U.S. Department of Agriculture
Extension Service

Plans and Procedures for Administration and Implementation of Title IX of the Education Amendments of 1972, in the Cooperative Extension Service

SECTION A - INTRODUCTION

I. Policy and Objectives

The purpose and objectives of Title IX is to eliminate and prohibit sex discrimination against participants (beneficiaries) and employees of educational programs and activities receiving or benefitting from Federal funds. Title IX reads that:

"No person in the United States, shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

This can be achieved through implementing compliance requirements for each Extension program area, including their activities, methodologies, organizational structures, educational materials and announcements. These requirements are presented and discussed in detail in appropriate sections of this presentation.

Title IX of the Education Amendments of 1972, 7 CFR Part 15a, and these Plans and Procedures serve as a basis for administrative decision and action. These plans and procedures, at best, represent a serious attempt to provide specific answers and rather precise and detailed guidance for many problematical situations. Although additional interpretation and application of the regulations will, no doubt, become necessary and the sincerity of purpose demonstrated in this regard will in large measure determine our success.

II. Definitions

A. "Regulations" means regulations of the United States Department of Agriculture, Office of the Secretary, 7 CFR Part 15a, Education Programs or Activities Receiving or Benefitting From Federal Financial Assistance; Nondiscrimination on the Basis of Sex.

B. "Extension" means Extension Service of the U.S. Department of Agriculture.
C. "Administrator" means the Administrator of Extension Service of the U.S. Department of Agriculture.

D. "Director" means Director – Administrator of a State Extension Service, 1862, 1890, and Tuskegee.

E. "Agency" when used in the U.S. Department of Agriculture means Extension Service, and its Administrator.

F. "Recipient Agency" means a State Extension Service, both 1862, 1890 and Tuskegee, and any public or private agency, institution, or organization, or other entity, or any person to which the State Extension Service furnishes services.

G. "Participants (Beneficiaries)" means those individuals, or groups of individuals who are identified in the Procedures for the implementation of the Recommendations of the USDA-ECOP Task Force on Civil Rights and whose educational interests and needs are served through participation in educational programs and activities conducted by the State Extension Service.

H. "Application" means cooperative agreements, annual plans of work, budgets, and certification of offset funds required for continuing assistance under the Smith-Lever Act; and administrative documents required to obtain new or additional funds not included under fixed or formula distribution prescribed by the Smith-Lever Act.

I. "Education Program or Activity" means every program, activity or service conducted directly by the State Extension Services, or indirectly through organizations, groups, or other entities and includes major program areas in Agriculture and Natural Resources; Home Economics, including EFNEP; Community Resource Development; and 4-H Youth Development.

J. "Admission" means any condition, criterion, enrollment, membership, or requirements for participating in or receiving the benefits of any program or activity offered and/or conducted by the State Extension Service.

III. Discriminatory Actions Specifically Prohibited

Associated with these compliance requirements are specific prohibitions cited in the regulations for educational programs and activities and are summarized as follows:1/

1/Consult the text of 7 CFR Part 15a for a more complete discussion of these provisions.
A. A State Extension Service in providing aid, benefit, or service to a recipient shall not, on the basis of sex:

1. Treat one person differently from another in meeting any requirement or condition for such aid, benefit, or service;
2. Provide different aid, benefit, or service or provide them in a different manner;
3. Deny any person any such aid, benefit, or service;
4. Subject any person to separate or different rules of behavior, sanctions, or other treatment;
5. Discriminate against any person in the application of any rules of appearance;
6. Apply any rule concerning the domicile or residence of a participant;
7. Aid or perpetuate discrimination against any person by providing significant assistance to any agency, organization or person which discriminates;
8. Segregate any person on the basis of sex in the receipt of such aid, benefit, or service;
9. Otherwise limit any person in the enjoyment of any right, privilege, advantage, or opportunity.

B. A State Extension Service in applying any program criterion or requirement, shall not on the basis of sex:

1. Give preference to one person over another, by ranking persons separately, or otherwise;
2. Apply numerical limitations upon the number or proportion of persons of either sex;
3. Otherwise treat one individual differently from another;
4. Operate any test or other criterion which has a disproportionately adverse affect on persons on the basis of sex unless the test or criterion is shown to predict validly.
5. Apply any rule concerning the actual or potential parental, family or marital status of a participant which treats persons differently on the basis of sex;
6. Discriminate against or exclude any person on the basis of pregnancy, childbirth, termination of pregnancy, or recovery therefrom;
7. Treat disability related to pregnancy, childbirth, termination of pregnancy, or recovery therefrom differently from any other temporary disability or physical condition;

8. Make pre-admission inquiry or marital status of an applicant including whether the applicant is "Miss" or "Mrs."; unless any inquiry as to the marital status of an applicant is made equally to applicants of both sexes and is not used for discriminatory purposes.

IV. Major Compliance Requirements, USDA

The regulations identify major compliance requirements which must be met and implemented by State Extension Services in all educational programs, activities, and employment policies. Each State Extension Service will undertake a searching self-examination (evaluation) to identify any discriminatory policies or practices which may exist and to take whatever remedial action is needed for their correction. These requirements are set out as follows:

A. Conduct a self-evaluation (Identify and modify areas of non-compliance, take remedial steps for correction of discrimination).

B. Submit an assurance statement that its programs and activities will be operated in compliance with Title IX and that remedial steps are taken to eliminate and prevent discrimination on the basis of sex.

C. Designate an employee(s) to assume leadership responsibility. (Distribute the name, address(es), telephone number(s) of this person(s) to participants (beneficiaries) and employees.

D. Adopt and publish a complaint procedure (grievance procedure).

E. Develop and implement plans for dissemination of policy regarding Title IX (public notification plan).

F. Develop procedures for collection and use of sex-based data for evaluative purposes.

G. Develop plans for the conduct of compliance reviews and for the submission of compliance reports.

H. Develop plans and procedures for the removal and elimination of sex-stereotype language, illustrations, and photographs, from all future publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.

2/ This self-evaluation requirement acknowledges the importance of local county evaluation and planning in any education change process.
I. Develop procedures to achieve compliance with cooperating agencies and organizations (including those organized and serviced by State Extension Services).

J. Develop procedures to assure housing, where and when needed for participants (camps, etc.) is proportionate in quantity and comparable in quality to members of both sexes. Also, to assure that the same provisions apply to office facilities and housing for employees of both sexes.

K. Develop procedures for staff (employee) placement and job assignment to effect sex-neutrality and to remove sex bias from such actions.
SECTION B - ADMINISTRATIVE PROGRAM PLAN AND SUGGESTED IMPLEMENTATION AIDS

I. Introduction

This document represents an attempt to provide plans and procedures for administration and implementation of USDA regulations implementing Title IX of the Education Amendments of 1972, as amended, in the State Extension Services. The document was developed in response to requests for assistance from various State Extension Services. It is intended solely as a management guide. It should be used only to the extent that it serves as an aid in the administration and implementation of USDA Title IX regulations. There is considerable variance in the capacity and ability to meet Title IX requirements among the various State Cooperative Extension Services. The magnitude of such variance is a function of the problems, conditions, and situations unique to a State Extension Service and the type of programs it offers to clientele. Hence, the document should be freely adopted, supplemented, or changed as appropriate. Different from Title VI Affirmative Action Plan, the provisions in this Title IX document are not legal standards; they (plans and procedures) are, however, designed to serve as a management tool for implementation of the major requirements of USDA Title IX regulations.
II. Components and Suggested Aids

An administrative program plan for a State Extension Service to guide staff in the implementation processes should include the following components:

A. A comprehensive policy statement of nondiscrimination on the basis of sex as a guide for staff conduct and action. This policy statement should be of such detail that it will:

1. Express the nondiscrimination provision of Title IX that the agency does not discriminate on the basis of sex; and the obligation under Title IX to prohibit discrimination in all educational programs, activities and employment policies;

2. Identify the designated Title IX Coordinator(s) to whom inquiries can be referred;

3. Include the name(s), office address(es), and telephone number(s) of the designated staff person(s) responsible for Title IX implementation, coordination, and compliance;

4. Indicate that all educational programs and activities are covered by Title IX;

5. Include the expectations of staff to fully implement the policy and to achieve compliance with the regulations;

6. Indicate timelines and schedules for meeting compliance requirements;

7. Express the intent of administration to monitor progress in meeting all requirements; and

8. Include other procedures deemed necessary for full compliance.

B. Employee(s) designated to provide coordination and leadership; assignment of sufficient support staff for effective implementation.

1. Make a formal designation (announcement) of the person(s) selected;

2. Develop memorandum or other method of notification of appointment to participants and employees and indicate office address(es), and telephone number(s) of designated person(s);
3. Prepare a description of the functions and responsibilities to be performed by the Title IX coordinator(s);

4. Consider qualifications (knowledge, experience, and competencies) of staff to be considered;

5. Conduct necessary procedures for the recruitment and selection of designated employee(s);

6. Develop a statement of the compliance responsibilities of all staff and their relationship to the coordinator(s).

C. A public notification plan sufficiently detailed for guidance of State and county personnel.

1. The Public Notification Plan of action currently in use may be amended to include the requirements of Title IX provided; a Public Notification Plan of action is presently in place; the criteria of Title IX are made a part of the Plan; and all staff members are provided copies of the revised Plan. (A revised model is attached at Appendix A).

