Delaware Cooperative Extension
Handbook for Civil Rights Compliance for Extension Programs
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November 2018

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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. Information about USDA/NIFA policies can be found at: http://www.ascr.usda.gov/

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 on the basis of race, color, sex, disability, religion, familial status and national origin. For a full listing go to: http://nifa.usda.gov/resource/civil-rights-laws-authorities-and-regulations

USDA Civil Rights compliance reviews are conducted consistent with the following major statutes and Departmental Regulations (see Appendix A for more details on each):
• Americans with Disabilities Amendments Act of 2008
• Civil Rights Act of 1964 Title VI
• Civil Rights Act of 1964 Title VII
• Civil Rights Act of 1991
• Title XI, Education Amendments of 1972
• The Americans with Disabilities Act of 1990, Titles I and V
• Rehabilitation Act of 1973
• The Age Discrimination in Employment Act of 1967
• USDA Office of the Assistant Secretary for Civil Rights Regulations and Departmental Directives

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 age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program. 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

Delaware Cooperative Extension (DCE) is committed to the realization of the spirit and letter of federal and state Civil Rights law and regulations. The kinds of discrimination prohibited by Delaware Cooperative Extension policy follow those of the NIFA/USDA and the University of Delaware and prohibits discrimination on the basis of age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program in its employment, educational programs, and activities.

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

This document outlines the goals, objectives and procedures Delaware Cooperative Extension personnel will follow to fulfill the intent and requirements of Civil Rights laws and regulations. The goals and objectives that follow provide for the guidelines and support that notion that all paid employees and volunteers are expected to:

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

In general, to fulfill these expectations, all paid personnel and volunteers 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 goal areas and objectives. Each goal area addresses a different theme that will be addressed, planned for and evaluated for effectiveness. Each objective helps to elaborate on these goals by providing the rationale, the procedures to ensure compliance and subsequent appendixes that provide additional resources.

All personnel are expected to read and understand the content of this handbook. 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.
**Goal 1: Delaware Cooperative Extension Leadership will lead by example.**

**Objective 1. A statewide Civil Rights Handbook will be maintained.**

Rationale: Following a statewide Civil Rights handbook 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. This Handbook 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.

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<thead>
<tr>
<th>Procedures to ensure compliance:</th>
<th>Responsible party</th>
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<tbody>
<tr>
<td>This Handbook, including all Appendices, will be reviewed annually and updated as necessary.</td>
<td>Extension Leadership Team</td>
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<tr>
<td>This Handbook will be made available to all personnel in each office and Extension Staff Resources webpage.</td>
<td>Extension Leadership Team</td>
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</table>

**Objective 2. Delaware Cooperative Extension will strive for a diverse workforce and promote a work environment free of discrimination.**

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. 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.

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<tr>
<th>Procedures to ensure compliance:</th>
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<tr>
<td>Hiring of program staff will follow University Affirmative Action/Equal Opportunity Hiring and Recruitment policies: <a href="https://sites.udel.edu/generalcounsel/policies/affirmative-actionequal-opportunity-hiring-and-recruitment/">https://sites.udel.edu/generalcounsel/policies/affirmative-actionequal-opportunity-hiring-and-recruitment/</a></td>
<td>HR Liaison, University Administration and Search Committees</td>
</tr>
<tr>
<td>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: <a href="http://www.udel.edu/ExecVP/policies/personnel/index.html">http://www.udel.edu/ExecVP/policies/personnel/index.html</a></td>
<td>HR Liaison, Program Leaders, Supervisors</td>
</tr>
<tr>
<td>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.</td>
<td>Extension Director, County Directors and supervisors</td>
</tr>
<tr>
<td>The University of Delaware Office of Equity and Inclusion <a href="https://sites.udel.edu/oei/">https://sites.udel.edu/oei/</a> and the Office of Disability Support Services <a href="https://sites.udel.edu/dss/">https://sites.udel.edu/dss/</a> will provide up to date personnel policies and procedures for complaints.</td>
<td>University Administration</td>
</tr>
<tr>
<td>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</td>
<td>Extension Director and HR Liaison</td>
</tr>
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Objective 3. Coordination and interaction with 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.

