**NC STATE EXTENSION**

**Extension Program and Compliance Review Procedures**

**2022-2025**

The Extension Program and Compliance review guide serves as accountability tool to ensure that County Extension offices are in compliance with civil rights and equal opportunity policies in the implementation of Extension programs, that every customer and employee is treated with fairness, equality, and respect, and that programs are inclusive and have adequate diversity. An on-site review of each county Extension office, led by the respective District Extension Director (DED), will occur once every four years based on the schedule below. DEDs should provide the county with a minimum of 30 days written notice prior to the date of the compliance review. The DED should also notify the Director of Extension, Director of County Operations, ANR/CRD Program Leader, FCS/4-H Program Leader, and Evaluation and Accountability Coordinator of the scheduled compliance review dates.

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| --- | --- | --- | --- | --- |
|  | **2022** | **2023** | **2024** | **2025** |
| **WEST** | Cherokee  Clay  Graham  Macon  Swain | Haywood  Henderson  Jackson  Polk  Transylvania  EBCI | Buncombe  Cleveland  Madison  McDowell  Rutherford | Avery  Burke  Caldwell  Mitchell  Watauga  Yancey |
| **NORTH CENTRAL** | Alleghany  Ashe  Surry  Wilkes  Yadkin | Davidson  Davie  Forsyth  Rockingham  Stokes | Alamance  Caswell  Chatham  Guilford  Randolph | Durham  Granville  Orange  Person  Vance |
| **SOUTH**  **CENTRAL** | Alexander  Catawba  Gaston  Iredell  Lincoln | Cabarrus  Mecklenburg  Rowan  Stanley  Union | Anson  Montgomery  Moore  Richmond  Scotland | Cumberland  Harnett  Hoke  Lee |
| **NORTH EAST** | Edgecombe  Franklin  Nash  Wake  Warren | Bertie  Halifax  Hertford  Martin  Northampton | Beaufort  Dare  Hyde  Pitt  Tyrell  Washington | Camden  Chowan  Currituck  Gates  Pasquotank  Perquimans |
| **SOUTH EAST** | Greene  Johnston  Lenoir  Wayne  Wilson | Carteret  Craven  Jones  Onslow  Pamlico | Bladen  Duplin  Robeson  Sampson | Brunswick  Columbus  New Hanover  Pender |

At the beginning of each calendar year the DED shall:

* Set dates for County Extension Program and Compliance Review.
* Send letter to County Extension Director announcing date, time, and support
* materials/documentation needed at the time of the review conference.
* Notify Director of Extension, Director of County Operations, ANR/CRD Program Leader, FCS/4-H Program Leader, and Evaluation and Accountability Coordinator of the scheduled compliance review dates.

Structure of the on-site review:

* Begin with a walk-through of the county Extension office with the DED/review team noting general observations in Part I of the review guide.
* Conduct a meeting of total county Extension staff
  + Introduction/Purpose
  + Benefits of compliance review and program review
  + Emphasize that this is a "Program Review" and that as a part of the program review you will be looking at compliance with civil rights and affirmative action guidelines.
  + Ask questions on staff knowledge of civil rights and then review the answers.
  + Opportunity to help staff is greater if agents "open up" & talk.
  + Program review is a "fact finding" day - followed by exit conference to review strengths and weaknesses of the program.
* Conduct interviews with the CED and individual employees (if needed).
* Review documentation in the county civil rights file.
* Review ERS data

Written report:

* A written report will be provided by DEA to county staff, the Director of County Operations, and the Evaluation and Accountability Coordinator within six weeks of date of review.
* Required elements for the written findings and recommendations report include:

1. the date of DEAs written report of findings and recommendations;
2. the date compliance review was conducted at the county;
3. the following language: “The ‘And Justice for All’ poster was displayed in the office;”
4. the following language: “Official documents related to civil rights and affirmative action are on file, or can be referenced by staff on electronic files contained on an office computer or on the NC State Extension Intranet”
5. a list of any corrective measures that must be made by the county and;
6. the due date for the county response outlining what corrections were made, with the due date being set on or before 6 months from the date of compliance review.

* CEDs are expected to follow up on recommendations and submit report to the DED and Director of County Operations within six months of date of compliance review.