2. A nondiscrimination statement must be used—a sample notification statement independent of Title VI may read as follows: "It is the policy of (State Extension Service) not to discriminate on the basis of sex in its educational programs, activities, or employment policies as required by Title IX of the Education Amendments of 1972. Inquiries regarding compliance may be directed to (name, office address, telephone number of Title IX coordinator(s))"; or

3. A sample notification statement utilizing Title VI statement may read as follows: "(State Extension Service) offers educational programs, activities, and materials without regard to race, color, national origin, or sex as required by Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972. (State Extension Service) is an Equal Opportunity Employer."

4. The nondiscrimination statement(s) should be placed in or on printed publications, (letterhead, newsletters, bulletins, pamphlets, leaflets, circulars, fact sheets and miscellaneous publications) and should be uniform. It may be placed above the indicia, inside the front or back cover, or in unused white space where it is clearly visible to the reader.

5. All new and re-issued publications should contain the nondiscrimination provisions of Title IX.

6. The nondiscrimination statement should be placed on the cover or other conspicuous place in brochures announcing
the initiation of new programs, or materials promoting programs; program agendas for meetings, conferences, workshops, tours, and method and result demonstrations.

7. A sample written notification should be prepared for the State staff and for the county staff, respectively, for their use with commodity groups and associations; civic, social, fraternal, and professional organizations and groups with whom they cooperate citing the policy of the State Extension Service not to discriminate under the provisions of Title IX.3/ The statement should express that:

a. All educational programs, activities, and employment policies are nondiscriminatory on the basis of sex;

b. State Extension Service may not provide significant assistance to any organization or group that excludes any person from membership or participation in any activities of the organization or group, or that subjects any person to discrimination on the basis of sex;

c. Written responses should be requested from all organizations and groups indicating whether or not they have policies or practices that do not conform with conditions stated in the notification.

8. The State staff and county staffs should be advised to retain such written responses in the files for reference.

9. A list should be compiled of all organizations and groups to whom notifications are to be sent by the State staff; and a list should be compiled of all organizations and groups to whom notifications are to be sent by the county staff.

10. A sample notification statement(s) should be prepared for county staffs use with newspaper and news releases, radio and television interviews, scripts, etc. that communicate Title IX requirements.

D. Removal and elimination of sex discrimination, sex bias, and sex-role stereotype models from materials used in educational programs.

1. Prepare and issue policies and guidelines to all staff on the use of sex-neutral language, photographs, illustrations, graphics, etc.

3/ If the practices cited in 7, 8, 9 and 10 are being utilized to conform with Title VI requirements, such practices may be amended to include Title IX requirements.
2. Current publications which contain sex-bias, sex-stereotype language should receive high priority for reprint with sex neutral language, photographs, graphics, and illustrations.

3. An "editorial committee(s)" may be appointed and assigned to develop and implement procedures for use in the review of all current publications and future manuscripts regarding sex-bias and for the proper use of sex-neutral language.

E. Compliance Review

A program of compliance review currently in use for Title VI may be amended to include criteria for evaluating compliance with the requirements of Title IX. It should include the following:

1. A policy statement setting forth the overall framework for conducting Title IX compliance reviews;

2. A plan of procedure for assuring that compliance reviews will be performed on some prescribed frequency basis;

3. The designation of those staff members who will be responsible for the conduct of compliance reviews.

4. Develop schedule, guidelines, or other instruments for fact gathering. (Includes criteria and/or areas of inquiry);

5. Plan for analysis and interpretation of facts gathered. (How and by whom);

6. Develop a procedure for filing the compliance review report, and for its distribution and use by staff;

7. Develop a procedure for feedback to county and State staffs; and for follow-up procedures necessary to take corrective action.

F. Complaint Procedure

The complaint procedures currently used in the EEO Program may be amended to include both complaints of sex discrimination in employment, and complaints of sex discrimination in programs by participants under Title IX. Should this procedure be adopted, any conflict between the EEO Coordinator and the Title IX Coordinator, if different persons, will need resolution.

4/ Procedures for handling program complaints under Title VI of the Civil Rights Act of 1964 differ in that they are referred to the Administrative Extension and/or to the Secretary of Agriculture for appropriate action.
1. Adopt and publish complaint procedures providing for prompt and equitable resolution of participant and employee complaints alleging sex discrimination.

2. Communicate these procedures to participants, employees, and the general public, for the filing and handling of Title IX program complaints for resolution at the State level.

3. Complaint procedures should:
   a. Be readily usable, and should require complaints to be filed in writing;
   b. Include plans to notify person(s) against whom allegations are being made;
   c. Include plans to notify all parties of dates and procedures for hearings;
   d. Include steps for an orderly presentation of evidence of all views;
   e. Provide for the use of a neutral third party not directly affected by the outcome of a hearing;
   f. Establish a reasonable period of time within which a hearing will be carried out after receipt of the allegation;
   g. Include plans to notify, in writing, all interested parties of the complaint resolution; and
   h. Specify the mechanism to be used to ensure correction and/or remediation of discrimination.

G. Sex-Based Data Collection System

1. Develop plans and procedures for the collection of data, by racial-ethnic category, and sex of participants in each of the major program areas.

2. Strengthen and improve, as necessary, the procedure used in the establishment of sex and racial base data which identify populations within each county eligible for participation in each of the major program areas to ensure Title IX considerations. 5/

5/ Additional guidelines for the identification of potential participants will be developed to supplement those of the "Procedures for the Implementation of the Recommendations of the USDA-ECOP Task Force on Civil Rights", pages 40-44.
3. Develop techniques, and methods to assist county Extension personnel to document and record actions related to achieving compliance.

H. Staffing Plan and Staff Assignment

1. Develop policies and procedures and adjust staffing plans to avoid sex discrimination with regard to any applicant or employee for any position and with regard to the effective utilization of their skills within the State Extension Service.

2. Develop and adjust job descriptions and position vacancy announcements to reflect the sex-neutral requirements of all positions.

3. Establish policies and procedures which ensure all employees and applicants for employment are given equal consideration for any position for which they are qualified irrespective of the sex of previous incumbents filling the position.

4. Implement plans and procedures which will eliminate sex as a criterion for hiring or assignment.

I. Assurance of Compliance

Every application for Federal financial assistance for any educational program or activity must be accompanied by a signed assurance of compliance statement indicating that such educational programs and activities will be operated in compliance with USDA Title IX regulations and agency requirements.\(^6\) This includes:

1. Submission of a signed assurance for continuing State programs;

2. Submission of a signed assurance to accompany applications for Smith-Lever funds distributed on basis of special needs, 7 USC 343 (b); Smith-Lever special project funds, 7 USC 343 (d); Agricultural Marketing Act matching project funds, 7 USC 1623 (b), and Agricultural Marketing Act contract funds, 7 USC 1624 (a).

\(^6\) An assurance statement will be provided by the Department for State use in complying with this requirement.
J. Self-Evaluation Plans for State and County Levels.\textsuperscript{7/8/}

Plans for the conduct of the self-evaluation should be developed in a systematic and detailed manner. These plans should involve the following several stages:

1. Planning and evaluation process
2. Collecting, synthesizing, and evaluating the Data
3. Implementing modifications and remedial action
4. Maintaining necessary records.

III. Staff Preparation and Training

A. Staff preparation and training plans should be set out in detail in the State Plan of Work;

B. Progress and accomplishments toward completion of plans set out in the Plan of Work should be reported in detail in the Annual Civil Rights Compliance and Equal Employment Opportunity Report.

C. Staff preparation and training for implementation of Title IX will be matters of special interest for internal review and audit.

D. Specific staff preparation and training recommendations are set out in Appendix B.

IV. Report Requirements

The State Extension Service self-evaluation summary should consist of a combination of both State and county level findings for each compliance area identifying modifications required and affirmative plans (remedial actions) to correct the situation.

It is necessary for each State Extension Service to document and retain (for review purposes) at the county, area, and/or State office levels copies of all materials prepared and used in relation to each self-evaluation and for the implementation of procedures described herein. An official record should be maintained showing dates of issuance, distribution and actions taken regarding each compliance area. Such records are particularly critical in support

\textsuperscript{7/ Due to the importance and value of the self-evaluation requirement to the overall compliance with the regulations, it is placed last in order that a more complete discussion of its plans could be accommodated.

\textsuperscript{8/ A self-evaluation model is found in Section D. It will require expansion and modification in order to accommodate each State Extension Service's unique program and organizational needs.}
of the self-evaluation and related materials and support data which must be maintained on file for three (3) years and shall be made available to the Secretary of Agriculture upon request. In addition, such records are essential in the process of compliance reviews, audits, and investigations.

Future reports will be made of the progress toward the achievement of the affirmative plans cited in the State Self-Evaluation Summary as a part of the Annual Civil Rights Compliance and Equal Employment Opportunity Report to the Extension Service, USDA.
SECTION C - APPLICATION OF TITLE IX REQUIREMENTS
TO SPECIFIC PROGRAM CONCERNS

The case examples presented in this Section, by major program area, were provided by a number of State Extension Services. They are not exhaustive, but rather typical of the organizational and programmatic considerations in the application of the requirements of Title IX. Due to the number of examples cited for 4-H Youth Development, these are presented first.

I. 4-H Youth Development

A. 4-H Membership

All clubs and other types of organizational groups or delivery modes must be open and accessible to both males and females.

B. 4-H Clubs whose members are of one sex

All such clubs whose members are of one sex may be operating inconsistent with Title IX, and require careful evaluation. Corrective action may be necessary including expanded outreach and recruitment and program adjustments to accommodate interests of both males and females.

