

Delaware Cooperative Extension
Policy Handbook
For Civil Rights Compliance
For Extension Programs



Revised March 2010

**Delaware Cooperative Extension
Policy Handbook for Civil Rights Compliance
Extension Programs
Table of Contents**

Introduction	2
Purpose and Relevant Legislation	2
Commitment to Civil Rights	2
Policy 1. Extension personnel will have knowledge of laws, rules, and regulations and have appropriate staff training	4
Policy 2. Extension employee assignments will encourage working with diverse populations.	5
Policy 3. Internal and external search, program, and advisory committees and other relevant committees will be representative of the populations served	5
Policy 4. The procedure for processing program and employment discrimination complaints	6
Policy 5. A statewide Civil Rights Policy Handbook is developed, maintained and evaluated.	7
Policy 6. Programs will be accessible for the disabled	8
Policy 7. Program compliance data will be kept at the county and state levels by program area	9
Policy 8. Extension program participation data will be recorded and evaluated to determine all reasonable efforts	10
Policy 9. Strategies will be used to notify the public of non-discrimination policies	11
Policy 10. Extension created mailing lists (Electronic and Non-Electronic) will be maintained and reviewed to ensure diversity	12
Policy 11. Cooperative Extension will use all reasonable efforts to follow the federal guidelines of non- discrimination on the Basis of Sex (Title IX)	12
Policy 12: Periodic internal compliance reviews will be conducted	13
Policy 13. Cooperative Extension programs will use all reasonable efforts to accommodate limited English proficiency (LEP) participants	13
Policy 14. Coordination and interaction of 1862 and other Minority Land-Grant Institutions will be planned and implemented	14
 Appendices	
Appendix A: Federal Acts in Brief	15
Appendix B - Summary Complaint Procedures	18
Appendix C – ADA Program Accessibility Self Assessment Form	20
Appendix D - Compliance Forms and Directions	21
Appendix E – Participation Reporting	25
Appendix F - Official Non-Discrimination Clause	28
Appendix G - Mail Policies	29
Appendix H –Internal Review Form	30
Appendix I: Suggested Affirmative Action Activities for Extension Personnel	32
Appendix J – New Employee Acknowledgement of Receipt/Understanding	34

Delaware Cooperative Extension Policy Handbook for Civil Rights Compliance For Extension Programs

Introduction

The U.S. Department of Agriculture, the National Institute of Food and Agriculture (NIFA) 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.

Purpose and Relevant Legislation

The USDA Civil Rights regulations require NIFA to determine whether recipient institutions comply with the nondiscrimination and equal opportunity provisions contained therein. To implement these provisions, State Extension services and USDA are required to carry out regular compliance review inspections designed to measure the overall status of compliance of Extension recipients. The reviews will focus on those aspects that are covered by the Federal statutes prohibiting discrimination based on race, color, national origin, sex, age, and disability.

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

- Title VI of the Civil Rights Act of 1964,
- Section 504 of the Rehabilitation Act of 1973,
- Americans with Disabilities Act of 1990,
- Age Discrimination Act of 1975,
- Title IX of the Education Amendments of 1972,
- 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.

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.

Commitment to Civil Rights

Cooperative Extension is committed to the realization of the spirit and letter of federal and state civil rights law and regulations. The Civil Rights Act of 1964 and subsequent legislation prohibits discrimination based on race, color, religion, national origin, gender, age, or disability.

The kinds of discrimination prohibited by Delaware Cooperative Extension policy are those that occur on the basis of race, sex, religion, age, color, creed, national or ethnic origin; physical, mental or sensory disability; marital status, sexual orientation and status as a Vietnam-era or disabled veteran.

The Smith-Lever Act and subsequent amendments dictate that Cooperative Extension programs be designed to serve all the people. This includes all socio-economic classes as well as the protected classes identified in civil rights laws and regulations.

This document outlines the policies and procedures Delaware Cooperative Extension will follow in order to fulfill the intent and requirements of civil rights laws and regulations. The policies that follow provide for the guidelines and support that notion that all paid and volunteer employees are expected to:

- Avoid discriminatory exclusion in both the workforce and program participation.
- Re-mediate situations in which there is under-utilization or under-representation resulting from prior discrimination.

In general, to fulfill these expectations, all paid and volunteer employees are expected to make all reasonable efforts to encourage people from underrepresented groups to seek employment in Cooperative Extension and to participate in programs. All reasonable efforts include:

- Creating awareness (e.g. notification of opportunity by direct contact, mailings and mass media),
- Assuring access (e.g. appropriate selection of time and location for events; preventing inappropriate pre-employment inquiries),
- Providing utility (e.g. offering programs of interest to the targeted audience; using only bona fide occupational qualifications to evaluate candidates).

This document is organized by areas of knowledge as outlined by Civil Rights Review Guide for Extension programs as developed by USDA. Each area addresses a different theme that will need to be addressed, planned for and evaluated for effectiveness. For each policy area the theme is identified, the rationale is given, the procedures to ensure compliance are provided and subsequent appendixes are identified that provide additional resources.

The areas are as follows:

- 1: Knowledge of Laws, Rules, and Regulations and Staff Training
2. Extension Staff Member Assignments
3. Advisory Committees, Boards and Other Relevant Committees
4. Procedure for Processing Program and Employment Discrimination Complaints
5. Statewide Equal Opportunity/ Diversity Plan
6. Accessibility for the Disabled
7. Program Areas (State and Local)
8. Extension Program Participation Data
9. Public Notification
10. Mailing Lists (Electronic and Non-Electronic)
11. Title IX Non- Discrimination On the Basis of Sex
- 12: Internal Compliance Reviews
13. Limited English Proficiency (LEP)
14. Ongoing Administration of Programs and Interaction of 1862 and Other Minority Land-Grant Institutions

All personnel are expected to read and understand the content of this handbook. A summary of activities that front line Extension employees can use to ensure compliance is listed in Appendix I: Suggested Affirmative Action Activities for Extension Personnel. It is expected that all Extension employees have the knowledge and commitment to comply with the federal laws and regulations as well as the Extension and University policies under which we work.

Policy 1. Extension personnel will have knowledge of laws, rules, and regulations and have appropriate staff training

Rationale: It is expected that the organizational structure, functions and policies of Extension be in place to support meeting the needs of diverse clientele. To that end, it is expected that there is a diverse workforce with skills, knowledge, and ability to carry out those duties assigned for Extension programs and that they understand and implement activities that support equal opportunity requirements.

