



United States
Department of
Agriculture



Cooperative State
Research, Education,
and Extension Service

Washington, DC 20210

CIVIL RIGHTS COMPLIANCE REVIEW GUIDE

Extension Programs

Civil Rights Compliance Review Guide*

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

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

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

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

For CSREES-USDA Administrative Use Only

Preamble

General

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

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

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

Purpose and Relevant Legislation

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

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

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

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

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

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

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

Process

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

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

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

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

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

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

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

Areas for Review for Extension Programs

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

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

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

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

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

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

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<p>7. ...Continued</p> <p>Program Areas (State and Local)</p>	<p><i>g.</i> All reasonable efforts are carried out to insure equal access and integration of clubs.</p> <p><i>h.</i> Geographic boundaries established for program planning and implementation are done in a nondiscriminatory manner.</p> <p><i>i.</i> Membership in all clubs is open to both males and females.</p> <p><i>j.</i> 4-H recruitment committees are diverse by race and gender.</p> <p>* Camp participants, including resident instructors are diverse by race, ethnicity, and gender</p> <p>* Procedures are in place to mainstream participants into other Extension programs to ensure total inclusion.</p> <p>* 4-H expansion and review committee is diverse by race, ethnicity and/or gender.</p>	<p><i>c.</i> Review the geographic boundaries of clubs/groups to determine whether they are established based on race.</p> <p><i>d.</i> Review to the extent to which club/group participation and membership is open to males and females with respect to “Title IX, Nondiscrimination on the Basis of Sex,” including any recognition program.</p> <p><i>e.</i> Review the records to determine the extent to which 4-H recruitment/outreach committees have functioned to increase minority participation in the program and related activities including, enrollment in 4-H clubs.</p> <p><i>f.</i> Review and evaluate audience participation in 4-H camps or other resident workshops. Determine if housing at 4-H camps are integrated by race and ethnicity.</p> <p><i>g.</i> Review the extent to which participants in these groups are “mainstreamed” into other Extension programs.</p> <p>• Determine if Extension provides assistance to any organization that excludes any individual from participation because of their race, color, national origin, sex, age or disability.</p>			

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

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

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

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