Internal Compliance Review Guide

**Purpose of Guide:**

This guide is intended to **describe in detail**, all procedures for Internal Compliance Reviews. It is divided into sections based on organizational role/position.

**Section One**

Overview of the process of Internal Compliance Review (ICR)
The UME Affirmative Action Plan as basis of review
Review Process Summary

**Section Two**

Procedures for County and Regional Offices
(Sample) State Report Observations and Recommendations
Procedures for County and Assistant Director of Operations (ADO)

**Section Three**

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Forms and web links to forms
FAQ about forms
What to expect on review day

**Section Four**

Procedures for Members of the UME ICR * Committee
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Step-by-Step On Site Review
Step-by-Step Review Prep and Follow up
Step-by-Step Writing the Team Report
(Sample) Reports

**Section Five**

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Role of the Dean and Director

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Checklists
“Update of Central File and Internal Compliance Review Materials”

*Internal Compliance Review*

Office of Human Resources Management, AGNR
Revised May 2014
Section One

Overview of Internal Compliance Review

Internal Compliance Reviews (hereafter referred to as ICR or reviews) are a structured procedural method used to monitor the UME organization’s performance based on its AA Plan. Reviews are conducted in six counties every Spring, on a rotating four-year cycle. ICR reviews are conducted as a training simulation to give faculty and staff and all personnel associated with the review process experience in the area of federal compliance audits. USDA NIFA Civil Rights Office conducts reviews on a regular basis, and our ICR process keeps us prepared for those audits.

Dates for on-site reviews are set with AEDs, CEDs and ADO by December of the prior year. ALL COUNTY OFFICE PERSONNEL (faculty and staff) MUST BE PRESENT FOR THE ON-SITE REVIEW. No one is to be excluded from the chance to alert reviewers to questionable or discriminatory practices, make constructive suggestions, or to report promising/best practices.

New ICR Committee members are invited to serve between August-October in the year prior to on site reviews. Committee members commit to a three year obligation beginning with the first training meeting. New member may serve as alternates or observers during their first review cycle. The committee meets in March or April to receive training and to prepare for simulated reviews in April-May.

Period Covered By Review

The Internal Compliance Review is intended as a spot check to examine UME programs at a particular time. It is not a full review that covers programs over a lengthy period. In general, an internal review will cover UME initiatives conducted in the calendar year before the review. For example, reviews conducted in April 2004 will cover January 1 thru December 31, 2003.

Note: 4-H program projects activities, etc. Follow the 4-H program – reporting year which is the same as the calendar year (January 1 thru December 31). 4-H enrollment data will come from the enrollment year that corresponds with the fiscal year (July1-June 30). EFNEP follows the Federal fiscal year (July 1 – June 30) and will report for the fiscal year that most closely corresponds to the calendar year being reviewed. For example, for the 2000 review year EFNEP and 4-H enrollment data would cover July 1, 1999 - June 30, 2000).
### County Review Schedule (ICR)

<table>
<thead>
<tr>
<th>Year</th>
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<tbody>
<tr>
<td>2012</td>
<td>Baltimore County</td>
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<tr>
<td>2013</td>
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<td>Cecil</td>
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<td>2018</td>
<td>Anne Arundel</td>
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*** Reviews are intended for previous program year ***
UME Affirmative Action Plan as a Basis for the Review

The UME Affirmative Action Plan is available on the UME/AGNR website. A hard copy is also available in every county office’s Central Civil Rights File.

University of Maryland Extension operates under an Affirmative Action Plan formulated by UME faculty and approved by USDA NIFA in 2004. This plan serves as a contractual obligation between UME and USDA.

The focus of reviews is to monitor and ensure individual civil rights, equal opportunity in employment and promotion, and non-discrimination in programs conducted by UME and its partners.

Information gathered during the review process is used to assess and improve UME compliance with its AA Plan and with all civil rights laws and regulations cited in the plan.

Review Process Summary

The ICR process begins with the formation of the ICR Committee. This group is comprised of tenured extension faculty who conduct simulated reviews in six designated counties each year (see Section Four). The AGNR Human Resources Office (especially the Coordinator for Diversity Programs and Training) provides technical and administrative support to the ICR Committee.

The role of the Director of Human Resources Management as the college’s Equity Officer is: 1) to supervise the integrity of the review process; 2) to ensure all reporting to the Dean and USDA occurs in a timely manner; and 3) that corrections to the problematical areas are made through AEDs, CEDs and ADO.

University of Maryland Extension Reporting System (MCERS) data is audited in January-February prior to reviews. All data must be input prior to the announced date of the audit. Audited reports are made available as the basis of the review for both reviewers and those being reviewed.

The ICR committee meets for training and logistical coordination in March or April. The Human Resources Director, Diversity Coordinator, State Committee Chairperson, and Committee Advisor, all attend this meeting. ADOs may also be invited to participate at their discretion. The review teams are formed, county assignments are made, and reporting templates and other pertinent information are disseminated at this time. Experienced reviewers are placed on each team along with new reviewers to ensure accuracy and to assist and mentor new committee members.

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Data is exchanged electronically between the AEDs and CEDs and review team leader assigned to their county prior to the on-site review (see section three, item 6). This enables the team to prepare for a meaningful, in-depth review. Procedurally, this is also parallel to the document discovery phase of an actual Federal Compliance review Audit by NIFA. The on-site review includes a group meeting where submitted responses to the County Self-Evaluation Questionnaire (first section of the questionnaire) are shared with everyone and discussed. Then, the review team splits up into subject-matter areas for discussions with faculty and program assistants (and any other who have a role administering programs). Each subject matter area’s portion of the questionnaire is gone over along with MCERS data and promising practices. The reviewer makes notes for his/her report to the team. (See section three for more details)

After all areas are reviewed and the County Central file is examined, the review team reassembles to brief the office on how the review went procedurally: No feedback is give on specifics until the state report is prepared and the ADO, Dean and Director have been briefed and had input regarding review results.

Team leaders prepare a team report from their member’s reports by subject matter area and submit that to both the state Chairperson and the Coordinator for Diversity programs and Training. Deadlines for these reports are determined ever year during the ICR Committee training meeting in March.

The State Chairperson is responsible for completing the State Report within six weeks of on-site reviews. The State Report summarizes each county’s review results with a list of recommendations for correction/improvement and promising/best practices from each county.

The Coordinator of Diversity and Training Programs and the Director of Human Resources Management/Equity Officer present the State Report to the ADO, AEDs and CEDs and Program Leaders during their administrative meeting. After this meeting the best practices for the year are posted to the web and an email is sent to all of UME alerting them to this information. ADO AEDs and CEDS meet with faculty to implement recommendations for correction. (AA-AF1’s are prepared during this process and filed in each county’s Central Civil Rights rile).

