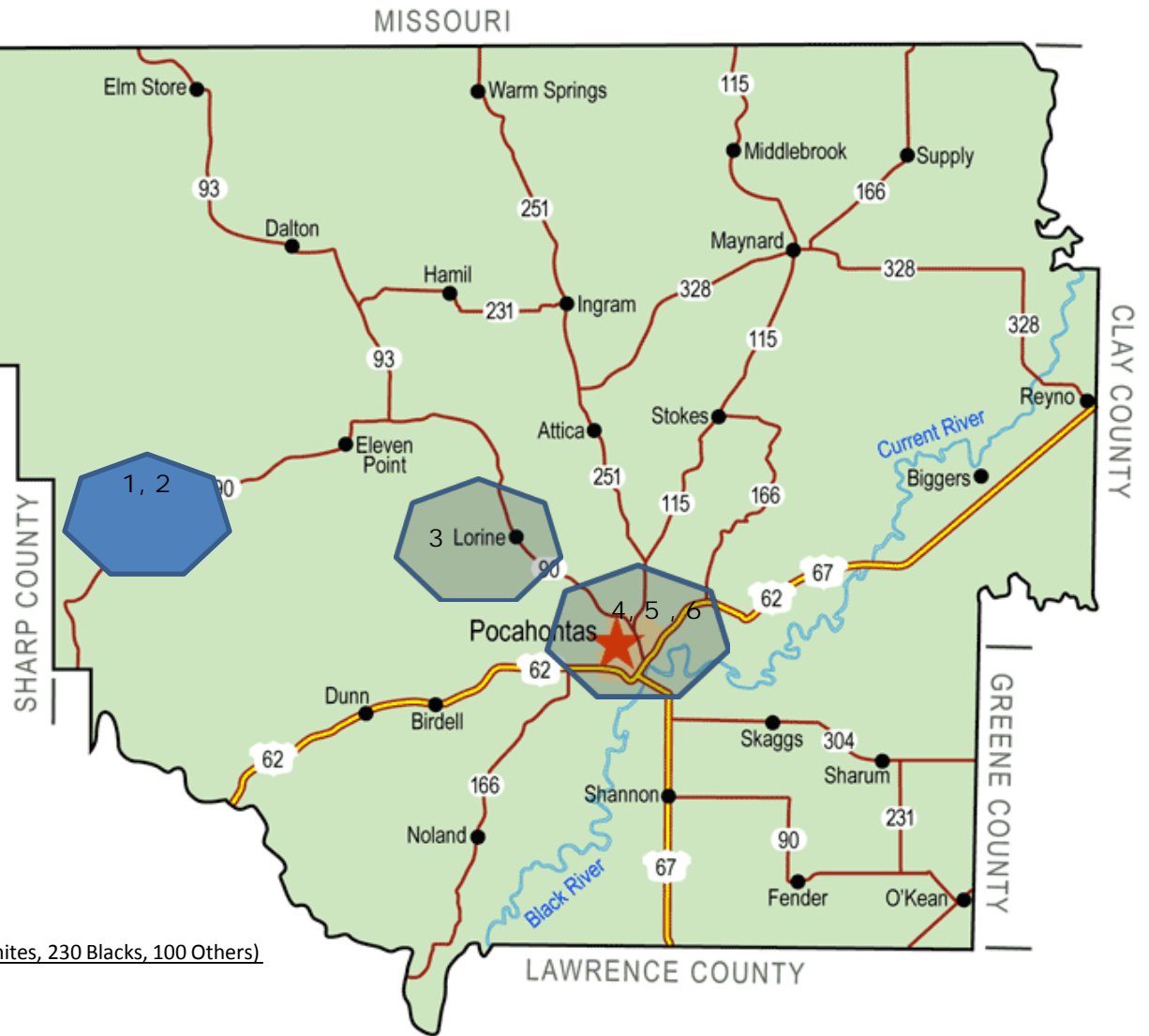
Potential membership areas should be identified on the maps in order to provide a basis for efforts in forming new clubs.

When the membership of a club is drawn from throughout the county and there is no residential pattern, a club may be designated as county-wide. In larger metropolitan areas it may be more practical to have more than one club serving an entire city or a region within a city. With the approval of the district director, clubs may be treated as city-wide or regional in nature. If it is not practical to show these clubs/units on the map, information on them should be attached to the map.

Separate maps are to be prepared for 4-H and E.H.C. membership areas using the map coding instructions below.

# RANDOLPH COUNTY

★ = County Seat



All 4-H Clubs are County-Wide (Membership area = 1200 Whites, 230 Blacks, 100 Others)

1. Hickory 4-H Club = 10 White, 2 Black, 1 Other
2. Mesquite 4- H Club = 5 White
3. Applewood 4- H Club = 6, White, 1 Black
4. 4-H Shooting Sports = 16 White
5. 4-H Lighthouse Club = 12 White, 4 Black
6. 4-H Livestock Club = 15, White, 3 Black, 2 Other

2014 4-H Club Map

## Sample Letter – County

Name of Appropriate Officer  
Name of Organization  
Street or Post Office Box  
Town, Arkansas

Dear \_\_\_\_\_:

The University of Arkansas Cooperative Extension Service provides many educational services to this county. Information provided is based primarily on research from our own University of Arkansas as well as other land-grant universities and the U.S. Department of Agriculture. Continuous effort is being made to expand these educational benefits in this state. Our present major program emphases are in the broad area of:

1. Agriculture (crops, livestock, poultry, etc.)
2. Home economics (food, clothing, housing, etc.)
3. Youth (4-H work, projects and activities, etc.)
4. Community development (working with local leaders on programs for greater use of resources.)

The Cooperative Extension Service is required to comply with civil rights laws and regulations, including the following: Title VI, Civil Rights Act of 1964; Title IX, Education Amendments of 1972; Section 504, Rehabilitation Act of 1973; Age Discrimination Act of 1975; Americans with Disabilities Act of 1990 and Executive Order 11246. Extension cannot provide assistance to any organization that illegally excludes persons from membership or participation in any activities of the organization or subjects any person to discrimination because of their race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status legally protected class. If you have any questions about how civil rights regulations affect the assistance that can be rendered by the Cooperative Extension Service to organizations, we will be glad to assist you in any way possible.

We appreciate your cooperation and will continue to solicit your support and suggestions as to how we can work more effectively with individuals, groups, and organizations to make our state a better place to live.

Sincerely,

County Extension Agent - Staff Chair