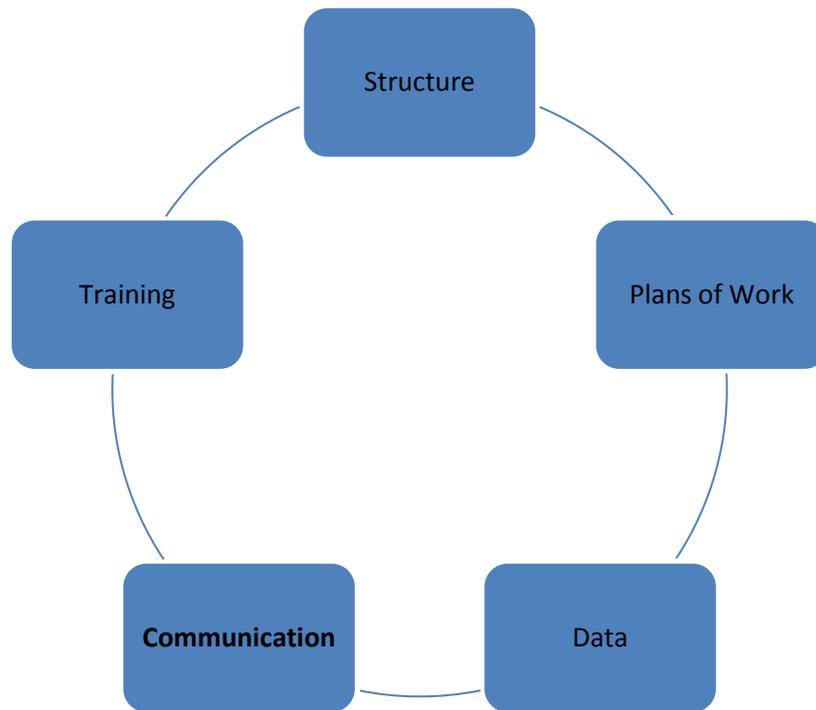


NCCEA Webinar  
Organizational Civil Rights Performance  
Handouts and Resources

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April 6, 2012

# Five Elements of Organizational Civil Rights Performance



## Organizational Structure

Is the structure in place sufficient to accomplish all civil-rights (nondiscrimination) related activities: internal compliance review, policy communication, training, coordination and collaboration with minority-serving institutions? Do people in positions tasked with civil rights-related responsibilities have any power and/or support of leaders in the organization?

## Plans of Work

Plans of Work, while tied to strategic missions and subject matter, have civil rights components, particularly in terms of stakeholder input and programs for the underserved.

Ideally, faculty work goals reflect these components in an integrated way tied to the effectiveness of outreach, the inclusion of the community in program planning and in programs; and, in retooling the organization and its resources to meet new challenges and needs such as those of limited English proficient people, people with disabilities, women farm operators, etc. Plans of Work may also feature diverse work groups and multi-disciplinary projects with minority-serving institutions, leveraging resources in new ways to meet new needs.

## **Data**

Do we know who we are reaching in our programs? Are we collecting demographic data sufficient to demonstrate we are reaching our constituents based on the potential pool of beneficiaries (US Census Data or some other reliable local data) by county and State? Do we use this data for planning purposes to identify potential beneficiaries for our programs and to reach out to underserved audiences?

Do we assess our work in both qualitative and quantitative terms? Have we assessed how we are unique or irreplaceable in quantitative terms? Is there wasted or duplicated effort? Are we getting 80% of our value from 20% of our investment/work? What are emerging areas of importance? Do we need to shift resources to magnify any elements of our work? Do we use data for more than an historical look back?

## **Communication**

For the purposes of the webinar and the instrument you completed in advance, we defined communication primarily in terms of external communication to stakeholders and program participants, volunteers, advisory committee members, focus group members, fair-goers, and the public.

Public notification to potential program participants, assuring them that the University/Extension doesn't discriminate in programs and that accommodation for people with disabilities is available upon request is a key form of communication.

The conduct of University officials and how that is viewed by the public also sends a message: this is why most Universities have human relations codes of conduct and ethics rules. These policies are generally reflected in performance appraisal systems.