C. Officers of 4-H Clubs and Committees

Any requirements or quotas, based on sex, of incumbents to offices of 4-H clubs, or chairpersons or offices of committees are inconsistent with Title IX. All members who believe they meet the prerequisites for leadership qualifications and credentials and merit consideration should exercise their right to compete for these offices without regard to their sex.

D. Volunteer Leader Use and Recruitment

The designation of only female volunteers to only serve as leaders of 4-H clubs whose members are female or the designation of only male volunteers to only serve as leaders of 4-H clubs whose members are male is inconsistent with Title IX. Similarly, when leaders provide counseling to members of their 4-H clubs (or use counseling materials) on matters which promote the continuation of sex-bias, sex-stereotype roles, in project selection, or to become a member in a particular 4-H club, such action is inconsistent with Title IX.
The recruitment of volunteers based upon their desire to lead a 4-H club and/or to serve in some leadership capacity with only members of their own sex and the use of such leaders in a way which promotes sex-stereotype in the 4-H club program are inconsistent with Title IX.

The use of sex-neutral role models particularly at the local 4-H club level may encourage young people to broaden their horizons and experiences by changing from traditional sex-stereotype roles; such models also demonstrate, visibly, the image of sex-neutral educational programs and activities of the 4-H Youth Development Program to the public and to potential recipients.

E. Volunteer, Paraprofessional, and Professional Staff Training

Staff training that was planned and conducted in any one of the categories of staff for members of a particular sex is consistent with Title IX. In cases where a particular category of staff is composed of all members of one sex and such composition was not the result of sex discrimination, such training is not inconsistent with Title IX. The availability of training opportunities and the option to participate equally in training opportunities for both males and females are ensured by Title IX.

F. Programs of Other Organizations

Cooperating with and providing significant assistance to such organizations and groups as civic, social, educational, business and professional men and women's groups whose membership exclude persons on the basis of sex is inconsistent with Title IX.

Recognition and Incentive awards sponsored by such organizations and groups and made available to a State Extension Service, to be administered as the State Extension Service may determine, in support of an educational program or activity without regard to the sex of the participants may be accepted and utilized in keeping with Title IX.

Any recognition and incentive awards program or activity conducted by Extension at the local, State, and national levels in which there are quotas on the basis of sex for awards or sex-separate attendance or participation rules are inconsistent with Title IX.

G. Wills and Legal Grants

Acceptance of financial resources created by a will, trust, or similar legal instrument, or by an act of foreign government to administer or assist sex-specific activities is permitted under Title IX. Examples: Youth Agriculture Specialist Exchange (Russia) Boys only.
Grant program created by a will to attract boys into the Sheep Industry is consistent with Title IX.

Youth Exchange Program sponsored by an Act of a foreign government which specify the sex of participants is permitted under Title IX.

Efforts, however, should be made to provide opportunities for similar events or activities for both sexes.

H. 4-H Camps and Camping Activities

4-H Camps which are planned, conducted and managed on a sex-separate basis (all boys or all girls) are inconsistent with Title IX.

Educational activities which are provided during a camping experience (session) must be open to all persons irrespective of the sex of the camper.

Athletic activities and competition (sports) at camp sessions and on other occasions must be provided for boys and girls on the same basis without sex segregation, unless the activity is a contact sport in which case, a team may be for one sex only. There should be opportunity provided for members of the excluded sex to participate on a separate team.9/

A 4-H animal rodeo conducted on a sex-segregated or sex-exclusive basis is inconsistent with Title IX. Similarly, a 4-H car rodeo conducted on a sex-segregated or sex-exclusive basis is inconsistent with Title IX.

I. 4-H Queen and King Contests: 4-H Dairy Sweetheart Contest

These contests, where awards are based upon a combination of factors related to personal appearances, poise, and talent of participants may be limited to persons of one sex only.

J. 4-H Fashion Revue (Girls); Appropriate Apparel (Boys)

These activities are more directly related to a 4-H project than are the 4-H Queen and King Contests. Thus they do not fall within the beauty contest exemption and must be conducted on a sex integrated manner.

K. 4-H Educational Materials and Public Information

Educational and informational materials must be free of sex-bias, sex-stereotyped roles, and sex discriminatory language.

9/ Contact sports are football, basketball, rugby, ice hockey, wrestling.
photographs, illustrations, graphics or reference to girls' 4-H program or activity and to boys' 4-H program or activity. (For a more complete discussion see provisions of the Public Notification Plan, Appendix A, pages 65 and 66).

L. Advisory, Planning, Program Development Groups

Selection of adults and youth to serve as members of these groups to State and national conferences; county, State and national 4-H planning bodies represented by a reasonably equitable distribution of both sexes is not inconsistent with Title IX.

Criteria, not on the basis of sex, for the selection and/or participation of adults and youth as members of these groups should be established and made known to all persons concerned.

M. Activities (Noncompetitive and Competitive)

Except in very limited cases, (some cited previously), sex-exclusive and sex-restrictive activities are inconsistent with Title IX.

Criteria for selection and/or participation must provide equal opportunity to members of both sexes in 4-H activities conducted at the local, county, district, State and national levels. Also, rules and regulations governing such activities must apply and be administered equally to members of both sexes. This includes the tabulation of scores, selection of winners, and designation of awards.

N. Chaperones, Counselors, and Supervisors of Youth

Criteria for the selection of adults and teen youths to serve as chaperones, counselors, and supervisors should be based upon salient factors related to tasks to be performed and not on the basis of their sex.

O. 4-H Clubs Associated with Boarding, Academy, Private, and Religious Schools

Title IX does not cover the Admission policies of elementary and secondary schools. Therefore, boarding schools, private academies, and religious schools (at the elementary or secondary level) which admit only boys or only girls may have a school 4-H club which would be composed of students of one sex. To the extent, however, that these schools admit girls and boys, then the other provisions of Title IX do apply and the schools must not discriminate against their students on the basis of sex. The school would have to open the 4-H club(s) to both sexes on a nondiscriminatory, non-segregated basis.
There is an additional exception for religious schools, in that particular activities may conflict with a specific tenet of the religious organization and would not be required to submit to the Secretary of Agriculture a statement identifying the particular Title IX provision which conflicts with a specific religious tenet.

II. Home Economics Program, including EFNEP

A. Programs of Other Organizations

Cooperating with and providing "significant assistance" to such organizations and groups as civic, social, educational, business and professional groups (men, women) whose membership excludes persons on the basis of sex are inconsistent with Title IX.10/

Recognition and incentive awards sponsored by such organizations and groups, and made available to a State Extension Service, (an operating unit) to be administered as the State Extension Service may determine, in support of an educational program or activity without regard to the sex of the participants may be accepted and utilized in keeping with Title IX.

Any recognition and incentive awards program or activity conducted by Extension at the local, county, State, and national levels, in which there are quotas on the basis of sex for awards on sex-separate attendance rules are inconsistent with Title IX.

B. Extension Homemaker Clubs (membership)

The requirements for participation and membership in such clubs (Extension sponsored and assisted) must be open and accessible to both males and females.

Extension Homemakers Clubs whose members are of one sex may be operating inconsistent with Title IX and require careful evaluation. Corrective action may include the expansion of outreach and recruitment and program adjustments to accommodate the interests of both males and females.

Activities of these Extension Homemakers Clubs and other activities of the Home Economics Program whose participants are of one sex may be operating inconsistent with Title IX requirements. Corrective action of the nature described in the previous paragraph would apply in these cases also.

10/ A discussion of the responsibilities of a State Extension Service (county planning unit level) for the dissemination of policy regarding Title IX in relation to cooperating organizations and groups may be found at page 47.
C. Expanded Food and Nutrition Program Aides

The employment and utilization of program aides in the various aspects of the program, on the basis of sex, are inconsistent with Title IX.

D. Use of Sex-Linked, Sex-Bias, Sex-Stereotype Language

The continued use of such language is inconsistent with Title IX. 11/

E. Educational Materials and Public Information

Educational and informational materials must be free of sex-bias, sex-stereotype roles, and sex-discriminatory language, photographs, and illustrations.

F. Newsletters for Members of One Sex

Newsletters where the communications are written expressly for members of one sex only are inconsistent with Title IX.

Newsletters, as with other materials used in the educational process, and those released to the public, should be sex-neutral in language, photographs, illustrations, etc., and must not be restricted to members of one sex only. (See responses to items D and E above.)

G. Religious Clubs with Membership of One Sex

Title IX of the Education Amendments of 1972 exempts educational institutions controlled by religious organizations and presumably such clubs may qualify for this exemption.

H. Single-Sex Audiences

Any educational activity in which program participants are of one sex may be in violation of Title IX.

The burden of proof in such cases rests with the State Extension Service (or operating unit level) to ensure that such exclusion is not a result of sex discrimination.

I. Advisory, Planning, Program Development Groups

Selection of adults to serve as members of these groups on the local, county, district, State and national levels should include both male and female members.

11/ For a more complete discussion of language usage, photographs, illustrations, graphics, etc., see provisions of the Public Notification Plan, Appendix A, pages 65 and 66.
Criteria, not on the basis of sex, for the selection and/or participation of adults as members of these groups should be established and made known to all persons concerned.

