

**UMass Extension Response to
2006 CSREES Civil Rights Compliance
Review**

conducted in August, 2006



UMassAmherst Outreach **UMass**
Extension

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INTRODUCTION

The mission of UMass Extension is to improve the health, well-being and security of youth, families and communities; conserve and enhance natural resources; and strengthen agriculture and food systems. We fulfill our mission by utilizing the research and teaching capacity of the University of Massachusetts Amherst to generate and communicate knowledge while creating approaches, methods, and tools for solving problems. UMass Extension links the Massachusetts land grant university with a larger community of people in collaborative partnerships to address issues of fundamental importance to the people of Massachusetts, New England, and the nation.

UMass Extension continues to grow and change in response to the many challenges facing the University, the Commonwealth of Massachusetts, and the country. Extension programs adhere to federal and state statutes, regulations and University policies regarding Civil Rights as a cooperator with the United States Department of Agriculture (USDA), Cooperative State Education, Research and Extension Services (CSREES). UMass Extension makes it a priority to reach out to diverse audiences across the state and strives to offer equal access to educational programs and equal opportunity in employment without discrimination based on race, ethnicity, gender, age, physical ability, religion, sexual orientation and veteran status.

In 2007 Extension moves toward a landmark leadership transition, as Nancy Garrabrants, former Director of the Stockbridge School and Assistant Dean in the College of Natural Resources and the Environment, becomes the first female Extension Director in Massachusetts, and its first permanent director since 2000. The new Director, along with Interim Director Bob Schrader, who will remain as Associate Director, and the Extension staff are committed to promoting equal access to Extension programs for all of the state's citizenry, and will continue to build upon the strong progress Extension recently has made in enhancing its civil rights policies, public notification processes, staff development opportunities, and program delivery to diverse audiences.

As our state's population grows to include people from increasingly different ethnic and racial backgrounds while funding sources have remained level, Extension staff and partners are challenged to ensure civil rights compliance and equal opportunity in our operations, communications, and new program delivery. In response to CSREES Civil Rights responsibilities, we improved our services to assure equal access to innovative programs that reach out to constituencies in the Commonwealth in innovative ways.

Organization of the Response Report:

The UMass Extension Civil Rights Compliance Response serves as an initial Civil Rights Plan to be further developed with staff over time. It is organized into two sections to

highlight both current progress and the planned future steps that will be taken to address the recommendations contained in the CSREES review report.

- I. Historical background and current steps taken administratively and programmatically by Extension since the 2006 review to increase Civil Rights compliance (pages 3 – 7).
 - A. Technology
 - B. Staff development
 - C. Planning and Reporting
 - D. Program Delivery
 - E. Administration
 - F. Organizational Collaborations.
- II. Future plans to ensure administrative and program directors’ responsibilities to achieve Civil Rights Report Recommendations (See Appendix A, p. 13) within six categories (pages 7 – 12).
 - A. Civil Rights Communications and Staff Development
 - B. Ensuring Equal Access to Programs
 - C. Data Collection and Analysis
 - D. Staff Recruitment and Impact Analysis
 - E. Disability Access
 - F. Internal Reviews

I. Historical Background and Current Civil Rights Compliance Achievements:

In 2005 Extension moved off campus to a modern new building site which is more accessible to the public. It shares the site with the Outreach Marketing and Communications Unit and the Outreach Development Function. In 2004 Extension welcomed a new Outreach Vice-Provost, Sharon Fross. As the Vice Provost shaped Outreach departments into a more unified service arm of the University, Extension programs has ensured civil rights are an integral part of new initiatives in the following areas.

A. Technology:

Extension revised its communications methods to take advantage of the larger reach of new technologies. Its website now features a useful public notification section and links to various “Civil Rights Information and Resources” for staff and the general public. *Extra*, an internal electronic newsletter highlights Extension staff’s educational contributions to diverse constituencies across the state while providing updates and increased awareness among all staff across the state on diversity topics. In the near future, updates will include best practices information such as how to increase diversity on advisory councils; integrate clubs and programs; notify collaborating organizations about UMass Extension’s non-discrimination policy; manage the written process for handling civil rights related complaints locally; collect civil rights data on a consistent basis across and within programs, especially with large audiences, symposia, and workshops; and ensure gender neutral programming. “*eXtension*” and its “Diversity in

Higher Education” Community of Practice are being evaluated to determine how this national electronic information and program resource can further enhance UMass Extension’s programming and outreach to underserved communities.