## **Training**

For the purposes of the webinar and the instrument, we defined training in terms of formal training as well as *internal communication*, especially policy communication. This includes civil

rights- related policy and procedure—and training on the same— to the degree that staff feel comfortable applying concepts to issues that come up in daily work situations.

Formal instruction includes online and classroom training: with staff completing lessons that have specific learning goals and outcomes that prepare them to make decisions and take actions about civil rights-related issues in their day-to-day responsibilities. Training includes internal communication about policy or procedure imparted in meetings and in-service settings.

The internal compliance review training “simulation” would be the most involved hands-on training experience most employees would be likely to experience related to civil rights compliance.

**For Administrative Use Only-(month) 2012**

**Minimum Data Collection**

**Civil Rights Compliance Review**

\_\_\_\_\_ **University Cooperative Extension Service**

Minimum program data expectation at the County and State level: two full years of program data showing race, ethnicity and gender (REG) for each program year in all program areas. This data will be requested at the state level from program leaders. Data at the county level will be collected from individual staff members. In counties where staff conduct programs in the same program area, data may be combined; however, individual staff must be prepared to identify program data specific to their efforts.

Reviewers will also request program contact data at the county level from the end of the last full reporting year to date depending on the program area (for example from 10/1/11 to present for traditional programs as noted in the chart below) from individual county staff. Reviewers may request to review older program data as needed.

**Particulars for \_\_\_\_\_ University:**

Program contact data will generally be derived from the \_\_\_\_\_ University (data application/system) for traditional programs. Other national data systems such as 4-H Access will be utilized for other program data. The following table may serve as a guide for assembling data for reviewers:

TIME FRAMES FOR DATA REPORTING _____ (month) _____ 2012 Review			
<b>University Extension Program</b>	Traditional Programs: Agriculture & Natural Resources Family and Consumer Sciences Economic and Community Development (Program year)	EFNEP SNAP ED CYFAR (Federal fiscal year)	4-H (4-H program year)
<b>Reporting Years for Civil Rights Review</b>	FY12 10/1/11 to current (partial year) FY11 10/1/10-11/30/11 (full year) FY10 10/1/09-11/30/10 (full year)	FY11 10/1/10-9/30/11 FY10 10/1/09-9/30/10	2011 2010 4-H Access, ES-237, etc.

**Statewide data requirements for all program/unit leaders: all counties**

- A. State Summary of two complete program years, 2010 and 2011 for all programs in table above, as applicable and others if they exist.
- B. Advisory Boards and Committees:

- State Extension Advisory Councils/Boards/ Committee(s) membership listings by RGE for program years 2010 and 2011
- District rosters and attendance for the same program years

**County data requirements:**

1. **County Extension Programs** - Individual Agent/Educator and County-level reports for minimum of two complete program years: SEE CHART. Data should include each program year reported separately and compare actual to potential clientele by race, ethnicity, and gender (Example, 2010 Census).
2. Additional program areas
  - Extension Homemaker Clubs, if applicable, by REG, including summary\*
  - 4-H Club data includes copies of each club's member list totaled by REG\*.
  - Locations of clubs identified on a county map.
  - County camp data (overnight and day camps) enrollment listing by REG (2 years)
  - List of camp scholarships by recipients' REG
  - State, district, or county events (e.g., lists of who participated in competitive, leadership, and congress events) by participants' REG
3. Extension Advisory Councils/Boards, Program Committees, including summary\*
  - Extension and all Advisory or Program Planning committees by REG for all county programs, including membership listings and those used by the faculty/agents for program committees/councils
4. Volunteers
  - Master Gardeners by REG, including summary\*
  - All 4-H Volunteers by REG, including summary\*
  - Other program volunteers, including summary\*
5. All program mailing lists by REG  
 \*summary means list only the name of the club /committee/ group and summarize the number of members on it by race, ethnicity, and gender

