

# HEADS UP

## UPDATES AND ISSUES

### DIVERSITY AND CIVIL RIGHTS



Dallas L. Holmes, EdD. USU Cooperative Extension, Diversity and Civil Rights Specialist (435) 770-0744

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## **Federal Civil Rights Compliance Reviews: Awareness and Documentation Requirements**

The National Institute of Food and Agriculture [NIFA] conduct regular, systematic civil rights compliance inspections as required by USDA and the Department of Justice civil rights regulations. These reviews are necessary to assure that Extension is working in compliance with equal opportunity policies in the implementation of Extension programs, that every customer is treated with fairness, equality and respect, and that we are inclusive and have adequate diversity. These comprehensive week-long reviews conducted by a USDA Civil Rights Specialist focus on administration, program development, program delivery, employment practices and the application of Civil Rights laws including:

- Nondiscrimination on the basis of Race, Color, or National Origin [7CFR part 15]
- Nondiscrimination on the basis of Sex in any education program or activity [7 CFR part 15a.1]
- Nondiscrimination on the basis of Handicap in program or activities [7 CFR part 15b]
- Nondiscrimination on the basis of Age in programs or activities [45 CFR Part 90]

Utah State University Extension had its most recent federal civil rights compliance review in 2001. There is the expectation that a future Utah Extension federal civil rights compliance review could be called for at any time. The USU Extension Civil Rights Performance Plan 2009-2013 requires that all counties have a state civil rights review as an ongoing check of civil rights compliance. How can we be prepared for a federal compliance review? Maintaining a record of documentation is critical to acceptable compliance reviews.

County Extension and State Specialist faculty should establish and maintain a documentation file that demonstrates personal adherence to civil rights laws. This can be accomplished by:

1. Reporting the quantity and quality of program face-to-face contacts made by race/ethnicity and gender for all Extension contacts made while serving stakeholders.
2. Identifying potential audiences and needed programs through needs assessment research.
3. Appropriate public notification and reasonable accommodation for program accessibility to the disabled.
4. Insuring that Extension committees/boards are a demographic mix of races/ethnicities and gender which in turn are representative of the community served.
5. Having established procedures and processes to accommodate those with Limited English Proficiency [LEP] insuring nondiscrimination due to National Origin.

In addition to this personal civil rights documentation file each county and the state Extension office are responsible for maintaining a documentation file which demonstrates adherence to civil rights laws and equal opportunity policies. These civil rights documentation files are always open to public inspection.

Annually USU Extension requires that all employees complete a Civil Rights Self Assessment which reminds them of Civil Rights laws and policies. Additional information concerning civil rights compliance reviews and USDA/NIFA federal standards can be obtained at <http://extension.usu.edu/diversity/htm/employee-resources> "Civil Rights Review Resources"

**"Utah State University is an affirmative action/equal opportunity institution."**