**Benefits of Extension Program and Compliance Review**

1. Provides additional means of program evaluation to determine whether needs of clientele, including minorities, are being met.
2. Provides for more readily available information on service to minority groups to respond to special and regular reports and requests.
3. Encourages staff to develop new programs, methods and techniques to reach underserved audiences.
4. Meets the laws, regulations and policies requiring reviews.
5. Avoids problems of investigation and/or complaints associated with legal noncompliance, if alleged by outside groups/individuals.
6. Brings staff to a better understanding of the need for documentation and records.
7. Provides a basis for improving personnel and program management methods; provides benchmark data on which to measure progress.
8. Increases staff awareness of managerial responsibilities in areas of employee supervision, training and career development.
9. Documents information for Director and state supervisory and administrative staff; reduces possibility of misinformation and or lack of communication.
10. Enables county staff to be more knowledgeable of laws, rules and regulations and facilitates their "indoctrination" of planning groups, organizations, lay leaders, governing bodies, legislators and others involved in cooperative working relationships.
11. Uncovers areas in which NC State Extension rules and procedures on civil rights and equal employment opportunity matters need to be reemphasized, strengthened, incorporated into written policies and procedures, and/or disseminated to staff and other appropriate persons.
12. Facilitates preparation of county and State annual program plans in terms of staff-time statistical data, as well as narratives called for to fulfill specific civil rights and EEO requirements.

**Sample Compliance Report Template**

*Prepare the report to county staff, and Director of County Operations in letter format, using the following outline for the narrative summary:*

This report represents the result of a review of the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ County Extension program, as well as staff's compliance with the Civil Rights Act of 1964 (Title VI and VII), various related Civil Rights regulations, Affirmative Action Plan, Title IX of the Education Amendments (1972), administrative policies and procedures. This review was made in by on\_\_\_\_\_\_\_\_ , where records and data were examined, and personal interviews were conducted with Extension personnel.

The review began with a discussion of the purpose and benefits of the Program and Compliance Review. This was followed with a review of compliance terms and terminology, a review of the county civil rights file, and ERS compliance data. All County Extension faculty and support staff participated. At the completion of the review an exit conference to discuss the results of the review was held with: (names of individuals present at exit conference).

*Then as a narrative, write comments and recommendations on various areas of concern, citing significant findings/observations related to the interview instrument, including a summary of the recommendations.*

Part 1: Observation

Findings:

Recommendations:

Part 2: Staff Knowledge of Civil Rights

Findings:

Recommendations:

Part 3: Program Management

Findings:

Recommendations:

Part 4: Staff Selection

Findings:

Recommendations:

Part 5: Files and Documentation

Findings:

Recommendations:

Part 6: Data Review

Findings:

Recommendations:

I appreciate your preparation for this review and your positive participation in the review conference. I am pleased with the programming and outreach efforts which are occurring in \_\_\_\_\_\_\_\_\_ County, however; there is always room for improvement in outreach efforts to all audiences and in offering high quality and relevant educational activities. A written response to these recommendations must be submitted to my office on or before \_\_\_\_\_\_\_\_\_\_\_\_\_\_[Due Date - not more than 6 months from date of compliance review]

*Send the letter with comments and recommendations to county staff and to the CED and Director of County Operations, with the original completed copy of the instrument (data/notations entered) maintained for the permanent file.*

**Additional Information on Civil Rights**

Office entrances and routing of clients must NOT result in discrimination on the basis of race, color, national origin, sex, age, or disability.

Extension employees must be housed in office space according to function, without regard to race, ethnicity, or sex.

Facilities where Extension programming occurs must be accessible to disabled people or reasonable accommodations must be made. Counties should perform an accessibility self-assessment and take necessary steps to reduce barriers for disabled persons to participate in Extension programs.

The "And Justice for All" poster must be prominently displayed where it is readily visible the visiting public. displayed? Check all that apply.

**When is "All Reasonable Effort" required?**

The phrase "all reasonable efforts" refers to NIFA-USDA civil rights requirements pertaining to extension programming in interracial communities or defined geographic areas. A community is defined as multi-racial when one or more persons of a racial minority live in a community and are potential members of the target audience for an extension program. Extension is required to use “all reasonable effort” with programming delivered to all organized groups and clubs. All reasonable effort is required when new groups are formed and is done periodically to assure that individuals living in the community where the groups/clubs meet are invited to become members. All reasonable efforts are required when a club or group is identified as not having balanced membership when entered into the Extension Reporting System (ERS).