III. Agriculture and Natural Resources

A. Programs of Other Organizations

Cooperating with and providing "significant assistance" to such organizations and groups as civic, social, educational, business and professional women and men's groups whose membership excludes persons on the basis of sex is inconsistent with Title IX.12/

Recognition and awards sponsored by such organizations and groups and made available to a state Extension Service, to be administered as the State Extension Service may determine, in support of an educational program or activity without regard to the sex of participants may be accepted and utilized in keeping with Title IX.

Any recognition and incentive awards program or activity conducted by Extension at the local, county, State, and national levels in which there are quotas on the basis of sex for awards or sex-separate attendance rules are inconsistent with Title IX.

B. Extension Sponsored and/or Program Affiliated Organizations and Groups

(Commodity and livestock groups and associations, cooperatives, general farm organizations, etc.)

Such organizations and groups with whom a State Extension Service (county planning unit) provides "significant assistance" and program support on a frequent and continuing basis must not discriminate on the basis of sex, in their membership or participation in activities to comply with Title IX.13/

12/ The acquisition and confirmation, in writing, from such groups and organizations stating the membership is not on the basis of sex; that there are no other sex-discriminatory policies or practices, should be prerequisites for continuation of assistance from a State Extension Service. (county planning unit).

13/ A discussion of the responsibilities of a State Extension Service (county planning unit) for the dissemination of policy regarding Title IX in relation to organizations and groups may be found at page 37; also the Public Notification Plan at Appendix A.
C. **Use of Program Aides**

The employment and utilization of program aides in various aspects of the program, on the basis of sex, are inconsistent with Title IX.

D. **Advisory, Planning, Program Development Groups**

Selection of adults to serve as members of these groups on the local, county, district, State and national levels should include both male and female members.

Criteria, not on the basis of sex, for the selection and/or participation of adults as members of these groups should be established and made known to all persons concerned.

E. **Single-Sex Audiences**

Any educational activity, in which program participants are of one sex, may be in violation of Title IX.

The burden of proof in such cases rests with the State Extension Service (county planning unit) to ensure that such exclusion is not a result of sex discrimination.

F. **Educational Materials and Public Information**

Educational and informational materials must be free of sex-bias, sex-stereotype roles, and sex discriminatory language, photographs, illustrations, or references to "men's" program or activity.\(^{14}\)

G. **Newsletters for Members of One Sex**

Newsletters where the communications are written expressly for members of one sex only may be inconsistent with Title IX.

Newsletters, as with other materials used in the educational process, and released to the public, must be sex-neutral in language, photographs, illustrations, etc., and must not be restricted to members of one sex only.

IV. **Community Resource Development**

A. **Programs of Other Organizations**

Cooperating with and providing "significant assistance" to such organizations and groups as civic, social, educational,

\(^{14}\) For a more complete discussion of language usage, photographs, illustrations, etc., see provisions of the Public Notification Plan, Appendix A, pages 65 and 66.
business and professional women and men's groups whose memberships exclude persons on the basis of sex is inconsistent with Title IX.15/

Recognition and awards sponsored by such organizations and groups and made available to a State Extension Service, to be administered as the State Extension Service may determine, in support of an educational program or activity without regard to the sex of participants may be accepted and utilized in keeping with Title IX.

Any recognition and incentive awards program or activity conducted by Extension at the local, county, State, and national levels in which there are quotas on the basis of sex for awards or sex-separate attendance rules are inconsistent with Title IX.

B. Extension Sponsored and/or Program Affiliated Organizations and Groups

Such organizations and groups with whom a State Extension Service (county planning unit) provides significant assistance and/or gives or receives program support on a frequent and continuing basis must not discriminate on the basis of sex in their membership, or participation in activities.16/

C. Use of Program Aides

The employment and utilization of program aides in various aspects of the program, on the basis of sex, are inconsistent with Title IX.

D. Advisory, Planning, Program Development Groups

Selection of adults to serve as members of these groups on the local, county, district, State, and national levels, should include both male and female members.

Criteria, not on the basis of sex, for the selection and/or participation of adults as members of these groups should be established and made known to all persons concerned.

15/ The acquisition and confirmation, in writing, from such groups and organizations stating that membership is not on the basis of sex, that there are no other sex discriminatory policies or practices, should be prerequisites for continuation of assistance from a State Extension Service (county planning unit).

16/ A discussion of the responsibilities of a State Extension Service (county planning unit) for the dissemination of policy regarding Title IX in relation to organizations and groups may be found at page 42; also the Public Notification Plan at Appendix A.
E. Single-Sex Audiences

Any educational activity in which program participants are of one sex, may be in violation of Title IX.

The burden of proof in such cases rests with the State Extension Service (county planning unit) to ensure that such exclusion is not a result of sex discrimination.

F. Educational Materials and Public Information

Educational and informational materials must be free of sex-bias, sex-stereotype roles, and sex-discriminatory language, photographs, illustrations, or reference to "men's" or "women's" program or activity.

G. Newsletters for Members of One Sex

Newsletters where the communications are written expressly for members of one sex may be inconsistent with Title IX.

Newsletters, as with other materials used in the educational process, and those released to the public, must be sex-neutral in language, photographs, illustrations, etc., and must not be restricted to members of one sex only.

17/ For a more complete discussion of language usage, photographs, illustrations, etc., see provisions of the Public Notification Plan, Appendix A, pages 65 and 66.
SECTION D - SELF-EVALUATION

The performance of a self-evaluation is one of the major and unique requirements of Title IX. It provides a systematic process for the assessment of compliance in policies, programs and practices and the development and implementation of modifications and remedial steps to correct any instances of deficiencies identified.

This section is presented as a guide for use by State and county Extension staffs in preparing and conducting the self-evaluation. It is comprehensive in scope and calls for an initial investment of significant staff time for its successful completion. Hopefully, with this investment, an effective self-evaluation will reduce the prospects of investing significantly more staff time on a continuing and long-term basis and possibly avoiding costly complaint resolution and litigation.

The format and criteria are established as follows:

--Evaluation of State Extension Administrative offices.
--County Planning Unit (County), by major program area.18/ 19/
  --Agriculture and Natural Resources
  --Community Resource Development
  --Home Economics (Family Life) including Expanded Food and Nutrition Program
  --4-H Youth Development

The compliance areas and the criteria (evaluative elements) are identified in the first two left columns; the presentation of modifications and remedial steps taken (to be taken)-affirmative action for deficiencies found, identification of the person(s) responsible for the action, and the date of completion are to be completed for the 3rd, 4th, and 5th columns respectively. (Forms may be duplicated).

The self-evaluation performed in each county should be summarized and presented as the State plan and submitted along with the State Extension Administrative offices plan.

18/ Those State Extension Services which conduct a separate Natural Resources Program independent of the Agriculture Program may modify and extend the Self-Evaluation form presented for Agriculture for this purpose.

19/ Those State Extension Services which conduct a separate Food and Nutrition Program independent of the Home Economics Program may modify and extend the Self-Evaluation form presented for Home Economics for this purpose.
Maintenance of evaluative records and the documentation relating to all modifications and remedial steps taken (affirmative action) for a three (3) year period following the completion of the self-evaluation is required. Such records shall be provided to the Secretary of Agriculture upon request.
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<tr>
<th>EVALUATIVE ELEMENT</th>
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<tr>
<td><strong>COMPLIANCE AREAS</strong></td>
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<tr>
<td>State Extension Administrative Staff to:</td>
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<td><strong>Dissemination of Policy</strong></td>
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<tr>
<th>COMPLIANCE AREAS</th>
<th>POLICIES, PROCEDURES, PROGRAMS, ACTIVITIES, METHODS AND MATERIALS</th>
<th>MODIFICATIONS AND REMEDIAL STEPS TAKEN (TO BE TAKEN)</th>
<th>PERSON(S) RESPONSIBLE</th>
<th>DATE OF COMPLETION</th>
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</table>

### Gen. Requirements

**State Extension Administrative Staff to:**

1. Prepare and Issue Policy Statement

   - Nondiscriminatory Provisions
   - Obligation to prohibit discrimination
   - Formal announcement of designated person(s); office address(es), telephone number(s).
   - Identification of Programs and activities covered.
   - Expectations of staff to implement policy and achieve compliance.
   - State timelines and schedule for meeting compliance requirements.
   - Plans and intent to monitor progress in meeting requirements.
   - Develop job description of Title IX coordinator(s).
   - Relationship of staff (State and County) to those of Title IX coordinator(s).
   - Procedure indicated for filing a complaint.

2. Make policy known to staff, relevant potential recipients, and general public.
**EVALUATIVE ELEMENT**

<table>
<thead>
<tr>
<th>COMPLIANCE AREAS</th>
<th>MODIFICATIONS AND REMEDIAL STEPS TAKEN (TO BE TAKEN)</th>
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<tbody>
<tr>
<td><strong>POLICIES, PROCEDURES, PROGRAMS, ACTIVITIES, METHODS AND MATERIALS</strong></td>
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</table>

State Extension Administrative Staff to:

**Grievance Procedures**
- Procedures for resolution of complaint.
- Time schedule within which hearings are to be held; notification, in writing, to all parties.
- Notify all parties of resolution of complaint.
- Review and appeals procedures.
- Provide means for correction and/or remediation of discrimination.

