C

ivil Rights

Review

Checklist

County:

Review Date:

Signed: , District Director

Signed: , Civil Rights

Compliance Officer

DivLogoSep2011

United States Department of Agriculture and County Governments Cooperating

The Arkansas Cooperative Extension Service offers its programs to all eligible persons regardless of race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status, and is an Affirmative Action/Equal Opportunity Employer.

**PREFACE**

Civil rights reviews are intended as part of a proactive effort to determine how well Extension programs are being delivered to clientele. Civil rights reviews also serve as a systematic self-assessment of determining compliance with Federal regulations and taking remedial steps to correct any instances where deficiencies are identified.

The Arkansas Cooperative Extension Service conducts civil rights reviews for each county on a five-year rotation basis. This civil rights review provides a framework for use by county faculty, district supervisors, and the civil rights compliance officer to do a self-assessment of the progress made towards making certain that program opportunities are available to all residents within the county. This checklist will be used as a guide to lead faculty and staff through the civil rights reviews. During the review, opportunities are presented for the presentation of program accomplishments, along with the solicitation for comments and explanations to measure the overall status of delivering programs on a non-discriminatory basis in compliance with all Federal regulations.

**RELEVANT LEGISLATION**

Civil Rights reviews are conducted consistent with the following Civil Rights Laws, Authorities and Regulations

* Title VI, Civil Rights Act of 1964, as amended, 42 U.S.C. § 794
* Age Discrimination Act of 1967, 42 U.S.C. § 601 et. seq.
* Title IX, Education Amendments of 1972, et seq.
* Section 501 of the Rehabilitation Act of 1973, as amended, 19 U.S.C. § 794
* Americans with Disabilities Act of 1990, 42 U.S.C. § 12101 et. seq.
* USDA DR 4330-2, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA, dated March 3, 1999

**PROCEDURES**

Several weeks prior to the review, county faculty will be asked prepare for the actual on-site review. The county staff chair must have at least three (3) copies of the last completed Civil Rights Yearly Assessment document (AFFACT-01) for the on-site review. The AFFACT-01 will serve as a basis in conducting civil rights reviews. The civil rights compliance officer, district director, and other review team members will have this checklist and will review the information provided in the AFFACT-01 and other data as needed to determine the status of compliance efforts. **All members of the county faculty and the appropriate county secretary should plan their schedules to be available on the day of the review**.

The civil rights compliance officer, district director and other review team members will share verbally with the county staff chair any deficiencies during the review, as well as recommendations for reaching compliance, if needed. After the review, the A.F.F.A.C.T.-326, Civil Rights Compliance Report will be completed, listing findings and recommended remedial action and submit it to the Associate Vice President for Agriculture-Extension. The civil rights compliance officer and the county Extension staff-chair will receive a copy of the report. It is the responsibility of the district director and the county Extension staff chair to see that the recommended remedial actions are implemented in a timely fashion.

**PLEASE NOTE: The Civil Rights Yearly Assessment (A.F.F.A.C.T-01) and all information attached to it, the Civil Rights Compliance Report (A.F.F.A.C.T-346), and this checklist (A.F.F.A.C.T-347) must all be kept in one file in the county office, labeled “Civil Rights Review (Year of the Review)”, ex “County Civil Rights Review (2012).” This file must be kept at least five (5) years.**

In preparing for the review, please note the Review Team will inspect the following documentation that should be in the county’s civil rights file:

* 2014 University of Arkansas Cooperative Extension County Civil Rights Compliance Plan
* Summaries of Civil Rights Laws
* University of Arkansas Non-Discrimination Policies
* County Demographic Information
* County Demographic Information - current
* Potential Audience Demographic Information- Each Program Area ( AFFACT-05) - current
* Civil Rights Yearly Assessment Reports (AFFACT-01) – last three (3) years
* Annual AIMS Civil Rights Contact Date Reports for Each Program Area
* Mailing Lists (Current Year) containing demographic information
* County Extension Council Membership List – Race and Gender (AFFACT-04)
* Attendance Records – last three (3) years
* Committee Minutes (Including 4-H and EHC Expansion and Review Committees) (AFFACT-04) - last three (3) years
* Internal Civil Rights Review and Findings (AFFACT-346) – most current
* Accessibility for the Disabled
* ADA Self-Evaluation and Compliance (AFFACT-345)
* Listing of all reasonable accommodations requested and provided (AFFACT –