B. Staff Development:

2006 saw the initiation of an Extension organizational development function, including developing a comprehensive Civil Rights component which offers staff training. Programs have been delivered and are planned to help better ensure the adoption of equal opportunity best practices and laws, equal access to programs and employment opportunities, staff sensitivity to the complexities of a multi-cultural society, and routine use of improved demographic data collection methods. In June 2006 the majority of Extension staff across the state completed professional development sessions offered by the UMass Office of Equal Opportunity and Diversity on state and federal legal regulations, university policies, and resources including disability and translation services.

In June 2007 Extension offered staff cultural sensitivity training on “Multi-cultural Communications.” A hands-on practical program on “Building UMass Extension Programs in Diverse Communities” will follow in fall 2007. Future plans include training on university policies, such as recognizing and preventing sexual harassment, and on avoidance of racial and gender bias in the workplace and of discrimination within hiring, layoff, and promotion practices. Extension plans comprehensive trainings to assist staff in determining appropriate methods to achieve parity in outreach to diverse audiences and in the collecting and evaluating of data at all levels as part of internal civil rights planning and reporting. This includes clarification as to standards to ensure that “all reasonable efforts” have been met for program access by diverse individuals, including those with disabilities and limited English proficiency.

C. Planning and Reporting:

Extension is successfully responding to the clear call for increased internal and external accountability from both its campus-based and public stakeholders. In 2005 – 06 Extension developed a Plan of Work based on extensive input from constituents to develop focused issues-based programs responding to areas of high concern for Commonwealth citizens. A web-based planning and reporting system designed in conjunction with colleagues across the country now measures progress towards goals, with every issue and project including data collection on those diverse audiences either reached or requiring more contact. Extension programs which had not previously collected such information will have the tools necessary to document all reasonable efforts to integrate programs and volunteer advisories. Such information enhances decision making effectiveness by pinpointing areas of need, and contributes to staff ability to respond more rapidly to emerging issues of importance given the increasing diversity of its citizenry.

D. Extension Program Accomplishments related to Civil Rights:

1. **UMass Extension** offers campus based programs related to diversity, including, in 2006, the “Pathways to College Program” which encouraged underserved Holyoke Latino middle school youth to visit area campuses while allowing university students to apply their research to the needs of residents and the community in the area of economic development. Managed by 4-H staff, it is funded by a three-year Housing and Urban Development grant, and is a part of the Holyoke Planning Network Community Outreach Partnerships Center. This year the “Envirothon Program” involved Extension educators in collaborations with the schools and brought 43 diverse teen teams from across the state to campus to learn about energy alternatives and natural resource protection.
2. **Massachusetts 4-H Program**. In 2005, Extension conducted a Benchmarking Study of best practices in 10 states’ 4-H programs; this resulted in a strategic plan for Massachusetts 4-H with an urban program focus that seeks to provide increased racial and gender program access to underserved youth across the state. A statewide youth technology initiative began, along with development of a cross-campus National Science Foundation grant proposal to deliver science and technology programs to diverse youth. Several grants enabled inner city and Latino youth to attend 4-H camp in Western Massachusetts and, through “4-H Operation Military Kids” “Purple Camp,” military youth from across the country were able to attend a Worcester 4-H camp providing support and learning activities for the children of deployed service men and women from diverse backgrounds. 4-H’s efforts to increase diversity in 2006 includes a performance goal for each Educator to conduct targeted recruitment in at least one community per county to increase volunteer and member diversity in the club program and advisories.
3. **Nutrition Education Program** continues its outstanding work in partnership with Massachusetts schools and communities across the state. It obtained significant new grant funding to conduct research and develop innovative curricula such as the award winning “Choices” series. NEP staff work to reduce the prevalence of obesity and chronic disease among Massachusetts children and families by teaching Massachusetts families about balanced food selection, physical activity, and other healthy lifestyle behaviors. NEP programs help reduce health disparities among Massachusetts residents, and improve food safety in Massachusetts by instructing teachers and students in safe food handling.
4. **Agriculture and Landscape Program** innovations include work with Massachusetts communities, growers, and farmers markets to bring Brazilian and Asian produce into the Massachusetts marketplace and to encourage healthy preparation of foods. Its workforce development efforts include a successful pesticide application certification program