Procedures to ensure compliance:	Who's responsible
Hiring of staff will follow University Affirmative Action guidelines and search committees will be diverse. Policies can be found at: http://www.udel.edu/ExecVP/policies/personnel/index.html	HR Liaison, University Administration and search committee chairs
The University of Delaware Office of Equity and Inclusion and the Office of Disability Support Services will provide up to date personnel policies and procedures for complaints.	University Administration
Extension personnel will follow University policy when handling issues. Information can be found at: http://www.udel.edu/oei/affactn.html	Employees
The Extension administration will support, encourage and provide staff member's participation in equal opportunity/diversity training.	Extension Director and Civil Rights Administrator
Periodic meetings at the county and state levels will reflect discussions regarding civil rights compliance and civil rights planning. These will be reflected in meeting minutes	Civil Rights Administrator and County Director/Supervisor
The document outlining the federal acts under which Cooperative Extension programs will be updated periodically as laws change. As the document changes, the New Employee Handbook will be updated, the website will be updated and all staff will receive a copy of the changes. See Appendix A: Federal Acts in Brief	Civil Rights Administrator and County Director/Supervisor
New Employee Handbook will include employment and program related equal opportunity requirements and strategies for compliance. This handbook will be made available to each county office and to other Extension supervisors. Upon hiring of new staff: Supervisors are responsible for sharing this document with new employees New personnel will sign a document attesting to reading and understanding the requirements. Appendix J – New Employee New Employee Acknowledgement of Receipt/Understanding	Extension Director/ Civil Rights Administrator Supervisor Employee
Performance reviews will consider employee's accountability to implementing equal opportunity requirements in Extension programs.	Supervisor
Staff will be knowledgeable about and understand how to implement program strategies that will be in compliance with the EEO/AA laws and regulations	Employees

Policy 2. Extension employee assignments will encourage working with our diverse populations.

Rationale: In order to promote a diverse and open workforce, employee assignments must not limit them to working exclusively with customers or employees of their own race.

Procedures to ensure compliance:	Who's Responsible
Position descriptions will not limit personnel to working in subject matter or geographical areas which tend to maintain a strict racial identity between the employees and minority customers. University policy will be followed in the development of position descriptions. See additional information at: http://www.udel.edu/ExecVP/policies/personnel/index.html	HR Liaison, Program Leaders, Supervisors
Staff meetings are open to all county employees regardless of work assignments.	County Directors/ Supervisors
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 clientele.	Supervisors
Employees are expected to identify needs, and develop programs that are open to all citizens.	Employees
Participation reports will be kept to report efforts and clientele reached.	Employees

Policy 3. Internal and external search, program, and advisory committees and other relevant committees will be representative of the populations served.

Rationale: In order to create and implement programs that support the diverse nature of our communities, members of internal and external advisory boards, program committees and search committees must be diverse, and/or are representative of the population of the county in relation to geographic areas being served.

Procedures to ensure compliance:	Who's Responsible
As internal and external committees and boards are developed, staff will take steps to ensure membership is diverse with respect to ethnicity, race, age, gender, disability and geographic location.	Employees, Supervisors
Appointment of committee and advisory boards will ensure diversity. All reasonable efforts should be used to identify membership based on programmatic, community or county demographics.	Employees, Supervisors
Where bylaws are used, bylaws will include clauses that support affirmative action requirements and diverse audience participation.	Employees
Documentation regarding the selection process of advisory councils/boards will be kept by employees in charge of committees. Copies will be kept in employee program files and county affirmative action file	Employees

Policy 4. The procedure for processing program and employment discrimination complaints will be followed.

Rationale: In order to ensure fair treatment of employees and clientele, procedures are to be followed to handle complaints with respect to discrimination.

Procedures to ensure compliance:	Who's Responsible
Professional job descriptions and promotion documentation will be posted on the website	HR Liaison and Civil Rights Administrator
Employment complaint procedures are available to all staff	Civil Rights Administrator and HR Liaison
Program complaint procedures are available to volunteers, clientele and to the public. Procedures will be posted on the website. See Appendix B – Summary Complaint Procedures.	Civil Rights Administrator and Program Administrators Employees
Staff members and volunteers have received training in program complaint procedures, understand the complaint process and issues of compliance and noncompliance and understand the bases on which program discrimination is prohibited in Extension programs.	Supervisors/Program Managers
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.	Unit Heads/County Directors For off site locations- Employees
Documentation of the training of staff and volunteers is kept in the county "civil rights compliance" file.	Civil Rights Administrator, County Director
Documentation of complaints is kept in the county "documented complaints file" and at the state level by Civil Rights Administrator.	Employee, County Director, Civil Rights Administrator
Documentation of complaints is to be shared between the Civil Rights Administrator and the Office of Equity and Inclusion. See Appendix B for complaint procedures.	Civil Rights Administrator and Office of Equity and Inclusion staff
<p>University processes for filing program or employment related complaints will be followed.</p> <p>The Office of Equity and Inclusion (Program and Employment Related) has developed the procedures for program and employment complaints to ensure fair treatment where discrimination is alleged. These procedures can be found at: http://www.udel.edu/oei/affactn.html</p> <p>Program complaints can also be filed with USDA, Office of the Assistant Secretary for Civil Rights. Complaint procedures and more information can be found at: http://www.ascr.usda.gov/complaint_filing_program.html</p> <p>U.S. Department of Agriculture Director, Office of Adjudication and Compliance, 400 Independence Avenue, SW, Washington, DC 20250-9410</p>	Employees

<p>The University Administration, Human Resources Department and Labor Relations Department have established processes for employment related complaints regarding harassment, discrimination or other employment related issues. The University policies that outline steps to be taken can be found at: http://www.udel.edu/oei/affactn.html and at http://www.udel.edu/ExecVP/policies/personnel/index.html</p>	
<p>Employees will know and understand the process for assisting clientele in making both informal and formal complaints.</p>	<p>Employees</p>

Policy 5. A statewide Civil Rights Policy Handbook is developed, maintained and evaluated.

Rationale: A state civil rights plan ensures that all employees and the organization are working under the intent to maintain compliance with equal opportunity non-discrimination rules and regulations applicable to Extension programs. The state plan is in place to ensure that educational benefits are provided to a diverse audience of the State on a nondiscriminatory basis and that a diverse workforce supports Extension educational efforts.

Procedures to ensure compliance:	Who's Responsible:
<p>The civil rights officer in cooperation with state leadership will annually review the state Civil Rights Policy Handbook. Updates will be made as necessary.</p>	<p>Civil Rights Administrator, Program Leaders and Extension Director</p>
<p>Specific civil rights plan of work goals will be set by program areas as determined by internal audit data and/or federal audit reports.</p>	<p>Civil Rights Administrator, Program Leaders and Extension Director</p>
<p>The civil rights officer will conduct internal audits on a rotating basis of one county per year to ensure the civil rights plan in implemented.</p>	<p>Civil Rights Administrator</p>
<p>County directors will ensure new hires read and understand affirmative action requirements and civil rights plan of work.</p>	<p>County Directors/ Supervisor</p>
<p>Performance reviews will take into consideration an employee's performance in following the civil rights policies and procedures. This will include review of participation report data.</p>	<p>County Director/ Supervisor</p>
<p>Employees will know and understand the civil rights plan of work and the contents of this handbook.</p>	<p>Employees</p>

Policy 6. Programs will be accessible for the disabled

Rationale: To provide a welcoming and accessible environment, work facilities and programs must accessible to disabled employees, volunteers, customers, clients, and visitors.