The Dean notifies NIFA Civil Rights office that a review has been conducted and that corrections have been made for deficiencies noted. This is a very general letter and usually contains a list of counties reviewed and best practices. The content of Internal Compliance Reviews is proprietary.

Once corrections are in process, ADO formally writes letters to the Dean and Director (ccing the Director of Human Resources Management) with details of actions being taken. These letters kept on file in the Dean’s Office for Federal Audits by NIFA.

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Between September-October the ADO conduct informal interim reviews using the Interim Review Checklist. While not an obligation under the UME AA Plan, this process ensures adequate follow up and has been useful to UME in the past. Interim Review Checklists are filed in the County Central File with copies of ADO, AEDs and CEDs letters noting corrections and recommendations.

*AED Area Extension Director, CED County Extension Director and ADO Assistant Director of Operations…*
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Section Two

Procedures for AEDs, CEDs and ADO

Directions for Reviews

Two reviews teams will conduct Internal Compliance Reviews in April and May each year.

The materials on the website are updated: the forms are the same as used last year. Please ensure you are using latest forms by printing them off the website. We will be using the “Response Plan” form AA-AF to improve in areas that have ongoing problems.


Click this link or past it into the address field of your browser window. Then scroll down and click on “Internal Compliance Review” on the HR menu.

Central Civil Rights File

The Central Civil Rights file should contain all the items noted in the “index to CF” document in the first folder of your Central Civil Rights file (also on the web). http://agnr.umd.edu/sites/default/files/admin-services/CENTRAL_FILE_INDEX3_12_12.pdf

All Central File documents are available on the web. The point of having a Central File is to provide Civil Rights reference materials to Faculty and Staff: ensure that everyone knows where the file is and what is in it! Reviewers will be checking to ensure that all Faculty and Staff are familiar with the file and its contents.

County Files that you need to provide documentation for:

1. List of training received by Faculty and Staff (AA-AF-15)
2. Internal Compliance Review County Plans and reports (last four years)
3. Racial and ethnic data for county population
   Year 2000 Census figures
   Only 4-H clubs require a map of locations
4. Reports showing program reach (MCERS county-level program summary)
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5. EAC member list by race and gender; meeting minutes; agendas, (AA-AF-8)
6. Organizational Open Member Statement letters (nondiscrimination letters from partnering organizations updated to no more than five years old)
7. ADA Self-Evaluation for your office annually
8. AA-AF1 “ICR Responses Plan” (file last four years beginning in 2003)
IMPORTANT

The first 29 questions cover the office in a general way and are to be filled out and submitted electronically (e-mail) to the Review Team Leader a week before the on-site review. Faculty is asked to fill out and submit an electronic copy of their subject matter section (e.g., Family and Consumer Science): Educators will prepare and e-mail their review sections to the review team leader one week prior to the on-site review.

The first 29 questions on “Program Planning” will be completed prior to the review and discussed with the county faculty and staff as a whole during the review team visit. Question 1 - 29 will be completed with the entire group at the meeting. The questionnaire is divided into sections by topical specialty (FCS, EFNEP, etc.). Review team members will use the completed questionnaires and MCERS reports as a departure point for discussion during the on-site visit.

Questions 30 – 46  4-H
Questions 47 – 59  FCS
Questions 60 – 64  EFNEP
Questions 65 – 77  AGNR including Master Gardeners

Educators will insert needed forms and reports to complete their section during the on-site visit.

Computer-generated reports to be used for Compliance Review.

These print outs take the place of most of the forms we were using in the past to consolidate data from different sources. All these reports show percentages of participation achieved compared to current county census figures for either adults or youth.

MCERS

Diversity Attendance Report

- State Level
- County Level
- Individual Educator Level

4-H Enrollment system

1. Total clientele contacts by racial-ethnic groups

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FSNE Reports

1. Year-end summary by county

Procedures for AEDs, CEDs and ADO

Responsibilities

ADO, AEDs and CEDs work closely with the Human Resources office to establish and communicate dates for annual Internal Compliance Reviews.

AEDs and CEDs are responsible for informing county faculty and staff ahead of time of what to expect from the review, and about how to access resources and prepare. All faculty and staff need to actively participate in the review. AEDs and CEDs must ensure that all faculty and staff are present during the on-site review.

UME Director and ADO review state and county reports from the ICR review teams and formulate corrective actions for each county to take with deadlines for accomplishments.

The Director and ADO also review positive practices noted by the review teams, with a view to identifying organizational policies and procedures needed to facilitate the spread of these practices. The Dean, Director and ADO determine how findings from the State Report are disseminated, although the Diversity Coordinator typically posts best practices from the State Report once that UME administrative leadership has reviewed report.

It is suggested that ADO, AEDs and CEDs review county office recommendations from the State Report with their faculty as soon as possible, the more timely the feedback, the more useful.

AA-AF1 Response Plans

Please utilize the AA AF1’I CR Response Plan’ to itemize actions meant to address “recommendations by county” as noted in the ICR State Report. An AA-AF1 should be completed for each initiative-area recommendations/deficiency. AA-AF1’s should be forwarded to the ADO for his/her State Report response to the Associate Director. The AA-AF1 questions three, four and five are meant for follow up during the next review cycle, and may be left blank on the initial response.
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Feedback on individual faculty affirmative action performance may occur through:

Plan of Work Review  
Annual Faculty Review Results  
ADO Annual AA Report

Feedback on county level affirmative action performance may occur through the sharing of follow up information by the ADO, AED or CED. The Coordinator for Diversity Programs and Training will post “best practices” annually on the web once the state report has been accepted by the Director and Associate Director.

Sample of State Report Observations and Recommendations from 2003

Here’s an illustration of the kinds of issues that the reviews are meant to surface and address.

General Observations

1. UME leadership must support and reinforce the requirement that all faculty and staff must be present at ICR Reviews. This year’s reviews were plagued by absences of key faculty and staff, despite the fact that the dates were scheduled in July of 2003 for late-April 2004.
2. The ICR Response Plan (form AA-AF1 see appendix A) approved by the ADO in 2002 will be utilized to formulate specific strategies for achieving parity in problem areas. AA-AF1’s should be filed in the Central Civil Rights File (folder #8), with a copy in individual Faculty Program Files when applicable.
3. Overall, counties improved in the consistent use of media statements: need to work on using accommodation statements when announcing programs (see Central File folder #13 and UME Affirmative Action Plan appendices).
4. The content and organization of Central Civil Rights Files improved due to extensive hands-on training in 2003: staff knowledge of what’s in the Central File needs to be improved. The Human Resources Management Office has made all these documents available in the web.

General Notes as to MCERS Use – Review teams and county faculty utilized audited MCERS demographic reports as a basis for the review. The biggest sources of under-reporting were:

1. Not reporting program contacts by area and regional faculty not reporting contacts.
2. Not reporting contacts by UME Faculty who presume that if they don’t personally conduct a class, they don’t “claim” the participants, even if they have developed and supplied the instructional materials and trained others to deliver the instruction.