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<tr>
<td>Administration and Extension personnel will develop, coordinate, and implement a comprehensive program of Extension work between Land Grant and minority serving institutions. University and Extension leadership will maintain a forum for continued mutual consultation among top officials of the institutions</td>
<td>Extension Director</td>
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<td>Program Leaders</td>
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<tr>
<td>Extension program leadership will provide a listing of joint Extension programs and the respective planning committees being carried out by the respective institutions to Extension Directors on a yearly basis.</td>
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<tr>
<td>The Civil Rights Administrator and Extension Director will have on file the letters of compliance, Civil Rights directives from Extension Director and maintain the documentation of Civil Rights review coverage by Extension leadership (internal and USDA reviews).</td>
<td>Civil Rights Administrator and Extension Director</td>
</tr>
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Objective 4. Assure that the groups we manage (volunteers, clubs) and partner with have policies and procedures that align with our Civil Rights guidelines.

Rationale: 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 and maintain records discriminatory practices are not followed.

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<th>Procedures that ensure compliance:</th>
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<tr>
<td>Extension personnel will have on file compliance forms (Appendix B) for organizations with which ongoing educational programs are conducted to ensure their commitment to affirmative action compliance. Lists are maintained in Townsend Hall for statewide organizations and within each county office for county based organizations. Compliance forms for organizations with whom we have ongoing partnerships shall be updated once every three years. New organizations shall sign compliance forms prior to partnering with Cooperative Extension. Complies of signed and returned compliance forms should be kept in the appropriate office Civil Rights folder.</td>
<td>Leadership Team and Employees</td>
</tr>
<tr>
<td>To any group, which cannot or will not provide assurance of compliance, Cooperative Extension personnel may only provide a presentation that provides an overview of Cooperative Extension programs that includes an articulation of the requirement for compliance or be present to receive acknowledgement or contributions.</td>
<td>Employees</td>
</tr>
</tbody>
</table>
Goal 2: Educate and involve staff, volunteers, and advisory boards in Civil Rights training.

Objective 1. Extension personnel will have knowledge of laws, rules, and regulations and have appropriate training.
Rationale: It is the policy of Delaware Cooperative Extension to provide professional development opportunities to all of its employees. Administrators, faculty, and educators are expected to participate in opportunities offered within the College of Agricultural and Natural Resources, as well as those provided by external vendors, to enhance their awareness and understanding of diversity issues and to increase their ability to reach out to underserved groups.

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<th>Procedures to ensure compliance:</th>
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<tr>
<td>County Directors and other supervisors will ensure new hires read and understand this Handbook and relevant legislation.</td>
<td>County Directors/Supervisor</td>
</tr>
<tr>
<td>New personnel will sign a document <em>(Appendix C)</em> attesting to reading and understanding the requirements. This signed document will be placed in the employee’s personnel file and kept in the appropriate office <em>Civil Rights folder.</em></td>
<td>Supervisors, Employees</td>
</tr>
<tr>
<td>Periodic meetings at the county and state levels will reflect discussions regarding Civil Rights compliance documentation and Civil Rights planning. To enhance communication and collaboration, county staff meetings are open to all employees, regardless of work assignments. These Civil Rights discussions will be reflected in meeting minutes, which should be kept in the appropriate office <em>Civil Rights folder.</em></td>
<td>Civil Rights Administrator and County Director/Supervisor</td>
</tr>
<tr>
<td>Extension administration will support, encourage, and provide equal opportunity/diversity training for staff members. Employee attendance in these trainings is encouraged and should be documented in the Logic Model Planning and Reporting System (LMPRS) and kept in the appropriate office <em>Civil Rights folder.</em></td>
<td>Extension Director and Civil Rights Administrator</td>
</tr>
<tr>
<td>Employees will be knowledgeable about and will understand how to implement program strategies that will be in compliance the Civil Rights policies contained in this Handbook.</td>
<td>Employees</td>
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Objective 2. Extension volunteers will have knowledge of laws, rules, and regulations and have appropriate training.
Rationale: Volunteers, as an extension of our programming efforts, should also be knowledgeable of our Civil Rights requirements and our commitment to diversity and nondiscrimination.