Procedures to ensure compliance:	Who’s Responsible:
University owned facilities will meet the University requirements concerning the Americans with Disabilities Act and accessibility.	University Administration
A periodic assessment of programs and work facilities with respect to accessibility of programs to disabled people will be conducted to ensure that no discrimination is occurring and all reasonable efforts are implemented to reduce barriers to program participation, facilities and equipment resources.	Civil Rights Administrator and County Director
All reasonable efforts will be made to hold off site programming in facilities that comply with ADA standards for accessibility.	Employees
Unit administrators and supervisors will ensure that there is equality, fairness and respect in the use of Extension work facilities, including support for disabled educators, paraprofessionals, secretarial and support staff in the dissemination and use of office equipment and office space.	Supervisors and County Directors
The ADA Program Accessibility Self Assessment Form will be reviewed and updated every 3 years as needed. See Appendix C – ADA Program Accessibility Self Assessment Form	Civil Rights Administrator
The ADA Program Accessibility Self Assessment Form will be used by employees to determine if programming locations will meet needs of individuals with disabilities. See Appendix C – ADA Program Accessibility Self Assessment Form	Employees
<p>All brochures and informational flyers promoting programs will provide accessibility instructions for people with special needs. All reasonable efforts will be implemented to meet the accessibility requests. Sample Language to be used in marketing materials:</p> <p>“All reasonable efforts will be used to meet the accessibility requests. Please contact the office two weeks prior to event to request assistance.”</p> <p>OR</p> <p>“If you have special needs that need to be accommodated, please contact the office two weeks prior to the event.”</p>	Employees
To assist with the accommodations, the University Office of Disability Support Services can be contacted to arrange for assistance. Call 831-4643	Employees

Policy 7. Program compliance data will be kept at the county and state levels by program area.

Rationale: To ensure that Extension education benefits are provided to the citizens of the State on a nondiscriminatory basis and that all reasonable efforts are carried out to ensure equal access and integration, program areas will be evaluated for compliance.

Procedures to ensure compliance:	Who's Responsible
Extension personnel and the organization will be able to determine participation data by individual and by program area.	Civil Rights Administrator
The Civil Rights Administrator will review every three years the Non-Discrimination Compliance Forms. See Appendix D for Compliance Forms and Directions.	Civil Rights Administrator
During the performance review process supervisors will evaluate the employee's programs and participation data with respect to compliance of the policies and procedures set forth in this document	Supervisors
Extension personnel will have on file compliance forms for organization with which ongoing educational programs are conducted to ensure their commitment to affirmative action compliance.	Employees
To any group, which cannot or will not provide assurance of compliance, Cooperative Extension personnel may only provide a presentation that describes Cooperative Extension programs including an articulation of the requirement for compliance or be present to receive acknowledgement or contributions.	Employees
<p>For all clubs or specialty groups for all program areas:</p> <p>Club officers and volunteer leaders receive written guidelines on civil rights and equal opportunity requirements.</p> <p>Volunteers affirm and note an assurance statement of nondiscrimination using the compliance forms annually.</p> <p>Where program delivery methods is by club, extension personnel will train club leaders about responsibilities regarding:</p> <ol style="list-style-type: none"> Public notification regarding existence of the club, dates, time, and location of organizational meetings. Inviting all potential members without regard to race, ethnicity, or gender. The value of diversity and the expectations for equal opportunity requirements. Equal opportunity and accessibility requirements with respect to any setting where clubs meet The membership of all clubs operating in interracial and non-interracial communities is open to all individuals regardless of race and gender 	<p>Program Managers for</p> <p>4-H Clubs</p> <p>FCE club</p> <p>Master Gardener</p> <p>Master Foods Educators</p> <p>Other clubs/Extension program groups</p>
Extension personnel will keep records documenting public notification efforts for outreach and marketing efforts by program.	Employees

Extension personnel will keep records regarding committees and advisory boards specific to their programs including data regarding how the members are selected and membership data that include race, ethnicity, gender, geographic location. It is expected that committees and advisory councils will be diverse by race, ethnicity, gender, and geographic location.	Employees
Extension personnel will have in place procedures to mainstream participants into other Extension programs to ensure inclusion.	Employees, Program Leaders/

Policy 8. Extension program participation data will be recorded and evaluated to determine all reasonable efforts.

Rationale: To document all reasonable efforts and program participation, the Extension system will have in place a data collection system that documents program participant’s information regarding race, ethnicity, gender and disability.

Procedures to ensure compliance:	Who’s Responsible
A data collection system will be in place to collect data on race, ethnicity, gender, age and disability. See Appendix E – Participation Reporting	Civil Rights Administrator and Extension Director
Program areas will be responsible for maintaining data regarding eligible populations for program participation. This data will be used to better understand how to design and implement inclusive programs. On-line data sources will be bookmarked in central location for personnel use.	Program Administrators/ Supervisors/Employees depending on program and activities
Extension personnel will document program participation data and submit information on a monthly basis.	Employees
Supervisors will review personnel compliance with data submission as part of annual review.	Supervisors

Policy 9. Strategies will be used to notify the public of non-discrimination policies.

Rationale: To ensure that the public is aware of Cooperative Extension programs and that these programs are open to all regardless of age, race, ethnicity, gender and location geographic residence, the extension system will use strategies to notify the public.

Procedures to ensure compliance:	Who's Responsible
A web page will be maintained at the state level outlining Cooperative Extension's policies regarding public notification and the procedures by which the public can access extension programs, request assistance or make complaints regarding access.	Extension Director/ Civil Rights Administrator
The '...And Justice for All' poster must be displayed and easily visible in each area of the Extension facility where the public visits.	County Director/Unit Head
A media list including media outlets that reach minority, elderly, disabled and limited English speakers will be maintained at the county and state level.	Employees, County Directors/ Unit Head, Ag Comm. Office
Extension employees will include the non-discrimination statement in news releases. For best results, the statement will be included in the body of the text rather than as a separate paragraph at the end.	Employees, Ag Communications Office
Artwork and other graphics should be representative of the diversity of constituency groups. Representations should not make assumptions about the economic status or subject matter interests of any particular group.	Employees
The Extension logo and nondiscrimination statement will be used on all Extension printed and web based publications, including bulletins, leaflets, press releases, circulars fact sheets, program announcements, and miscellaneous publications. See Appendix F - Official Non-Discrimination Clause	Employees
Notification informing the public of assistance for the disabled will be included in program announcements and registration materials. See Policy 6 of this document for sample language to be used in marketing material.	Employees
Extension personnel will ensure that information about new programs and program changes will be communicated to grass roots organizations and community media including minority groups.	Employees
On an annual basis, extension personnel will inform advisory committees, club presidents, and/or organization presidents of the non-discrimination policies of Delaware Cooperative Extension.	Employees
Extension personnel will keep documentation regarding their efforts to inform organizations, the county, communities or key contact people about extension programs and our non-discrimination policies. This may include press releases, letters or documentation of a presentation made. See Appendix I: Suggested Affirmative Activities for Extension Personnel	Employees

Policy 10. Extension created mailing lists (Electronic and Non-Electronic) will be maintained and reviewed to ensure diversity.

Rationale: Information on Extension created mailing lists should provide the data necessary to show that programs are being marketed to diverse audiences. For those mailing lists that are generated based on program participation, lists should be designed in a way to show diversity.

