

Civil Rights Checklist

County/Tribal and Program Directors should use this checklist as a guide to lead faculty and staff through annual regular review of progress toward the goals outlined in their Civil Rights Plan, and to make sure their office compliance procedures and files are up to date. The Director will discuss civil rights compliance with their respective teams annually using the checklist. The checklist is also used to conduct the internal Civil Rights Compliance reviews required by NIFA in WSU Extension reviews prior to 2024.

If there is a box next to the item this is a deliverable and documentation will need to be stored in Teams, please retain documents for 5 years. All documentation must be updated annually. It is highly recommended this information be stored electronically on your designated Teams site.

Each location or program will have a folder for the corresponding year. In that folder you can either create subfolders for each item below or use a labeling system outlined below. Please make **4b Training Records** a subfolder for collection manageability. Please make sure the **number and letter** accompany your materials.

Naming convention and required forms (all those with checkboxes below):

- 1a. Civil Rights Plan LOCATION/PROGRAM
- 1b. GROUP NAME Advisory Members LOCATION/PROGRAM
- 2. TYPE OF OUTREACH/PROGRAM LOCATION/PROGRAM
- 3a. Reporting Contacts LOCATION/PROGRAM
- **3b.** Language Access Plan LOCATION/PROGRAM
- **3c.** ADA Checklist LOCATION/PROGRAM
- 3d. DATE.PROGRAM Special Accommodations Requests LOCATION/PROGRAM
- 3e. ORGANIZATION Compliance Statements or Bylaws LOCATION/PROGRAM
- 4a. Training Plan LOCATION/PROGRAM
- **4b.** Training Records LOCATION/PROGRAM ----THIS IS A SUBFOLDER
- 4c. Periodic Compliance Review Recommendations and Response LOCATION/PROGRAM
- 4d. Policies/Laws/Regulations/Interpretations LOCATION/PROGRAM

1 a. Civil Rights Plan LOCATION/PROGRAM — Please have faculty and staff annually review the current Civil Rights Plan and update as needed. I recommend a revision date to show the information is current. Two examples (labeled:1a. Civil Rights Plan Example 1 and 1a. Civil Rights Plan Example 2) can be found in the Teams shared folder.

To reduce the number of deliverables, please include the following in your plan:

- Organizational Chart
- Roles and Responsibilities for fulfilling ADA accommodations
- Statement of Nondiscrimination
- Reasonable Accommodation Statement
- Training Plan
- US Census County Data and Participant Enrollment
- Barrier Analysis
- Public Notification best practices

1 b. GROUP NAME Advisory Members LOCATION/PROGRAM—Provide internal and external advisory membership lists, which include the race, ethnicity and gender of the members. These lists should also include the designation of members who represent limited English proficiency (LEP) populations. When filing, please put the name of the advisory group name in the title (example: 1.b.DEI Advisory Members). A sample template (labeled: 1b. Advisory Data Collection Template) can be found in the Teams
2. Type of Outreach/Program LOCATION/PROGRAM – Provide samples of each type of outreach by program. This includes a list of various advertisements, publications, social media snapshots, and educational events open to the public. When filing please include the type of outreach and program in the title (examples: 2. social media 4H, 2. Flyer SNAP-ED, or 2. QR code Small Farms).

Reasonable Accommodation Statement - WSU Extension's reasonable accommodation statement must be on all meetings and training announcements. Include actual articles or submitted copy to newspapers, radio and TV, flyers, brochures, e- newsletter announcements, virtual academic content, etc. showing reasonable accommodations statements. The statement must include the procedure a potential participant would use to request reasonable accommodation.

<u>Statement of Nondiscrimination</u> - WSU Extension's statement of nondiscrimination must be on all WSU Extension printed or electronic material. Include meeting announcements, email notices, flyers, brochures, actual articles, radio, televised outreach, newspapers, and web pages, and virtual academic content and delivery. Record dates of release or use, as well as a list of outlets where submitted.

Required Posters – Please make sure a "And Justice for All" poster is prominently displayed in all main public areas and in all meeting rooms. WSU Extension faculty and staff should bring copies of the poster to post at off-site meetings, trainings, and events. If your county demographics indicate the potential for high non-English speaking audiences (10% or greater), you should display the poster in the language of that population (if available from USDA).

Note: Please visit <u>Justice for All Posters</u> periodically for the updated versions. It can be challenging to reach someone at the regional level to order posters, if you must print, please for accessibility purposes consider 11 x17.

3 a. Reporting Contacts LOCATION/PROGRAM - Faculty and staff report services provided to underrepresented groups through the Reporting Contacts spreadsheet located on Teams (labeled: 3a. Reporting Contacts by County Spreadsheet). Balanced participation occurs when ethnicity, race, gender of participants across all programs are representative of the county population. WSU Extension considers that programs are complying when participation has reached 80%. If balanced participation was not reached, include documentation explaining the differences between the percentages of population in the county (ethnic, age, gender, etc.) and the percentages of populations reached in each strategic goal or County/Tribal Civil Rights Plan.