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Faculty working in more than one county must report contacts individually by county of the event. As work becomes more collaborative and less geographically tied to a single county, faculty will have to resolve these reporting problems in order to show the real scope of their work.

Master Gardener face-to-face teaching events are not being reported in most cases despite feedback to correct this after 2002 ICR reviews and MCERS training in November – January 2003, and February 2004. The critical step of making sure that someone is designated and trained to enter Master Gardener contacts from the volunteer logs has not been implemented.

Lack of staff and coordination in identifying and training staff to enter EFNEP contacts in MCERS led to a universal understatement of contacts under Initiative II.

**Recommendations with Action Points**

1. Ensure that counties diversify their advisory boards and committees and that all counties are utilizing advisory bodies and community data to inform their programming. Publicize the new Limited English Proficiency Policy (May 2003).

   Focus efforts on volunteer and EAC recruiting materials for Latinos in bilingual format (Spanish and English). Recruit people who understand the culture and language.

   Provide targeted materials in Spanish in areas that affect Latinos health/safety (e.g., one educational item in each subject matter area to use statewide)

2. “All Reasonable Efforts” Documentation was weak in many cases. Reinforce use of MCERs reports and “All Reasonable Efforts Checklist”.

3. Most counties had some gender parity issues, reinforcing the need for Title IX and ICR Response Plans (AA-AF1). Title IX Self-Evaluation should be completed (folder #4) when gender parity is not achieved.

4. ADO should confirm that all counties have completed an ADA Self-Evaluation document in the Central File (folder #6).

   Add accommodation statement to materials to ensure people that they are welcome to seek special assistance. ADO should monitor use of accommodation statements.

5. UME leadership must support and reinforce the requirement that all faculty and staff must be present at ICR reviews: absenteeism is getting worse.

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Include internal compliance topics in faculty and staff meetings to review central file issues, review of program accessibility, and other related issues.

6. Counties need to update their Job Description files (no more than five years old) housed adjacent to the Central Civil Rights file. (Note: IEPs and AFRs are retained in a confidential file area like the AEDs and CEDs’ office.)

7. The Internal Compliance Review Committee recommended in 2003 that “Area Agents” and “Regional Specialists” go through Internal Compliance Reviews and that their work be captured MCERS. When coordination doesn’t occur, when area agents either don’t report at all or report contacts to what they consider their “home” county, contact data is muddled and underreported.

8. Continue and expand collaboration and joint programming efforts with other faculty and outside entities, making sure to report contacts whenever UME educational materials are used and faculty or FEA’s are actively involved in train-the-trainer.

9. Ensure that FSNEP and Master Gardener program participants are being reported consistently by designating people to put in the contacts and by making sure they have been trained by the IT Coordinator.

   Develop a reporting tool for FCS volunteers (similar to Master Gardener log) to capture their FSNEP face-to-face teaching contacts.

   Train someone to enter FSNEP data into MCERS (monthly).

   Train someone to enter Master Gardener data from volunteer logs into MCERS (monthly).
Section Three

ICR Process for Faculty and Staff Being Reviewed

Faculty prepares their files:

1. Maryland Cooperative Extension Reporting System (MCERS) is audited in January-February and end of year reports are prepared for the review. MCERS reports capture bulk diversity/demographic data on those who participate in extension programs, giving a good indication of how well extension is reaching minority and historically under-served audiences. During the audit, make sure you contact the IT Department with any corrections to your data.

2. Print out your faculty member reports from MCERS (once audit has been finalized and announced). It’s a good idea to have last year’s reports on hand for comparison if you are in the same position title and location. Print out reports by focus county if you have multi-county responsibilities, (see pages 8-9 for report titles).

3. Review areas where you aren’t meeting parity (see page 15 for definition).

4. Review the County Central File (Central Civil Rights File) to ensure you know what resources are in it.

5. In outcome/initiative areas where you aren’t attracting a sufficient number of diverse participants based on county population, prepare examples of All Reasonable Efforts:

   - press release clippings and other media (posters, flyers) you have used to publicize programs to minority and underserved audiences
   - mailings and other communications that include Civil Rights and Accommodation statements
   - mailing lists you have used to reach minority clientele
   - meeting records where minority stakeholders or other partners were present
   - Committee and board records showing the diversity of your stakeholders, advisors, or participants
   - Media that demonstrates where you made time, location, special interest, accommodation, or other attempts to attract minority, disabled or other historically underserved clientele to programs.
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6. Complete the subject matter area section of the county ICR Self-Evaluation questionnaire that relates to your responsibilities/subject matter area. Send it electronically to your AED or CED at least 10 days prior to the onsite review date.

7. Look at program/outcome areas where you’ve exceeded parity and identify practices that made you successful. Make a list for the interview during your on-site review.

8. Gather up any media you have that demonstrate promising/best practices to share with the reviewer.

9. Ensure that all the forms associated with compliance review are completed and on file for your programs (see page 13 for link to forms available on the web).

10. If you administer any major grant-based programs that have separate reporting applications, make sure you have printed out relevant summary reports for your interview. (e.g., FSNE, 4-H Enrollment System, Master Gardener Log etc.)

11. Make sure you have at least four years of records on hand for your program area.

12. Have mailing lists on hand to show outreach to minorities (also documents to show partnerships with agencies doing outreach).

13. IF YOU WORK IN MULTIPLE COUNTIES (or have other extenuating circumstances) TALK TO THE REVIEW TEAM BEFORE THEIR VISIT AND ARRANGE TO HAVE FILES AND MCERS County Reports FOR THE COUNTY BEING REVIEWED ON-SITE WHEN YOU MEET WITH THE REVIEWER.

Access to Forms

Review forms are all available in the “Compliance Review Materials” off the Fiscal Office website at: [http://agnradmin.umd.edu/FiscalOffice](http://agnradmin.umd.edu/FiscalOffice) HR menu. The forms are divided by format into a folder of portrait forms (4-H forms, letters, AA-AF1) and a folder of landscape forms (AA-AF8, 11, 15).

Frequently Asked Questions about Forms

1. AA-AF1 – Is this done by each county and/or each educator? Who completes these questions?
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The AA-AF1 can be used for any level to devise an action plan for correcting long-standing non-compliance patterns. It can be done for a single educator or for a whole county team. The AED or CED completes it as part of devising a corrective strategy and the AED or CED and ADO may use it with a county or regional team to make specific corrective actions: for example, devising a plan of special-interest programming for minority women.

2. AA-AF3 – Do we need letters from every organization in the files? Do we have to get these from government organizations such as schools, social services, etc. that are all following these guidelines.

No. Federal agencies and public schools or other organization with federally-based non-discrimination regulations don’t need letters on file. This form is for use with private entities like parochial/private schools, clubs, churches, and fraternal organizations. The AA-AF3 letter give UME faculty an opportunity state that no one will be excluded from programs we do or participate in.