Procedures to ensure compliance.	Who's Responsible
University guidelines on protection of sensitive data regarding mailing lists and program participation information will be followed. University of Delaware policies are found at: http://www.udel.edu/pnpi/	Employees
Mailing lists will not be shared with non-Extension agencies. If Cooperative Extension is in cooperation with other organizations or is a co-sponsor of the program and can justify using its mailing list as part of the marketing of said program, then they can be used but not shared. For more information on mailing policies and procedures see Appendix G - Mail Policies	Employees
Where possible, mailing lists will contain contact information as well as provide information regarding the individual's race, ethnicity and gender. This information will be in a format that can be reviewed by outside reviewers.	Employees
The various mailing lists held within a program or county are representative of the diversity of the population in the geographic areas being served and racial minority group members are represented on the mailing lists.	Employees
Mailing lists will be updated at least yearly or as appropriate given audiences or the origin of the mailing list.	Employees

Policy 11. Cooperative Extension will use all reasonable efforts to follow the federal guidelines of non-discrimination on the basis of sex (Title IX).

Rationale: To provide welcoming and accessible programs, environments and delivery locations to ensure the participation of gender diverse audiences.

Procedures to ensure compliance:	Who's Responsible
Civil Rights Administrator will conduct county reviews of programs for compliance with Title IX Act on an annual rotating basis.	Civil Rights Administrator
Extension personnel will ensure that programs, methods, content, and places of services are implemented in a manner that ensures nondiscrimination on the basis of sex for all participants.	Employees
Extension personnel will ensure that they do not use sex-stereotype language, and illustrations, within Extension publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.	Employees

Policy 12: Periodic internal compliance reviews will be conducted.

Rationale: To ensure compliance of civil rights policies and procedures and reinforce the knowledge base employees over time.

Procedures that will ensure compliance:	Who's Responsible
The <i>Delaware Cooperative Extension Policy Handbook for Civil Rights Compliance of Extension Programs</i> document will be reviewed every three years for compliance with federal and university policies.	Civil Rights Administrator
The Civil Rights Administrator will conduct a review of county programs on a three-year rotating basis. This review will be conducted to ensure policies and procedures outlined in the <i>Delaware Cooperative Extension Policy Handbook for Civil Rights Compliance Extension Programs</i> are being followed by personnel.	Civil Rights Administrator
The Civil Rights Administrator will keep on file the federal review policies and guidelines, the federal audit report developed and the state response to this report.	Civil Rights Administrator
The Civil Rights Administrator and county director will keep on file copies of the internal reviews and the corresponding recommendations until the next Federal audit takes place. See Appendix H –Internal Review Form	Civil Rights Administrator County Director

Policy 13. Cooperative Extension programs will use all reasonable efforts to accommodate limited English proficiency (LEP) participants.

Rationale: As LEP populations grow in our communities, Cooperative Extension programs and outreach efforts need to meet the needs of the citizens in their communities.

Procedures that ensure compliance.	Who's Responsible
A periodic assessment of extension programs will be conducted to determine the services offered to LEP audiences as compared to the eligible LEP population.	Civil Rights Administrator
Reasonable efforts will be used to provide educational workshops, person-to-person teaching, counseling, and other educational methods to reach LEP persons as determined by needs assessments and clientele inquiry. This includes use of written or oral communication when working with LEP individuals	Employees and Program Leaders
Educational materials are published in a language other than English. Copies of these are filed with the Civil Rights Administrator, county civil rights files and within personnel program files.	Employees and Program Leaders
Extension personnel will be knowledgeable about LEP populations in their program areas and geographic areas.	Employees
Extension personnel will document their efforts in working with LEP audiences. This will include numbers reached, documents developed and	Employees

marketing strategies used to engage LEP audiences. A file containing these efforts will be made available to reviewers.	
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Policy 14. Coordination and interaction of 1862 and other Minority Land-Grant Institutions will be planned and implemented.

Rationale: In order to maintain a high level of visibility for compliance with civil rights laws, rules, and regulations, persons with leadership responsibility in the civil rights area receive sufficient administrative support and direction that encourages cooperative planning and implementation of the federal guidelines.

Procedures that ensure compliance:	Who's Responsible
Administration and extension personnel will develop, coordinate, and implement a comprehensive program of Extension work between land grant and/or minority serving institutions.	Extension Directors
University and Extension leadership will maintain a forum for continued mutual consultation among top officials of the institutions.	Extension Directors
On an annual basis Extension leadership and the Civil Rights Administrator will promote planned interactions between the institutions and review areas where minority institutions are participating effectively in Extension work.	Extension Directors
Extension program leadership will document a list of committees and membership with identification of participation from 1862 and minority institutions. This information will be sent to Extension Directors and Civil Rights Administrator on a yearly basis.	Extension Director and Civil Rights Administrator
Extension program leadership will provide a listing of joint Extension programs being carried out by the respective institutions to Extension Directors and the Civil Rights Administrator on a yearly basis.	Program Leaders
The Civil Rights Administrator and Extension Directors will have on file the letters of compliance, civil rights directives from Extension Director/1890 Administrator and maintain the documentation of civil rights review coverage by Extension leadership (internal and USDA reviews).	Civil Rights Administrator and Extension Directors

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Appendix A – Federal Civil Rights Acts Under Which Cooperative Extension Operates

Hyperlinks are provided for additional detail.

[7 CFR 18: Equal Employment Opportunity in the State Cooperative Extension Services](#) – Employment Protections

Provides a cooperative procedure involving the President and Secretary to assure that the Cooperative Extension Service provides equal opportunity in employment to each individuals without regard to race, color, national origin, sex, or religion.

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

Protects individuals who are 40 years of age or older against employment discrimination based on age.

[Civil Rights Act 1964](#)

Enforces the constitutional right to vote, to confer jurisdiction upon the US district courts to provide injunctive relief against discrimination in public accommodations. It authorizes the Attorney General to institute suits to protect constitutional rights in public facilities and public education, to extend the Commission on Civil Rights, to prevent discrimination in federally assisted programs, to establish a Commission on Equal Employment Opportunity, and for other purposes.

[Title VI of the Civil Rights Act of 1964](#) – Program Participation Protections

Prohibits discrimination based on race, color, religion, sex or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any programs, services or activities receiving federal financial assistance. A person or a class of individuals may file a written complaint. A representative may also file a complaint on behalf of someone. The Department of Justice is charged with coordinating the enforcement efforts of nondiscrimination in federally assisted programs. The responsibility for enforcing Title VI rests with the federal agency that extended financial assistance. For Extension Programs contact: USDA Cooperative State Research, Education, and Extension Service (CSREES), Office of Civil Rights, Washington, DC 20250. Phone: 202-720-2700.

[Title VII of the Civil Rights Act of 1964](#) - Employment Protections

Prohibits discrimination based on race, color, religion, sex or national origin in the hiring, firing, promotion, wages, classification, employment referrals or assignment, extending or assigning the use of facilities, training, apprenticeships, fringe benefits, life insurance, pension and retirement programs and any other conditions or privileges of employment. A person may file a complaint for her/himself, for a class of individuals or by a third party on behalf of other persons. A 1978 amendment to Title VII of the 1964 Civil Rights Act, known as the Pregnancy Discrimination Act, also makes it unlawful for an employer to discriminate on the basis of sex for pregnancy, childbirth, or childbirth related matters.