Revision (8-24-23) Reporting Contacts by County is essential to meeting and determining civil rights violations, this process will also be referred to as the data reporting. Please download an empty Excel spreadsheet quarterly, fill it out and send to Kenitra.Keeney@wsu.edu. This will allow the Extension Relations Coordinator to include the data into the primary data reporting spreadsheet and update the dashboard. By doing this you will meet both collecting REG data and a parity analysis--the dashboard helps you with this.

- 3b. LEP Needs Assessment and Language Access Plan LOCATION/PROGRAM WSU Extension has an updated Language Access Plan (LAP) and is in the process of creating a Language Access Committee. If your location already has a LAP, please cover the following areas:
 - -- Identify potential service population and language needs
 - -- Staff have been trained on language access obligations and prohibited practices
 - -- Competent interpretation and translation services are consistently provided free of charge
 - -- Notification of services is provided
 - -- Documentation of outreach to LEP individuals takes place

Resources: NIFA Resources and LEP.gov Resources

ADA accessible, please notify your county/tribal director or Extension County Relations

WSU Extension Annual Civil Rights Review Checklist and Filing Guide

Coordinator. Please include:

- --Steps taken to eliminate barriers
- -- Any self-assessment outside of the checklists

3d. DATE.PROGRAM Special Accommodations LOCATION/PROGRAM - If you
have a request for reasonable accommodation, you must include the request. Include
meeting sites and description of accommodation(s) made. The Date.Program
information will assist leadership with data and needed resources to better reach
underserved populations (example: Jan 4 4H, Jan 6 MG, Jan 10 Small Farms)

<u>3 e. ORGANIZATION Compliance Statements or Bylaws LOCATION/PROGRAM</u> - Documentation of non-discrimination is required from all non-public organizations with whom we partner before providing any service to the group (e.g., a copy of by-laws with non-discrimination language included, signed statement, signed letter, or membership list showing protected classes). These must be updated every two years. A sample letter can be found Teams (3e. Sample Letters of Confirmation of Organizational Policy)

4 a. Training Plan LOCATION/PROGRAM

Initial, annual, and on-boarding civil rights training is being created and will be posted to the WSU CAHNRS Extension website. All training documentation and training plans for faculty, staff, and volunteers around civil rights and WSU Extension's commitment to civil rights compliance must be documented. It's important to include the dates and names of participants in the training. Please consider at a minimum these training topics more training is welcomed along with more documentation:

- --Meeting minutes, agendas, conferences and/or professional development with CCR related topics
 - --Review the website Extension is for Everyone
 - --Volunteer Orientation (4-H and Master Gardeners)
 - -- Compliance and Civil Right Reporting
 - --Title IX
 - --WSU Policy Prohibiting Discrimination and Harassment (EP15)

Note: WSU has education and training materials located here <u>CCR Education and Training</u>. The WSU compliance resources require a password.

<u>Complaint Procedures</u> - Faculty, staff, and volunteers need to know and understand the procedure to follow for:

- -- Filing grievances and complaints related to civil rights compliance in WSU Extension programs
- --Filing employment discrimination and sexual harassment complaints.

WSU provides resources at the following location <u>Filing a Complaint or Greivance</u> Questions can be directed to the Office of Compliance and Civil Rights at 509-335-8828 or ccr@wsu.edu.

	4 b. Training Records LOCATION/PROGRAM — THIS IS A FOLDER
	Place all training records into the Teams folder (labeled: 4 b. Training Records).
	Documentation is key. Minimal training documentation is required, but additional
	training includes meeting minutes, agendas, conferences, and presentations which
	include civil rights compliance topics—including attendance records (when possible).
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	4 c. Periodic Compliance Review Recommendations and Response
	LOCATION /PROGRAM - Include annual internal reviews and recommendations/reports
	and responses. WSU Extension's internal civil rights compliance will be conducted
	annually
	Group 1- Adams, Colville Reservation, Ferry, Grant, Lincoln, Okanogan, Pend Oreille,
	Spokane, Stevens
	Group 2-Asotin, Benton, Columbia, Franklin, Garfield, Walla Walla, and Whitman
	Group 3-Clark, Cowlitz, Klickitat, Lewis, Pacific, Skamania, Wahkiakum, and Yakima
	Group 4-Clallam, Grays Harbor, Jefferson, Kitsap, Mason, Pierce, and Thurston
	Group 5-Chelan, Douglas, Island, King, Kittitas, San Juan, Skagit, Snohomish, and
	Whatcom
	Programs – ANR, CED, Y&F, and 4-H
	4 d. Policies/Laws/Regulations/Interpretations LOCATION/PROGRAM -Include
	policies if they are different from federal, state, and/or university policies.

3/25/24 5