

**May 2005 Civil Rights Compliance Review
Ohio State University Extension
Programs and Operations Report, 9/05
Employment Report, 10/05**



We are in receipt of the final reports from the Civil Rights Compliance Review of OSU Extension. It has been noted that the reviews disclosed no overt acts of discrimination in the conduct of OSU Extension programs and employment practices. Some conditions were noted which indicated the need for strengthening procedures to assure continued compliance with civil rights requirements.

Following are the combined recommendations and planned/taken actions for the Program & Operations and Employment reports.

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Extension Administrative Review on December 8, 2005

Employment, Hiring and Civil Rights

Recommendations:

1. Renew and strengthen an integrated affirmative EEO recruitment program to recruit and hire minorities for Extension positions at the State and county level.
2. Insure that all position descriptions of staff contain nondiscrimination requirements and are filed in local Extension offices.
3. Analyze the diversity of the present statistical report (applicant pool) from which hiring decisions are made and when there is a representation of women and minorities in the pool that meet the qualifications, ensure that they are interviewed and in some instances hired.
4. Continue to make every effort to search out qualified minorities for vacancies that occur in top campus-based positions.
5. OSUE officials are encouraged to continue the diversification of females and minorities on organizational committees

Actions Planned or Taken:

1. A committee comprised of Ohio State University Extension employees, representing the professional associations, is being formed to develop action steps to increase applicant pools of all qualified candidates.
2. Leader, Human Resources will work with other Administrators to remind County Extension Directors in charge of local hiring to include non-discrimination requirements on all position descriptions.
3. Seeking diverse representation on all committees is an on-going commitment that OSU Extension has and we will continue to seek out individuals to serve on committees to ensure balance of race, gender, ethnicity, and age.

Committees' and Volunteers' Role with Civil Rights Laws, Rules and Regulations

Recommendations:

1. Review advisory committee member recruitment process in counties to insure all reasonable efforts are being made to expand committee membership to minorities in accordance with the county population.
2. Ensure that orientation and continuous civil rights education and training are provided to all Advisory Committees and Council Members.
3. All staff and volunteers need updated training on processes for resolution of program complaints to be able to explain this to clientele.
4. Staff and volunteers need to know procedurally how to resolve employee complaints, including location of people throughout the organization to help mediate issues.
5. Insure that all position descriptions of volunteers contain nondiscrimination requirements and are filed in local Extension offices.

Actions Planned or Taken:

1. All extension employees who work with volunteers will receive an update on how to address complaints that may be made and will share this information with volunteers at volunteer training.
2. Each program area will be asked to develop a volunteer position description that will include nondiscrimination requirements.
3. Volunteers will receive training on AA/EEO/Civil Rights via program areas as new volunteers are added and on a bi-annual basis.
4. All Advisory committees will be asked to view the 45 minute DVD on Civil Rights Laws that was produced in 2005 and to sign a document indicating that the DVD was viewed and there is an understanding of the importance of AA/EEO/Civil Rights. As new members are added they will view the DVD as part of orientation.
5. All counties are encouraged to review their recruitment process and term length on an annual basis. We will continue this encouragement and ask for successful strategies that can be shared with other counties.

Limited English Proficiency Policies and Procedures

Recommendations:

1. Staff should establish a comprehensive policy on Limited English Proficiency to provide guidance to all county staff in the full implementation of LEP requirements.
2. State should fully utilize the materials available in "Extension en Espanol" and other similar components to further enhance Limited English Proficiency efforts to available multi-racial and multi-lingual clientele.

Actions Planned or Taken

1. All OSU Extension Employees will be made aware of LEP requirements as indicated by Executive Orders 13166.
2. OSU Extension Administrative Cabinet will develop policy and guidelines on LEP audiences.
3. The "Extension en Espanol" web site will become a site featured on the OSU Extension Diversity web site.

