

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 Criteria⁷ 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 counties 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

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.