## ORGANIZATIONAL PERFORMANCE

### “MAKE OR BREAK POINTS” DATA

Law or Regulation	Review Recommendation	Organizational “Breakpoint” (crisis, liability, or opportunity)
<i>7 Code of Federal Regulation (CFR) Part 15A §5 (b) ...collecting and receiving data on race, ethnicity and gender by federal agencies and recipients of federal financial assistance is an essential element in determining how well benefits and services are being delivered to customers.</i>	CES managers and staff must review program delivery methods to assure barriers do not exist that impede the participation of all eligible racial/ethnic minorities to participate in programs especially where data shows under-representation of eligible minorities.	Participants in programs don't reflect “who's out there.”  Extension loses ground as the “go to” organization in the community.
<i>Title IX and 7CFR Subpart D§15a.31 covers nondiscrimination in programs based on sex, therefore necessitating data collection on the gender of program participants</i>	CES must train all staff on methods to collect race, ethnicity and gender data and how to use race, ethnicity and gender data for program planning.	Data on participants is collected and reported in some form, but is insufficient in terms of being collected and reported by race, ethnicity and gender at every level...  Census or other “potential beneficiary pool” data is not compared: historical actual contact data is not utilized for program planning.
<i>7 Code of Federal Regulation (CFR) Part 15A §5 (b) ...collecting and receiving data on race, ethnicity and gender by federal agencies and recipients of federal financial assistance is an essential element in determining how well benefits and services are being delivered to customers.</i>	CES programs with large numbers and percentages of race/ethnic data not reported and/or listed as “not provided”, “undetermined” and/or “unknown” must be reviewed to ensure data is collected for assurance of nondiscrimination in programs.	Educators/ Agents/ Volunteers are not collecting and reporting race, ethnicity and gender of program participants.
A breakpoint provides leadership with a strategic choice to avoid risk or seize a positive opportunity.		

## ORGANIZATIONAL PERFORMANCE

### “MAKE OR BREAK POINTS” **POW**

Law or Regulation	Review Recommendation	Organizational “Breakpoint” (crisis, liability, or opportunity)
<i>Title VI, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”</i>	CES should train Extension faculty on the four Department of Justice Criteria used to determine when to produce programs and materials in another language.	Educators are unsure about when to offer program accommodations for people with limited English proficiency.
same	CES must devise a comprehensive Limited English Proficiency Plan and a budgetary plan for LEP materials and program accommodation.	There is no institutional plan or procedure for handling translation and interpretation requests, including a proactive communication and public notification stance.
same	<p>CES must devise a comprehensive Limited English Proficiency Plan and a budgetary plan for LEP materials and program accommodation</p> <p>All reasonable efforts are required to be documented of actions to include minorities in programs including data to confirm the level of minority involvement in programs.</p> <p>CES local offices must develop plans to include youth in programs were data suggests they are under-represented in 4-H programs.</p>	<p>Institutional resources are deemed insufficient to meet current demand for interpretation of programs and translation of materials.</p> <p>Program contact data indicates that Hispanic/Latino clientele are underserved in most program areas, even youth who are bilingual.</p>
7 CFR Subtitle A §15.3 (c) <i>Where a primary objective of the Federal financial assistance is not to provide employment but discrimination on the grounds of race, color or national origin in the employment practices of the recipient... tends to exclude individuals from participation in, deny them the benefits of, or subject them to discrimination under any program or activity of the recipient...</i>	U ____ should include in its administrative operation a system of reporting to assist in monitoring and evaluating applicant flow and personnel actions with a focus on the results of equal opportunity efforts to recruit and hire under-represented Hispanics.	<p>There are no Latino Agents or Educators and only a few Hispanic nutrition assistants.</p> <p>A survey of committees and volunteers shows a very few Hispanic persons in those groups statewide.</p>
Americans with Disabilities Act, and ADA Amendments Act of 2008, and 7 C.F.R. §15b.4 <i>“...Deny a qualified handicapped person the opportunity to participate as a member of planning or advisory boards.”</i>	U_ Director in accordance with US and USDA civil rights regulations must assure racial and ethnic minorities are not denied participation on advisory groups and staff must determine if barriers exist to the inclusion of individuals from <u>under-represented groups</u> on advisory boards.	<p>Lack disabled advisors and volunteers.</p> <p>Organizational blind spot concerning wants and needs of persons with sensory disabilities.</p>
A breakpoint provides leadership with a strategic choice to avoid risk or seize a positive opportunity.		