Staff Understanding of Civil Rights Laws, Rules and Regulations

Recommendations:

1. Strengthen understanding among county staff on the relationship of the diversity plan, and civil rights laws, rules and regulations
2. Provide civil rights training opportunities in which all county staff can benefit from understanding the impact on county diversity plans
3. Strengthen use of staff conferences to disseminate changes in civil rights procedures which may impact diversity plans for expanding program compliance.
4. Civil rights/ affirmative action laws and regulations should be included in all diversity training.
5. Consider re-establishing an EEO Counselor Program for Extension employees.
6. Ensure that EEO Counselors are representative of the State Extension population by race and gender. Additionally, ensure that proper training is provided to EEO Counselors, to carry out those duties for counseling employees

Actions Planned or Taken

1. An "Understanding Civil Rights" broadcast was developed and presented to Extension personnel in Fall 2005. Participation was documented through receipt of a signed compliance agreement. All new personnel will be required to view broadcast.
2. All staff will review AA/EEO/Civil Rights laws on an annual basis through staff conferences.
3. An AA/EEO/Civil Rights Manual will be distributed to all OSU Extension County Offices, Center, Regional Offices, and State Offices. In addition to containing laws, there will be mini lesson plans that can be utilized to review various laws.
4. The AA/EEO Counselor Program will begin in 2006 and AA/EEO counselors will provide AA/EEO updates as requested at regional events, conferences, or meetings. Training for AA/EEO Counselors is planned to be conducted jointly with Purdue University in 2006.
5. During diversity training sessions reference will be made to the appropriate AA/EEO/Civil Rights law that connects the importance of diversity and upholding the law.

Insuring Non-Discrimination in Programming, including Public Notification

Recommendations:

1. State should ensure that all procedures include information that the program can accommodate persons with special needs (within reason)
2. We cannot provide assistance to any organization that excludes people from their membership or participation based on race and gender. State Officials need to update policy requirements for employees to determine whether any organization or groups with whom they are working follows discriminatory practices.
3. Increase outreach efforts to improve minority participation levels in *4-H camping* programs.
4. Insure a public notification plan is implemented in all program areas and that counties follow all reasonable efforts.

5. State should establish written guidelines to include data on race, ethnicity and gender on mailing lists. Also, ensure mailing lists are dated to enable verification of their accuracy.

Actions Planned or Taken

1. A reminder to all Extension professionals will be included in the Communiqué indicating that there should be an accommodation statement on all flyers, registration, and or posters announcing a workshop, training, or meeting.
2. The Assistant Director, 4-H Youth Development will work with the statewide camping specialist to develop strategies and methods to increase participation of youth who are members of protected classes in camp programs.
3. A revised Non-discrimination Statement has been developed and will be used in 2006. OSU Extension will begin to collect these statements on a tri-annual basis with blanket certification being given at the state level for agencies that have statewide jurisdiction. Educators conducting programs for local groups, organizations, or agencies will continue to obtain the non-discrimination statement. The statement must be resigned every three years for groups who have established relationships with OSU Extension and as needed when working with a new group, organization, or local agency.
4. All employees will be reminded of public notification and all reasonable efforts. A form has been designed to assist with documenting public notification and all reasonable efforts. This form will be made available on the Diversity web site as well as the AA/EEO web page maintained by Human Resources.
5. All counties are encouraged to use two AA/EEO data collection forms made available through OSU Extension Human Resources to begin to collect AA/EEO data for participants and mailing lists. OSU Extension is unable to keep race and gender information with mailing data bases due to legal advisement from the University Human Resources. We can however, keep this data separately for participants and those who are on mailing lists. Please see the attached document explaining the Ohio State University's policy regarding race and gender on mailing lists.

Follow-through from Diversity Reviews

Recommendations

1. State should maintain a timely process for counties to respond to correction action identified in diversity reviews. The process should include comments from the State that the findings/recommendations were satisfactorily addressed by the review counties.
2. State should make findings of internal diversity reviews available statewide to ensure all counties are made aware of civil rights information they may need to focus on to ensure compliance in a timely manner.

Actions Planned or Taken

1. The summary of each year's diversity reviews will be shared via the Communiqué and archived on the Diversity Resources web site.
2. During the diversity review process counties will be asked to identify how they have addressed the recommendations in their report and how the action plan was implemented.