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<tr>
<td>Staff will provide training to volunteers so that those who represent Delaware Cooperative Extension will be knowledgeable about and understand how to implement program strategies to be in compliance with the policies identified in this Handbook.</td>
<td>Employees</td>
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<td>For all clubs or specialty groups for all program areas:</td>
<td>Program Managers for</td>
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Club officers and volunteer leaders receive written guidelines on Civil Rights and equal opportunity requirements.

Volunteers affirm and note an assurance statement of nondiscrimination using the compliance forms annually.

Where program delivery method is conducted by club leaders, Extension personnel will train club leaders about responsibilities regarding the following and leaders will ensure:

- Public notification regarding existence of the club, dates, time, and location of organizational meetings (such as an annual newspaper release stating that participation is open to all).
- Invitation of all potential members without regard to race, ethnicity, or gender.
- That diversity is valued and the expectations for equal opportunity requirements is communicated and met.
- 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.

Documentation of the training of volunteers should be reported into LMPRS, and be kept in the appropriate office Civil Rights folder.

**Objective 3. Increase participation of people of underrepresented groups on county and state Extension advisory boards and committees and provide them with Civil Rights training.**

Rationale: Delaware Cooperative Extension is committed to increasing the diversity of local Extension boards and committees, which help identify program needs, develop, implement and evaluate programs for the residents of the state. In order to create and implement programs that support the diverse nature of our communities, members of internal and external advisory boards and committees must be diverse, and/or are representative of the population of the geographic areas being served. These groups should also be informed of our commitment to diversity and nondiscrimination through appropriate training.

### Procedures to ensure compliance:

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<tr>
<td>As internal and external committees and/or boards are developed, all reasonable efforts should be used to identify membership that will be diverse by race, ethnicity, gender, and geographic location. Documentation of board members (using Appendix D) along with records regarding the recruitment and selection process will be kept in the appropriate office Civil Rights folder.</td>
<td>Employees, Supervisors</td>
</tr>
<tr>
<td>Where bylaws are used, bylaws will include clauses that support affirmative action requirements, diverse audience participation, and provide for the rotation of officers. Bylaws should additionally include</td>
<td>Employees</td>
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</table>
the provision that the Extension personnel in charge of the group has the ability to appoint minority and/or underrepresented group members to the board. A copy of all bylaws should be kept in the appropriate office **Civil Rights folder.**

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<th>Employees</th>
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On an annual basis, staff will review key components of this Handbook including the non-discrimination policies with advisory board and committee members. Meeting notes that show this training has occurred should be kept in the appropriate office **Civil Rights folder.**

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<th>Employees</th>
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Goal 3: Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.

Objective 1. Plans of Work will demonstrate working with diverse populations.
Rationale: To improve participation of people from underrepresented groups, personnel should strategically assess what efforts they will take to reach those individuals and these planned efforts should be noted in each individual’s plan of work.

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<tr>
<td>Extension personnel will follow this Handbook when conducting Extension programming.</td>
<td>Employees</td>
</tr>
<tr>
<td>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.</td>
<td>Supervisors</td>
</tr>
<tr>
<td>Employees are expected to identify needs and develop programs that are open to all citizens. Individual’s Plans of Work in LMPRS will show targeting of underrepresented audiences. This data will be queried annually, aggregated, and kept in the appropriate office <strong>Civil Rights folder</strong>.</td>
<td>Employees</td>
</tr>
<tr>
<td>Extension personnel will have in place procedures to mainstream participants into other Extension programs to ensure inclusion.</td>
<td>Employees, Program Leaders/</td>
</tr>
<tr>
<td>Employees are required to document Civil Rights efforts in county files. <strong>Appendix E</strong> details the items that should be documented in office <strong>Civil Rights folders</strong>.</td>
<td>Employees</td>
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Objective 2. Programs will be accessible for the disabled.
Rationale: To provide a welcoming and accessible environment, work facilities and programs must be accessible to disabled employees, volunteers, customers, clients, and visitors.