3. AA-AF8 – On some pages if says for EAC. Do you only need the makeup of that committee? Is this only the makeup of committees UME forms vs. participates in?

The current form doesn’t specify the EAC, although a form should be on file in each county’s Central File for the EAC. Faculty should keep this form to record any committees or boards they use for initiative/program-based efforts and then they’ll have the data to fill in on the County Self-Evaluation Questionnaire when it is time for ICR visits. This form is handy to keep track of stakeholders who act in any advisory capacity, even if it is a one-time meeting.

4. AA-AF11 – Do we need to complete this if using someone else’s mailing list? For instance, we often have DSS send out a newsletter to all individuals on food stamps. We are not mailing them since the data is confidential… we are just providing the newsletter and the mail. Is this only for mailing lists that the office keeps?

This is for UME mailing lists. IF I am having another agency do mailings, I would make a note to that effect, saying that all eligible were contacted, with the # of mailings annually and a copy of the newsletter in the program files. In your case the diversity of the people on the list is probably dictated by eligibility under federal guidelines; for other agencies it would be good to note how diverse the mailing list was and where the names came from to ensure all people were included.

5. AA-AF15 – Training List Log. Is these trainings an educator attended? How detailed is this? I don’t’ understand the purpose of this one. Please clarify.
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The intent of this form is to record all professional development activity for EVERY employee. Reviewers are on the lookout for patterns of discrimination; for example, the female admin. Asst. holds down the front at the office all year while faculty goes to numerous conferences, seminars and trainings. Major internal professional development activities (as well as external seminars) can be captured on this form; one form should be done for every employee (by name) and housed in the Central File. Training noted should be job-related (such as computer application classes) and also include non-discrimination/diversity-related training on policy and procedure.

What is Parity?

A UME program initiative or outcome area will be considered to have “balanced participation” or parity when the percentage of minority and gender group participants are within 5 percentage points of the distribution of minority and gender groups in the potential clientele based on the census.

This is the minimum desired baseline for minority program participation. Parity will be used to evaluate the extent of integration necessary to achieve and maintain a balanced membership in compliance with civil rights and affirmative action requirements. All programs within integrated communities must have a “balanced participation” or have documentation that “all reasonable efforts” to achieve balanced participation have been ongoing and in good faith.

To assess parity use MCERS reports to compare the actual census population % by category (native American, Black, White etc.) for your city or county to the percentage of contact in each demographic category that actually participated in UME programs (grouped by outcome). For example, if 12% of your population is African American, then 7% to 17% of your participants must be African American to achieve parity.

Note: “Minority-majority” areas such as Prince Georges County and Baltimore City will examine participation percentages of whites to ensure they are not being under-served. Highly homogenous counties with less than 2% minority population do not have to meet parity goals.

What to Expect on Review Day

After a general meeting with the faculty and staff of the county office, the reviewers will split up to review individual faculty subject matter areas and programs. At this time, be prepared to elaborate on your responses to your section of the self-evaluation questionnaire and to show evidence of All Reasonable Efforts in areas where you have not achieved parity.
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Be prepared to give the reviewer examples of things you’ve done to improve participation in your programs, and to share practices that have made you successful. This is also a time to get your questions about programmatic issues answered and to alert the reviewer regarding needs you have related to accommodation and attracting more diverse audiences to your programs.

Review the questions on form AA-AF1 in advance: you may need to fill one of these out for areas where you are not achieving parity.

The county faculty or staff member initiating an UME sponsored program in the host county is responsible for all affirmative action reporting. Where events are co-sponsored, the county faculty or staff in the host county is responsible for coordinating all affirmative action reporting with participating regional agents, regional specialists and state specialist.

Regional agents, regional specialists and state specialist are to make affirmative action reports via the Educator in the host county.

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<th>Regional Events Data Entry</th>
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<tr>
<td>Whenever a faculty member conducts a regional event, he or she must record the data by individual county participants. For example, if a faculty member has 100 participants from four different counties, he or she must record audience from each individual county.</td>
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Four Counties:

- Carroll County = 25
- Howard County = 25
- Wicomico County = 25
- Garrett County = 25

Total Participants = 100
Section Four

Review Team participation

New ICR Committee members are invited to serve between August-October in the year prior to on site reviews. Committee members commit to a three year obligation beginning with the first training meeting. New members may serve as alternates or observers their first review cycle. The Committee meets in March to receive training and to prepare for simulated reviews in April-May. More experience members act as review team leaders and advise new members during annual county reviews. Internal reviews are simulated training versions of Federal Compliance Audits.

Committee Composition

Committee members are tenured faculty members employed by University of Maryland Extension at the state, regional and/or county levels. Members are selected and appointed by the Director of UME to represent the two regions. Members are representative of a cross-section of administrative and management faculty, all Extension subject matter areas, and all races and genders. Occasionally, it may be necessary to adjust the selection procedure to provide geographical, race and gender balance to the committee. The Director of UME sets the committee member’s term which is generally three to four years.

The committee shall consist of eight to ten tenured or tenure-track faculty members, with six serving on reviews teams and at least two acting as alternates. In addition, one senior UME representative serves as State Chairperson to produce the state report. AGNR’s Coordinator of Diversity Programs and one campus based human resources specialist shall serve as official members to coordinate and support the work of the UME ICR committee.

The ICR committee forms two review teams and works closely with the Diversity Coordinator (Human Resources Office, AGNR) to prepare for reviews:

1. Maryland Cooperative Extension Reporting System (MCERS) is audited in January-February and end-of-year reports are prepared for the review. MCERS Reports capture bulk diversity/demographic data on those who participate in extension programs, giving a good indication of how well extension is reaching minority, and historically under-served audiences.
2. Review county faculty prepares their files for the audit.
3. Review team leaders notify county offices of review times and details of the process for the onsite visit.
4. The Diversity Coordinator analyzes MCERS reports by county and alerts teams to specifics or areas that need focus, including areas where promising practices need to be identified, captured, and shared with all counties.

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5. AEDs and CEDs complete county ICR Self-Evaluations questionnaire responses and have their faculty complete the sections for each subject matter/program area. Responses to questionnaire are electronically transmitted to each county’s review team leader at least one week prior to on-site review date.

6. Review teams study MCERS reports (at various levels including faculty member level) and receive copies of counties’ completed questionnaire from their team leader to prepare for the on-site visit.

7. Teams arrive at county offices for on-site review simulation.

8. After the review visit, team members write up their reports and forward to the team leader.

Committee Responsibilities

Committee members are expected to attend all meetings and will need to spend at least five to seven days in committee work per year. This includes: one training meeting to make plans and study review procedures; a few hours to prepare with other team members for the on-site review; two or three days for the actual county reviews; and at least one day to write the final report and send it to the team leader. The review team leaders will need to spend at least one additional day assembling reports and processing them to the state committee chairperson. The state committee chairperson will need to spend three to five days attending the initial committee training meeting, communicating with team leaders and the Diversity Coordinator, and preparing the State Report.