which helps increase work opportunities for new immigrant groups in Massachusetts. “Agriculture in the Classroom” curricula help teachers work with diverse student groups who have strong cultural affiliations and interests in farming, especially in a state where traditional farming communities are declining. An automatic new web site tracking process is now used to determine the number of log-in contacts from underserved and diverse communities interested in agriculture and landscape services and issues.

5. **Natural Resources and Environmental Conservation** is exploring possibilities for reactivating ties to the Wampanoag tribe on Martha’s Vineyard by reinstating a water resources and protection specialist position. NREC is working with faculty in the Department of Natural Resources Conservation on a proposed National Science Foundation research grant project on vernal pools and amphibian dispersal. NREC would partner with an urban school system to train and employ students from underserved communities as technicians for the project and use the experience to help provide information in their schools about natural resource based scientific research.

E. Administration:

In 2003-04, Extension faced budget cuts of over a million dollars (25% of combined state and federal discretionary funds) resulting in the lay-off of staff which was cited by the 2006 Civil Rights review as adversely impacting females on staff (81.63% of layoffs) and in the administration of programs. While the review did not specify any overt acts of discrimination, in the future Extension will work more closely with the University Office of Equal Opportunity and Diversity (EOD) to conduct civil rights impact analysis to systematically assess each program’s fair employment practices so that one group is not affected more than another during times of staffing changes.

This will be reinforced at the county level by reporting on program progress at achieving diversity goals, through the conduct of periodic internal reviews, by improved recruitment of and outreach to diverse candidates, by written guidelines for resolving program complaints and with inclusion of up-to-date policies in all program offices’ files. Ongoing work with EOD, the field offices, and Barnstable and Plymouth counties will also occur in order to update mailing lists in each region so that current contact information on minority organizations can aid in recruitment and program delivery to new audiences. Responsibility for filing vacant positions and ongoing search data has been vested in two individuals on staff who are responsible for the Human Resource function. Guidance will be provided by the UMass Office of Equal Opportunity and Diversity and by Extension Administration on the use of Affirmative Action data to determine outreach methods. The goal is to achieve parity reporting by Ag and NREC and 4-H programs so that race, gender and ethnicity are accurately and fully collected for large group lectures, workshops and other programs. The 4-H

Martech system will be updated and replaced by ES237 National Committee redesigned software to enable avoidance of problems in data collection by race, gender and ethnicity.

Key elements of the initial Civil Rights Plan contained in this Response Report will be considered by a staff diversity team comprised of membership reflective of both majority and minority staff composition within Extension. The final plan will reflect a multi-year strategic program that identifies a time line of priorities and action steps for each year that parallels Plan of Work goals. A realistic assessment of staff capacity matched to needs will also be included as part of the planning and resource allocation process. Communications within each program's staff meetings will be conducted to assure staff have a clear understanding of civil rights plan, policies, and procedures. Individual staff responsibilities for civil rights administration will be clarified, with modification of position descriptions to reflect assumption of such responsibilities.

F. Organizational Collaborations:

After the 2003 budget cuts, Extension undertook the re-building of stronger working relationships with its non-profit partners. It continues clarification of mutual roles and responsibilities among Extension, its two 4-H Foundations, five 4-H camps and agreements with the two counties by developing new memoranda of agreement which lay the groundwork for future collaborations. One such project is the recently completed Massachusetts Service Alliance needs assessment survey grant with the Massachusetts 4-H Foundation and UMass Alumni Association and Retired Professional Staff Association. This grant sought to bring in older citizens as volunteers and explores the volunteer interests of "boomer plus" demographic age group members who are affiliated with the campus. It should be noted that Agriculture and Landscape faculty and staff were involved in over ten major grants awarded as part of the Governor's budget for 2007 and that this offers new opportunities for more diverse audience data collection.