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<td>Annually, programs and work facilities will be assessed using the Americans with Disabilities Act (ADA) Program Accessibility Self-Assessment Form (<strong>Appendix F</strong>) to determine if programming locations will meet needs of individuals with disabilities, that no discrimination is occurring, and that all reasonable efforts are implemented to reduce barriers to program participation, facilities, and equipment resources. These forms will be placed in <strong>Civil Rights folders</strong>.</td>
<td>Civil Rights Administrator and County Director</td>
</tr>
<tr>
<td>All reasonable efforts will be made to hold off site programming in facilities that comply with the Americans with Disabilities Act (ADA) standards for accessibility.</td>
<td>Employees</td>
</tr>
<tr>
<td>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:</td>
<td>Employees</td>
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Objective 3. Cooperative Extension programs will use all reasonable efforts to accommodate minority and/or underrepresented (Title IX) audiences and limited English proficiency (LEP) participants.
Rationale: As LEP populations and other minority and/or underrepresented audiences grow in our communities, Cooperative Extension programs and outreach efforts need to meet the needs of the citizens in their communities.

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<tr>
<td>All results oriented efforts will be used to provide educational workshops, person-to-person teaching, and other educational methods to reach LEP persons and other underrepresented audiences as determined by needs assessments and clientele inquiry.</td>
<td>Employees and Program Leaders</td>
</tr>
<tr>
<td>Within reason, educational materials will be offered in languages other than English. Samples of these materials should be kept in the appropriate office Civil Rights folder.</td>
<td>Employees and Program Leaders</td>
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Objective 4. 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, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program, the Extension system will use strategies to notify the public.

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<tr>
<td>A web page will be maintained at the state level that outlines 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.</td>
<td>Extension Director/ Civil Rights Administrator</td>
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<tr>
<td>The `...And Justice for All' poster must be displayed and easily visible in</td>
<td>County Director/Unit Head/ employee when off site</td>
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“All reasonable efforts will be used to meet accessibility requests. Please contact the office two weeks prior to event to request assistance.”

OR

“If you have special needs that need to be accommodated, please contact the office two weeks prior to the event.”

Samples of these marketing materials should be kept in the appropriate office Civil Rights folder.

To assist with the accommodations, the University of Delaware Office of Disability Support Services can be contacted to arrange for assistance. Call: 302-831-4643

Employees
each area of the Extension facility where the public visits (front office or lobby and conference rooms). Posters may be taken and posted when programs are offered in the community.

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 G - Official Non-Discrimination Clause.

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. Copies of these releases should be kept in the appropriate office Civil Rights folder.

Extension personnel will ensure that they do not use stereotype language and illustrations, within Extension publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.

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. Copies demonstrating diversity in artwork/graphics should be kept in the appropriate office Civil Rights folder.

Extension personnel will ensure that programs, methods, content, and places of services are implemented in a manner that ensures nondiscrimination.

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, flyers, brochures, letters or documentation of a presentation made. Any documentation should be kept in the appropriate office Civil Rights folder.

**Objective 5. Conduct outreach efforts that increase participation by minority and/or underrepresented groups.**

Rationale: As Extension personnel develop and implement programs, several strategies will be used in conducting outreach efforts to ensure that minority and underrepresented groups are aware of and encouraged to participate in programs.