[Civil Rights Act of 1991](#) – Employment Protections

Provides workers with more protection against bias and harassment; allows employees who successfully sue their employers, greater monetary damages and cost reimbursements. Additionally, the act reversed certain Supreme Court rulings concerning Affirmative Action. Explicitly prohibits quotas, except under certain consent decree provisions. Provides for compensatory damages to be awarded for pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life. Allows for jury trial if the complaining party seeks compensation. Shifts the burden of proof to the employer in Disparate Impact cases.

[Title IX of Education Amendments of 1972](#) – Employment and Program Participation Protections

Prohibits discrimination based on sex, including admissions, financial aid, rules governing behavior, access to courses and training programs, extracurricular activities, other educational programs, and employment discrimination including wages, recruitment, hiring, job classification and most fringe benefits. The regulations provide that recipients of federal funds for education must treat pregnancy, childbirth, and termination of their own behalf or on behalf of others may file a complaint. The agency responsible for enforcing this law is the Office of Civil Rights, Department of Education, Washington, DC 20201.

[Federal Equal Pay Act of 1963](#) – Employment Protections

Protects men and women who perform substantially equal work, requiring equal skill, effort and responsibility; under similar working conditions and in the same establishment; from sex based wage discrimination.

[Family & Medical Leave Act 1993](#) – Employment Protections

Allows employees who have worked for the same employer for one year to take up to 12 weeks of unpaid leave, under certain circumstances, such as the birth/adoption of a child or to care for a spouse or parent with a serious illness; exempts employers with fewer than 50 employees.

[Rehabilitation Act of 1973](#) – Employment Protections

Section 501 prohibits discrimination based on physical or mental disability in employment, upgrading, demotion or transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation and selection for training, including apprenticeship. Complaining parties may send a letter to the Office of Federal Contract Compliance Programs, Employment Standards Administration, Department of Labor, Washington, DC 20210.

Section 504 prohibits discrimination based on physical or mental disability in programs and activities receiving federal funding.

[Vietnam Era Veterans Readjustment Act of 1974](#) – Employment Protections

Prohibits discrimination against any veteran because she/he is a veteran with a disability or veteran of the Vietnam era in employment, upgrading, demotion or transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. Persons wishing to file a complaint may send a letter to the Veteran's Employment

Service of the Department of Labor through the local State Employment Office. The agency responsible for enforcing this law is the Office of Federal Contract Compliance Programs, Veteran's Employment Service, Department of Labor, Washington, DC 20210.

[The Americans with Disabilities Act of 1990](#) – Employment Protections

Prohibits employers from discriminating against any qualified employee or applicant for employment because of a physical or mental disability. In addition, it requires employers to make reasonable accommodations for qualified individuals with disabilities, unless doing so would impose undue hardship.

[The Americans with Disabilities Act Title II](#) - Program Participation Protections

Prohibits discrimination on the basis of disability by public entities.

[USDA Departmental Regulation 4330-2 - Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance From USDA](#) dated March 3, 1999.

This regulation applies to all programs and activities receiving federal financial assistance from USDA, its agencies and instrumentalities, and to the processing of all complaint and compliance review investigations pertaining to those programs and activities. It is USDA policy to ensure. no person is subject to prohibited discrimination in programs and activities funded in whole or part by USDA based on race, color, national origin, gender, religion, age, disability, and, where applicable, political beliefs, marital or familial status, income, or because of the receipt of public assistance. The policy, in part, is enforced by

- a) fairly and efficiently responding to discrimination complaints filed against recipients of federal financial assistance by USDA; and
- b) systematically evaluating whether and the extent to which recipients of Federal USDA financial assistance conduct their programs and activities in a manner consistent with applicable Federal and USDA civil rights requirements.
- c) No person shall be subjected to reprisal or harassment because he or she filed a discrimination complaint; participated in or contributed to the identification, investigation, prosecution, or resolution of civil rights violations in or by a recipient of financial assistance from USDA; or otherwise aided or supported the enforcement of federal or USDA civil rights laws, rules, regulations, or policies.

Appendix B – Complaint Procedures

Extension Program/Activity Related Complaints Having To Do With Discrimination Based On Gender, Race, Color, Or National Origin

Informal concern expressed – Extension staff would attempt to evaluate the concern and mediate the resolution of that concern and notify clientele of the procedures for filing formal complaints. Inform your supervisor.

Formal complaint – written – Extension staff receiving the concern should immediately notify the clientele of the opportunity to make a formal written complaint. After informing the clientele of the procedure, the staff member may attempt to help the clientele by discussing the nature of the complaint, actions that could be taken and then proceed to correct the action wherever possible. The staff member should notify the Director, Cooperative Extension of the possible complaint is to be filed.

NOTE: If as a result of your discussion with the clientele, they decide not to file a formal complaint, it is suggested that you document by letter to the clientele, a summary of your discussion, the corrective action to be taken or already taken concerning the complaint, and remind them of their right to file a formal complaint.

The complaint should be sent to:

- 1) University of Delaware, Office of Equity and Inclusion, 305 Hullihen Hall, University of Delaware, Newark, DE 19716. Phone: 302-831-8063

OR

The Director, Office of Civil Rights, U.S. Department of Agriculture, Office of Civil Rights, Room 326-W Whitten Building, 14th & Independence Avenue, SW, Washington, DC, 20250-9410 or call 202-720-5964 or go to: http://www.ascr.usda.gov/complaint_filing.htm

AND

- 2) A copy of the letter should be sent to the Director of Cooperative Extension, 113 Townsend Hall, University of Delaware, Newark DE 19716.

Employment Related Complaints Related To Race, Color, National Origin, Religion, And Gender

All grievances and complaints by Extension employees should try to be resolved by the employee and their supervisor. If a complainant does not feel they can present their complaint, or receive proper consideration at their immediate supervisor level, the complaint moves up the supervisory channel or goes directly to the EEO Coordinator. If there is a need to discuss the situation with an outside person, the complainant can visit with a professional in the Department of Labor Relations, Faculty and Staff Assistance Program or the Office of Equity and Inclusion.

To file a formal grievance, follow university policies and procedures.

For salaried staff: <http://www.udel.edu/ExecVP/policies/personnel/4-91.htm>

For Level 15 and below: <http://www.udel.edu/ExecVP/policies/personnel/4-85.htm>

For level 16 and up: <http://www.udel.edu/ExecVP/policies/personnel/4-86.htm>

Americans With Disabilities Act Related Complaints

Informal concern expressed – Extension staff should inform clientele that they need to visit with the County Director or Unit Head. The County Director/Unit Head attempts to gather all information, evaluate the concern and work toward a resolution of the situation.