Expenses incurred by committee members, while conducting ICR committee business, are submitted to the Director of Human Resources Management/Equity Officer. The appropriate expenses account form will need to be processed with a note indicating they are members of the ICR committee.

State Chairperson

The State Chairperson of the ICR committee is a tenured faculty member employed by UME.

The Dean and Director appoints the State Chairperson for a period of 4 years, and the State Chairperson can be located at either of the state level (College Park or UME) or in any county or regional office. The chairperson may act as an observer to the county review, where appropriate.
Internal Compliance Review

Responsibilities

The State Chairperson works with the Coordinator of Diversity Programs and Training (Human Resources Office) to:

- Review and update county review procedures and plan county reviews.
- Follow up with recommendations from committee meetings.
- Organize lists of committee members, review team appointments, and complete correspondence pertinent to the county.
- Collect reports from the six reviewed counties and ensure that all program areas are completed.
- Distribute electronic files of review materials to counties, and
- Forward electronic reports to Coordinator, Diversity Programs and Training on or before the due date.

Committee Reporting and Response Procedure

1. Review team faculty forward their program area reports to team leader.
2. Team Leader compiles team report by county and sends to Committee Chairperson and Coordinator, Diversity Programs.
3. State Report is written by Chairperson and Coordinator and submitted to the Director of Human Resources Management/Equity Officer who reviews it and transmits it to UME Director and Associate Director.
4. After review, State Report is transmitted to Regional Extension Directors for communication to County Extension Directors.
5. Coordinators of Diversity Program and Training post “best practices” to web for dissemination to UME faculty statewide.
6. AEDs, CEDs and ADO complete AA-AF1 “ICR Response Plans” and forward with cover letter to Associate Director and Director.
7. Corrective measures and plans are then communicated to USDA CSREES as appropriate.
8. During next review cycle, prior AA-AF1’s are reviewed and second half is filled out (items 3,4,5). Copies are kept in program initiatives files and Central Civil Rights File for review by ADO.

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

Preparation for Compliance Reviews

Review Team Leader

Two Review Team Leaders are to be appointed each year, they should attend all meetings. Each will coordinate a Faculty Review Team.

- Contact County Directors for the program review arrangements.
- Prepare the agenda for the first review day and share with county directors and team members.
- Preside during the first review and arrange with other team members to preside the second day if necessary. (This may differ depending on the team’s county assignments and team preferences).
- During the county review, examine the administrative/management section of the self-evaluation questionnaire (questions 1-29). Team members, in agreement with the regional team chairperson, will decide the subject-matter program area section each will review.
- Coordinate travel arrangements (if traveling together) and beginning and ending times.

Communication Timeline

Sixty days before the review, the State Chair of the Compliance Review Committee shall remind County Directors about the upcoming review with a reminder for submission of completed self-evaluation questionnaires as electronic files no later than one week prior to the on-site review. Please copy State Chairperson and Coordinator for Diversity Programs and Training on this communication.

One week before the review, get the completed County Office Compliance Self-Evaluation Questionnaire as electronic file from AED and CED and distribute copies to review team members by subject matter area. Review team members print out audited MCERS reports and prepare for the on-site review.

AEDs and CEDs are responsible for informing county faculty and staff ahead of time of what to expect from the review, and how to access resources and prepare. All faculty and staff need to actively participate in the review. AEDs and CEDs should assure that all faculty and staff are present for the on-site review.
INTERNAL COMPLIANCE REVIEW GUIDE

LETTER SAMPLES

Notification Letter for Internal Compliance Review

(Sent at least 60 days prior to review) by State Chairperson Management)

Date:

AED or CED:

Address:

Dear AED/CED:

This letter serves as a reminder of the upcoming ICR review scheduled for in your county or city. The regional chairperson/leader of your review team will contact you in the near future and make arrangements for the review.

Prior to the on-site review you will call a meeting which all faculty and staff attend to complete the first 29 questions of the self-evaluation. Faculty will also complete their subject matter area portions of the questionnaire in a preliminary manner. This completed self-evaluation questionnaire will be sent electronically to the Regional Chairperson no later than one week prior to your on-site review.

The internal review is required per our affirmative action plan and is intended to assist counties and Baltimore City in their preparation for a full federal audit. It is also a good opportunity to identify any areas that should be highlighted and to improve on those that need modification.

Thank you in advance for your cooperation and hospitality. The committee looks forward to working with you to accomplish this important task. Please contact me if you have any questions and/or concerns.

Sincerely,

State Chairperson

Cc: Director, UME, Director Human Resources Management and Regional Extension Directors

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Internal Compliance Review Guide

Thirty days before the review date, the county directors will receive a letter from the Review Team Leader. The Team Leader will set up a schedule including, but not limited to beginning and ending times for the review schedule for meeting with individual program areas. The schedule should be followed as planned. Names of the persons participating in the review, subject areas they will review, and the schedule for the day will be included. See sample letter in Appendices.

Date

MEMORANDUM

TO: AED or CED (of counties up for review)

FROM: Director, UME

RE: Year – County Compliance Review

During the (identified week) of April/May, county compliance reviews will be conducted in your County or counties by the ICR committee. County faculty and staff are being requested to prepare the information and supporting documentation and forward it via-e-mail to the review team leaders prior to the on-site review. Prior to audit, please access the County Office Compliance Self-Evaluation Questionnaire on the web at (specify URL link) along with the forms used by the Review Committee teams. Please have faculty completes the subject matter/programmatic sections of the questionnaire as follows:

- Questions 1-29 County Office (CED and faculty and staff)
- Questions 31-48 4-H Faculty
- Questions 49-60 Family and Consumer Sciences Faculty
- Questions 61-64 EFNEP Faculty
- Questions 65-76 Agriculture, Natural Resources Horticulture Faculty

Faculty members should complete their sections as accurately as possible, making sure to organize supporting documentation for the on-site review. The review will focus on programs from the prior fiscal year. Note: 4-H program and activities are reported on a calendar year. Use data from the last calendar year. You should also provide information and supporting documentation showing how the recommendations of the previous year’s audit were implemented.

The completed County Office Compliance Review Self-Evaluation questionnaire should be sent as a Word file attachment to an e-mail to your review team leader or their designee no later than one week prior to the on-site review.

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

The success of this process will depend very much on the timely response of each faculty member. For your information, I have enclosed an electronic copy of ICR Review Guide which explains in more detail the procedures used to implement the county review. All forms and related materials are available on the college website.

Thank you in advance for your cooperation. Please don’t hesitate to contact (name of State Chairperson, Compliance Review Committee) if you have any questions or concerns.