**Procedures that ensure compliance:**

Each county will develop and maintain a “grassroots” list of minority and underrepresented agencies, organizations and groups to whom program announcements and newsletters will be routinely sent to inform members of the groups or participants in their program of educational programs and opportunities. Such program announcements and letters of outreach will include the Extension office telephone number, address and website information, and the affirmative action statement. A copy of this list should be kept in the appropriate office Civil Rights folder.
Document efforts to reach minority and underrepresented audiences through mass media (which includes radio, newspapers, television, websites, and social media) to inform potential participants of the program and the opportunity to participate. This documentation of these mass media efforts should be kept in the appropriate office Civil Rights folder.

Any contacts via personal face-to-face meetings, calls, or written communication with the leadership of minority and underrepresented groups informing them of Extension’s programs and any invitations to participate in the programs being conducted should be documented (written notation of meeting/call or copy of letter/email/invitation). This documentation of personal outreach efforts to foster a more inclusive audience should be kept in the appropriate office Civil Rights folder.

In meetings with other community organizations or agencies on which Extension educators serve, information about Extension programs and their availability for minority and underrepresented groups will be stressed.
COMPLAINTS

Should there be a discrimination complaint made by our clientele regarding an Extension program or activity, employees shall follow the procedures outlined in **Appendix H**. All staff should be aware of these procedures and make them available to volunteers, clientele, and the public.

COMPLIANCE

Program compliance data will be kept at the individual, county and state levels through the use of compliance forms and the reporting system. Data will be collected, reviewed and evaluated to determine parity and reasonable efforts.

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, programs will be evaluated for compliance.

The goal is to ensure balanced membership and parity in programs. Parity is achieved when club/group membership matches the demographics of the population. Balanced membership in clubs and groups is achieved when the number of members of the underrepresented race reaches 75% of the number of non-majority members the club would have if its racial composition were exactly proportional to that of the membership area. For example, a club with 20 members in a membership area where Blacks comprise 20% of the population would be exactly proportional if it had 4 Black members. This club would be considered to have “balanced membership” if it had 3 Black members (75% of the ideal goal/parity).

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<th>Procedures to ensure compliance:</th>
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<tr>
<td>Using the Logic Model Program Reporting System, Extension personnel and the organization will</td>
<td>Employee</td>
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<td>be able to determine participation data and special accommodations made to reach underserved</td>
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<td>audiences by individual, county, and by program area. The system will be queried for these items</td>
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<td>annually and reports will be kept in the appropriate office <strong>Civil Rights folder</strong>.</td>
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<td>Extension personnel will document in program output reports within LMPRS participation data,</td>
<td>Employees</td>
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<td>including participant demographics, and special accommodations made to reach underserved</td>
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<td>audiences for that program. Reports should be entered monthly.</td>
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<td>A yearly assessment of Extension programs will be conducted to determine the services offered</td>
<td>CED and Program</td>
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<td>to audiences as compared to the eligible population – the parity assessment as described above.</td>
<td>Supervisor</td>
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<td>Employees will prepare material for review by CED/Supervisor.</td>
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</tr>
<tr>
<td>During the performance review process, supervisors will evaluate the employee’s programs and</td>
<td>Supervisors</td>
</tr>
<tr>
<td>participation data with respect to compliance of the policies and procedures set forth in this</td>
<td></td>
</tr>
<tr>
<td>document.</td>
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</tbody>
</table>

Additionally, the following procedures will be conducted to ensure compliance of Civil Rights policies and procedures and reinforce the knowledge base of employees over time.
<table>
<thead>
<tr>
<th>Procedures that will ensure compliance:</th>
<th>Responsible party</th>
</tr>
</thead>
<tbody>
<tr>
<td>Each Extension office will conduct internal audits (using forms in <strong>Appendix I</strong>) on a rotating basis of one county per year to ensure the Civil Rights plan is being implemented.</td>
<td>Extension Director, County Directors</td>
</tr>
<tr>
<td>The Civil Rights administrator will also review office Civil Rights folders on a 3-year rotating basis to ensure policies and procedures outlined in this Handbook are being followed by personnel.</td>
<td>Civil Rights Administrator</td>
</tr>
<tr>
<td>The Civil Rights administrator will keep on file the federal review policies and guidelines, past federal audit reports developed, and the state response to those reports. Additionally,</td>
<td>Civil Rights Administrator</td>
</tr>
<tr>
<td>The Civil Rights administrator and county directors will keep on file copies of the internal reviews and the corresponding recommendations until the next federal audit takes place.</td>
<td>Civil Rights Administrator, County Director</td>
</tr>
</tbody>
</table>
Appendix A
Federal Civil Rights Acts under Which Cooperative Extension Operates


