



## CIVIL RIGHTS COMPLIANCE REVIEWS BY NATIONAL INSTITUTE OF FOOD AND AGRICULTURE (NIFA) STAFF

### SCOPE

The purpose of a review is to determine the level of compliance with Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination based on race, color or national origin; Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex; the Americans with Disabilities Act of 1990 which prohibits discrimination on the basis of disability; Departmental rules and Regulations and Secretary's Memorandum No. 1662 and 1894.

The review is designed to determine whether the State Cooperative Extension Services have taken necessary actions to eliminate any discriminatory practices in program delivery and hiring and employment practices.

The review involves an examination of records, statistical data, and interviews with employees and program participants. In addition, the review will address if all programs and activities are handled equitably by the management and focus on the degree to which parity of participation has been achieved. The complexity of ES problems has been further exacerbated by criticism and litigation. Several states are under Court ordered Plans and/or Consent Decrees, with reports being filed regularly to the Courts and/or the Department of Justice. Legislation, organization, funding and tradition have complicated the efforts to strictly adhere to the laws and regulations. The reviews help to determine the problems which exist(ed), what actions the states have taken to correct them, and provide the United States Department of Agriculture with an opportunity to assist the states to come into compliance by focusing on the areas of concern and providing technical assistance and guidance where needed.

### GENERAL INFORMATION

Initially, an informal meeting is held for introductory purposes. The meeting is conducted by the reviewer with the Extension Board Chair and the local extension staff. At that meeting, the following information is either obtained for review or located for later perusal.

1. Obtain general population statistics on the county by race, national origin, gender; on eligible youth (race); on eligible farmers (race, gender) -- all as appropriate.
2. Staff listing - agents, clerical and aides.
  - a. name
  - b. race, national origin and gender
  - c. title
  - d. functional assignment
3. Impact / Outcomes - obtain copies of reports for each professional staff member for the previous 6-12 months. Determine if totals indicate that service is being offered along racial lines.

4. Affirmative Action Plan (AAP) - determine implementation of the local AAP and annual compliance report through review.
5. Civil rights responsibility - determine the staff member who carries civil rights responsibility and the alternate.
6. Civil rights training - determine how the staff receives civil rights training.
  - a. frequency
  - b. method
  - c. review training agenda, if available
7. Complaints - inquire regarding receipt of any civil rights complaints.
8. Poster - observe the location of the "And Justice for All" poster.
9. Public notification - inquire regarding means of public notification.
  - a. review samples of methods
  - b. note use of the nondiscriminatory statement
  - c. note use of media, artwork and pictures in conveying message of mixed participation
10. Mailing list(s) including email list serves
  - a. determine means of assembling program mailing list(s)
  - b. determine coding on lists by race, national origin and gender
  - c. determine how often lists are updated and date of last update
11. Performance Reviews - determine degree to which performance reviews of staff members are used to reassure compliance efforts. Also determine the consistency in the use of performance reviews for this purpose, between individual staffers.
12. Compliance reviews - inquire regarding frequency of civil rights compliance reviews. Determine degree of follow up to recommendations reported in previous compliance reviews. Examine written review reports for consistency and thoroughness. Determine whether interviews with community contacts are a component of the review process.
13. Seating - determine if the office seating arrangement is fully integrated.
14. Salary data - request the compilation of staff salary data. Comparatively analyze this data in terms of salary, education, tenure, race, national origin and gender.
15. Documentation - determine the degree which files/logs reflect detailed and complete documentation of "All Reasonable Efforts" (ARE); determine the degree to which documentation provides a discernable paper trail reflecting compliance efforts.
16. Title IX - determine degree of implementation of Title IX self-evaluation goals for individual staffers.

## FAMILY AND CONSUMER SCIENCES

1. Program Development Committee - provide committee member's names and addresses.
  - a. determine selection process
  - b. composition by race, national origin and gender
  - c. degree which committee has aided in implementing civil rights requirements and has promoted mixed participation
  - d. review copies of minutes of previous meetings