Formal complaint – The Extension staff member receiving the complaint or witness to a complaint should notify the individual immediately that a formal complaint can be filed. After informing the clientele of the procedure, the staff member and County Director can attempt to assist the clientele by discussing the nature of the complaint, action that could be taken and proceed to correct the action wherever possible. The staff member/county director should notify the Director of Extension of the complaint to be filed and the actions taken by the county staff. A written complaint should be sent to:

- 1) Director of the Cooperative Extension Service, 113 Townsend Hall, University of Delaware, Newark, DE, 19717-1303. 302-831-2504 –
- 2) Program participants can also contact the University of Delaware Office of Disability Support Services, University of Delaware, 240 Academy St. Alison Hall Suite 119, Newark, DE 19716
Phone: (302) 831-4643 Fax: (302) 831-3261

OR

The Director, Office of Civil Rights, U.S. Department of Agriculture, Office of Civil Rights, Room 326-W Whitten Building, 14th & Independence Avenue, SW, Washington, DC, 20250-9410 or call 202-720-5964 or go to: http://www.ascr.usda.gov/complaint_filing.htm

Appendix C – ADA Program Accessibility Self Assessment Form

Facilities

Are there handicap parking spots and/or drop-off locations at the meeting facility?	Yes	No
Are entrances, corridors and rooms accessible to ADA populations?	Yes	No
Can wheelchairs maneuver in these spaces adequately?	Yes	No
Are restroom facilities accessible?	Yes	No

Do you have the equipment for meeting the needs of physically, visually or hearing-impaired participants? Have you checked it to see it really works?

Audio Amplification	Yes	No
Visual Enhancement	Yes	No
Assistance with writing (notes/test taking)	Yes	No

Educational Materials and Workshops/Presentations

Do you have a list of people who you can contact who can interpret via sign language or other means to communicate your program information during a workshop?

Do you have the ability to reformat written information into

Braille	Yes	No
Large print	Yes	No
Audiotape	Yes	No
Computer-based	Yes	No

Are your materials inclusive and portray individuals with disabilities?	Yes	No
Have you reviewed materials to ensure they are not offensive or demeaning to individuals with disabilities?	Yes	No
Do you provide alternative testing methods	Yes	No
Identified procedures to notify and evacuate individuals with disabilities during an emergency	Yes	No

Public Notification

Have you publicized your program through venues that will reach individuals with disabilities? Yes No

Appendix D – Non-Discrimination Compliance Forms And Instructions

Cooperative Extension cannot provide significant assistance to any organization that illegally discriminates. Cooperative Extension has an obligation to inform organizations about this policy of non-discrimination. County extension staff must have documentation on file about groups or organizations to which they provide significant assistance, certifying that discriminatory practices are not followed. Typically, a government agency that receives federal funding will be following the same federal guidelines and therefore would not need a compliance statement. If in doubt, get one.

- 1) Club leadership should document their efforts to inform their communities and community leaders of the non-discrimination policies of Delaware Cooperative Extension. An “All Reasonable Effort Form” follows that should be used to log information and actions taken.
- 2) All Cooperative Extension personnel and volunteers are required to obtain assurance of civil rights compliance **BEFORE** providing service to any group. This requirement is as binding for a limited or periodic provision of service as it is for a sustained relationship.

To any group, which cannot or will not provide assurance of compliance we may only:

- Provide a presentation which describes Cooperative Extension programs including an articulation of the requirement for compliance
- Be present to receive acknowledgement or contributions.

There are several ways to document that an organization is in compliance.

- a) Obtain a copy of the organization’s by-laws, which include the non-discrimination statement. This document should be confirmed every 5 years or when bylaws change.
- b) Obtain a signed statement from an officer of the group attesting to the non-discriminatory policies and practices of the group. When new officers are elected, a new letter should be obtained. The Compliance Statement form follows.
- c) Confirm in writing any oral assurances given by the group contact. Periodic re-certification is necessary. (Sample confirmation letters follow.)
- d) Obtain a membership list, which includes known minorities or identifies protected group status.

Cooperative Extension may no longer provide services to organizations if there is clear evidence that groups are discriminating, despite their by-laws or letters of compliance.

**“All Reasonable Efforts”
Record Sheet**

Please help your County Extension Educators document efforts to meet "all reasonable efforts" of making the community aware that your club is open to all, regardless of race, color, national origin, age, disability or sex.

Club _____ Individual Responding _____

Posters and Exhibits in Public Places

List places in your community that an exhibit or poster was located (Include 4-H Window Display here)

	<u>Date</u>	<u>Place (including town)</u>
(Example:)	9/10/09-10/15/09	W.B. Simpson Ele., Camden

Individual Contacts and Their Address

List individuals personally contacted to recruit into your club. May include phone call or personal visit.

<u>Name</u>	<u>Address</u>
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Compliance Form

The Cooperative Extension Service of Delaware needs confirmation from groups it regularly serves with Extension educational programs that the recipients of these programs comply with the statement of its policy in accordance with Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendment of 1972.

This policy as stated is:

“No person shall, on the grounds of race, color, national origin, handicap, age or sex, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity conducted by the Delaware Cooperative Extension Service.”

Name of Organization: _____

Address of Leader Signing Form _____

Phone Number: _____

Policy Accepted by: _____

Name of group or organization

Date: _____

Signature of leader/president

Sample Letter Of Confirmation Of Organizational Non-Discrimination Policy

EXAMPLE A:

It was a pleasure to talk with you regarding a program for **(Name of Organization)**. The Cooperative Extension program is supported by public funds and adheres to civil rights laws and regulations. You assured me that membership in your organization is open to all without regard to race, sex, religion, age, color, creed, national or ethnic origin, physical, mental or sensory disability, marital status, sexual orientation, and status as a Vietnam-era or disabled veteran. Hence, I can accept your invitation to speak to your group on **(Date)** from **(Time)** to **(Time)** at **(Location)**. My topic will be **(Topic)**.

EXAMPLE B:

This letter confirms our discussion on **(Date)**, about **(Name of Organization)** of which you are **(Office)**. You indicated that your organization maintains a policy of non-discrimination which provides for membership and services to all without regard to race, sex, religion, age, color, creed, national or ethnic origin, physical, mental or sensory disability, marital status, sexual orientation, and status as a Vietnam-era or disabled veteran.

This statement policy is important. Cooperative Extension, as a publicly funded program, must adhere to civil rights principles and laws that prohibit service to groups that deny equal access. Your organizational policy assures opportunity for your group to benefit from Extension programs.

Appendix E – Participation Reporting

INSTRUCTIONS FOR COMPLETING EXTENSION PARTICIPATION REPORTS - Excel

These instructions are for completing the Extension Participation Reports using an Excel spreadsheet. Data will automatically be totaled. Data submitted is for all educational meetings, programs, individual contacts, and office visits in which you organized the educational effort, presented a program or educational information. If you did not have a role in planning or presenting and only attended the meeting as an educational experience for yourself, it does not count. This form is used to collect participation data on the delivery of Extension educational programs.