In 2007, The Board of Public Overseers, (BPO) created by the Legislature and with members appointed by the Governor, lobbied the legislature for increased funding, joining together to proactively propose a larger and more comprehensive Extension budget to the Chancellor for the upcoming budget cycle. Work will continue to move forward to increase the gender and racial diversity of all state advisory groups and BPO so as to provide representation for more diverse viewpoints.

Extension aims to continue cultivating strong collaborations with county funded Extension programs in Barnstable and Plymouth, especially in the areas of increased outreach to new immigrant and minority groups, updating of complaint procedures and reasonable efforts documentation, recruitment of more diverse staff and advisory members, and improved handicapped

facilities and translation materials. Extension is developing a more aggressive grant seeking and revenue generation approach to contribute to Extension's financial self-sufficiency within the University and to broaden its scope of program access to underserved communities.

II. Future Plans to Achieve Civil Rights Compliance Report Recommendations:

A. *Civil Rights Communications and Staff Development*

1. Administration Responsibilities:

Develop updates on civil rights information and coordinate with program directors for inclusion of new policies and procedures, as part of each program's staff meetings, or information channels, as appropriate to facilitate staff development.

- a. Develop and send out written notifications of new policies in advance, such as an internal written process for handling civil rights complaints locally.
- b. Offer "just-in-time" training sessions in staff meetings that would include review of the "...And Justice for All" poster as a guide to complaint filing; new Civil Rights related protocols, processes, or discussion of challenges; Question & Answer opportunities (e.g.: civil rights file management, complaint procedures, recruiting, regional mailing list update efforts, public notification plan, etc.)
- c. Conduct needs assessments, develop content, and schedule sexual harassment and communications awareness trainings as part of ongoing Extension Organizational Development offerings for staff.
- d. Work with Office of Equal Opportunity and Diversity and relevant university and federal offices to develop policy and standards for Extension regarding "all reasonable efforts" to accommodate limited English proficiency clients and people with disabilities.
- e. Conduct ongoing policy meetings with Extension Program Directors and leadership on plans to implement civil rights initiatives within Extension, Outreach and the University.
- f. Establish a six to eight member staff Extension "Working Committee on Diversity" comprised of people both skilled at and interested in equal opportunity and access issues. The group would consider and advise as to priorities, implementation steps and strategies, timelines and appropriate communication approaches to be used to move forward the Extension Civil Rights priorities contained in this document within the respective program areas. This would help fulfill the recommendation, in part, that Extension increase minority representation among policy makers responsible for setting program objectives for Massachusetts Extension.
- i. Extension leadership will develop committee membership criteria that reflect the required expertise and the demographic make-up of both staff, the counties and the minority communities that Extension serves and will work with the program directors to involve interested and skilled staff as members.

- ii. Expectations as to duties, time to be spent on committee work/meetings and the particular focus area or expertise each person is asked to contribute will be specified.
- iii. Committee work will focus on setting up reasonable timelines for achieving the goals and objectives articulated in this plan, identify opportunities for program outreach as an inclusive organization within each of the program and county areas, and suggest strategies for responding to emerging Civil Rights issues affecting Extension, its program plans, and staff duties over time.
- iv. Special focus of the team will be the development of content and process for an internal review program and a schedule for counties and programs to use to document civil rights internal compliance efforts over time.

2. Program Director Responsibilities:

Cooperate in reviewing Civil Rights information, providing guidance and feedback on policies, scheduling and notifying staff of update meetings.

- a. Ensure that staffs are knowledgeable by supporting attendance and participation in meetings and training sessions and through discussion of the impact of updates on program delivery and operations.
- b. Implement “all reasonable efforts” policies and practices to address constituencies’ needs for translation, English and disability assistance in materials and programs.
- c. Ask staff to provide constructive feedback on policy and procedure implementation and to work on special need areas (e.g.: recruitment of African American 4-H’ers in Worcester or development of county internal reviews including USDA policies and procedures, instruments to use within county, documented findings with written results for follow-up action by Extension).
- d. Seek, recommend, and appoint staff from the program to serve on a UMass Extension Diversity committee that will provide recommendations, practical advice, and working assistance in the implementation of Extension Civil Rights initiatives in his/her program area.
- e. Work with the program’s Extension Diversity committee representative to implement suggested methods and communications regarding Civil Rights within the program area, ensuring that all office files contain up-to-date policy information.
- f. Ensure that partnering organizations receiving educational assistance are aware of and sign off on UMass Extension’s statements of compliance.