**Who is responsible for conducting "All Reasonable Effort?"**

All extension staff must understand what "all reasonable efforts" means and what minimal efforts are required. The Extension employee who is most directly responsible for the program will be held responsible for the all reasonable effort requirements. Club members and volunteers may be asked to assist in the process.

**What are the minimum “All Reasonable Effort” requirements?**

The minimum “all reasonable effort” required for county Extension staff members for any identified clubs or groups whose membership is not balanced, includes the following items:

* Use all available mass media, including radio, newspaper, and television to inform potential recipients, with the multi-racial communities, of the program and of the opportunity to participate.
* Personal letters and fliers/publications addressed to potential recipients inviting them to participate, including dates and places of meetings or other planned activities.
* Personal visits by the county Extension staff to a representative number of defined potential recipients in the geographically defined areas to encourage participation.

**Where would you publicize educational programs and activities to be sure that all audiences are aware of the program or activities?**

Publicize in areas/locations that are frequented by the targeted audience. To reach minority audiences

notices should be posted in minority neighborhoods and disseminated through grass roots organizations, minority churches and media that specifically reaches minorities.

**What are some of the considerations involved in making your programs accessible to disabled persons?**

(a) May not refuse participation by a disabled person in a service, program, or activity simply because the individual has a disability; (b) Must provide programs and services in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity; (c) Must eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy their services, programs, or activities unless “necessary for the provisions of the service, program, or activity;” (d) Are required to make reasonable modifications in policies, practices, and procedures that deny equal access to individuals with disabilities, unless a fundamental alternation in the program would result; (e) Must furnish auxiliary aids and services when necessary to ensure effective communications, unless an undue burden would result; (f) May not place special charges on individuals with disabilities to cover the costs of measures necessary to ensure nondiscriminatory treatment; and (g) Shall operate programs so that, when viewed in their entirety, they are readily accessible to and usable by individuals with disabilities.

**What are the guidelines for participation of minorities on advisory and planning groups?**

The groups should represent the racial, ethnic, and gender makeup of the population.

**How do you file an employment discrimination complaint?**

To file a workplace-related complaint you can complete the Discrimination, Harassment, and Retaliation Complaint form which provides preliminary information to the Office for Institutional Equity and Diversity to assist in resolving violations of NC State University’s Equal Opportunity and Non-Discrimination Policy. The form can be accessed at the NC State Equal Opportunity and Equity section’s website.

**How would someone file a Civil Rights Program Complaint?**

Complainants have three options for filing complaints: informal complaint procedure, formal complaint procedure, and notification sent directly to USDA. Complaints can be informally resolved by an employee or County Extension Director. If a complaint cannot be resolved informally, the client should be provided with the NC State Extension Discrimination Complaint Brochure. A formal written complaint may be made with the Director of Extension. Clients may send notification of a complaint to the USDA Assistant Secretary for Civil Rights using USDA Program Discrimination Complaint Form, AD-3027, found online or at any USDA office.

**What are the bases on which program discrimination is prohibited in NC State Extension programs?**

Discrimination is prohibited on the bases of race, color, religious creed, sex, political beliefs, age, disability, national origin, or limited English proficiency. (Not all bases apply to all programs.) Reprisal is prohibited based on prior civil rights activity. In addition, NC State University and NC State Extension prohibit discrimination based on sexual orientation, gender identity, veteran status, genetic information, or any other legally protected status.

All Extension employees should participate in at least a civil rights refresher or civil rights discussion during a staff meeting each year. All new employee and new volunteers must receive civil rights training.

Extension employees may not sponsor, support, financially assist or officially participate in any conferences, conventions or meetings where participants are segregated, excluded or treated differently based on race, color, national origin, religion, handicap, or gender/sex?

Extension may NOT offer sex separate programs, recognitions, contests, or awards.

Each county must conduct a LEP (Limited English Proficiency) self-assessment and take steps to ensure that LEP persons have access to the programs and services provided by Extension employees including having program announcements and educational materials prepared in languages other than English.

All informational materials released to public must have the nondiscrimination statement which indicates that all educational programs/activities are "open to all regardless of race, color, sex, disability, or national origin?"