CIVIL RIGHTS PROGRAM EVALUATION AND REVIEW GUIDE



RESEARCH | EXTENSION | TEACHING

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UVI SOA CES is an equal opportunity provider and employer.

CIVIL RIGHTS PROGRAM EVALUATION AND REVIEW

Background

The National Institute of Food and Agriculture, and its land-grant partners, such as the University of the Virgin Islands School of Agriculture Cooperative Extension Service (SOA CES), are committed to being equal opportunity providers of SOA CES programs. These programs must treat every customer and employee with fairness, equality, and respect. This applies to all aspects of the program, including identifying needs, setting priorities, allocating resources, selecting and assigning staff, conducting programs, and getting feedback.

The performance of a civil rights audit and review is one of the major and unique requirements of federal civil rights legislation. It provides a systematic process for the assessment of compliance with federal regulations as it pertains to policies, procedures, programs, and practices as well as the development and implementation of modifications to correct any instances where deficiencies are identified.

This guide is designed when conducting a civil rights evaluation and review of the SOA CES.

Purpose and Relevant Legislation

Civil Rights Compliance Reviews are conducted in accordance with the following Civil Rights Laws, Authorities, and Regulations:

- Title VI of the Civil Rights Act of 1964
- Title VII of the Civil Rights Act of 1964
- The Age Discrimination Act of 1967, as amended
- Title IX of the Education Amendments of 1972
- The Equal Pay Act of 1963, as amended
- The Rehabilitation Act of 1973
- American with Disabilities Act of 1990, as amended
- The Civil Rights Act of 1991
- Executive Order 13166
- Other pertinent federal laws and regulations

The Civil Rights Program Evaluation and Review will provide the opportunity for the presentation of specific program accomplishments from the following programs: Agriculture/Horticulture, Family and Consumer Sciences, and 4-H Youth Development, and Communications, Technology and Distance/Online Learning. The format elicits, using structured statements, both quantitative and qualitative information. Moreover, it offers the opportunity for comments and explanation regarding statements that may not adequately reflect accomplishments. All statements made and dates cited will be based upon verifiable records and/or documentation.

STAFF TEAMWORK IN PROGRAMMING

1)	Does UVI SOA hold staff conferences for the purpose of cross-discipline programming?								
	Yes	No							
	If yes, how often?								
2)	Give examples of c	ross-discipline programming:							
3)		lanned for the next year in the way and frequency that SOA CES staff will plans to achieve additional cross-discipline programming? Describe the							
4)	List agents and nur 12 months:	nber of days of professional development they have attended during the pas							
5)	"Provide educa	rs' job descriptions contain the following, or a similar statement? tional programs and materials to all people of the county/ regard to race, color, religion, national origin, sex, age or							
6)	What training have underserved audien	staff members received in the past four years regarding issues of reaching ces?							

7) Within the past four years, have all organizations with whom SOA CES cooperate of basis received and responded to Written Notification of SOA CES Civil Rights Pole									
	Yes	No							
	If yes, provide list of	f cooperators with signed cooperation agreements:							
8)	Where are Civil Rig	hts laws and files found on the SOA CES website?							
	List all staff in your	office who know where to find this site.							
9)	What should staff d	o if they receive a Civil Rights complaint?							
	List all staff who kr	ow how to respond to a complaint.							

LIMITED ENGLISH PROFICIENCY

The federal government requires that any entity receiving or administering federal money must take steps to provide equal access to programs and services for all individuals.

1.	On average, how often do you assist customers with limited English proficiency?
2.	On average, how much time do you spend working with customers that have limited English proficiency? hours per \(\text{day} \) week \(\text{month} \)
3.	Do you use outside sources (volunteer, refugee services), other than family to assist with the translations/interpreting? □ Frequently □ Sometimes □ Never What source(s):
4.	How often do you use family, friends, or other persons brought by the clients to do translation/interpretation? □ Frequently □ Sometimes □ Never
5.	How often do these encounters involve situation where children provide interpretation? \Box Frequently \Box Sometimes \Box Never
6.	In order of frequency, which language groups do you encounter when working with limited English proficient clients? [1 being the most frequent and 7 being the least frequent]
	SpanishArabicAfricanAsianOther:
7.	Have you ever used a translation/interpretation service? ☐ Yes ☐ No If yes, check any that apply: ☐ In-person ☐ Co-worker ☐ Volunteer ☐ Telephone ☐ Other:
8.	Are you comfortable and qualified to interpret another language ☐ Yes ☐ No Language(s):

PLAN OF PUBLIC NOTIFICATION

Letting people know SOA CES program is open and available to the public is called public notification. Public notification activities are the extra efforts you plan in order to advise minorities of program availability on a non-discriminatory basis, and usually consists of a series of various communication methods that advise the public about program availability.

Some of the basic "public notification" activities:

- SOA CES program outreach should use the most diversified possible communications to attract persons of all races, colors, religions, genders, and national origins to participate. Examples include: posters, flyers, minority organization bulletin board notices, or other public mailings.
- Prominently display the And Justice for All poster in all SOA CES offices and facilities where programs are delivered.
- Provide information on SOA CES programs to organizations that relate to the Protected Class members of the territory via mail, personal visits, newsletters, phone calls, etc.
- Use the non-discriminatory statement or phrase in all news releases that announce a SOA CES program and/or explain how to participate.
- Place the names of persons of a Protected Class on appropriate mailing lists so that individuals and/or families will receive information regarding SOA CES programs for which they are potential recipients.
- In SOA CES programs that may traditionally attract only males or only females, use words, phrases, or statements in the program announcements that clearly indicate that participation of both males and

	females are encouraged and appropriate.
	rs to the following questions will help your unit gauge your public notification efforts: List the locations where the <i>And Justice for All</i> poster is displayed:
2)	Does the SOA CES nondiscrimination statement (i.e., "SOA CES is an equal opportunity provider and employer.") appear on all informational materials released to the public?
3)	Have you documented any "extra efforts" to inform historically underserved audiences about SOA CES resources and meetings? If yes, list examples: Yes No
4)	List minority organizations which are kept informed about new SOA CES programs and the methods by which they are informed:

5)		ttlets which are used by historically underserved audiences and UVI SOA has nce SOA CES programming:
6)		ing lists used in SOA CES consist of exclusively of one race color, religion, or by the mailing lists and explain.
	Yes No	
7)	equal opportunity i	on-discriminatory statements, photos, and graphics used to convey the message of in informational materials released to the public. documents should be kept in your local unit civil rights file.
8)	sex-stereotype lang	ples of sex-neutral language (i.e., elimination of sex discrimination, sex bias, and ruage) in materials used in educational programs?
	Yes No Examples of such of	locuments should be kept in your local unit civil rights files.
9)		program announcements and educational materials which have been prepared at cational level or in a language other than English for a specific target audience:
10)	What changes are p	planned pertaining to the above questions?

PROGRAM ACCESSIBILITY

The Americans with Disabilities Act of 1990, amended in 2008, prohibits the discrimination against qualified individuals with disabilities. The ADA Act requires reasonable accommodations in SOA CES programming and that programming occurs in accessible locations. An <u>ADA checklist for Existing Facilities</u> is available through the ADA National Network.

Is the following, or a similar statement, on all newsletters, brochures, and program announcements?
 "SOA CES is committed to making its services, activities, and programs accessible to all participants. If you have special requirements due to a physical, vision or hearing disability, please contact [SOA CES agent's name and telephone number]."
 List any accommodations made to serve disabled participants in programs for the past 2 years. Be as specific as you can.

ALL REASONABLE EFFORTS

Affirmative Action refers to creative actions or steps taken to accomplish compliance with the intent of the Civil Rights Act. As an SOA CES employee, you must make all reasonable efforts to comply with our Civil Rights regulations. All Reasonable Effort activities are required efforts you need to use when programming with members of one race who function in a multi-racial community. Some of the required steps in implementing All Reasonable Effort include:

- Determine by community, neighborhood, or minor civil division, the multi-racial communities in the territory
- Determine, by club or group name, program area groups functioning in the territory
- Determine from participation data if the club or group membership reflects the racial composition of the territory.

The minimum All Reasonable Effort requirements for local unit SOA CES staff members working with any identified clubs or groups whose membership is all one race, include the following items:

- Use all available mass media, including radio, newspaper, and television to inform potential recipients within local multi-racial communities of the program and of the opportunity to participate. List examples:
- 2) Personal letters and flyers/publications addressed to potential recipients inviting them to participate, including dates and places of meetings or other planned activities. List examples:
- 3) Personal visits by SOA CES staff to a representative number of defined potential recipients in geographically defined areas to encourage participation. List examples:

SOA CES PERSONNEL

(Agents, Program Assistants, Office Professionals)

District:	Virgi	n Islands						
Employee's Name	Race	Ethnicity	Gender		Title	Program Area	Time: Full or Part	% Funded by SOA CES
			M	F				

Local SOA Advisory Board

List the names of the members and indicate their race, gender, and ethnicity.

	RACE										
Member Names	White	Black or African	American Indian or	Asian	Native Hawaiian/ Other Pacific	Two or More	Gender		Ethn	Ethnicity	
		American	Alaskan Native		Islander	Races	M	F	Hispanic/ Latino	Non Hispanic/ Latino	
For districts, insert addi	tional l	ines as ne	ecessary.								

If your board is not diverse, what steps have been or are being taken to improve this situation?										
Diverse	Not Diverse									

According to the SOA Advisory Board bylaws, the Board meets bi-annually. Record the number of board members in attendance for each of the last 12 months:

Have changes been made in the meeting location or schedule to increase attendance at meetings? If yes, list examples:

Yes No

PROGRAM REVIEWS

Program:
List programs, projects, or activities designed during the year to serve the needs of specific under-served audiences (e.g., racial/ethnic minorities, women/men, the disabled, etc.) If none, please check:
Briefly describe any program or facility/location changes made during the past program year which have resulted in increased participation by underserved audiences:
List organizations serving primarily minority or underserved audiences that SOA CES informs of program opportunities. If none, please check:
Briefly describe a success story in reaching a new audience during the past four years:
Indicate helesy the names and membership democraphics of organizations (e.g., special interest groups, commedity

Indicate below the names and membership demographics of organizations (e.g., special interest groups, commodity groups, farm organizations, health care coalitions, schools, civic clubs, financial institutions, other youth agencies, religious groups, etc.) with which SOA CES has worked.

If none, please check:

NUMBER OF MEMBERS BY RACE, GENDER, AND ETHNICITY

	RACE *									
Organization	White	Black or African	American Indian or	Asian	Native Hawaiian /	Two or More	Gender*		Ethnicity*	
		American	Alaskan Native		Other Pacific Islander	Races	M	F	Hispanic/ Latino	Non Hispanic/ Latino

^{*} Race, ethnicity and gender numbers must be equal

COMPLETION

Review completed by	Date				
CES As					
Approved by Dean and Director, S	School	of Agriculture	Date		
Other staff involved in the review were:					
				_	
				_	

Corrective Actions

The following corrective actions have been made in regards to the SOA CES Civil Rights Audit.