B. *Ensuring Equal Access to Programs*

1. Administration Responsibilities:

Identify and improve current methods used to balance, monitor, and evaluate level and types of program delivery contacts to racial and ethnic groups in Ag and Landscape, Nutrition, NREC, and 4-H.

- a. Conduct research, e.g.: Benchmark other states' contact approaches; review best practices recommended by CSREES Civil Rights staff.
- b. Collect available demographic and census information on ethnic, racial and low socio-economic populations and locations across Massachusetts. Distribute to program directors for consideration and planning.
- c. Evaluate effectiveness of existing outreach efforts for reaching and recruiting diverse clientele within each program in conjunction with program directors.
- d. With program directors' input, develop and recommend a plan for new outreach efforts / expanded program/ services delivery to diverse groups/ communities.

2. Program Director Responsibilities:

Participate in strategic civil rights planning initiatives for new outreach service and program delivery to diverse audiences.

- a. Review demographic and research data thoroughly and apply to program delivery.
- b. Be accountable for implementing improvements and initiatives.
- c. Organize and submit progress reports requested by Administration as requested.
- d. Suggest necessary features and steps involved to implement strategic initiatives to broaden program delivery to new constituencies.
- e. Provide leadership/assign staff to develop and expand program delivery to underserved groups.
- f. Assess degree of effectiveness of new diversity efforts and correct course as needed within the program over time, providing all appropriate documentation.

C. Data Collection and Analysis

1. Administration Responsibilities:

Re-design, standardize and streamline Extension's civil rights data collection processes to strengthen methods for balancing, monitoring and evaluating the level of program delivery contacts to racial and ethnic groups to ensure documentation of "all reasonable efforts."

- a. Recommend use of standardized tools for collecting civil rights data by program.
- b. Develop simple data collection/entry system for staff to regularly input data at the program level that is tied into "Prism," the planning and reporting system.
- c. Provide staff training on data collection and evaluation processes to assess current diversity levels by race, ethnicity, and gender, specifically at the county level.
- d. Provide census reports and monitor program enrollments midyear and annually.

2. Program Director Responsibilities:

Advise on the redesign, standardization and streamlining of Extension's civil rights data collection processes and implementation of procedures internally.

- a. Provide feedback on the tracking process design and evaluate the quality and quantity of information provided.
 - b. Ensure that staff understand and consistently use tools to collect data across all programs.
 - c. Oversee submission of quarterly civil rights data entry on database by field staff.
 - d. Track progress towards goals by checking census data and program enrollments, documenting “all reasonable efforts regularly” and adjusting course as necessary.
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D. Staff Recruitment and Impact Analysis

1. Administration Responsibilities:

Develop comprehensive civil rights recruitment plan and impact analyses processes to create an Extension workforce representative of Massachusetts’ population.

- a. Review existing CSREES and University civil rights recruitment plans, pertinent analyses, tools available from Office of Equal Opportunity and Diversity.
- b. Gather and report data on current Extension staffing levels and project future staffing needs.
- c. Seek constituencies’ input in order to develop recruitment, hiring, and retention approaches that meet diverse communities’ and audiences’ priority needs.
- d. Develop a comprehensive recruitment plan to recruit from diverse applicant pools and hire more diverse applicants especially in counties lacking parity.
- e. Reinforce the use of civil rights requirements in determining program employment across all counties, programs, and staff areas.

2. Program Director Responsibilities:

Participate in administrative, informational, and analysis meetings on Extension civil rights planning and impact analyses, in particular in regard specific program needs.

- a. Provide administration with requested data on projected recruitment and impacts by specific program area.
- b. Provide feedback on current policies and procedures, needs, and potential improvements to enhance current Extension recruiting practices and policies.
- c. Lead planning process at the program level regarding staff, advisory, and council recruitment when filling vacant positions to ensure that “all reasonable efforts” are used to recruit minority groups which reflect the population of the county.
- d. Implement new civil rights oriented procedures and policies over time.
- e. Track progress toward diverse recruitment when vacancies occur.
- f. Participate as part of an administrative team to conduct civil rights impact analysis in the case of staff lay-offs.

