

Civil Rights Documentation Requirements for County Offices

Background

As a recipient of federal funding through the USDA, the UW-Madison Division of Extension is required to comply with specific obligations of nondiscrimination and equal opportunity associated with civil rights laws. Colleagues programming at the county level must make special efforts to reach out to and expand access to people from groups protected by these laws. These groups include:

- African Americans
- American Indians/Native Americans
- Asians
- Native Hawaiians and Other Pacific Islanders
- People of two or more races
- Hispanics/Latinos
- Women
- People with Limited English Proficiency (LEP)
- People with disabilities

Colleagues are required to keep on file items documenting outreach activities and all reasonable efforts to provide programming to protected and underserved audiences. Two groups of files are required: 1) general office civil rights files and 2) program area civil rights files. Hard-copy files are considered primary, and electronic files can be used as backup.

Files must be self-explanatory, well organized, easy to review, and in an easily accessible location for all county staff.

- Items included should be quickly identifiable to someone looking through the files. If not immediately obvious, include notes on the item indicating the target audience, how the item was used, or purpose of the information it contains, where it was used, date, etc.
- The files should demonstrate outreach efforts without the need for verbal descriptions. Someone reviewing them should be able to understand the effort taking place without talking to anyone in the office.
- Files should support and provide evidence toward meeting goals in the County Civil Rights action plan.

Tips for Maintaining Civil Rights Files and Gathering Data throughout the Year

- Request and record demographic data (race, ethnicity, gender (REG) and age) from participants reached at events. This data is then entered into Recording Results System as “direct contacts”. See demographic information request templates at: <https://blogs.extension.wisc.edu/oaic/yourcivilrightsfiles/>
- Create a folder in Outlook or another online location for storing emails you send or receive that provide evidence on collaborations, efforts to build relationships and establish partnerships to reach and serve protected audiences. Place printed copies of *most relevant* emails in the appropriate hard-copy folder.
- Create lists of all organizational partners and send the non-discrimination letter to them once every three years, as an office, rather than individually. Track their responses as they come in. Spreadsheets work well. Keep all assurances of nondiscrimination from partners on file in paper version or scanned.
- Create files for the protected and underserved audiences you are intentionally reaching and making efforts toward serving. Keep communication and documents used for your efforts in these files throughout the year.
- Update files annually as needed. Recommend purging records over 5 years old.

Organize Files Using the Following Categories	
<i>General Office Civil Rights Files</i>	<i>Program Area Civil Rights Files</i>
<ul style="list-style-type: none"> • Maps • County census data/demographic data • Annual civil rights action plans • Primary partners • Mailing lists • Position descriptions • Office staff meetings and trainings on expanding access • Disability Accommodations • Language Access Services • Communications or trainings on expanding access provided to local officials/board members who serve on search and screen panels 	<ul style="list-style-type: none"> • Personal communications • Race, ethnicity, gender (REG) data collection tool(s) • Participation records from Recording Results • Lists of partners • Mailing lists • Media outlets • Expanding Access data from Recording Results • Accommodations • Language Access • Other program materials • Also for 4-H: Expansion and Review; 4-H Online • Also for FoodWise: demographic data for nutrition mission; partners; FoodWise annual reports; other documentation
<p>A cross-referencing note can be used for information that should appear in both groups of files. For example, if information on primary partners is kept in the program area files, place a cross-referencing note to this information in the general office files.</p>	

Contents of General Office Civil Rights Files

- Highway **maps**, city maps, plat maps, etc., that illustrate county demographic data and information that informs programming and outreach to protected and underserved audiences.
- **County census data** and other demographic data from local sources. For assistance, contact:
 - Applied Population Lab, [contact Dan Veroff](#)
 - Community Asset Mapping Training, contact [Teresa Curtis](#)
- **A civil rights action plan** for the county office team. Action plans should begin with an introduction presenting a brief demographic overview of the county followed by action items with the following details:
 - name of protected groups targeted for all reasonable efforts,
 - specific outreach actions expected to be carried out,
 - expected community partners,
 - names and roles of Extension colleagues participating in the outreach
 - estimated timeline
- Documentation showing that **primary partners** have been informed of Extension nondiscrimination policies including the letter sent to partners, dates sent, response received, and the partner’s non-discrimination policies or signed assurance of nondiscrimination.
 - Note: Colleagues may choose to place these records in program files rather than general office files.
 - Find a list of partners form and partner nondiscrimination letter guidelines, template and FAQs at: <https://blogs.extension.wisc.edu/oaic/yourcivilrightsfiles/>
- **Mailing lists** for surface and electronic mailing and other contact lists used for general Extension office mailings. The lists must be coded with Race, Ethnicity and Gender (REG) information about the people included on the lists. REG information does not need to be listed next to each individual. A summary at the top or bottom of each list noting the estimated percentage of each protected group is sufficient. Example: 51% men; 49% women; 12% Latino; 2% African American; 5% Native American; 10% two or more races; 71% Caucasian.