1. Extension participation reports are to be completed at least monthly. More frequently is preferred.
2. Date refers to the date of the meeting or face-to-face contact.
3. Event or activity is the name of the program or activity. If you are conducting a number of the same programs with different audiences or at different sites, also indicate some identifying information. i.e. Bridgeville Food Safety; Dublin Hill 4-H.
4. Program number is the number of the program under the goals of the plan of work. Please include the number in the column
 - Program 1. An Agriculture System that is Highly Competitive in the Global Economy
 - Program 2. A Safe and Secure Food and Fiber System
 - Program 3. A Healthy Well Nourished Population
 - Program 4. An Agricultural System that Protects Natural Resources and the Environment
 - Program 5. Enhanced Economic Opportunity and Quality of Life for Americans
5. The next columns identify the ethnic and racial makeup of the audience. Identify the number of participants for each category
6. The next column is total the number of participants.
7. Complete the gender columns with the gender of your audience. Identify the number of participants of each gender.
8. Location designates whether a program audience was conducted in a single county, state or out-of-state. Use N for New Castle; K for Kent; S for Sussex; DE for statewide effort and O for out-of-state presentation.
9. This form should be kept in the individual's civil rights files as well as a departmental civil rights file for periodic review by State Civil Rights Administrator, supervisors and eventual review by federal authorities. Reports should be file by federal fiscal year, October 1-September 30.

INSTRUCTIONS FOR COMPLETING EXTENSION PARTICIPATION REPORTS - web form

These instructions are for completing the Extension Participation Reports using the web-based system. Data submitted is for all educational meetings, programs, individual contacts, and office visits in which you organized the educational effort, presented a program or educational information. If you did not have a role in planning or presenting and only attended the meeting as an educational experience for yourself, do not count this. This form is used to collect participation data on the delivery of Extension educational programs.

1. Extension participation reports are to be completed at least monthly. More frequently is preferred.
2. Date refers to the date of the meeting or face-to-face contact.
3. Event/Activity/Face-to-Face Contact – refers to the title of the program or event or type in “Face to Face.” Event or activity is the name of the program. If you are conducting a number of the same programs with different audiences or at different sites, also indicate some identifying information. i.e. Bridgeville Food Safety; Dublin Hill 4-H.
4. Program number is the number of the program under the five planned programs of the plan of work. Please include numbers and names of all programs in POW by using the drop down. Your choices are as follows:

Program 1. An Agriculture System that is Highly Competitive in the Global Economy

Program 2. A Safe and Secure Food and Fiber System

Program 3. A Healthy Well Nourished Population

Program 4. An Agricultural System that Protects Natural Resources and the Environment

Program 5. Enhanced Economic Opportunity and Quality of Life for Americans

5. The next sections document the racial makeup of the audience.
6. Complete the gender columns with the gender of your audience.
7. Submit this form electronically to <http://ag.udel.edu/forms/extension/participation.php>. Keep a copy for your file. Reports should be file by federal fiscal year, October 1-September 30.
8. These documents are kept on the CANR server and are tallied for federal reporting purposes.

Appendix F – Official Non-Discrimination Clauses

Appropriate Long Versions

Cooperative Extension Education in Agriculture and Home Economics, University of Delaware, Delaware State University and the United States Department of Agriculture cooperating. Distributed in furtherance of Acts of Congress of May 8 and June 30, 1914, Delaware Cooperative Extension, University of Delaware. It is the policy of the Delaware Cooperative Extension System that no person shall be subjected to discrimination on the grounds of race, color, sex, disability, age or national origin.

or

Cooperative Extension programs and policies are consistent with federal and state laws and regulations on non-discrimination regarding race, sex, religion, age, color, creed, national or ethnic origin; physical, mental or sensory disability; marital status, sexual orientation, or status as a Vietnam-era or disabled veteran. Evidence of noncompliance may be reported through you local Cooperative Extension Office.

Short version:

It is the policy of the Delaware Cooperative Extension System that no person shall be subjected to discrimination on the grounds of race, color, sex, disability, age or national origin.

OR

Cooperative Extension programs and employment are available to all without discrimination. Evidence of noncompliance may be reported through your local Cooperative Extension Office.

For a Joint UD and DSU initiative:

It is the policy of the Delaware Cooperative Extension System (University of Delaware and Delaware State University cooperating) that no person shall be subjected to discrimination on the grounds of race, creed, color, sex, age, religion, national origin, sexual orientation, veteran or handicap status

Appendix G- Extension Mailing List Policies

Postage:

1. Each county is allocated funds for postage.. Additional funds are available for specialists based on campus. Plan carefully. Discussions have taken place within the county regarding allocations to each program. You are aware that the federal budget remains flat, so funds for mailings will not increase.
2. **Enclosure slips** should still be used in mailing publications and fact sheets. Staff member name and title along with signature should be used on all mailings.
3. Commercial postage meters are used in Kent and Sussex counties and on campus. The campus mailroom will charge all Extension mail to the appropriate account.
4. **Bulk Mailing** is a way to save considerable amounts on mailings. Those on campus and those using University Graphics for printing that have mailed large mailings via campus use the University non-profit bulk-mailing permit with charges made to the appropriate Extension mailing account. Sussex County has its own bulk mail permit and Kent utilizes a state mail bulk permit. Bulk mailing should be used on all mailings over 200. This can save considerable funds.
5. Printing, labor and mailing costs can be greatly reduced by using electronic technology.
6. When submitting a grant, be sure to include funds to cover duplicating/printing and mailing costs.

Sharing of Mailing Lists:

Mailing lists comprise systems of records established to assist in carrying out various programs of a Cooperative Extension Service. These mailing lists are for the sole use of the Cooperative Extension Service and should not be furnished directly or indirectly to any person, firm, association, or federal government agency unless authorized by the individual Cooperative Extension Service director/administrator. State freedom of information or privacy regulations and institutional policies may apply to the release of these records. As such, legal consultation with the State Attorney's office and institutional counsel is recommended concerning the proper handling of access requests.

Mailing List Management:

Maintaining and managing mailing lists should follow University of Delaware guidelines ensure the protection of personal information. These guidelines can be found at: <http://www.udel.edu/pnpi/>.

Appendix H – Internal Review Form

COUNTY CIVIL RIGHTS REPORT – For Internal Audit Purposes

Date: _____ COUNTY _____

AREA - EQUAL OPPORTUNITY EMPLOYMENT

TRAINING OPPORTUNITIES

Number of staff utilizing course fee -waiver _____

Number of courses taken under fee waiver _____

List other in-service training opportunities that staff has participated in outside of formal courses.

AREA - PROGRAM DELIVERY

Describe efforts to modify educational programs and related activities to meet the needs and interests of under-represented groups in your county. Include the methods utilized to remove barriers from program participation including limited English speaking audiences.

County Extension Advisory Council

Race of Participants: White _____ Black _____ Hispanic _____ Asian _____ American Indian _____

Gender of participants: Male _____ Female _____

Dates of committee meetings during the last year.

Review of bylaws shows commitment to EEO/AA areas

Other Advisory Councils/Boards

Race of Participants: White _____ Black _____ Hispanic _____ Asian _____ American Indian _____

Gender of participants: Male _____ Female _____

Dates of committee meetings during the last year.