Cc: ADO
    Director, Human Resources
    State Chairperson, Compliance Review Committee
    Review Team Leaders

Enclosures

Step-by-Step
The On-Site County Review

The Review Team Leader will:

- Open the review process with all faculty and support staff by introducing team members.
- The AED or CED introduces county faculty and support staff.
- The Chairperson discusses: (a) the agenda for the day, (b) the procedures that will be followed during the day including lunch plans and (c) the objectives of the review.

It is important that the faculty and staff being reviewed feel at ease with the review process and understand the procedures that they will follow. The review is intended to be a positive, educational process rather than a judgmental, penalizing exercise. Than preparing for the more demanding federal audit.

Briefly, review the answers to questions one to twenty-nine of the notebook (all faculty and support staff present) asking for additions and clarification where needed. (You may hand out a printout of the electronic files submitted by the AED or CED. Announce a time (about 20 minutes) for individual questions and concerns regarding this portion of the self-evaluation to be considered by the review team. OR give faculty and staff an –email address to send confidential queries and comments to. Reviewers will want to note any additions or revisions to the first 29 questions based on input from individuals. Refer individuals who wish to explore making an EEO/AA complaint to the EEO/AA Advisor.

- After discussion of question thirty (which the Regional Chairperson used to capture inclusive practices), member of the group divide into program areas and review each area for compliance and positive practices.

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Internal Compliance Review Guide

- Program areas are reviewed, using on-line reports such as MCERS demographic and 4-H Enrollment System reports, and All Reasonable Efforts documentation. Supporting documentation may need to be reviewed as noted in specific review questions. These may be described by the reviewer to become a part of the team report, or in rare cases, collected as samples for scanning to county review electronic archives.
- When all reviewers have completed their sections, the review team members come together for a short meeting to discuss key observations and any immediate recommendation(s) for faculty and staff.
- The team leader and the County Director call all reviewers and faculty together for a short exit meeting to share observations. The Review Team Leader thanks everyone for his or her assistance and cooperation and notes that the review team will send the final report to the UME Director.

The regional chairperson collects all report from the team members in preparation for converting them to a review team summary report. This report is forwarded to the Compliance Review State Committee Chairperson in electronic format on or before the due date. Do not send paper reports or notes. Archiving of pertinent work samples representing best practices may be selectively included: scanning and archiving will be accomplished by the Human Resources Office, Coordinator or Diversity Programs and Training. Samples related to best practices are encouraged. (See Reporting and Response Procedure page 7).

Step-by-Step Preparation and Follow-Up for the County Reviews

The team members need to read/study the self-evaluation questions for the subject matter area they will review and print out pertinent MCERS and 4-H Enrollment System reports for study prior to the review.

- Team members print out subject area/county and educator sections of the questionnaire as needed to complete reviews.
- A team member may chair one of the county reviews, if requested to do so by the Review Team Leader.
- Prior to on-site review, study audited MCERS and 4-H Reports and the initiative program areas questionnaire responses.
- Use on-site time with faculty member to clarify data questions, pinpoint problem areas, and collect “best practices”.
- Assemble the final report from the subject area reviewed.
- Forward a final county report in electronic format to the Review Team Leader by the agreed due date.
- After a three year term, team members materials related to ICR must be returned to the Coordinator of Diversity Programs and Training, AGNR.

Office of Human Resources Management, AGNR
A final report is prepared by each team member and sent to the regional chairperson in electronic format. The team leader will then compile a review team summary report for each county reviewed and submit it in electronic format to the State Committee Chairperson. All review team county reports are assembled and forwarded by the State Chairperson to the Coordinator for Diversity Programs and Training in the Human Resources Office, AGNR. This report should include, but not be limited to, the following:

1. A cover page stating the name of the county reviewed, date of the review, members of the review team and program area(s) reviewed (Appendices).

2. Committee members’ general observation of the county review (sample form enclosed).
   - County faculty and staff (cooperative, non-cooperative, prepared, etc.).
   - Organization of files (updated, easy to locate).
   - Compliance statements for the AED or CED files (current).
   - Public notifications of All Reasonable Efforts (updated).
   - Title IX Self-Evaluation (available, current).
   - County ADA Self-Evaluation (available, current).

3. Committee members’ observations of program area(s) reviewed.
   - Minority participation in programs (MCERS reports).
   - Notation as to which initiatives achieved parity.
   - Composition of membership in clubs (4-H Enrollment System reports).
   - County maps showing current census demographic population data and club locations.
   - All Reasonable Efforts documentation (see All Reasonable Efforts Chart, Appendix A).
   - Organization of files – updated.
   - Membership lists (printouts).
   - Committee (OMB guidelines; composition by race, ethnicity, and gender).
   - Open membership/non-discrimination letters.
   - Mailing lists (printouts).
   - Documentation of meetings, special interest programs (MCERS and 4-H reports).
Internal Compliance Review Guide

4. Committee member recommendations.
   - Make/record recommendations for all program areas observed.
   - Include all actions that should be corrected.
   - State if no recommendations are made.
   - Encourage and describe positive practices and reinforce “All Reasonable Efforts”.

5. Complete subject matter area sections of self-evaluation questionnaire and make notes for your report to the team leader.
Internal Compliance Review Guide

Sample Team Final Report
(Cover Form/Signature Sheet)

University of Maryland Extension
Compliance Review

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<th>State</th>
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</table>

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<th>Name and Title of Person(s) Conducting Review</th>
<th>Program/Area Reviewed</th>
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</thead>
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<td>1.</td>
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<td>2.</td>
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<td>3.</td>
<td>3.</td>
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<tr>
<td>4.</td>
<td>4.</td>
</tr>
</tbody>
</table>

Team Leaders: Please forward signed original to Coordinator of Diversity Programs and Training after you submit electronic County Reports.

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

Regional Team Final Report Format
(Observations and Recommendations)

The University of Maryland Extension Service
Internal Compliance Review Report

County/City

Date

Program/Initiative

General Observations

Recommendations

_______________________________  Committee Chairperson
_______________________________  Committee Member
_______________________________  Committee Member
_______________________________  Committee Member
_______________________________  Committee Member

(see attached electronic format sample)

Office of Human Resources Management, AGNR
University Maryland Extension
ICR Team Report Example #1

__________________________  County

Date__________________________

Programming Planning

General Observations

- County Faculty and Staff very cooperative, professional and well prepared.
- Central files organized and up-to-date.
- Excellent joint programming efforts.
- Administrative Assistant trained in MD Relay.

Recommendations

- Continue joint programming efforts and open lines of communication across program and county lines.