## ORGANIZATIONAL PERFORMANCE

### “MAKE OR BREAK POINTS” **POW**

Law or Regulation	Review Recommendation	Organizational “Breakpoint” (crisis, liability, or opportunity)
<p>28 CFR Ch.1 §42.104 (b), (vii) and 7 CFR 15b, Subpart A, § 15.3 (b), (vii) “A recipient to which this subpart applies may not, directly or through contractual or other arrangements, on the grounds of race, color, or national origin deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.”</p>	<p>CES should identify barriers to minority membership on advisory committees and take steps to diversify Area Advisory Committees and county-level committees, boards, and councils including Promotion and Expansion Committees.</p> <p>CES administrators and county staff must make efforts and/or develop plans to include women and racial and ethnic minorities on all advisory groups and work with groups to ensure minorities are represented on advisory committees and boards</p>	<p>Advisory bodies are not diverse; no new members or ideas; infighting or stagnation may characterize work.</p> <p>New community constituents are left out of Extension program plans.</p> <p>There is low to zero percent Latino representation on advisory bodies compared to the percentage represented in the population.</p>
<p>Title VI, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”</p>	<p>CES managers and staff must review program delivery methods to assure barriers do not exist that impede the participation of all eligible racial/ethnic minorities to participate in programs especially where data shows under-representation of eligible minorities</p>	<p>Historically underserved groups are still under-represented in some areas of Extension programming.</p> <p>In one large county there was a recent move to funnel funding to groups who have historically advocated for Black/ African American interests and away from Extension at the request of those citizens.</p> <p>Boys and Girls Clubs in your State receive large grant for after school programming.</p>
<p>Americans with Disabilities Act , and ADA Amendments Act of 2008, and 7 C.F.R. §15b.4 “No qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving assistance from this Department.”</p> <p>Section 508, National Rehabilitation Act of 1973</p>	<p>CES must include information on how to secure accommodation (accessible contact information) for persons with disabilities on all program announcements. Program announcements should be in <i>formats</i> accessible to people with sensory disabilities. Where feasible, include information on how to obtain materials in other formats, and make websites accessible and link to websites popular with disabled clients.</p>	<p>The University has a legal action pending by students who use text reading applications to access online classes and course management software: they paid tuition and then couldn't access their courses because they are blind or partially-sighted and web-based delivery was not accessible.</p> <p>Extension Educators routinely notify the public of programs using print material in English.</p>
<p>7 C.F.R. §15b.4 “Despite the existence of separate or different aid, benefits, or services... a recipient may not deny a qualified handicapped person the opportunity to participate in such programs or activities that are NOT separate or different.”</p>	<p>N/A</p>	<p>A separate program or class is held for people/person with disabilities in order for an accommodation to be made</p>
<p>A breakpoint provides leadership with a strategic choice to avoid risk or seize a positive opportunity.</p>		

**ORGANIZATIONAL PERFORMANCE**  
**“MAKE OR BREAK POINTS” TRAINING**

Law or Regulation	Review Recommendation	Organizational “Breakpoint” (crisis, liability, or opportunity)
<p><i>Staff knowledge of civil rights...as per the USDA Compliance Review Guide.</i>  <i>All staff are expected to be knowledgeable and skilled in implementing equal opportunity requirements in Extension programs.</i></p>	<p>CES training should increase the practical knowledge of staff, specifically as to how to apply 7 CFR Part 15 in the Extension program delivery environment. Training should include relevant and meaningful day-to-day real-life examples and be continued on a regular basis to ensure compliance to Title VI by all Extension staff.</p>	<p>Program complaints from constituents.</p> <p>Faculty and staff lack knowledge or confidence to prevent problems: handle requests for reasonable accommodations; plan programs with provisions for immigrant populations, etc.</p>
<p><i>7 Code of Federal Regulation (CFR) Part 15A §5 (b) ...collecting and receiving data on race, ethnicity and gender by federal agencies and recipients of federal financial assistance is an essential element in determining how well benefits and services are being delivered to customers.</i></p>	<p>CES must train all staff on methods to collect race, ethnicity and gender data and how to use race, ethnicity and gender data for program planning.</p>	<p>Staff/ vols unable to describe fully how to collect, or to list reasons why they must collect, contact data.</p>
<p><i>Staff knowledge of civil rights...as per the USDA Compliance Review Guide</i></p> <p><i>All staff are expected to be knowledgeable and skilled in implementing equal opportunity requirements in Extension programs.</i></p>	<p>Training should include relevant and meaningful day-to-day real-life examples... increase the frequency of face-to-face (in-service trainings and other short formats) or webinar-meeting-type exposure to immediately applicable Title VI concepts such as “parity,” “disparate treatment,” “direct contact,” “accommodation statement,” “targeted program,” “sensory disability,” etc.</p>	<p>We have an internal compliance review process.</p> <p>We use blended learning to supplement online methods and give people a chance to interact with an instructor or experienced professional to reinforce concepts and ensure understanding and retention.</p>
<p>A breakpoint provides leadership with a strategic choice to avoid risk or seize a positive opportunity.</p>		