- Position descriptions** for all staff with civil rights and nondiscrimination responsibilities highlighted.
- Disability Accommodation Requests**
- Language Support Requests**
- Copies of Civil Rights 101 online training completion certificates for all county office staff**
- [Civil Rights Self-Assessment](#)** and **personal civil rights compliance plan** for each educator.
- Office staff meeting** agendas, minutes, and other evidence that discussions about civil rights responsibilities, outreach to and programming with protected audiences, nondiscrimination and related equal opportunity topics have occurred and that all meetings are announced to all staff with meeting notes available to all in the office.
- Records of communications to local elected and county officials** who serve on search and screen panels about the importance of expanding applicant pools for county-based positions

Contents of Program Area Civil Rights Files

- REQUIRED AND VERY IMPORTANT - Personal Communications:** Letters, notes, emails, documentation of phone calls/voicemails, newsletters and other examples demonstrating direct communication with people of protected groups and efforts to build relationships with them. Also, documentation demonstrating that partners who serve or provide access to people of these groups share information about Extension with them. If it is not evident, use notations on each item in the files explaining how that item was used to reach individuals of specific protected groups.
- Race, Ethnicity, Gender (REG) data collection tool(s):** A copy or example of the tool used to collect demographic data of participants.
- Lists of partners**, and/or advisory groups with Race/Ethnicity and Gender (REG) information for individuals in the groups and audiences they serve or represent. REG information does not need to be listed next to each individual. A summary statement noting the aggregate, estimated total composition of the group is sufficient (ex: 50% of the group is women, 12% of the group is Latino, 8% is Native American, etc.). Also include notations about the demographics of the audiences reached through partnerships.
 - Download the [List of Partners form](#) to assist in documenting this information.
- Mailing lists** for surface and electronic mailing and other contact lists used for program area mailings. The lists must be coded with Race, Ethnicity and Gender (REG) information about the people included on the lists. REG information does not need to be listed next to each individual. A summary at the top or bottom of each list noting the estimated percentage of each protected group is sufficient.
- List of **media outlets** used to promote programs. Make notations on those used to reach specific racial and ethnic groups and other underserved groups.
- Copies of annual **Results Narratives or Expanding Access records from Recording Results** describing actions to reach people of protected and underrepresented groups.
- Documentation of **accommodations** made relating to programming for those with Disabilities based on ADA guidelines and policies
 - Example of educational programming that has been created/adapted to fit the needs of people with disabilities (provide information of location of programs, resources, communications that support these efforts).
 - Accommodation requests and action taken
 - Example of use of Accommodation statement of program related materials used for marketing, registration, etc.
- Language Access Services for LEP individuals and groups**
 - Translated materials in languages other than English.

- Documentation on the planning that took place when decisions were made about whether or not to translate materials, for whom, feedback from clients, and how materials were used or applied, etc.
- Information about times when interpreters were used: how it was determined an interpreter would be needed, for whom, feedback from clients, etc.
- Conversations (emails) taking place about whether to have an interpreter available or not.
- Other program materials** (tenure and post tenure documentation) demonstrating intent to engage and success in reaching protected audiences
- Copy of educator's Plan of Work**
- Copy of Parity Determination** from Recording Results

For 4-H Youth Development

- Documentation about 4-H **Expansion and Review** efforts: describe how this function is accomplished annually in the county; describe the process for engaging community partners, which community members participate (include race, ethnicity and gender), and outline the action plan developed as a result of the effort
- Standard ES237 report from 4-H Online
- List and locations of community and after-school clubs
- Documentation and data on 4-H club participation by REG for all programs
- Documentation of training provided to volunteers and leaders in the county on expanding access in 4-H clubs
- Documentation of discussion/progress toward club expanding access goals on charters

FoodWise

- Nutrition program files should be included in the Health & Well-Being files and include:
 - County **demographic data** relevant to nutrition program mission.
 - Information about **partner organizations** and agencies and the demographics of the people they serve.
 - Annual **FoodWise reports** (Program narratives and Year-End) highlighting efforts for expanding access to protected audiences
 - **Additional documentation** that demonstrates outreach to people protected by civil rights laws. This should include: promotional materials, letters, emails, notes from conversations, etc., with notations explaining the specific efforts to reach out to people of protected audiences who qualify for the nutrition program.

Considerations for Electronic Files

When someone from the public, a visiting team of colleagues, or a USDA representative reviews the files, they should be easy for that individual to quickly access specific sections. Colleagues may provide an electronic filing system as back up to hard copy files. Colleagues have found it difficult to be as complete with electronic files as with paper files. A combination of the two formats is more advisable, with paper files still being primary. Keep the following guidelines in mind when developing and maintaining electronic files for civil rights requirements:

- Creating PDF documents is one way to do this. The PDFs could be listed in a Table of Contents, listing all of the files available with headings for the sections. A user should easily click on the title of the file to see it.
- It is helpful to have a section for each program area and a section for overall office materials (maps, letters of non-discrimination to partners, office conference agendas, etc.)

- When possible, create spreadsheets of contacts and mailing lists sortable by Race, Ethnicity, Gender and zip code.
- It is helpful for each member of a visiting team to have access to the files electronically. Copying the files onto a flash drive, shared network drive or into a private Google Drive folder are good options.
- All items should be dated.

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