Family and Consumer Sciences

General Observations

- Best Practices for African-Americans participation this educator is working with 2 organizations that are predominantly African-American. The contact was made through the retired teachers’ organization. Health fairs conducted at the State Highway Administration attract a large number of African-Americans.
- A. A. statement recorded on all posters, pamphlets, flyers etc.
- Practices to improve reach and inclusiveness are: Educator plans to work with the State Highway Administration in Lunch and Learn Programs to target males.
- Plans are being made to work with the migrant programs this summer.
- Programs are taken to the clients.
- Low literacy materials developed.
- The FCS educator in this county is responsible for _____________ County as well as _________________ County. The participants in the classes are from both counties (reviewed focus county reports for both).
Internal Compliance Review Guide

Recommendations

- Continue joint programming efforts and open lines of communication across program and with other agencies.
- ARE documentation should be kept to demonstrate ways they are trying to attract males.

Agriculture and Natural Resources

General Observations

- Reviewed at random selection of brochures, all of which carried a non-discrimination statement.
- Reviewed folder containing opens to the public materials; Press Release File, File of Flyers and Brochures. All included required statement.
- Reviewed file containing Grassroots organizations appeared complete.
- Reviewed mailing list appeared complete and to include all required information.
- Reviewed “All Reasonable Efforts” file and found everything to be in order.
- Meet in accessible locations. Have not received any special requests.
- Master Gardener programs have high number of female participants and as niche market interest increases expect female participation to move higher.
- Small Farm program also draws a higher number of female participants.
- Landscaping conference targeting the Hispanic workforce used local community college Spanish Department for translation.
- Working with pre-lease center on gardening and farm labor.

Recommendations

- D and E in self-evaluation is 4-H activities and should not be listed under AGNR.

4-H Youth Development

General Observations

- Practices to improve reach and inclusiveness were: hiring of a Native American to work with a grant funded reading program.
- After school program for local middle school to increase reach into underserved populations.
- Affirmative Action statement recorded on all materials.
- Working with migrant program to reach Hispanic youth.
- Excellent gender equity accomplished through school enrichment programming.

Office of Human Resources Management, AGNR
Recommendations

- Continue joint programming efforts and open lines of communication with other agencies.
Program Administrative and Central Files

General Observations

Review team met with the entire faculty and staff in the county office to review the first section of the Compliance Review Self Evaluation. We discussed the purpose of the review and the importance of maintaining files to prepare for a federal review. Team members met with individual faculty and staff for review of the program areas. This office has a faculty and staff of eight and has experienced staffing changes after the review period (CED/4-H Educator resigned January 2004). CED duties are now shared. Staff is integrated. EAC is active and generally meets 3 to 6 times per year, however during the review period the EAC met one time; the council is integrated. Self-Evaluation indicated other program committee as the ______________ AG Commission; this group is a county appointed group and is not part of the formal UME program.

Faculty and staff communicate well, they meet monthly some informal meetings without an agenda and some are formal meetings with an agenda. There have been times when 4-H staff has not been included in faculty meetings. All have equal access to facilities, equipment and training, and work across racial lines in programming as needed and on specific projects. Since the review period there is a new EEO/AA Advisor.

Training lists are up to date for faculty and staff and central files appear to be in order and were updated within the past two years prior to this review. However Individual Extension Plans, Position Descriptions and Annual Faculty Reports were not available to faculty and staff nor filed centrally (Locked in former CED office). Community group and organization letters were on file; however the self-evaluation indicated several organizations need updated letters. Public notification of open availability of programs is needed. Office is located in a county building and is accessible; faculty and staff are aware of accommodations to people with disabilities. They offered meetings at specified locations to provide accessibility. For example, close by the Amish community and in county buildings that are accessible to people with disabilities. Contact reporting in 2002-2003 appears to have been in consistent and possibly some duplicate reporting. Have focused targeted programming to “Hot Spot” areas.
Internal Compliance Review Guide

Recommendations

- Update AF-8 form (committee list) for EAC meetings.
- Maintain Individual Extension Plans, Positions Descriptions and Annual Faculty Reports adjacent to central files.
- Update nondiscrimination letters on file.
- Conduct formal faculty and staff meetings that include all employees. Suggestions are to include internal compliance topics, to review central file issues, review of program accessibility, and other related issues. For example, hand out and discuss the index of the central files, following months discuss contents and updating information such as training lists. As staff changes, include ICR policy and procedure training and specifically training for the new EEO/AA Advisor as needed.
- Review contact reporting procedures.

Reviewer: ______________________________________ Extension Educator
Section Five

Summary of ICR Reporting and Response Procedure

1. Review team faculty forward their program area reports to Team Leader.
2. Team Leader compiles team report by county and sends to Committee Chairperson and Coordinator of Diversity Programs.
3. State Report is written by Chairperson and submitted to the Director of Human Resources/Equity Officer who reviews it and transmits it to UME Director and Associate Director.
4. After review by Dean and Director, State Report is transmitted to ADO for communication to AEDs and CEDs.
5. Coordinator of Diversity Programs and Training posts “Best Practices” to web for dissemination to UME faculty statewide.
6. AEDs, CEDs and ADO complete AA-AF1 “ICR Responses Plans” and forward with cover letter to Dean and Director.
7. Corrective measures and plans are then formulated through the ADO AEDs and CEDs and communicated to USDA NIFA by the Dean and Director as appropriate.
8. During next review cycle, prior AA-AF1’s are reviewed and second half is filled out (items 3, 4, 5). AA-AF1 copies are kept in program initiative files and county Central Civil Rights File for review by ADO.

Please use the AA-AF1 “ICR Response Plan” to itemize actions meant to address” recommendations by county” as noted in the ICR State Report. An AA-AF1 should be completed for each initiative-area noting recommendations or deficiencies. AA-AF1’s should be forwarded to the ADO for his/her State Report Response to the Associate Director. The AA-AF1 questions 3, 4 and 5 are meant for follow up during the next review cycle, and may be left blank on the initial response.

Feedback on individual faculty affirmative action performance may occur through: Plan of Work Flow, Annual Faculty Review Results and ADO Annual AA Report.

Feedback on county level affirmative action performance may occur through the sharing of follow up information by ADO, AED or CED. The Coordinator for Diversity Programs and Training will post “best practices” annually on the web once the state report has been accepted by the Director and Associate Director.
Internal Compliance Review Guide

Dean and Director Responsibilities

The Dean notified USDA/NIFA Civil Rights Office that a review has been conducted and that corrections have been made for deficiencies noted. This is a very general letter and usually contains a list of counties reviewed and best practices. The content of ICR is proprietary.

Once corrections are in process, ADO formally writes letters to the Dean and Director (ccing the Director of Human Resources) with details of actions being taken. These letters are kept on file in the Dean’s Office for Federal Audits by NIFA.

ADO Follow Up

Between September-October ADO conduct informal interim reviews using the Interim Review Checklist. While not an obligation under the UME AA Plan, this process ensures adequate follow up and has been useful to UME in the past. Interim Review Checklists are filed in the County Central File with copies of ADO, AED and CED letters noting corrections and recommendations.

