

Civil Rights Compliance Manual for Area Reviews

Office of Access, Inclusion, and Compliance
<https://blogs.extension.wisc.edu/oaic>
oaic@extension.wisc.edu



Extension

UNIVERSITY OF WISCONSIN-MADISON

Civil Rights Compliance Manual for Area Reviews

Scope of Document

This manual pertains to civil rights compliance reviews for Extension offices throughout the state, which are organized within 22 geographical service areas. The following document was created by the Office of Access, Inclusion, and Compliance (OAIC) to help Area Extension Directors (AEDs) and Extension staff prepare for scheduled reviews in their respective Areas. Extension's Compliance Coordinator & Equity Strategist (Compliance Coordinator) will use this document to conduct the review process and coordinate ongoing support for programming equity in Extension offices statewide.

Purpose of Compliance Reviews

- UW-Madison Division of Extension receives federal funding from USDA's National Institute of Food and Agriculture (NIFA) and other sources.
- As a result, Extension is accountable for compliance with specific federal nondiscrimination laws and policies ¹ and is subject to routine civil rights compliance audits by NIFA.
- Local Extension offices are obligated to document and maintain records that substantiate compliance with nondiscrimination laws and policies.
- OAIC conducts Area-based civil rights compliance reviews as one effort to internally monitor Extension compliance with nondiscrimination laws and policies.
- Reviews fundamentally focus on outreach efforts and whether members of protected groups are proportionally represented in Extension programming.
- Reviews help identify and assess strengths and opportunities related to civil rights compliance. Reviews also help address any elements of concern related to civil rights compliance responsibilities in Extension programming.

¹ Nondiscrimination laws include, but are not limited to, the following: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments Act of 1972, and The Americans with Disabilities Act (ADA) of 1990. Policies include Executive Order 13166 (August 2000). These laws and policies prohibit discrimination in Extension programs and activities on the basis of race, color, national origin, sex, age, disability, and reprisal or retaliation for prior civil rights activity.

Overview of Area-Based Civil Rights Reviews

Reviews are structured to promote a collegial dialogue for information sharing and action planning.

- Frequency**
 Area-based reviews are conducted every 4 years on a rotating schedule (see Appendix A)
- Coordination**
 Extension’s Compliance Coordinator schedules reviews with AEDs; each office is reviewed independently.
- Scope**
 Reviews focus on documentation for up to two years prior to the review.
- Attendance**
 All Extension staff are expected to be present and participate during their office’s review. In addition to Area staff, reviews may also be attended by Assistant Deans as well as AEDs whose Areas are scheduled to undergo a review the following calendar year.
- Structure and Timeline**

Component	Task	Time Period
Preparation	Schedule specific date(s) for reviews	4-6 months prior to review
	Schedule coaching call(s), as desired	As desired by AED
	Complete the “Civil Rights Compliance Self-Assessment Tool for Educators in Extension Offices” (see Appendix B)	No later than 1 month prior to review
	Provide access to digital civil rights files (if applicable)	No later than 2 weeks prior to review
“The Review”	Review of paper civil rights files (if applicable)	Day of review
	Demographic/profile presentation and Q&A	Day of review
	Reviewer reflections and concluding dialogue with staff	Day of review
Debrief with AED	Share compliance review summary and strategize regarding Civil Rights Action Plan (see Appendix C)	1-2 months after review
Follow-up with AED	Progress check-ins on action plan	At least annually

Guidance for Organizing and Maintaining Civil Rights Files

- Civil rights files provide documentation showing compliance with nondiscrimination requirements.
- Files should substantiate ongoing efforts toward meeting goals in the Civil Rights Action Plan (e.g., building relationships, program planning, evaluation of progress).
- Contents must be self-explanatory. Reviewers should easily be able to identify the target audience(s) and how an item pertains to civil rights compliance objectives.
- Files should be easily accessible and well-organized (see the Civil Rights File Structure chart below).
- Whether paper and/or digital, files should be separated into “General Office” and “Program-Specific” files; at a minimum, they should include the categories and record types listed below.
- Beyond review by Extension’s Compliance Coordinator, files may also be subject to review by federal USDA/NIFA partners in the event of an external compliance review or investigation.