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

Federal Equal Pay Act of 1963 – Employment Protections
Protects men and women who perform equal work, requiring equal skill, effort and responsibility; under similar working conditions and in the same establishment; from sex based wage discrimination.

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.
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.

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.

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.

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 based on disability by public entities.
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.

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.

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.

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
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. 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.

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.

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.

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.

2. Club leadership should document their efforts to inform their communities and community leaders of the non-discrimination policies of Delaware Cooperative Extension. A “Results Oriented Form” follows that should be used to log information and actions taken.

Annually, club leadership needs to sign and date a Compliance Form. This form is to be kept by the Agents/Educators in their files for audit purposes.
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 age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program. 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 age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program. 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.
“Results Oriented Efforts” Record Sheet

Please help your County Extension Educators document efforts to meet "Results Oriented Efforts" of making the community aware that your club is open to all, regardless of age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program.

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)

<table>
<thead>
<tr>
<th>Date</th>
<th>Place (including town)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Example: 9/10/15-10/15/15)</td>
<td>W.B. Simpson Elementary, Camden</td>
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</table>

Individual Contacts and Their Address

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

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
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|                                                      |

Results of Efforts:
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 Federal Civil Rights law and U.S. Department of Agriculture (USDA) Civil Rights regulations and policies.

This policy as stated is:

“Prohibits discrimination on the basis of age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program.”

Name of Organization: ____________________________________________________________

Address of Leader Signing Form: _________________________________________________

____________________________________________________________________________

Phone Number: __________________________

Policy Accepted by: ____________________________________________________________

Name of group or organization

Date: __________________________

Signature of leader/president
Appendix C
Acknowledgement of Receipt/Understanding

I, ___________________________________________(name), acknowledge that I have received and read the Delaware Cooperative Extension 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.

Signature: __________________________________________

Date: ___________

Return this document to your supervisor
Appendix D  
Advisory Board/Committee Member Template

Name of Advisory Board/Committee: ______________________________________________________

Role of Board/Committee:                                                                 
____________________________________________________________________________________

Date: __________________  

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Race</th>
<th>Gender</th>
<th>Age</th>
<th>Area of Representation</th>
</tr>
</thead>
<tbody>
<tr>
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Appendix E
Sample Listing of Documentation for Each Goal Area

Relevant Legislation
- DE Cooperative Extension Handbook for Civil Rights Compliance
- Copies of relevant legislation (as listed in Appendix A)

Goal 1: Delaware Cooperative Extension Leadership will lead by example.
- Copies of signed and returned compliance forms (Appendix B)
- Documentation of planning and coordination with 1890 institutions

Goal 2: Educate and involve staff, volunteers, and advisory boards in Civil Rights training.
- New Employee signed Acknowledgement of Receipt/Understanding (Appendix C)
- Staff meeting minutes reflecting discussion of Civil Rights topics
- Documentation of personnel trained in Civil Rights topics
- Documentation of volunteers trained in Civil Rights topics
- Documentation of board members (using Appendix D) along with records regarding the recruitment and selection process
- Copies of bylaws that include clauses that support affirmative action requirements, diverse audience participation, provide for the rotation of officers, and that the Extension personnel in charge of the group has the ability to appoint minority and/or underrepresented group members to the board.
- Meeting notes reflecting annual review/training with boards/committees/groups on Civil Rights topics
- Copies of training materials used for all volunteers and clubs
- Public notification regarding existence of club, dates, time and location of organizational meetings
- Invitation to all potential members without regard to race, ethnicity or gender and that clearly articulates that diversity is valued
- Documentation that club meeting locations provide for equal opportunity and accessibility
- Samples of Marketing materials (press releases, postcard) that document public notification efforts

