

**COOPERATIVE STATE RESEARCH, EDUCATION, AND EXTENSION SERVICE  
COMPLIANCE REVIEW GUIDE FOR EXTENSION PROGRAMS**

**PURPOSE AND SCOPE**

The purpose of the review is to determine the extent to which extension programs being carried out are in compliance with Executive Orders, Department of Justice regulations enforcing nondiscrimination requirements and Departmental and Agency Regulations to the end that no person shall, on the grounds of race, color, national origin, sex, disability or age be excluded from participation, be denied the benefits of, or be subject to discrimination under any Cooperative State Research, Education, and Extension Service (CSREES) program or activity.

**PROCESS**

Review administrative manuals, policy statements, and other documents for adequacy in effectively implementing all requirements; and interview staff and examine records and other documentation to determine continuing implementation of policies and procedures.

Review and examine office records, statistical data including potential and actual participation in programs; Plans of Work, annual reports, and other reports; membership and attendance records; planning process; collection and use of racial participation data; office facilities and arrangements; and staff training opportunities and other related management aspects of the CSREES extension operation.

Include both 1862 and 1890 elements of the program in the review.

The review should encompass, but not be limited to, the following areas of inquiry:

**1. COOPERATIVE EXTENSION SERVICE ORGANIZATION**

Determine the administrative structure currently in place to carry out the CSREES extension mission. Gain an understanding of the formal and informal lines of authority and responsibility for civil rights matters within Cooperative Extension and to the larger university structure(s).

**2. PROFILES OF COUNTIES REVIEWED**

Develop an understanding of demographic data relative to the locations visited. Give particular emphasis to information related to total population by race, agriculturally related data by race and sex, types of enterprises generating economic activity, and indication of individual and family well-being.

**3. LOCATIONS VISITED/PERSONNEL INTERVIEW**

Secure a list of Cooperative Extension personnel in the locations visited by name, race, sex, title, and area of responsibility.

**4. KNOWLEDGE OF LAWS, RULES AND REGULATIONS**

Determine if staff are familiar with the applicable civil rights laws, rules, and regulations, and instructions; and determine if the county office has a civil rights file readily available to all staff members, and that it contains all essential information and material.

**5. INTERNAL POLICIES AND PROCEDURES**

Complaint Process

- a. Interview staff to determine their knowledge of program and employment complaint procedures, and review records of the receipt and or disposition of complaints for adequacy of procedure.
- b. Determine the adequacy of the procedures used with staff, leaders, clientele, organizations, agencies and the general public to inform them of procedures for filing programs and/or employment complaints as applicable.

**6. AFFIRMATIVE ACTION PLANS**

Determine the extent to which Affirmative Action Plans are available and implemented by staff.

**7. POSITION DESCRIPTIONS**

- a. Review job descriptions and assignments and interview staff to determine if any restrictions to work with clientele are or have the effect of being based on race, color, national origin, sex, age, or disability.
- b. Review delegated responsibility and authority to designated staff member(s) at State and county levels for carrying out civil rights responsibilities.

**8. PLANS OF WORK**

- a. Review for adequacy the administrative manuals, policy and procedure statements, and related documents, program planning guides, and program plans to provide a basis for effective civil rights implementation.
- b. Interview staff members to determine whether a single Plan or Work was prepared without regard to race, color, national origin, sex, age, or disability.

**9. CLIENTELE PARTICIPATION DATA COLLECTION**

- a. Review the written policy and procedures for the collection and use of racial participation data, and the establishment of a data reporting system to evaluate the quantity and quality of services by race and sex.
- b. Review the data collection and reporting system implementation to evaluate its adequacy to provide factual program participation statistics by race and sex.
- c. Secure a copy of the statistical summary report for the last year for the Extension units included in the review.

**10. TARGETING OF BENEFITS AND CONTACT PARTICIPATION**

Review for adequacy the State and county procedure for determining potential recipient data, and the extent of its use in comparing actual contacts by race, national origin, and gender to potential recipient numbers and percentages.

**11. SERVICE ACROSS RACIAL AND GENDER LINES**

Review a representative sample of minority and non-minority staff members' weekly activity report or a printout of each agent's clientele contacts by race and sex to determine the extent to which services are provided across race and gender lines.

**12. PUBLIC NOTIFICATION**

- a. Review written policy and procedure for informing the public of Cooperative Extension's responsibilities and policies in relation to the civil rights laws.
- b. Through review of records, newspaper clippings, brochures, radio and television messages, circular letters, and interviews with staff, determine the extent to which staff are familiar with the requirements of the "Public Notification Plan." Determine whether the requirements for Public Notification are being implemented in a manner that informs all eligible people of Extension programs and their equal access to these programs and their protection against discrimination in the conduct of such programs.

**13. NONDISCRIMINATION STATUS OF ORGANIZATIONS WORKED WITH**

- a. Review written policy and procedures which guide staff in determining discriminatory practices of organizations, agencies, and groups before officially accepting and/or participating in activities and events.
- b. Review records and interview staff to determine if staff provides substantial assistance to organizations which discriminate based on race, color, national origin, age, sex, or disability. Determine the adequacy of the system for determining and documenting the nondiscrimination status of organizations receiving Extension assistance.

**14. STAFF CONFERENCES**

Staff conferences are held periodically, including the expressed purpose of determining the status of civil rights implementation and compliance.

**15. STAFF TRAINING**

- a. Review written policy and procedure to assure equal access and opportunity to participate in training and professional improvement activities on a non-segregated basis.
- b. Review staff conference plans and proceedings, training agenda, training opportunity announcements, and interview staff members to determine the extent to which civil rights matters were included in these training sessions.
- c. Review staff development and training records, professional improvement opportunity announcements, and interview staff to determine whether employees participate on a nondiscriminatory basis.