Civil Rights File Structure	
General Office Files	Program-Specific Files
<p>I. Civil rights planning and training:</p> <ul style="list-style-type: none"> • Civil rights action plans • Staff meeting agendas, minutes, or other evidence of discussions about civil rights responsibilities • Documentation showing that all staff completed required civil rights training • Printed copy of slides from office’s demographic/profile presentation <p>II. Outreach:</p> <ul style="list-style-type: none"> • List of primary partners, including description of their target audience and confirmation that a signed assurance of nondiscrimination was returned <p>III. Other documentation:</p> <ul style="list-style-type: none"> • Signed assurance of nondiscrimination forms for all partners • Documentation of disability accommodations (include date requested, need expressed, date and type of accommodation provided) • Documentation of language access services, such as LanguageLine usage • Records of civil rights related communications or trainings to local officials/board members 	<p>I. Civil rights planning and training:</p> <ul style="list-style-type: none"> • Documentation of participation in activities related to civil rights and expanding access (e.g., committee involvement, training, etc.) • OAIC consultation write-ups • Completed self-assessment tools <p>II. Outreach:</p> <ul style="list-style-type: none"> • Evidence of efforts to build relationships and establish partnerships to reach protected groups (e.g., relevant emails, letters, notes from phone calls) • Evidence of collaboration with entities that serve members of protected groups • List of media outlets, platforms, etc. used to reach diverse audiences • Sample documents with nondiscrimination and accommodation statements <p>III. Other documentation:</p> <ul style="list-style-type: none"> • Demographic data collection tool(s) • Documentation of disability accommodations (include date requested, need expressed, date and type of accommodation provided) • Documentation of language access services (e.g., samples of translated materials, list of interpreter usage)

Additional information, data and/or documentation may be requested as needed.

Demographic/Profile Presentation

In this presentation, staff provide insight regarding the specific context of Extension programming in their community. The prepared presentation should not exceed 90 minutes in order to allow for follow-up discussion. Presentations should focus on the three main areas described below:

I. **Tell the Story of Your Community**

Outline specific social, economic, and other community characteristics that shape your programming and outreach decisions regarding members of protected groups. This may include, but is not limited to, population data (by race, ethnicity, language(s) spoken, gender, age, individuals with disabilities, poverty, etc.) and other relevant factors (e.g., employment, key economic drivers, housing, schools, land use, etc.).

II. **Highlight Programming Efforts**

Select 3-5 brief examples of programming which highlight staff efforts to serve members of protected groups.

III. **Share Challenges & Goals**

Describe any challenges Extension staff face in expanding program access to members of protected groups. Similarly, discuss future goals and viable action steps for expanding program access and achieving parity in programming efforts.

Compliance Review Summary

Following the Area-based review, the Compliance Coordinator will provide the AED with a written summary of the review. The summary document serves as a record of Extension's internal monitoring of compliance and a copy should be kept within the office's civil rights files. It is also resource tool for updating the Civil Rights Action Plan.

Civil Rights Action Plan

Action plans outline specific steps the office will take to further promote civil rights compliance (see Appendix C for a sample). Every action listed should have a responsible party assigned, as well as a target completion date. Specific actions may be based on goals identified by staff in the Demographic/Profile Presentation, may result from collaborative discussions during the review itself, and/or may come from recommendations included in the Compliance Review Summary. The Compliance Coordinator will work with the AED in the development of the action plan. Plans should be discussed at office staff meetings throughout the year to review progress toward goals and document updates. The Compliance Coordinator will provide ongoing follow-up.

Appendices

- Appendix A: Area-Based Civil Rights Review Schedule: 2021-2025
- Appendix B: Civil Rights Compliance Self-Assessment Tool for Educators in Extension Offices
- Appendix C: Civil Rights Action Plan

Area-Based Civil Rights Review Schedule: 2021-2025

Area	County	Year of last review	Year of next review				
1	Ashland	2016	2022				
1	Bayfield	2016	2022				
1	Douglas	2016	2022				
1	Iron	2015	2022				
2	Barron	2015	2022				
2	Burnett	2016	2022				
2	Sawyer	2015	2022				
2	Rusk	2015	2022				
2	Washburn	2015	2022				
3	Langlade	2014	2021				
3	Lincoln	2014	2021				
3	Price	2015	2021				
3	Taylor	2013	2021				
4	Florence	2020	2025				
4	Forest	2020	2025				
4	Oneida	2020	2025				
4	Vilas	2020	2025				
5	Pierce	2019	2024				
5	Polk	2019	2024				
5	St. Croix	2019	2024				
6	Chippewa	2019	2024				
6	Dunn	2019	2024				
6	Eau Claire	2019	2024				
7	Clark	2019	2024				
7	Marathon	2019	2024				
7	Portage	2019	2024				
7	Wood	2019	2024				
8	Marinette	2013	2022				
8	Menominee	2016	2022				
8	Oconto	2013	2022				
8	Shawano	2016	2022				
9	Buffalo	2017	2023				
9	Jackson	2013	2023				
9	Pepin	2017	2023				
9	Trempealeau	2017	2023				
10	Calumet	2013	2022				
10	Outagamie	2016	2022				
10	Waupaca	2016	2022				
10	Winnebago	2016	2022				
11	Brown	2019	2024				
12	Door	2016	2022				
12	Kewaunee	2016	2022				
12	Manitowoc	2014	2022				
13	Crawford	2016	2023				
13	La Crosse	2017	2023				
13	Monroe	2017	2023				
13	Richland	2017	2023				
13	Vernon	2014	2023				
14	Adams	2017	2023				
14	Green Lake	2016	2023				