Review of bylaws shows commitment to EEO/AA areas

Expansion and Review Committee

Race of participants White _____ Black _____ Hispanic _____ Asian _____ American Indian _____

Gender of participants: Male _____ Female _____

Number of Adults: _____ youth: _____

Dates of committee meetings during the past year.

List annual goals of the 4-H Expansion and Review Committee and progress toward meeting those goals:

Other relevant committees:

Gender of participants: Male ____ Female ____

Number of Adults:____ youth:_____

Dates of committee meetings during the past year.

AREA - PUBLIC NOTIFICATION

"And Justice for All" posters are displayed at the following locations in the county:

List **public notification** efforts utilized in your county

Media release files have been reviewed to ensure they contain non-discrimination clauses. Date of review:

AREA: ACCESSIBILITY FOR THE DISABLED

A facility assessment has been conducted to determine accessibility for individuals with disabilities.

This includes facility and equipment that reduce barriers to participation

Yes _____ No _____

If no, what plans have been made for assessment.

What steps have been taken to ensure promotional materials and registrations inform participants of accessibility?

AREA - CIVIL RIGHTS TRAINING

All staff have received civil rights training? Yes _____ No_____

If no, what plans have been made for training?

Staff meeting minute dates when Civil Right information has been provided.

Civil Right Training has been conducted for the following county groups during the past year:

Staff civil rights files have been reviewed on the following dates:

County Civil Rights files have been reviewed on the following date(s):

Additional Comments/Narrative/Success Stories:

Appendix I: Suggested Affirmative Action Activities for Extension Personnel

1. Be familiar with the protective laws and how they impact what you need to do to be compliant.
2. Identify needs and develop programs that are open to all citizens.
3. Complete accurate and truthful participation reports in a timely manner.
4. Take steps to ensure committee and advisory board membership is diverse with respect to ethnicity, race, age, gender, disability and geographic location
5. Know and understand the process for assisting clientele in making both informal and formal program complaints.
6. Know and understand the process for making both informal and formal employment related complaints.
7. Employees will know and understand the civil rights plan of work and the contents of this handbook.
8. Ensure that meeting locations can accommodate persons with disabilities and make arrangements for meeting special needs if applicable.
9. Ensure that promotional material include the accommodation statements.
10. Keep an individual affirmative action file for each major program conducted. Be sure it is up to date and you know where it is. Results Orientation Efforts has replaced all reasonable efforts. Document your efforts and your results. What to keep in your file?
 - a. Personal letters and promotional material that you have sent to specific minority audience contacts inviting them to participate. Keep copies of the letter and the contact information. This would include email correspondence.
 - b. Conduct personal visits to representative minority contacts to inform them of programs and invite them to participate. Jot a note outlining your visit, with who you visited, what you discussed and next steps for inclusion.
 - c. Copies of brochures that show you have followed EEO/AA rules and the mailing lists used. Mailing lists should note any protected audiences that may be included.
 - d. Copies of press releases that include the non-discrimination clause.
 - e. Documentation of the training of volunteers regarding the EEO/AA rules and regulations.
 - f. Keep records regarding committees and advisory boards specific to the programs offered. Include data regarding how the members are selected as well as membership data including race, ethnicity, gender, geographic location. It is expected that committees and advisory councils will be diverse by race, ethnicity, gender, and geographic location.
 - g. Meeting minutes identifying EEO/AA training of volunteers/club members.
 - h. Compliance forms or copies of the bylaws of organization with which ongoing educational programs are conducted to ensure their commitment to affirmative action compliance.
 - i. Document when you have turned down conducting a program because the organization was not in compliance with civil rights guidelines.
 - j. Keep a copy of the letter/list of recipients when you send out the guidelines on civil rights to volunteer leaders and partnering agencies.
 - k. Document attempts to inform your clientele of other extension program opportunities.
11. Know where the county affirmative action file is and what it is in it. What is in it?
 - a. Information regarding the demographic make-up of the county
 - b. Participation report data of personnel
 - c. Information regarding the advisory council – make-up, meeting minutes
 - d. Information about press releases and mailing lists used to market programs
 - e. Copies of press articles or media materials
 - f. ADA assessment

- g. Program complaint file
 - h. Relevant federal Laws
12. If you manage Extension clubs or a volunteer group (FCS, 4-H, Horticulture – MGs etc.), keep a file that documents the following:
 - a. Write each club president. Remind them of their commitment to open-club participation. Request each club president respond to you in writing as to efforts clubs have made to recruit from all persons in their community. (annually; keep copies in your AA files.)
 - b. Have Council presidents send a letter to all club presidents reminding them of our open membership policy. (Yearly. Keep copies in your file.)
 - c. Be sure at least one newsletter promotes club membership and includes statement of all clubs being open to any interested person in the community. (Yearly. Keep copies in your AA file.)
 - d. Do at least one newspaper release per year on club membership and open to public of all programs of the Delaware Cooperative Extension Service. (Yearly, keep copies in your AA file.)
 - e. Visit organizations and promote involvement in club programs. List clubs in communities and who to contact to join. Keep documentation in your AA file.
 - f. Review periodically any bylaws include the commitment to non-discrimination clauses.
 13. When organizing a new club or group of volunteers.
 - a. Be sure entire community is aware of membership opportunities.
 - b. Use news media to alert to opportunities.
 - c. Visits to local organizations by organizers.
 - d. Personal visits by organizers.
 - e. Be sure by-laws and constitution has open membership clause and statement of non-discrimination.
 - f. Provide training to new volunteers about the Civil rights requirements for Cooperative Extension.
 - g. Keep documentation in your AA file of all these actions.
 14. Advertise all programs as open to the public. Use mass media frequented by minorities. Document activities by keeping the list attached to the press release.
 15. Check all materials. Be sure non-discriminating clause is on the materials including websites, email newsletters and web-based recruitment and marketing of programs.
 16. Ensure that educational or promotional materials do not use stereotype language and/or illustrations.
 17. EFNEP/ SnapED – Document efforts to recruit non-minority families.
 18. Understand the populations in your community and document efforts in working with Limited English Proficiency audiences. Include numbers reached, documents developed and marketing strategies used to engage LEP audiences. Establish a file containing these efforts that can be made available to reviewers.
 19. Mailing lists should contain contact information as well as provide information regarding the individual's race, ethnicity and gender. This information will be in a format that can be reviewed by outside reviewers.
 20. In using facilities or presenting programs for non-extension sponsored groups, be sure the organization has an open membership policy. If there is any doubt, get a written statement of open participation and keep it on file.
 21. Document your efforts to provide alternative teaching methods, program meeting places, etc. that reach the special needs of minority audiences or limited English proficiency participants and encourages them to participate in Extension programs.

Appendix J – Acknowledgement of Receipt/Understanding

I, _____ (name), acknowledge that I have received and read the Delaware Cooperative Extension Policy Handbook for Civil Rights Compliance for Extension Programs. To the best of my ability, I will carry out the policies and procedures outlined within the document to ensure University of Delaware Cooperative Extension compliance with federal laws and regulations as well as University policies.

Print Name: _____

Date: _____

Signature: _____

Return this document to your supervisor