**Excerpt from Opening of an Extension Compliance Review Report**  
**Program Compliance Review**  
**Methodology and Review Determinations**

The program review was undertaken as a component of the National Institute of Food and Agriculture's systematic program to examine the delivery of program services by \_\_\_\_\_ Cooperative Extension Service. The National Institute of Food and Agriculture's review consisted of record examination and interviews with \_\_\_\_\_ personnel at the state and county levels.

Site visits were made to county Extension offices in \_\_\_\_\_ counties to conduct interviews and collect Extension program participation data pertinent to assessing \_\_\_\_\_'s adherence to civil rights requirements in administering and implementing its programs. Based on the Extension Program Review Guide shared in advance with \_\_\_\_\_ University leadership, additional pertinent information regarding \_\_\_\_\_'s overall program practices was gathered for further analysis and reporting.

The program review includes the following evaluative questions and determinations:

- Whether Extension policies and program delivery had the effect of denying minority group members equal access to Extension benefits and services.
- Whether Extension services offered were furnished in a different way to some customers because of their race, color, national origin, gender, or disability.
- If programs and related activities, including educational methods, were planned to indiscriminately reach potential customers of all races, social, and economic levels in the State.
- If staff members are providing assistance to any organization that excludes any individual or group from membership and/or participation because of race, color, national origin, sex, age, or disability.
- Whether the State Extension System for collecting and reporting program participant data (clientele) was utilized for program outreach to underserved groups and for measuring parity of participation of minority and non-minority beneficiaries.
- If Extension staff were implementing a public notification program informing minority customers of program availability and the requirement for non-discrimination; and, the extent to which minority farm operators were being provided educational assistance by staff members.
- If Extension program committees were representative of the population being served by Extension staff in relation to geographic areas, including race, gender,

age, color, disability, and socioeconomic levels.

- If programming methods, content, and meeting locations/places were being designed to meet the needs of all customers, including racial and ethnic minorities, and were accessible in a nondiscriminatory manner.
- How these program methods, content, and meeting places were being chosen to meet the needs of all customers (including racial/ethnic minorities).
- Whether Extension-sponsored clubs and groups reflected the racial composition of the community or areas being served and were in compliance with USDA nondiscrimination regulations (including, operating in areas or communities where racial/ethnic minorities live).
- If Extension was implementing procedures for reviewing the compliance status of the county Extension programs.
- Whether the Director was assuring the prompt, fair, and impartial processing of alleged program delivery-related discrimination complaints.

In developing this report, reliance was placed on Extension administrative records and information gathered through interviews with Extension staff. All statements made and Extension program data noted in this report were based on records and documentation provided by State, Regional, and County personnel. The report includes an analysis of both quantitative and qualitative information.

## Compliance Review Instrument

**Instructions:** Circle the choice that most closely expresses your personal perception of how things are. Your answers will form a “perceptual map” to allow you to focus on key areas of organizational civil rights performance during the webinar. The instrument items represent a sampling of key indicators for strategic consideration.

Go to the tabulation sheet and add up the response values under each category (1-5). Report the three categories with the **lowest tabulated numerical totals** (like golf) to [ncorley@nifa.usda.gov](mailto:ncorley@nifa.usda.gov) by March 15<sup>th</sup>.

**By sharing these three response areas with the instructors in advance of the webinar, they will be able to focus on information that, as a cohort, you have designated as the most critical to you.**

1. Our organization’s structure and civil rights functions are sufficient to assure eligible individuals have the opportunity to participate in programs.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always      frequently      sometimes      almost never

2. We have specific functional positions at the highest level of the organization (some report to Assistant/Associate Director or Director), to accomplish our civil rights goals.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always      frequently      sometimes      almost never

3. We have mechanism(s) in place to ensure staff are kept informed and are able to make day-to-day decisions concerning civil rights laws and equal opportunity requirements.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always      frequently      sometimes      almost never

4. Organization officials and employees demonstrate a working knowledge, sufficient to their positions, of the requirements of civil rights rules and regulations in their everyday job activities.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always      frequently      sometimes      almost never

5. Plans of Work and/or Individual Development Plans include work goals related to civil rights/diversity/equal opportunity (e.g., serving diverse communities, functioning on a diverse work team, collaborating with multicultural community partners).