E. Disability Access

1. Administration Responsibilities:

Address disability access in the program offices, including Plymouth County, by assessing needs, conducting site visits, and participating in county board meetings where necessary to ensure locations are fully accessible to disabled clientele.

- a. Develop communications, policies, and procedures including definitions of what constitutes re: “All reasonable efforts”.
- b. Work with program and county leadership to construct access improvements.
- c. Assess and monitor physical and other disability needs and accommodations in the offices with an eye to identifying “all reasonable efforts” to meet concerns. For example, “reasonable” might mean the use of alternate public meeting sites when regular work offices cannot accommodate handicapped access requirements for parking or elevator facilities.
- d. Evaluate the effectiveness of the access changes over time by seeking feedback from all program office staff and constituents.

2. Program Director Responsibilities:

Cooperate with Extension administration’s efforts to establish disability access improvements.

- a. Implement administrative policies and procedures in regards to disability.
 - b. Ensure staff understand and implement policies and procedures at offices.
 - c. Provide evaluative data requested from Extension.
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F. Internal Reviews

1. Administration Responsibilities:

Research other states’ models and methods used to conduct internal reviews.

Recommend processes, policies for design, implementation and evaluation.

- a. Work with CSREES Civil Rights office to compile best practices, policies.
- b. Identify measurement areas and progress indicators and milestones.
- c. Work with counties and programs to develop and implement a corresponding civil rights review, schedule, self-evaluation tools and internal program processes.
- d. Prepare an annual summary report for Extension leadership.

2. Program Director Responsibilities:

Review summary of research on other states’ models and methods for conducting civil rights internal reviews and assist in planning and implementing new approaches.

- a. Participate in assessing how to adapt civil rights processes to specific program related content and structures.
- b. Review and recommend improvements to self-evaluation tools, reporting, and decision making processes.
- c. Collaborate with administration to establish review schedule in a timely manner.
- d. Redesign information sources or change staffing duties as necessary to facilitate civil rights internal reviews.
- e. Ensure staff participation in implementation and evaluation of civil rights internal review outcomes.
- f. Incorporate staff members' specific Civil Rights accomplishments in performance reviews (PMP).

Kathleen Chatwood July 20, 2007

2006 CSREES Civil Rights Compliance Review Recommendations

Appendix A

Recommendations

Mr. Robert Schrader, Interim Director, UMass Extension should:

1. Strengthen the utility of staff meetings for training staff on the impact of civil rights rules and regulations as it relates to outreach efforts, and to ensure that contents of civil rights files requiring updates are done so in a timely manner.
2. Ensure that Extension staffs determine "all reasonable efforts" are used in the recruitment of minority groups, which reflect the population of the county when filling vacant positions on Extension Advisory Committees or Councils.
3. Review the "...And Justice for All" poster to help guide staff to understand the clientele's right to file a program complaint directly with the U.S. Department of Agriculture, Office of Civil Rights in Washington, D.C.
4. Develop and implement an internal written process for handling program complaints at the county level, which includes training staff and volunteers.
5. Assist in the resolution of accessibility issues in the Plymouth County Office so that the Extension location becomes fully accessible to disabled clientele.

6. Evaluate the collection of race, ethnicity, and gender data of sufficient quality and quantity, so that UMass Extension administrators, program leaders, and staff can make determinations of nondiscrimination. This data must be collected on a consistent basis across and within all program areas.
7. Strengthen the methods for balancing, monitoring, and evaluating the level of program delivery contacts to racial and ethnic groups in Landscape, Nursery and Urban Forestry Programs and 4-H youth to insure that the county's program outreach efforts are documented for "all reasonable efforts" in reaching and recruiting a diverse clientele.
8. Review the public notification plan, with all staff, to ensure that the statements of compliance are signed by the designated representative of any organization which receives educational assistance from UMass Extension.
9. Develop and implement a review schedule for county civil rights internal compliance use.
10. Provide written guidance to assist Extension staffs to determine, when "all reasonable efforts" have been met, to accommodate clientele with limited English proficiency who use the program services.