4. Submit signed Assurance Statement with each application for Federal financial assistance for:

**Submission of Assurances**
- Continuing State programs;
- Smith-Lever funds distributed on basis of special need.

5. Review all policies, practices, programs and activities, methods and materials at State Administrative level.

- Review all policies, practices, programs and activities, methods, and materials at County Planning unit levels.
### EVALUATIVE ELEMENT

<table>
<thead>
<tr>
<th>COMPLIANCE AREAS</th>
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<tbody>
<tr>
<td>State Extension Administrative Staff to:</td>
<td>self-evaluation</td>
<td>- Summarize these self-evaluations, indicating modifications and remedial steps taken (to be taken); person(s) responsible; date of completion for these two levels, into a State Affirmative Plan for submission to Extension Service, Washington, D.C.</td>
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</table>

6. Develop and issue an overall framework (plan) for conducting "in-house" compliance reviews.

- Establish some prescribed frequency.
- Designate staff members to be responsible for conduct and follow-up of reviews.
- Provide guidelines, questionnaire, or some instrument for "fact gathering" as to the status of compliance.
- Provide means for analysis and interpretation of "facts" gathered.
- Provide for formal report to appropriate State and county staffs.
- Provide for follow-up on corrective action needed.
- Maintain documented records of compliance results and subsequent actions.
State Extension Administrative Staff to:

7. Review administrative manuals, policy and procedure statements, and related documents regarding sex discrimination, sex-bias, sex-stereotype, and/or any restrictions, on the basis of sex, which prevent persons from participation in programs or activities.

   Review Established Policies and Procedures Used By State Extension Service

   (List the documents reviewed; should include those associated with State Leaders Program responsibilities as well as Administration).

8. Review State policies and procedures of the Program Development Process in relation to qualifications, requirements, composition, by race and sex, and functions of planning, advisory, study, program development groups and other standing or ad hoc. groups regarding sex-bias, sex-stereotype roles or language.

   Program Development (Planning, Implementation, Evaluation)

   -Review procedures for programming and implementation initiated and conducted by State Extension Administrative and/or the State Extension Specialists staffs for sex discrimination, sex-bias, sex-stereotype roles in activities, educational materials, and information and promotional efforts.
### EVALUATIVE ELEMENT

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<tr>
<td>State Extension Administrative Staff to:</td>
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<tr>
<td>- Review relationships of State administrative and specialist staffs to organizations and groups with whom they work in regard to Title IX requirements.</td>
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<tr>
<td>9. Review all newspaper, radio, T.V. releases regarding any sex-related discriminatory practices, including sex-stereotype or sex-bias language.</td>
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<tr>
<td>- Review all newsletters originating from State offices, specialists staff regarding any sex-related discriminatory practices.</td>
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<tr>
<td>Review Established Policies and Procedures Used By State Extension Service (Continued)</td>
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<td>- Review editorial policies, procedures to guide authors in the preparation of manuscripts for new publications.</td>
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<tr>
<td>- Review policies and procedures for a review process to occur for current and new publications for consistency with Title IX requirements.</td>
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<tr>
<td>10. Review position assignments and staffing patterns to determine if such decisions are made on the basis of sex; indicate positions affected and action to remedy the situation.</td>
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</table>
State Extension Administrative Staff to:

Staffing Plan and Staff Assignment

- Review job descriptions and position vacancy announcements for sex-related discriminatory practices, i.e., language, sex-bias, sex-stereotype, women's work, men's work, etc.

- Develop policies and procedures which ensure employees and applicants are given equal consideration for any position for which qualified, irrespective of the sex of incumbent, or those being considered.

- Adjust all employment practices to eliminate sex as a criterion in employment unless sex is a bona fide occupational requirement.

Data Collection System

- Develop and issue instruction for the collection and reporting of recipient participation, by race and sex, in programs and activities.

- Develop a "plan" of anticipated recipient participation, by sex, for those underrepresented in the program for each county planning unit to serve as a basis for measuring progress in meeting compliance.

- Agriculture, Natural Resources
- Home Economics (Family Living)
- Community Resource Development
- 4-H Youth Development
### EVALUATIVE ELEMENT

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</table>

**County Extension Staff to:**

1. Evaluate advisory, planning, study, program development, and other ad hoc groups used for planning and implementing programs and activities in terms of requirements, qualifications, and composition, by sex, consistent with Title IX requirements. (List such groups reviewed).

**Planning Committee System**

- In cases where county policies and practices are different from State prescribed policies and practices regarding these planning bodies, evaluate such policies and practices in terms of the above as well as sex-bias, sex-stereotype language, and sex discrimination.

2. Review and evaluate the organizational structure used in conducting the agricultural program in regard to sex discrimination, sex-bias, sex-separate, or sex-stereotype influences upon participation by recipients.
<table>
<thead>
<tr>
<th>EVALUATIVE ELEMENT</th>
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<tr>
<td>County Extension Staff to:</td>
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<tr>
<td>3. Compute the total number and percentage of participants (recipients), by sex, who participated in all agricultural programs and activities during the last report period and identify the extent to which there were sex-separate, sex-exclusive attendance.</td>
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<tr>
<td>Participation</td>
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<tr>
<td>4. Review and evaluate the extent to which the selection and use of educational methods contributed to sex-segregated and/or to a disproportion of participants of the under-represented sex.</td>
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<tr>
<td>Educational Methods</td>
<td>(List educational methods and indicate evaluative influence, if any)</td>
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<tr>
<td>5. Review and evaluate the program to determine the extent to which the selection of the subject matter content contributed to disproportional representation of participants of one sex, and/or to sex-separate, sex-segregated activities.</td>
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<tr>
<td>Subject Matter</td>
<td>(List those which were of some influence)</td>
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<tr>
<td>Policies, Procedures, Programs, Activities, Methods and Materials</td>
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</table>

### County Extension Staff to:

6. Review and evaluate the extent to which educational materials and teaching aids prepared and used at the county planning unit level contributed to disproportional representation of participants of one sex, and/or sex-separate, or exclusive activities.

   (Include sex-bias, sex-stereotype roles, sex discriminatory language, illustrations, photographs, etc.)

7. Review and evaluate the influence which newsletters, news releases, personal letters, mass media releases announcing educational programs and activities, may have had upon disproportional representation of participants of one sex and/or sex-separate activities.

   (Include language which contribute to sex-bias, sex-stereotype roles and sex discrimination).
## EVALUATIVE ELEMENT

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**County Extension Staff to:**

8. Review and evaluate the completeness and effect of the Public Notification Plan for informing the Public and in promoting and encouraging participation in the agricultural program.

   (Identify extent to which it will require revision as well as improved management.)

9. Determine whether any organization or group follow sex discriminatory practices in membership and participation on the basis of sex; indicate extent to which current procedures for making such determinations are effective.

**County Extension Staff to:**

- Evaluate the extent to which formal communications between such groups and the county staff adequately advise them of Extension's responsibilities under Title IX.

- Evaluate the extent to which established procedures for dealing with organizations and groups which discriminate are understood and followed by county staff members.
<table>
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<tr>
<td><strong>COMPLIANCE AREAS</strong></td>
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<tr>
<td>Policies, Procedures, Programs, Activities, Methods and Materials</td>
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County Extension Staff to:

10. Evaluate current methods and procedures for the collection of data, by sex, and the adequacy of proper documentation, including staff efforts; its adequacy in meeting Title IX requirements.

- Develop a plan indicating the anticipated (potential) increased participation of those persons who are disproportionately represented in participation, because of their sex, in the agricultural program.
# TITLE IX SELF-EVALUATION AND COMPLIANCE

## County Planning Unit, By Program

### III. Community Resource Development

<table>
<thead>
<tr>
<th>EVALUATIVE ELEMENT</th>
<th>COMPLIANCE AREAS</th>
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<td>County Extension Staff to:</td>
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</tr>
<tr>
<td>1. Evaluate advisory, planning, study, program development, and other ad hoc groups used for planning and implementing programs and activities in terms of requirements, qualifications, and composition, by sex, consistent with Title IX requirements. (List names of such groups reviewed).</td>
<td>Planning Committee System</td>
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<tr>
<td>- In cases where county policies and practices differ from State prescribed policies and practices regarding these planning bodies, evaluate such policies and practices in terms of the above as well as to sex-bias, sex-stereotype language and sex discrimination.</td>
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<tr>
<td>2. Review and evaluate the organizational structure and planning procedures used in conducting the Community Resource Development Program in regard to sex discrimination, sex-bias, sex-separate, or sex-stereotype influences upon participation by recipients.</td>
<td>Organizational Structure</td>
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<tr>
<td>Participation</td>
<td>3. Compute the total number and percentage of participants (recipients), by sex, who participated in all Community Resource Development programs and activities during the last report period, and identify the extent to which there were sex-separate and sex-exclusive in attendance.</td>
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<tr>
<td>Educational Methods</td>
<td>4. Review and evaluate the extent to which the selection and use of educational methods contributed to sex-separate and/or to a disproportion of participants of the under-represented sex. (List educational methods and indicate influence, if any).</td>
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<td>Subject Matter</td>
<td>5. Review and evaluate the program to determine the extent to which the selection of the subject matter content contributed to disproportional representation of participants of one sex, and/or sex-separate, sex-segregated activities. (List those which were of some influence).</td>
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</table>
6. Review and evaluate the extent to which educational materials and teaching aids prepared and used at the County Planning unit level contributed to disproportional representation of participants of one sex, and/or sex-separate activities. (Include sex-bias, sex-stereotype roles, sex discriminatory language, illustrations, photographs, etc.).

7. Review and evaluate the influence which newsletters, news releases, personal letters, mass-media releases announcing educational programs and activities may have had upon disproportional representation of participants of one sex and/or sex-separate activities. (Include language which contribute to sex-bias, sex-stereotype roles and sex discrimination).

