

MU Extension Policy for Internal Civil Rights Compliance Reviews

Federal law requires periodic reviews of offices to ensure that they are in compliance with civil rights laws and regulations. During these reviews, the civil rights file, public notifications, plans of work for meeting affirmative action goals, personnel descriptions, etc. are reviewed. Accessibility of the office and programs is also determined. Interviews are held with faculty, staff and council members. Detailed information about what an internal compliance review entails may be found on the civil rights checklist found in the civil rights file of each state and county office. All offices must be prepared for a review at any time.

As part of the Internal Compliance Review process, regional directors and the AA/EEO officer assume leadership for internal compliance reviews in each region. They review one-third of the counties each year. This way, every county is reviewed every three years. Regional directors and the AA/EEO officer supply their schedule for review by September 1 of each year. Upon completion of the review, a written report is developed. One copy of the report goes to the county, one is kept in the regional director's office and one copy will be sent to the AA/EEO office. The report follows the checklist for the civil rights file. The AA/EEO officer spot-checks four offices per year. In addition, state program offices will be reviewed every three. The AA/EEO officer will review these.

Roles and Responsibilities for Internal Compliance Reviews

Role of the AA/EEO officer and regional director as a team

1. Provide leadership for reviewing each county every three years
2. Schedule one-day county reviews that include the regional director, AA/EEO officer and county program directors in each region at a central location. County program directors will bring their civil rights files for review.
 - a) Verify that the county civil rights file is in each office, and that everyone in the office is aware of its contents and application. The team will verify that the annual notification of review form has been completed.
 - b) Ensure that the county civil rights file is complete with copies of all pertinent federal and university laws, regulations and policies.
 - c) Ensure that affirmative action plans are on file for each county. County demographics should be reviewed and compared to actual contacts for each program area. If a gap between demographic and actual contact is evident, faculty must share specific ideas for reaching the underserved audiences. All reasonable efforts must be documented.
 - d) Assurance of compliance forms must be on file for each outside group receiving significant technical assistance from extension. The forms can be found at <http://extension.missouri.edu/staff/eo-compliance.aspx#forms>.
 - e) Review the list of all county personnel by race and gender

- f) Review all county mailing and committee lists. See the grids to be used to record this in the civil rights file: <http://extension.missouri.edu/staff/eo-compliance.aspx>.
- g) Pay special attention to participation data of 4-H events, ensuring that there are no restrictions on attendance, selection, etc.
- h) Ensure that the annual certification of compliance for 4-H clubs is completed by the regional director: <http://extension.missouri.edu/staff/eo-compliance.aspx#forms>.
- i) Check the minutes of the expansion and review committee to verify that it meets regularly and strategizes to increase representation of audiences.

Role of the regional director in the onsite visit

1. Work with each specialist to ensure that they are accurately collecting and reporting minority program participation using the planning and reporting system, considering the use of the demographic cards.
2. Note whether or not all public notification requirements are being met. The “Justice for All” poster must be displayed, and all brochures and news releases must be reviewed for the non-discrimination statement. Attention should also be focused upon sample stereotyping, or discrimination in newsletters.
3. Check with all faculty and staff members to ensure that they are knowledgeable about the discrimination complaint procedure, <http://extension.missouri.edu/staff/eo-complaints.aspx>, and for the existence of EEO counselors.
4. Ensure that the client program complaint process is visible during programming
5. Verify the ADA self-assessment has been completed, and where there is limited accessibility, that there is a plan for ensuring program accessibility.
6. The RD Internal Compliance Review Form can be found at <http://extension.missouri.edu/staff/eo-compliance.aspx>.

Role of the county program director

1. Ensure that the civil rights file is complete and that all personnel in the office have contributed to and reviewed the file, signing the notification of review form
2. Provide leadership in the county for gathering the affirmative action plans once they are completed for each program area and place them in the civil rights file
3. Work with regional director and AA/EEO officer to schedule internal compliance reviews.
4. Attend a one-day regional review with the regional director and the AA/EEO officer.

Role of the statewide program director

1. Ensure that the civil rights file is complete and that all state personnel in the program area are familiar with the file and its contents.
2. Work with the AA/EEO officer to schedule an internal compliance review every three years.

Role of the AA/EEO officer

1. Partner with regional directors to conduct day-long compliance reviews with county program directors.
2. Partner with program directors as they prepare for compliance reviews.
3. Provide training on conducting compliance reviews to regional directors and county program directors.
4. Conduct spot-check compliance reviews in four counties and two state offices each year.
5. Review compliance review reports and make recommendations as necessary.
6. Provide comments, assistance and resources to all faculty and staff as identified in the compliance review.
7. Review compliance review process and change as necessary.

Role of county faculty and staff

1. Update affirmative action plan and report each year using the WebApps system. Focus on methods of conducting “all reasonable efforts” to reach underserved audiences.
2. Ensure accessibility of all programs.
3. Ensure familiarity with the office civil rights file and its implications.
4. Provide pertinent information to the civil rights file.
5. Participate in the internal compliance review as requested.
6. Contact an EEO counselor or the director of organizational development with any civil rights issues.