2. Recruitment - determine the means used to encourage and recruit participation in the family and consumer sciences program by race, national origin and gender.
3. Public notification - review samples of the methods used to publicize the educational program. Note use of the nondiscriminatory statement. Note use of media, artwork and pictures in conveying message of mixed participation.
4. Attendance - determine if educational programs are successful in reaching expanded audiences as reflected by:
  - a. racial and gender composition of those in attendance
  - b. means of publicizing their availability
5. Meeting places - determine the effect the location and time of meetings may be having on participation in the program by race, national origin and gender.
6. Complaints - determine each family and consumer sciences staff member's knowledge of complaint procedure (EEO complaints and program complaints).
7. Mailing list(s) including email list serves - determine method of compiling program mailing list(s); determine coding on lists by race, national origin and gender; determine how frequently lists are updated and date of last update.
8. Newsletter(s) - obtain samples of program newsletters.
  - a. observe content to see if targeted audience is mixed by race, national origin and gender
  - b. use of nondiscriminatory statement
  - c. note use of artwork and pictures in conveying message of mixed participation

### EXPANDED FOOD AND NUTRITION EDUCATION PROGRAM (EFNEP and FNP)

1. Families - obtain total program participation by race.
2. Program Assistants - obtain racial breakdown of total families served by race of each nutrition aide.
3. Records - review aide records for contacts.
4. EFNEP and FNP youth groups - determine if they exist. If so, then:
  - a. their racial composition
  - b. how and by whom they are served
5. Examine the absorption of EFNEP and FNP adult and youth graduates into the traditional Family and Consumer Sciences and 4-H Programs.

### 4-H YOUTH DEVELOPMENT

1. 4-H Clubs - determine total number of clubs.
  - a. racial composition of each
  - b. what each club's membership base is (i.e. community or school)
  - c. determine degree of program balance

2. Community clubs - for community-based clubs, determine the racial composition of the area a club encompasses.
3. Documentation - obtain and review documentation (if needed) of all reasonable efforts made to integrate 4-H clubs located in interracial communities.
4. Meeting places - for community-based clubs and special interest meetings, determine the effect that locations and time of meeting may be having on participation in program by race, national origin and gender.
5. Special interest meetings - determine the racial breakdown of those attending special interest meetings.
6. Recruitment - determine the method used to encourage and recruit participation in the program by race, national origin and gender.
7. Public notification - review samples of the methods used to publicize the youth program. Note use of the nondiscriminatory statement. Note use of media, artwork and pictures in conveying message of mixed participation.
8. Program Development Committee - provide committee member's names and addresses.
  - a. determine selection process
  - b. composition by race, national origin and gender
  - c. degree which committee has aided in implementing civil rights requirements and has promoted mixed participation
  - d. review copies of minutes of previous meetings
9. Camp - if a 4-H camp is held annually, obtain racial and gender participation data from the last session held.
  - a. determine means for selecting participants
  - b. note method of publicity including use of artwork and pictures to reflect mixed participation
  - c. note housing arrangement (for overnight camps)
10. Complaints - determine each program professional's knowledge of civil rights complaint procedure.
11. Volunteer leaders - obtain information regarding recruitment of minority leaders as well as the racial composition of the present group of volunteer leaders. Determine degree which volunteer leaders work across, not along, racial lines.
12. Constitution - determine if club's constitutions or by-laws have been amended to include the nondiscriminatory statement.

## AGRICULTURE AND NATURAL RESOURCE DEVELOPMENT

1. Service to clientele - determine service to potential clientele as identified in the county Affirmative Action Plan. First, determine the potential clientele.
2. Commodity meetings - review participation records from commodity meetings held.
3. Small farmers - inquire about services provided to small and/or limited resource farmers in the county.

4. Program Development Committee - provide committee member's names and addresses.
  - a. determine selection process
  - b. composition by race, national origin and gender
  - c. degree which committee has aided in implementing civil rights requirements and has promoted mixed participation
  - d. review copies of minutes of previous meetings
5. Complaints - determine each professional staff member's knowledge of the civil rights complaint procedures.

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## RACIAL COMPOSITION OF 4-H CLUBS

Breakdown by Race and Sex, Given Numerically and by Percentage

	<u>Year</u>	<u>Year</u>
White _____		
Black _____		
Hispanic _____		
Total Number of Clubs _____		
Integrated Clubs in Integrated Areas _____		
One Race Clubs in Integrated Areas _____		
All White Clubs _____		
All Black Clubs _____		
All Hispanic Clubs _____		
One Race Clubs in Non-integrated Areas		
White _____		
Black _____		
Hispanic _____		
Composition of Clubs:		
Whites in Integrated Clubs _____		
Blacks in Integrated Clubs _____		
Hispanics in Integrated Clubs _____		
Whites in One Race Clubs in Integrated Areas _____		

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