8. Review and evaluate the completeness and effect of the Public Notification Plan for informing the public and in promoting and encouraging participation in the CRD program. (Identify extent to which it will require revision as well as improved management).
### EVALUATIVE ELEMENT

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<tr>
<td>County Extension Staff to:</td>
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<tr>
<td>9. Determine whether any organization or group receiving &quot;significant assistance&quot; follows sex discriminatory practices in membership and participation on the basis of sex; indicate extent to which current procedures for making such determinations are effective.</td>
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<tr>
<td>-Evaluate the extent to which formal communications between such groups and the county staff adequately advise them of Extension's responsibilities under Title IX.</td>
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<tr>
<td>-Evaluate the extent to which established procedures for dealing with organizations and groups which discriminate are understood and followed by county staff members.</td>
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<td>10. Evaluate current methods and procedures used for the collection of data, by sex, and the adequacy of proper documentation, including staff efforts; its adequacy in meeting Title IX requirements.</td>
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<td>-Develop a plan indicating the anticipated (potential) increased participation of those persons who are disproportionately represented in participation, on the basis of sex, in the CRD program.</td>
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TITLE IX SELF-EVALUATION AND COMPLIANCE  
County Planning Unit, By Program  

IV. Home Economics (Family Living)  
Including EFNEP  

EVALUATIVE ELEMENT  

<table>
<thead>
<tr>
<th>COMPLIANCE AREAS</th>
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</table>

County Extension Staff to:  

1. Evaluate the county Home Economics Extension committee, or other planning and development committees, study groups, etc. used for planning and implementing programs and activities in terms of requirements for participation, qualifications, and composition, by sex, consistent with Title IX requirements. (List names of such groups reviewed).

   - In cases where county policies and practices differ from State prescribed policies and practices regarding these planning units, evaluate such policies and practices in terms of the above as well as to sex-bias, sex-stereotype language and sex discrimination.

2. Review and evaluate the organizational structure and planning procedures used in conducting the Home Economics program in regard to sex-discrimination, sex-bias, sex-stereotype, and sex-separate influences upon participation by recipients.
## EVALUATIVE ELEMENT

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</table>

**County Extension Staff to:**

3. Review the membership, by sex, of each Homemakers Club and indicate the extent to which the members of such clubs are of one sex, or disproportionately members of one sex.

- Review the composition, by sex, of officers and/or representatives, to county functions of each Homemakers Club and the extent to which such officers and/or representatives are members of one sex or disproportionately of one sex.

- Review membership requirements, constitution or by-laws of Homemakers Clubs to determine if such requirements discriminate on the basis of sex.

(Include sex-bias, sex-stereotype roles, sex-discriminatory language as a part of the review).
<table>
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<tr>
<th>COMPLIANCE AREAS</th>
<th>EVALUATIVE ELEMENT</th>
<th>MODIFICATIONS AND REMEDIAL STEPS TAKEN (TO BE TAKEN)</th>
<th>PERSON(S) RESPONSIBLE</th>
<th>DATE OF COMPLETION</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Extension Staff to:</td>
<td>Leader-Training Method</td>
<td>4. Evaluate Leader-Training meetings in relation to requirements for attendance, subject matter content as a basis of determining their influence upon participation on the basis of sex. (Include sex-bias, sex-stereotype language and sex-separate activity). (List those reviewed).</td>
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<td></td>
<td>Special Interest Method</td>
<td>-Evaluate special interest classes, courses, sessions, workshops, and other types of educational activities offered by the Home Economics program in relation to recipient participation on the basis of sex. (List those where participation consisted of persons of one sex, or disproportionately of persons of one sex.</td>
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<td></td>
<td>Educational Methods</td>
<td>5. Review and evaluate the extent to which the selection and use of educational methods contributed to sex-separate and/or to a disproportionate of participants of the under-represented sex. (List methods and indicate influence, if any).</td>
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<tr>
<td>EVALUATIVE ELEMENT</td>
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<tr>
<td>County Extension Staff to:</td>
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<tr>
<td>6. Review and evaluate the Home Economics program (by class, workshop, session, special interest group, etc.) to determine the extent to which the selection of subject matter content contributed to disproportional representation of participants of one sex, and/or sex-separate activities. (List those which were of some influence).</td>
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<tr>
<td><strong>Subject Matter</strong></td>
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<tr>
<td>Educational Materials Teaching Aids</td>
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<tr>
<td>7. Review and evaluate the extent to which educational materials and teaching aids prepared and used at the county planning unit level contributed to disproportional representation of participants of one sex, and/or of sex-separate activities. (Include sex-bias, sex-stereotype roles, sex-discriminatory language, illustrations, etc.).</td>
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<tr>
<td>Newsletters, Communications</td>
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<tr>
<td>8. Review and evaluate the influence which newsletters, news releases, personal letters, mass-media releases announcing educational programs and activities may have had upon disproportional representation of participants of one sex, and/or sex-separate activities. (Include language which contribute to sex-bias, sex-stereotype roles and sex discrimination.</td>
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<td>EVALUATIVE ELEMENT</td>
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<td>County Extension Staff to:</td>
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<td>County Extension Staff to:</td>
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<tr>
<td>9. Review and evaluate the completeness and effect of the Public Notification Plan for informing the public and in promoting and encouraging participation in the Home Economics program.</td>
<td>(Identify extent to which it will require revision as well as improved management).</td>
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<td>10. Review the extent to which participation at local, county, district, State, and national levels is, on the basis of sex, and/or in which a quota(s), on the basis of sex, is a requirement.</td>
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<td>11. Determine whether any organization or group receiving &quot;significant assistance&quot; follow sex discriminatory practices in membership and participation on the basis of sex; indicate extent to which current procedures for making such determinations are effective.</td>
<td>- Evaluate the extent to which formal communications between such groups and the county staff adequately advise them of Extension's responsibilities under Title IX.</td>
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</tbody>
</table>

County Extension Staff to:

- Evaluate the extent to which established procedures for dealing with organizations and group which discriminate are understood and followed by county staff members.

12. Evaluate current methods and procedures used for the collection of data, by sex, and the adequacy of proper documentation, including staff efforts; its adequacy in meeting Title IX requirements.

- Develop a plan model indicating the anticipated (potential) increased participation of those persons who are disproportionately represented in participation, on the basis of sex, in the Home Economics program.
TITLE IX SELF-EVALUATION AND COMPLIANCE  
County Planning Unit, By Program

<table>
<thead>
<tr>
<th>EVALUATIVE ELEMENT</th>
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<tbody>
<tr>
<td><strong>COMPLIANCE AREAS</strong></td>
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<tr>
<td><strong>MODIFICATIONS AND REMEDIAL STEPS TAKEN (TO BE TAKEN)</strong></td>
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</tbody>
</table>

County Extension Staff to:

1. Evaluate the county 4-H Expansion and Review Committee, planning Program development, advisory, study, and other ad hoc committees used for planning and implementing programs and activities in terms of requirements for participation, qualifications, and composition, by sex, consistent with Title IX requirements. (List names of such groups reviewed).

   - In cases where county policies and practices differ from State prescribed policies and practices regarding these planning units, evaluate such policies and practices in terms of the above as well as to sex-bias, sex-stereotype language and sex-discrimination.
<table>
<thead>
<tr>
<th>EVALUATIVE ELEMENT</th>
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<tr>
<td>2. Review and evaluate the organizational structure and planning procedures used in conducting the 4-H Youth Development Program in regard to sex-discrimination; sex-bias, sex-stereotype, and sex-separate influences upon participation by 4-H members, and other recipients.</td>
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<tr>
<td>(Include types of clubs, units, special interest groups, school clubs, etc.).</td>
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<tr>
<td>3. Review the membership, by sex, of each 4-H &quot;unit&quot; and indicate the extent to which the members of such 4-H &quot;units&quot; are of one sex, or disproportionately members of one sex.</td>
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<tr>
<td>(List 4-H units reviewed and indicate those whose members are of one sex).</td>
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<tr>
<td>-Review the composition, by sex, of current officers of each 4-H &quot;unit&quot; and evaluate the extent to which such officers are members of one sex or disproportionately of one sex.</td>
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<tr>
<td>(Include procedures to indicate effect of sex-bias, sex-stereotype on the process).</td>
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<tr>
<td>County Extension Staff to:</td>
<td>- Review the membership requirements, constitution and by-laws of 4-H &quot;units&quot; to determine if such requirements discriminate on the basis of sex.</td>
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<td></td>
<td>(Include sex-bias, sex-stereotype roles, sex discriminatory language, illustrations, etc. as part of the review).</td>
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<td></td>
<td>- Review the educational programs conducted in local 4-H units to determine the extent to which such programs appeal to members of both sexes.</td>
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<td></td>
<td>- Review the activities provided its members by the local 4-H units and carried out at the local unit level, to determine the extent to which such activities are conducted on a sex-separate and/or disproportionately represented by members of one sex.</td>
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<td></td>
<td>- Review project enrollment procedures and requirements to determine the extent to which these influence the selection of projects by members, on the basis of sex.</td>
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<td></td>
<td>(Include sex-bias, sex-stereotype roles and illustrations in the review process).</td>
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<td>County Extension Staff to:</td>
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<tr>
<td>- Review the criteria for participation and/or selection used by 4-H &quot;unit&quot; lay leaders at the unit level for competitive and non-competitive events at the local and county levels and their influence upon disproportionate representation of members, on the basis of sex.</td>
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<tr>
<td>Membership Participation</td>
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<tr>
<td>4. Review and evaluate the requirements, qualifications, and procedures for the selection and appointment of 4-H unit leaders and the appointment of 4-H unit leaders and the extent to which these factors may contribute to sex-bias or sex discrimination in leaders appointments and functions.</td>
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<tr>
<td>Leader Selection</td>
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<tr>
<td>5. Evaluate leader-training meetings on the basis of requirements for participation, if any, and for subject matter content to determine their influence upon sex separate or sex discriminatory activity.</td>
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<tr>
<td>Leader Training</td>
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<tr>
<td>(List training meetings reviewed).</td>
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<td>COMPLIANCE AREAS</td>
<td>COUNTY EXTENSION STAFF TO:</td>
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<td>6. Review the participation, by sex, or camps and/or camping sessions held or conducted to determine the extent to which there were sex-separate, and/or disproportionate representation of persons of one sex.</td>
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<td>7. Review and evaluate all competitive and non-competitive activities in which recipients of the program participated and the extent to which these activities were sex-separate or disproportionately represented by persons of one sex;</td>
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</tbody>
</table>