**16. MAILING LISTS**

Review instructions to field offices 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. Review procedures in place to assure people are addressed in ways which avoid making assumptions based on gender about level or interest in subject matter areas; give appropriate recognition to multiple recipients at one address; and recognize individual preferences of how they are addressed.

**17. OFFICE FACILITIES**

Determine whether office space is fully integrated; office quarters and related facilities are assigned and available to all staff on a nondiscriminatory basis; supplies, educational materials, and secretarial help are available on a nondiscriminatory basis; and office entrances and the routing of clients are such that discrimination on the basis of race, color, national origin, sex, age, or disability is not occurring.

**18. PERSONS WITH DISABILITES**

Evaluate the extent to which Section 504 of the Rehabilitation Act of 1973 and the Americans With Disabilities Act (ADA) of 1990 are being implemented.

**19. INVOLVEMENT IN NEEDS ASSESSMENT AND PRIORITY SETTING**

- a. Examine the manner in which Cooperative Extension staff members meet together to plan the County Extension Program; and meet and work with the various planning committees and subcommittees.
- b. Determine whether planing committees have balanced membership based on race, national origin, and gender of the potential clientele in the area they represent.
- c. Record membership and participation of major committees for this year and last year. Evaluate the effectiveness of the committees in needs assessment and program implementation as related to civil rights concerns.

**20. PROGRAM AREA COMPLIANCE**

- a. Determine the major program areas under which base programs, program initiatives and/or staff are administratively grouped or categorized. For each program area determine compliance efforts and accomplishments. Through record review, circular letters, newspaper articles, membership rolls, program participation data, and interviews with county and district staff members, determine whether there is discrimination on the basis of race, color, national origin, gender, age or disability in the administration or management of Extension educational programs and activities. Review all delivery methods including camps, tours, college days, field trails, and demonstrations.
- b. \_\_\_\_\_  
(Program Area Name)
- c. \_\_\_\_\_  
(Program Area Name)
- d. \_\_\_\_\_  
(Program Area Name)

e. \_\_\_\_\_  
(Program Area Name)

f. \_\_\_\_\_  
(Program Area Name)

**21. EXTENSION HOMEMAKERS/FAMILY, COMMUNITY EDUCATION (FCE) CLUB PROGRAM**

- a. Review data on the total number of clubs and membership by race, the number of clubs in interracial communities and membership by race, and the number of clubs in non-interracial communities and membership by race.
- b. Review records of the extent to which “all reasonable efforts” have been made to integrate clubs serving interracial communities.
- c. Review the geographic boundaries of clubs to determine whether they function to discriminate, based on race, color, or national origin.
- d. Review the extent to which club participation and membership is open to males and the extent to which males are included.

**22. EXPANDED FOOD AND NUTRITION EDUCATION PROGRAM**

Review the current status and past history of the Expanded Food and Nutrition Education Program (EFNEP) relative to civil rights.

**23. 4-H CLUB PROGRAM**

- a. Through record reviews, circular letters, newspaper articles, membership rolls, program participation data, and interviews with county and district staff members, determine whether there is discrimination on the basis of race, color, national origin, sex, or disability in the administration or management of 4-H Programs. Include all subject matter areas defined as 4-H by the staff.
- b. Review and record data on the total number of 4-H Clubs (including other 4-H units) and the membership by race, the number of clubs in interracial communities and membership by race, and the number of clubs in non-interracial communities and membership by race.
- c. Review the geographic boundaries for 4-H Clubs to determine whether they function to discriminate based on race, color, or national origin.
- d. Review records to determine the extent to which “all reasonable efforts” have been made to integrate 4-H Clubs serving interracial communities.
- e. Review records to determine the extent to which the 4-H Expansion and Review Committee has been functioning.
- f. Review records of all 4-H leader training activities and methods to determine participation by race and sex and the availability of such activities without discrimination, and examine the extent to which efforts have been made to recruit and train minority group members to assume leadership roles.
- g. Review the extent to which Title IX, Nondiscrimination on the Basis of Sex, has been implemented in the 4-H Program, including the awards system.

- h. Evaluate and record 4-H camp participation data. Is housing integrated by race?
- i. Record race and gender data on district/area and State event participation by 4-H members from the county.

**24. CIVIL RIGHTS COMPLIANCE REVIEWS**

- a. Review written policy and procedure for the conduct of compliance reviews of county programs and related activities.
- b. Review records and reports regarding internal Civil Rights Compliance Reviews in terms of their accuracy, adequacy, and follow through.

**25. TITLE IX IMPLEMENTATION BY ADMINISTRATION**

Determine the process through which administrative guidelines for implementation of Title IX, Nondiscrimination on the Basis of Sex, were issued and the extent to which the guidelines are currently being continually and consistently followed.

**26. ONGOING ADMINISTRATION OF PROGRAMS**

Review the extent to which persons with leadership responsibility in the civil rights area are receiving administrative support and direction sufficient to maintain a high level of visibility for and compliance with civil rights laws, rules, and regulations.

**27. 1862-1890 MEMORANDUM OF UNDERSTANDING (MOU) REVIEW**

Examine the working relationships and administrative structure for civil rights concerns. Note Interaction, Cooperation, and Coordination of efforts between institutions.

*CSREES Compliance Review Guide for Extension Programs. Diversity and Civil Rights, 1996, <<http://extnet.usu.edu/diversity/guides.htm>> (10 June 2003).*