Goal 3: Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.
- An annually aggregated list from LMPRS reflecting individual Extension personnel’s intentions to target underrepresented audiences identified in POWs.
- Any and all efforts to comply with this Handbook, including:
  o Completed Americans with Disabilities Act (ADA) Program Accessibility Self-Assessment Forms (Appendix F)
  o Samples of brochures and informational flyers promoting programs and providing accessibility instructions for people with special needs and all reasonable effort statement on accessibility or Special Needs accommodation
- Documentation of any specific efforts to accommodate limited English proficiency participants and other minority and/or underrepresented (Title IX) audiences
- Translator, sign language or other accommodation
- Samples of materials offered in languages other than English.
- Samples of news releases or other materials that include the non-discrimination statement (as found in Appendix G).
- Samples of artwork/graphics or other materials that demonstrate diversity.
- Samples of Extension personnel’s efforts to inform organizations, the county, communities or key contact people about Extension programs and our non-discrimination policies. This may include press releases, flyers, brochures, letters or documentation of a presentation made.
- A copy of the county office’s grassroots list of minority and underrepresented agencies, organizations and groups to whom program announcements and newsletters will be routinely sent to inform members of the groups or participants in their program of educational programs and opportunities.
- Documentation of efforts to reach minority and underrepresented audiences through mass media (which includes radio, newspapers, television, websites, and social media) to inform potential participants of the program and the opportunity to participate.
- Documentation of contacts via personal face-to-face meetings, calls, or written communication with the leadership of minority and underrepresented groups informing them of Extension’s programs and any invitations to participate in the programs being conducted.

Complaints
- Documentation that procedures (Appendix H) were followed if a complaint is expressed either informally or formally.

Compliance
- Annual LMPRS reports detailing participation data and special accommodations made to reach underserved audiences by individual, county, and by program area.
- Completed Internal Audit Form (Appendix I)
Appendix F
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?  Yes  No
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?  Yes  No

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 G
Official Non-Discrimination Clauses

Appropriate Long Version

University of Delaware Cooperative Extension In accordance with Federal Civil Rights law and U.S. Department of Agriculture (USDA) Civil Rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Exceptions to Including the Full USDA Nondiscrimination Statement.

If the size of the material is too small to include the full statement, the material will at a minimum, include the following statement in print in the same size as the text:

“USDA is an equal opportunity provider, employer, and lender.”

OR:

“This institution is an equal opportunity provider.”

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) programs are prohibited from discriminating based on age, color, disability, familial status, gender identity or expression, genetics, limited English proficiency, marital status, national origin, political beliefs, race, religion, sex, sexual orientation, veteran status, or because all or a part of an individual’s income is derived from a public assistance program, in any program or activity conducted or funded by USDA.

OR

“These institutions are an equal opportunity provider.”
Appendix H
Complaint Procedures

Extension Program/Activity Related Complaints Having To Do With Discrimination Based On Sex, 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

2) U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; fax: (202) 690-7442; or email: program.intake@usda.gov or go to: https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer

AND

3) A copy of the letter should be sent to the Director of Cooperative Extension, 113 Townsend Hall, University of Delaware, Newark, DE 19716.
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 130, Newark, DE 19716. Phone: (302) 831-4643 Fax: (302) 831-3261. Information can be found at: Personnel Policy number 4-29. Policy Name: University Policy Against Unlawful Harassment http://www.udel.edu/ExecVP/policies/personnel/4-29.html

OR

U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; fax: (202) 690-7442; or email: program.intake@usda.gov or go to: https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer

Goal 1: Delaware Cooperative Extension Leadership will lead by example.
Goal 2: Educate and involve staff, volunteers, and advisory boards in Civil Rights training.
Goal 3: Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.
Appendix I
Internal Review Forms

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

Goal 1
Goal 2
Goal 3
GOAL 1 – Delaware Cooperative Extension Leadership will lead by example.