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

6. Organization officials and employees are held accountable by the performance system for achieving the requirements of civil rights laws, regulations, and policy.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

7. University, Extension, and Research policy are regularly communicated to volunteers regarding program participants' individual rights, accommodation, and accessibility.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

8. Managers control employees' access to professional development opportunities.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

9. The organization has a policy-based mentoring and professional development program for faculty and staff.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

10. As part of our Plan of Work we have in place a system for obtaining stakeholder input from a diverse constituency.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

11. We have in place processes and procedures to recruit, appoint, and/ or select diverse committee and board members.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

12. Our employees, if requested, can describe the options for filing a program complaint to a client/ program participant.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

13. Our program units have in place budgetary elements that provide means to fund reasonable accommodations requested by program participants with disabilities or limited English proficiency.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

14. Our public notification policy includes guidance about media that is accessible to blind, partially sighted, deaf, and hard-of-hearing potential program participants.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

15. The University, Extension or Research, or all three, have web accessibility policies governed by Section 508 of the Rehabilitation Act of 1973.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

16. Our program data includes *potential* clientele/population by race, ethnicity and gender to serve as a point of comparison to the actual contacts we reach.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆  
almost always frequently sometimes almost never

17. Our faculty and staff are able to list and/or explain the legal/regulatory reasons they must collect race, ethnicity, and gender data of program participants.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

18. We collect sufficient demographic data at the initiative, program, agent/educator, county and state level to demonstrate that we are reaching racial and ethnic minorities and women in our counties and the State.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

19. Our data collection system allows us to assess our position regarding delivering program benefits to historically underserved minorities and women at **multiple points in time** during a given year.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

20. Our data rolls up to the Director level and he/she is briefed on it.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

21. We make continual efforts (to integrate clubs, do joint club programming, increase after-school and school-based programming) to reach a diverse population and avoid segregation in our programs, especially clubs.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

22. We have policies in place to ensure that all press releases, articles, publications, posters, flyers, and program materials include nondiscrimination statements.

\_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_ ◆ \_\_\_\_\_  
almost always frequently sometimes almost never

23. Program media (articles, signs, posters, website, etc.) inform the public about how to secure accommodations for persons with disabilities.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

24. Our organization has an internal compliance review process that enables us to assess our civil rights program and provide compliance training.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

25. Our organization has a Limited English Proficiency Policy and a plan for providing program services to persons who are limited English proficient.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

26. Collaborative and mutually beneficial ties are maintained between the 1862 and minority-serving Land-Grant Institutions in my state (HSIs, 1994's, 1890's) regarding MOUs, collaborative projects, and other working relationships among leadership in the institutions.

\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆\_\_\_\_\_◆  
almost always frequently sometimes almost never

**TABULATION SHEET**

4= almost always

3=frequently

2=sometimes

1=almost never

**Transfer the number for each response next to the item number. Subtotal the “values” for each area.**

1.

**STRUCTURE**

1.

2.

7.

11.

26.

2.

**COMMUNICATION\***

6.

14.

15.

22.

23.

\*external

3.

**TRAINING**

3.

4.

**TRAINING (cont.)**

8.

9.

12.

24.

4.

**PLANS OF WORK**

5.

10.

13.

21.

25.

5.

**DATA**

16.

17.

18.

19.

20.

**Category Tabulation:**

**LOW      5-8**

**MEDIAN    12.5**

**HIGH 14-17**

**PERFECT 18 +**

Just as a compliance review is a snapshot of a Land-Grant Institution at one point in time, this instrument reflects your personal snapshot. No two people will have exactly the same “take” on a situation, but if you mapped thirty to fifty response sheets, a pattern of organizational performance should emerge.