345.1)

* EHC and 4-H Club
* Location of 4-H Clubs identified on county map – current
* Annual summary of 4-H overnight/ day camp participants (AFFACT – 13) – last three (3) years
* Annual list of 4-H camp scholarships recipients by race/ethnicity and gender (AFFACT- 14) – last three (3) years
* Location of EH Clubs identified on county map - current
* “All Reasonable Efforts” File
* Contains documentation of all good faith efforts, including notes, invitation letters, interview records, list of grassroots organizations, copies of flyers, newspapers articles, records of personnel visits, AFFACT-343, AFFACT-504; minority media lists
* List of materials and/or copies of information disseminated to the public in other languages
* Maintain these records for three (3) years
* Attendance Records
* Separate file for each program area, (Ag. Comm., Ag- Other, FCS, 4-H, EFNEP)

(AFFACT-0.8, 08.1, 08.2)

* Maintain these records for three (3) years
* Public Notification
* Copies of printed materials disseminated to the public announcing programs/events that contain the non-discrimination statement and/or ADA statement
* Maintain these records for three (3) years
* Office Conference Minutes
* Must include discussions/strategies to increase underrepresented clientele
* Maintain these records for three (3) years
* Non-Discrimination Assurances
* Annual Certification of Non-Discrimination for each EH and 4-H Club (AFFACT - 513, AFFACT – 662, AFFACT – 663)
* Annual Notification Letters to Organizations and Groups
* Determination of Non-Discrimination Status (AFFACT – 03)
* Maintain these records for three (3) years
* Volunteers
* Certification of Child Maltreatment Training (Always Keep)
* Annual Summary of Master Gardner Volunteers and 4-H Volunteers – (AFFACT – 15) – maintain these records for three (3) years

**PROGRAM MANAGEMENT**

County Extension Council, its committees, and subcommittees, membership lists includes racial/ethnic and gender background of the members.

County Extension Council membership list is representative of all program areas and geographic regions of the county.

Expansion and Review Committee minutes reflect discussion of reviewing current maps and identifying opportunities to expand the programs to reach and increase the membership of racial/ethnic minorities.

Attendance records are on file for meetings of the committee meetings.

**PUBLIC NOTIFICATION**

Extension’s statement of nondiscrimination is on all publications, flyers, newsletters, meeting announcements, and samples are on file.

All meeting announcements, flyers, brochures, etc. include a statement indicating the procedure for an individual with a disability to request assistance.

Examples of letters sent to organizations notifying them of Extension’s policy of nondiscrimination are on file.

“And Justice for All” poster is in main public area and in all meeting rooms.

All EEO required posters are displayed:

List of Extension EEO Counselors  FMLA

EEO is the LAW  CES Career Recruitment

Workers’ Compensation Form P  Employment Security Law

Fair Labor Standards  Job Safety & Health Protection

E-Verify  Uniformed Services Employment &

Reemployment Rights Act

**COMPLIANCE**

Office conference minutes indicate discussion/strategic planning to increase underrepresented clientele in programs.

County civil rights file includes the UA Cooperative Extension Service County Civil Rights Plan (2014) and the previous County Civil Rights Review

County staff knows the procedures to follow for grievances and complaints related to civil rights compliance in Extension.

County staff demonstrates thorough knowledge of Civil Rights Laws and Regulations and understands Extension’s civil rights goals.

County’s “All Reasonable Efforts” adequately demonstrate staffs outreach efforts to increase the underrepresented clientele in programs.

Copies of mailing lists are on file in the county office that includes tracking of demographic information.

ADA Self-Evaluation is on file in the county office.

Attendance records for programs conducted are on file in the county office that contains demographic information.

**PROGRAM DELIVERY**

For each program area, review AIMS contact data compared to potential audience data to determine compliance. If not, discuss efforts to remedy.

4-H and EH Club maps are current and on file in the county office.

Signed statements of nondiscrimination obtained from EH and 4-H clubs are on file.

Constitution or bylaws of County EH Council or EH Clubs containing a provision that membership is open to all regardless of race, color, national origin, religion, gender, age, disability, marital status.