List of joint UD and DSU programming efforts:
CIVIL RIGHTS REPORT – For Internal Audit Purposes

Date: ________________  Office: ____________________________________________

Program Area/Initiative: ________________________________________________

Name: __________________________  Program Year: __________________________

GOAL 1 – Delaware Cooperative Extension Leadership will lead by example.

Compliance Forms on File:
List Organizations and Dates Signed
GOAL 2 – Educate and involve staff, volunteers, and advisory boards in Civil Rights training.

Staff certificate signed
List names and date signed:
GOAL 2 – Educate and involve staff, volunteers, and advisory boards in Civil Rights training.

Training Opportunities

Staff meeting minute dates when Civil Right information was provided.
Dates Provided:

All staff have received Civil Rights training? Yes _____ No _____
If no, what plans have been made for training?

Employees:
List personnel names along with training titles and dates

Volunteers:
Civil Right Training has been conducted for the following volunteer groups:

Group Name ___________________________ Date Provided

Date of meeting minutes that reflect when Civil Right information was provided. Date of Minutes and attach minutes.
CIVIL RIGHTS REPORT – For Internal Audit Purposes

Date: ___________________   Office: ____________________________________________

Program Area/Initiative: _________________________________________________________

Name: ______________________________  Program Year: __________________________

Goal 2: Educate and involve staff, volunteers, and advisory boards in Civil Rights training.

Diversity of Committees/Boards/Clubs/Groups

Name of Council/Board: _________________________________________________

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

Gender of participants:  Male _____  Female_____

Number of:  Adults _____  Youth _____

Underrepresented areas that are represented:

Dates of meetings during the last year:

Review of bylaws shows commitment to EEO/AA areas:  Date completed:

Identify groups/organizations that you have invited to participate in CES programming. Attach copy of letter/email and mailing lists.

List annual goals of group and progress toward meeting those goals:

Completed Compliance Documents by clubs/groups. Attach forms
GOAL 3 – Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.

Special Intentions

All Staff have included within LMPRS special intentions to reach underserved audiences?
GOAL 3 – Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.

Accessibility for the disabled.

All outside facilities have been assessed to determine accessibility for individuals with disabilities.

This includes facility and equipment that reduce barriers to participation: Yes _____ No _____

If need be attach assessment form (Appendix F)

What steps have been taken to ensure promotional materials and registrations inform participants of accessibility? Attach samples
GOAL 3 – Develop, modify, and implement educational programs and advise the public of equal access to these programs to increase participation of people of underrepresented groups.

Efforts to Inform:

a) Letters sent to underrepresented individuals/groups. List who and when.

b) Programming specifically offered to underrepresented individuals/groups. ADA/Limited Income/ Limited Income and other protected audiences. List who and when.

c) Brochures/flyers, media release files have been reviewed to ensure they contain non-discrimination clauses and accessibility provisions. Provide samples.

d) Review of mailing lists and media lists to ensure diversity and Personal Non-Public Information (PNPI) requirements are followed. Date completed:
CIVIL RIGHTS REPORT – For Internal Audit Purposes

Date: ________________  Office: ______________________________

Program Area/Initiative: _________________________________________________________

Name: ___________________________  Program Year: ____________________

Complaint File

"And Justice for All" posters are displayed in all meeting rooms and entrances at the following programming locations in the county:

Complaints Filed (dates):

Nature of complaint and resolution:
CIVIL RIGHTS REPORT – For Internal Audit Purposes

Date: _________________  Office: ____________________________________________

Program Area/Initiative: _________________________________________________________

Name: ______________________________  Program Year: __________________________

Parity Assessment

1. General population demographics by county, zip/code and or school district.

2. Comparison of LMPRS/output data with population data to determine parity/balanced membership.

3. Findings:

4. What steps have you taken to ensure educational programming has been designed/modified to increase participation of underrepresented groups? Attach any letters of invitation or notes documenting your activities.