- Conducted at the County level:
  (List each activity separately)
County Extension Staff to:

- Conducted at the District level:
  (List each activity separately)

  Activities, Competitive and Noncompetitive

- Participated in at the State level:
  (List each activity separately)

- Participated in at the National level:
  (List each activity separately)

Review the requirements, qualifications, and other requisites for participation including procedures for each of the above listed activities and indicate the extent to which these factors may have affected participation on the basis of sex.

8. Review and evaluate the extent to which educational materials and teaching aids prepared and used at the county planning unit level contributed to disproportional representation of participants of one sex, and/or sex-separate activity.

(Include sex-bias, sex-stereotype roles, sex discriminatory language, illustrations, etc.).
<table>
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<tr>
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<tbody>
<tr>
<td>NEWSLETTERS,</td>
<td>County Extension Staff to:</td>
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<tr>
<td>COMMUNICATIONS</td>
<td>9. Review and evaluate the influence which news-</td>
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<td>letters, news releases, personal letters,</td>
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<td>mass-media releases announcing educational</td>
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<td>programs and activities may have had upon</td>
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<td>disproportional representation of partici-</td>
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<td>pants of one sex and/or sex-separate activi-</td>
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<td>ties.</td>
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<td>(Include language which contribute to sex-</td>
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<td>bias, sex-stereotype roles, etc.).</td>
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<td>PUBLIC</td>
<td>10. Review and evaluate the completeness and</td>
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<tr>
<td>NOTIFICATION</td>
<td>effect of the Public Notification Plan for</td>
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<td>PLAN</td>
<td>informing the public and in promoting and</td>
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<td></td>
<td>encouraging participation in the 4-H Youth</td>
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<td>Program.</td>
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<td>revision as well as improved management).</td>
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<td>ORGANIZATIONS</td>
<td>11. Determine whether any organization or group</td>
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<td>AND GROUPS</td>
<td>follow sex discriminatory practices in mem-</td>
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County Extension Staff to:

- Evaluate the extent to which formal communications between such groups and the county staff adequately advise them of Extension's responsibilities under Title IX.

- Evaluate the extent to which established procedures for dealing with organizations and groups which discriminate are understood and followed by county staff members.

12. Evaluate current methods and procedures used for the collection of data, by sex, and the adequacy of proper documentation, including staff efforts; its adequacy in meeting Title IX requirements.
Public Notification Plan of Action
To Insure All Potential Recipients
Equal Access to Programs in the State
Cooperative Extension Service

(USDA, Title 9 - Administrative Regulations:)
Equal Opportunity

(7 CFR Part 15a. Education Programs or activities)
Receiving or Benefitting From Federal Financial Assistance; Nondiscrimination on the Basis of Sex.

(Revised 7/8/80)
Public Notification Plan

Purpose

The "Public Notification Plan" is designed to more fully meet the requirements of Title VI of the Civil Rights Act of 1964, and other supporting documents related thereto, including:

(1) "Supplemental Instructions for Administration of Title VI of the Civil Rights Act of 1964, in the Cooperative Extension Service" July 1965, pp. 3-6.

(2) USDA - Title 9 - Administrative Regulations: Equal Opportunity

(3) 7 CFR Part 15a Education Programs or Activities Receiving or Benefitting From Federal Financial Assistance; Nondiscrimination on the Basis of Sex.

Objectives

(1) Develop and implement an effective Public Notification program which will contribute more fully to the achievement of the objectives of the Act; and of the requirements of Title IX Education Amendments.

(2) Keep all eligible people, covered by these requirements, informed of all Extension programs and their equal access to these programs and of their protection against discrimination in the conduct of such programs.

Responsibilities

Each State Cooperative Extension Service will develop a "Public Notification Plan" for full implementation during fiscal year 1981 applicable to State offices, District and/or area offices, and county offices. A copy of the State Plan will be kept on file at State headquarters for review and evaluation.

The State "Public Notification Plan" will be developed according to the general plans and guidelines set forth in this document and a copy sent to Extension Service, Washington, D.C.

Plan of Action

The plan of action utilizes three columns: the left column contains the "Program Function" identified in USDA Title 9 Administrative Regulations: Equal Opportunity and Title IX regulations; the middle column identifies the type of action required or necessary to carry out the program func-
tion; and the third column (right column) provides for the identification and elaboration on a course of action or things to be pursued to carry out the "Action Required."
Public Notification Plan of Action to Insure All Potential Recipients
Equal Access to Programs in State Extension Services

<table>
<thead>
<tr>
<th>PROGRAM FUNCTION</th>
<th>ACTION REQUIRED</th>
<th>SPECIFIC ACTION TAKEN (TO BE TAKEN) TO MEET THE ACTION REQUIRED</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Advise minorities of program availability and requirements of nondiscrimination on the basis of race, color, or national origin.</td>
<td>a. Prepare program announcements, promotional literature as well as other educational materials (bilingual as appropriate) that meet the level of comprehension of target audiences.</td>
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<td></td>
<td>b. Identify and utilize the various mass media outlets that serve to disseminate information to minorities and the underprivileged. (Match the audience to the media.)</td>
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<td></td>
<td>c. Direct information on programs to sources of business and social contacts of minorities and the underprivileged, and all other potential recipients.</td>
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<td></td>
<td>d. Develop a procedure for handling information on new programs and changes in current programs for dissemination to minorities and the underprivileged; and to all other recipients encouraging their participation without regard to race, color, national origin, sex, or religion.</td>
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### PROGRAM FUNCTION

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<td>SPECIFIC ACTION TAKEN (TO BE TAKEN)</td>
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<td>TO MEET THE ACTION REQUIRED</td>
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<tr>
<th>e. Design a system for getting minorities and the underprivileged on mailing lists; consolidate and/or adjust single sex-segregated mailing lists into unisex lists. (Guidelines for reconciling with Federal and State rules provided by USDA will be followed).</th>
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<td>f. Develop a uniform statement(s) for Title VI and Title IX requirements of nondiscrimination in programs and activities; include such a statement in all publications, printed materials, program announcements, and promotional literature.</td>
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</table>

II. Prominently display the nondiscrimination poster, "And Justice for All", in all offices and other facilities used by Extension in serving the public.

a. Place poster in all Extension office locations where it is readily visible to the public.

b. Place in Extension conference room for public visibility.

c. Place poster in prominent position at 4-H camps which are operated by the Extension Service.

d. Place a nondiscriminatory statement of Title IX requirements in all Extension office locations where it is readily visible to the public;
III. Inform minorities of new programs and program changes by mailing information to "grass roots" organizations listed by Director, Office Equal Opportunity.

Inform organizations, groups, associations, etc, with whom Extension cooperates in the conduct of educational programs and activities of the nondiscriminatory provisions of Title IX.

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<td>e. Place name(s), address(es), and telephone number(s) of Title IX Coordinator(s) in a prominent position within the statement.</td>
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<td>f. Place statement regarding Title IX in conference room for public visibility.</td>
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<td>g. Place statement regarding Title IX in prominent position at 4-H camps which are operated by the Extension Service.</td>
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<td>a. Develop procedures for maintaining communications, on a continuing basis, about new programs and current programs of interest to these organizations.</td>
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<td>b. Develop a list of organizations within the State with &quot;grass roots&quot; contacts with minorities and the disadvantaged to supplement and complement the list provided.</td>
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<td>c. Develop procedures for maintaining communications, on a continuing basis, about Title VI and Title IX nondiscriminatory requirements and of Extension's obligation not to provide &quot;significant assistance&quot; to organizations which discriminate on the basis of race, color, national origin, sex, or religion.</td>
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<td>d. Develop procedures to inform, in writing, such organizations and groups which discriminate that services of the Extension Service are withdrawn and are not available to them until the nondiscriminatory provisions are met.</td>
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<td>IV. Notify the Office of Information of any new programs or program changes.</td>
<td>a. State Extension Service will provide Administrator, with information on new programs and program changes which can be submitted to the Office of Information, USDA. This will include both Title VI and Title IX changes to programs or new programs.</td>
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<td>V. Submit Civil Rights &quot;success stories&quot; to administrator, SEA-Extension, for submission to the Office of Information.</td>
<td>a. Provide &quot;success stories&quot; on programs where the State Extension Service was primarily responsible for accomplishment regarding Title VI and Title IX adjustments.</td>
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<td>b. Submit to Administrator, accounts of a major program accomplishment in working with minorities and the underprivileged to serve as leads for feature stories and articles regarding Title VI and Title IX adjustments.</td>
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VI. All Informational materials released to the public will, as appropriate, contain a statement that the program or activity will be conducted on a non-discriminatory basis. Where appropriate, photos and graphics will be used to convey the message of equal opportunity.

a. Develop appropriate statements (sample) for county personnel use that all programs and activities of the State Extension Service will be conducted on a nondiscriminatory basis in keeping with both title VI and Title IX regulations.

b. Establish policies and procedures whereby such statements will appear on and/or in all informational materials released to the public by State and county personnel.

c. Establish policies and procedures which will ensure appropriate and effective use of photos, illustrations, and other graphics, including sex-neutral language in all publications. Such policies and procedures apply to State and county released publications.
d. Establish some systematic review process (editorial review committee) or other instrument for examining current supply of publications and the review of future manuscripts of proposed publications regarding the elimination of sex-bias, sex-discriminatory or sex-separate role model type information from these public informational releases and to utilize sex-neutral language to eliminate sex-discrimination.

e. Establish some systematic review process as cited above for all educational materials and news releases developed and distributed at the county level to ensure the elimination of sex-bias, and sex-stereotyping models and materials in such written publications.