APPENDIX A

Area-Based Civil Rights Review Schedule: 2021-2025

14	Juneau	2017	2023			
14	Marquette	2017	2023			
14	Waushara	2013	2023			
15	Fond du Lac	2012	2021			
15	Ozaukee	2015	2021			
15	Sheboygan	2014	2021			
15	Washington	2014	2021			
16	Columbia	2015	2021			
16	Dodge	2015	2021			
16	Sauk	2014	2021			
17	Iowa	2019	2024			
17	Grant	2019	2024			
17	Green	2019	2024			
17	Lafayette	2019	2024			
18	Dane	2016	2022			
19	Jefferson	2019	2024			
19	Rock	2019	2024			
19	Walworth	2019	2024			
20	Waukesha	2017	2023			
21	Milwaukee	2015	2021			
22	Kenosha	2017	2023			
22	Racine	2015	2023			
COUNTIES WITH REVIEWS IN 2020 AND 2021 WILL HAVE THEIR NEXT REVIEW IN 2025.						



Civil Rights Compliance Self-Assessment Tool for Educators in Extension Offices

Responses collected through this tool are intended to help reviewers tailor their feedback and improve training and education opportunities related to civil rights compliance.

Name:	
Position/Title:	
Area #:	
Office location:	
Today's date:	

1. Acknowledgement of General Civil Rights Compliance Responsibilities		
a. I completed the Civil Rights 101 training course.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. I understand that Extension receives federal funding from USDA/NIFA and other sources.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. As a recipient of federal funding, I understand that Extension must comply with all applicable nondiscrimination laws and policies.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d. I understand that my full participation in scheduled civil rights reviews is part of my responsibilities as an Extension employee.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e. I understand that Extension may not partner with persons, organizations, or entities who discriminate against those who are protected by civil rights laws.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f. My community partners have signed Assurance of Nondiscrimination statements which are included in our office civil rights files.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
g. I understand that the Office of Access, Inclusion, and Compliance (OAIC) is Extension's primary contact for any matters or questions related to civil rights compliance.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
h. I am aware that required documents and resources related to civil rights compliance are available on the OAIC website.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

APPENDIX B

2. Advisory Boards and Committees		
a. I am aware that internal and external advisory boards and committees should be reflective of the local community (i.e., race, ethnicity, gender, etc.).	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. I am aware that selection and appointment processes for populating these committees should encourage intentional outreach to diverse populations.	Yes <input type="checkbox"/>	No <input type="checkbox"/>


3. Program Delivery		
a. I am knowledgeable about the demographics of the area I serve, with special attention to those who are protected by civil rights laws.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. All clubs, activities, and programs are open to all individuals, regardless of their race, ethnicity, gender and/or disability. I understand my responsibility to take all reasonable efforts to promote inclusion and ensure clubs, activities, and programs are integrated.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

4. Data Collection and Integrity		
a. I understand that I am required to ask all program participants to voluntarily self-report their demographic information.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. I am aware that I need to enter my program participant data into the Planning and Reporting Portal every month.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. I understand my responsibility to maintain civil rights files regarding my programming efforts with protected audiences.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

5. Nondiscrimination on the Basis of Sex (Title IX)		
a. I know that programs and activities must be implemented in a manner that ensures nondiscrimination on the basis of sex.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

6. Public Notification & Outreach		
a. I know that the nondiscrimination statements and accommodation statements are available on OAIC's website .	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. I understand that nondiscrimination statements and accommodation statements must be included in all my electronic and printed outreach and program communications, including flyers, newsletters, websites, email, social media, and other public-facing materials.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

APPENDIX B

<p>c. I understand that the “And Justice For All” poster is a required method for notifying the public of their rights, complaint procedures, and Extension’s nondiscrimination policy.</p>		<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>d. I am aware that I may contact Extension’s Compliance Coordinator & Equity Strategist if I have any questions related to allegations of discrimination in programming.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	

<p>7. Accessibility for Individuals with Disabilities</p>		
<p>a. I am aware that I may contact Extension’s Access Consultant regarding requests for accommodation made by individuals with disabilities.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>b. I am familiar with the procedures for requesting sign-language (e.g., ASL) interpretation.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>

<p>8. Language Access</p>		
<p>a. I understand that it is Extension’s policy to ensure that individuals with limited English proficiency (LEP) have meaningful access to our programs, services, and activities.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>b. I am familiar with the procedures for requesting translation of written materials.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>c. I am familiar with the procedures for requesting voice interpretation.</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>

Please share any comments, questions, or reflections based on your self-assessment:



Civil Rights Action Plan

Office Location: _____

Date of Last Civil Rights Review: _____

Specific Action to be Taken	Responsible Party	Expected Community Partners	Target Completion Date	Expected Outcomes/ Impact	Progress/Comments	Date Reviewed
<i>Implement periodic discussions of civil rights planning at staff meetings.</i>	<i>Area Extension Director</i>	<i>N/A</i>	<i>01/31/2022, then quarterly</i>	<i>Regular review of Action Plan and documentation of discussions in minutes.</i>		