Many items could be included under each of the five areas of an organization’s performance for civil rights: the ones in the instrument are typically ones that are considered in federal compliance reviews. Whichever area(s) you perceive have low frequencies of attention in your organization are areas you may want to pay special attention to during training as potential areas for action back at work.

Remember, this is a perceptual snapshot intended to assist you in focusing your attention on areas you control to get the most out of the time you spend with your colleagues during the webinar.

Overall Tabulation All Areas

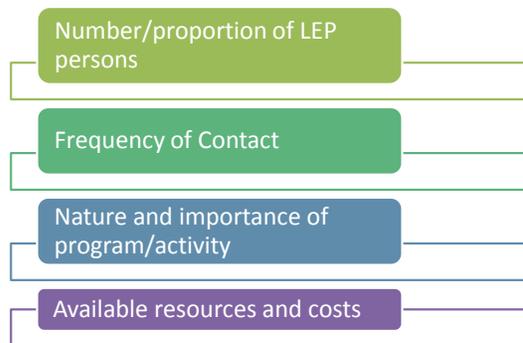
Low-25 Perfect- 100

Median-62.5

## WEBINAR COHORT PRE-WORK INSTRUMENT FEEDBACK

Data	☒☒☒☒☒☒	potential audience/capturing race, ethnicity, and gender/ use for program planning
Plans of Work	☒☒☒☒☒☒	advisory bodies diverse/underserved audiences included in program plans
Training	☒☒☒☒☒	demonstrate working knowledge /leads to application/ employee access and choice/ internal compliance review
Structure	☒☒☒☒	devoted positions/functional/power to act/ program participant rights protected/ beneficial ties with minority-serving Land-Grants
Communication	☒☒☒	leadership on policy communication public notification/ accessible formats /nondiscrimination statements/disability accommodation statements

## The Four LEP Factors



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{Additional copies of this publication (#7053), and the full report (#3300) and survey briefs are available online at [www.pewhispanic.org](http://www.pewhispanic.org) }

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Information about web accessibility

<http://section508.gov/index.cfm?fuseAction=Laws>



National Institute of Food and Agriculture  
www.nifa.usda.gov



## DATA

The Census Bureau uses these OMB race categories when collecting and reporting data.

Census data can be used to identify “potential beneficiaries.”

### OMB Race Categories

White

Black or African American

American Indian or Alaska Native

Asian

Native Hawaiian or Pacific Islander

Some Other Race (Census Bureau uses)

Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity

See page 11 for categories

[http://www.whitehouse.gov/omb/fedreg\\_1997standards/](http://www.whitehouse.gov/omb/fedreg_1997standards/)

## **Norman E. Pruitt, NIFA**

Norman currently serves as the Program Compliance Review Leader and as Equal Opportunity Specialist at the US Department of Agriculture's National Institute of Food and Agriculture (formerly CSREES) in Washington, D.C. He organizes and exercises leadership over, and provides technical guidance to, civil rights on-site compliance reviews, audits, and investigations of Land-Grant Universities and other institutions in the U.S. and U.S. Territories that receive federal financial assistance.

Norman comes to NIFA from the University of Maryland, College Park, where he earned an MBA in finance, an M.S. in Agriculture, and a B.S. in Journalism. Norman brings 27 years of Extension and Research experience to NIFA. He held several faculty and administrative positions in the College of Agriculture and Natural Resources, finishing his tenure at the University of Maryland, College Park as Director, Human Resources Management, and Equity Administrator for the College.

## **Nancy Corley, NIFA**

Nancy Corley joined NIFA's Equal Opportunity Staff in 2010. Nancy has over twenty years' experience in training and development with a special interest in intercultural skills: she grew up in a bi-cultural home. Nancy specializes in limited English proficiency and disability issues for compliance reviews, is involved in all aspects of on-site reviews and reporting, and designs and implements training for the unit.

Nancy worked as Coordinator of Diversity Programs and Training at the College of Agriculture and Natural Resources, University of Maryland where she took an active role in revamping compliance review practices and data collection for Extension. She formulated a Limited English Proficiency Policy for the College of Agriculture and Natural Resources in 2003. She holds a B.A. from the University of Tennessee in Anthropology, and a M.A. in Human Resources Development from Marymount University, in Arlington, Virginia. Nancy served as a linguist in the U.S. Army Security Agency on the East German border and has spent most of her career in the Washington, D.C. area.

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