VII. Administration of Public Notification Plan

a. Develop and issue "Public Notification Plan" and communicate its contents and action components to all State and county Extension staff members.

b. Develop and issue such directives as needed to ensure its implementation and action are incumbent upon all Extension personnel.
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<td>c. Provide copies to all county offices, district and/or area offices, and to state office personnel, including state specialists staffs.</td>
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<td>d. Encourage all staff members to actively participate in the program and to assist in the achievement of its objectives.</td>
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<td>e. Develop and maintain at the State office a repository of materials in support of activities and accomplishments of the program.</td>
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Staff Preparation and Training

The institutionalization and socialization of sex-stereotype role models developed during the past affect many members of society. The impact and scope of Title IX and its regulation was promulgated to ameliorate and eliminate these influences for the benefit of this society. The effective administration and implementation of these requirements challenge the best efforts that can be put forth by those in responsible positions of public trust. The adequate preparation of those persons who are to assume this important task is tantamount to its successful implementation.

A cadre of staff personnel, consisting of the EEO Coordinator(s) and/or Title IX Coordinator(s), selected State program leaders and Specialists, and District Supervisory staff, should be appointed to serve as a "Development Team" to carry out the following major functions:

A. Development of plans and procedures for each of the components of the State Extension Service implementation phase in the following areas:

1. Development of the overall policy statement; content, issuance and distribution dates, and other plans.
2. Plans and procedures for the dissemination of policy and development of the Public Notification Plan and publications review and editing for sex-bias and sex-stereotyping.
3. Develop plans and procedures for filing and disposition of grievances; audits and investigations.
4. Plans and procedures for the conduct of the self-evaluation at the State and county levels, including format, content, staff responsible, time schedule, materials, data preparation and interpretation.
5. Plans and procedures for monitoring and the conduct of compliance reviews on a periodic and continuing basis. Include frequency, staff responsibility, use ad distribution of results to staff.
6. Plans and procedures for the collection of sex-based data for program evaluation and accomplishment, and reporting.
7. Plans and procedures for achieving compliance with cooperating agencies and organizations, and others.
8. Plans and procedures for achieving sex-neutral decisions regarding staff placement, assignment and responsibilities.
9. Plans and procedures and staff responsibility for conducting training program for State and county personnel.
The "Development Team" as described above should be in a very unique and strategic position to conduct an effective staff training program. Staff training should occur on, at least, two levels to achieve understanding, commitment, and continuing support of the objectives of Title IX. The first level should involve State program Leaders and subject matter specialists, district supervisory and/or area personnel having responsibility for major program support. The second level should involve the county Extension staff and those who are responsible for the conduct of the county program.

B. The first level training should include but not be restricted to the following areas:

1. A review of background and conditions which prompted the need for Title IX and its Regulation. Emphasis should be upon data and information relevant to the particular State.

2. An in-depth review, discussion and sensitization of the subtleties and pervasiveness of sex-stereotype role models of discrimination and sex discrimination practices of institutions, agencies and society in general.

3. A review and discussion of the major components of the USDA requirements, their interpretation and application to each of the major program areas and related activities.

4. A review and discussion of the plans and procedures for administration of Title IX, including each of the major areas identified under the "Development Team" (page ) and how each of these relate to staff responsibilities for implementation.

5. Discussion of institution, agency, and individual staff members responsibility for compliance and support of the objectives.

C. The second level training should include but not be restricted to the following areas:

1. A review and discussion of the problems and challenge which Title IX requirements bring to the State Extension Service at the State and particularly the local level and the opportunity for improving and strengthening programs. Opportunities for staff growth and development; for promotion and additional responsibilities are considered.

2. A review and discussion of the forms which sex-discrimination, sex-bias, and sex-stereotyping take in daily activities and their influence upon how programs are planned, conducted and carried out.

3. An overview and discussion of the plans and procedures for administration and implementation of Title IX.

4. Presentation and discussion of each of the major areas identified under the functions of the Development Team in relation to county programs and staff.
5. Discussion of time schedule for completion of each county self-evaluation, implementation, schedule, staff assignments and responsibilities for implementation, need for compliance and continuing support, coordination with other civil rights requirements, and public relations efforts (meetings with leaders, government officials, opinion leaders, organizational leaders, lay leaders, etc. to gain understanding and support).

Following the completion of the training program, the "Development Team" may serve as a staff resource to others assigned responsibility for the conduct of the State level self-evaluation and for each county self-evaluation; and for the summarization and preparation of the self-evaluation findings, modifications, actions for submission to the Department.
APPENDIX C

CLARIFICATIONS
Clarifications for Administering the "Affirmative Action Plan for Meeting Nondiscriminatory Legal Standards in Employment and the Conduct of All Programs by State Cooperative Extension Services" (Section II, Subsection A)

I. Potential Recipients

Definition:

Recipient — Any public or private agency, institution, or organization, entity, or an individual to which the State Extension Service furnishes services.

Determination of Potential Recipients:

State Extension Directors may determine who are appropriate potential recipients of Extension education assistance. However, such determinations must be made:

1. Consistent with guidelines presented in "Procedures for the Implementation of the Recommendations of the USDA-ECOP Task Force on Civil Rights." (Revised 4/21/76) and irrespective of race, color, national origin, or sex.

2. Consistent with the intent for which Congress has appropriated funds. (Examples: Urban 4-H, Expanded Food and Nutrition.)

3. Consistent with USDA guidelines and requirements for the use of such funds.

State Extension Directors have the flexibility to determine potential recipients within the framework of meeting the above requirements in relation to geographic location (residence) of potential recipients such as metropolitan, suburban, rural nonfarm, and farm population.

II. Educational Methods (Selection and Intensity)

State Extension Services may determine that educational methods used will be:

1. Primarily mass media (radio, television, newspaper, circular letters, bulletins) for certain potential recipients.

2. Individual and group contact methods (home and business visitations, meetings, tours, camps, demonstrations, personal letters, office calls) for certain potential recipients.
The selection and utilization of educational methods must be made on a basis which does not involve any discrimination because of the race, color, national origin, or sex of potential recipients.

III. Program Content of Educational Assistance

State Extension Services may determine appropriate program content to be offered through Extension educational assistance to appropriate potential recipients, provided such content areas are:

1. Not based upon race, color, national origin, or sex.
2. Consistent with the intended use of appropriated funds.
3. Consistent with USDA guidelines and requirements for the use of such funds.

Examples of appropriate program content areas include the following:

1. Priorities of content given to programs offered among:
   a. Agriculture and Natural Resources.
   b. Home Economics (Family Living, EFNEP).
   c. 4-H Youth Development.
   d. Community Resource Development.

2. Within each of the major program categories, priorities may be established in areas such as management, marketing, agricultural policy, production, environmental quality, agricultural business, and forestry in Agriculture; nutrition, home management, clothing, family relations, housing, and home furnishings within Home Economics.

IV. Organization and Committee Structure

The purpose of this structure is to assist in the planning and conduct of Extension educational assistance offered to appropriate potential recipients.

State Extension Services may determine the appropriate organizational and committee structure, including the need for and use of:

1. Extension advisory committees.
2. Program planning committees, and subcommittees.
3. Organized Extension Homemaker groups.
4. Organized 4-H Clubs.
5. All other Extension-sponsored groups.

If such organization and committee structure is used, criteria for membership and operational procedure for such groups must be such that they do not discriminate based upon race, color, national origin, sex or religion. This includes appropriate representation of minority groups on advisory and program planning committees, and subcommittees.

V. All Reasonable Efforts - Organized Extension Homemaker Groups and 4-H Clubs for Title VI

The minimum reasonable effort required by county Extension staff members includes all items listed as follows:

1. Use of all available mass media, including radio, newspaper, and television, to inform potential recipients of the program and of opportunity to participate.

2. Personal letters and circulars addressed to defined potential recipients inviting them to participate, including dates and places of meetings or other planned activity.

3. Personal visits by the county Extension staff member(s) to a representative number of defined potential recipients in the geographically defined area to encourage participation.

State Extension Services may require additional steps to be taken such as encouraging volunteers to assist in involving potential recipients of opportunities to participate, but such additional steps are not required by USDA in meeting these requirements.