Human Resources Management Office Responsibilities

- Assist Director, Chairperson, and team members with training and county reviews.
- Prepare ICR electronic files and review materials for review teams.
- Receive electronic ICR from state chairperson.
- Review reports for completeness; compile observations and recommendations submitted by the regional chairperson.
- Summarize pertinent observations/recommendations, and positive practices that require future compliance action or communication to other counties in order to expand positive practices.
- Forward each county’s ICR report to Director’s office.
- Human Resources personnel may act as observers of a county review, where appropriate.
- Maintain electronic archive of compliance review record for last five years.

Office of Human Resources Management, AGNR
APPENDICES
Internal Compliance Review Guide

Appendices

Appendix A.. All Reasonable Efforts

Appendix B… Public Notification Statements

Appendix C… Forms

Appendix D… MCERs and 4-H Enrollment System Reports

Office of Human Resources Management, AGNR
Appendix A

“All Reasonable Efforts”

UME Counties and Educators should document efforts to notify, reach and include as participants, minority individuals in Extension conducted or sponsored programs. When:

Definition:

“All Reasonable Efforts” are defined as the minimum efforts required of County/City Extension Faculty to integrate all Extension educational programs conducted in interracial areas.

When Required:

1. “All Reasonable Efforts” (ARE) need to be documented when Extension program initiative/s, including individuals clubs, located in an interracial community do not reflect the racial composition of the community as defined in sections II and III of this document. i.e. not in parity. 2. Document ARE when new clubs are formed, “all reasonable efforts” must be conducted and documented prior to formal organization of the club. 3. “All Reasonable Efforts’ are conducted to integrate all Extension sponsored meetings and committees. 4. ARE is done to document efforts to involve minority groups in UME program initiative/s.

Responsibility: Educators should maintain documentation in their program files.

All Reasonable Efforts Documentation:

Because every initiative and club is different, there is no single way to document “All Reasonable Efforts”. However, the chart below shows some common documentation that an Educator should keep in order to record efforts made to ensure minority participation in initiatives and clubs. The chart may be used by the Educators to document ARE’s. Educators should also maintain samples of program materials such as new releases, agendas etc. These items are subject to review as well as any other documentation to confirm that ARE’s were made to reach potential clientele.
### UME “ALL REASONABLE EFFORTS” GUIDE

<table>
<thead>
<tr>
<th>INITIATIVE/PROGRAM</th>
<th>DATE OF PROGRAM</th>
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<tr>
<td>Public Notification/Marketing Efforts</td>
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<tr>
<td>Planning documents</td>
<td>Visits</td>
<td>Agendas</td>
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<tr>
<td>Flyers</td>
<td>Phone contacts***</td>
<td>Sign in sheets</td>
</tr>
<tr>
<td>Advertisements/announcements/flyers in a public place</td>
<td>Notes on referrals</td>
<td>Volunteer and committee rosters by race and gender</td>
</tr>
<tr>
<td>Mailing lists</td>
<td>Partnering with the community/groups</td>
<td>Member lists by race and gender</td>
</tr>
<tr>
<td>Presentations you did in connection with marketing</td>
<td>Printouts of e-mails you sent to prospective partners, volunteers and others</td>
<td>Participant count by race, gender and ethnicity</td>
</tr>
<tr>
<td>Sample letters and cards you sent</td>
<td></td>
<td>Reporting into MCERS</td>
</tr>
<tr>
<td>Printouts of web-based promotion you did</td>
<td></td>
<td>Translation/interpretation services</td>
</tr>
<tr>
<td>Newspaper articles</td>
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<td></td>
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<tr>
<td>See Appendix B</td>
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</tbody>
</table>

*** For new program initiatives, clubs or for programs not achieving parity you may choose to keep records of phone calls to pertinent contacts: key clients program planning committee members, volunteers, agency partners and others.

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Office of Human Resources Management, AGNR
Appendix B

Public Notification and Media Methods

Use all available mass media including radio, newspaper and television to inform potential recipients of the program and opportunity to participate. Include the following statement of non-discrimination in all prepared releases to the media: “Membership and participation in activities and events are open to all citizens without regard to race, color, gender, disability, religion, age, sexual orientation or national origin”. Special efforts will be made to contact minority owned or operated newspapers and stations, encouraging them to use announcements and releases from the Extension. All forms of mass media will be used to inform potential beneficiaries of the program.

Develop announcements, flyers and posters to be placed in public places frequented by all racial groups.

Write personal letters to individuals of the minority race inviting them to participate.

Make personal visits to a representative number of minority clientele in the defined community in which the club serves to encourage participation.

Contact community groups for assistance in informing potential minority clientele of available programs.

Long Civil Rights Statements:

“UME programs are open to all and will not discriminate against anyone because of race, age, sex, color, sexual orientation, physical or mental disability, religion ancestry, or national origin, marital status, genetic information, political affiliation, or gender identity and expression”.

This material may be available in alternative formats”. (phone number, toll free, TDD and website address).

Persons with disabilities who require alternate means of communication of program information should contact us at (telephone number/voice mail/fax/email address) or use the Maryland Relay Service at 7-1-1 for text telephone service to our voice number.
Internal Compliance Review Guide

**Short Civil Rights Statements**

“University of Maryland Extension is an Equal Opportunity Employer with Equal Access Programs”.

**ADA statement**

The following statement could be added to notices for all public meetings and program announcements associated with your office to inform prospective participants as to how to secure needed accommodation.

If you have a disability that requires special assistance for your participation in the (meeting/program), please contact (name, agency) at (telephone number) by date.
Internal Compliance Review Guide

Appendix C

Forms

See diskette Word file “ICR Forms” to print these out for your use:

AA-AF11    Mailing List Log
AA-AF15    Training Log
AA-AF8    Committee Attendance Log
AA-4H/HE5    Non-Discrimination Letter

“Sample Letter for Clubs”

Other forms have been superseded by use of the repots in Appendix D. Refer to All Reasonable Efforts chart in Appendix A for documentation needed to substantiate ARE: there is no form.
## Internal Compliance Review Guide

### AA – AF 11

**UNIVERSITY OF MARYLAND EXTENSION**

**MAILING LIST LOG**

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# Training Log

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**AA – AF 8**

**COMMITTEE MEETING ATTENDANCE**  
**UME COUNTY______________________**

Committee Name_________________________ Date_________________________

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<th>NATIVE AMERICAN/Alaskan</th>
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Office of Human Resources Management, AGNR
Internal Compliance Review

AA – AF 8

COMMITTEE MEETING ATTENDANCE

COMMENTS:        DATE__________________

COMMENTS:        DATE__________________

COMMENTS:        DATE__________________

COMMENTS:        DATE__________________

COMMENTS:        DATE__________________
Internal Compliance Review Guide

Sample Letters for Clubs

Dear ____________________________________:

University of Maryland Extension, in order to remain in compliance with Federal affirmative action’s guidelines, must obtain assurance from all clubs/organizations with whom it works that they follow nondiscriminatory practices based on race, color, gender, disability, religion, age or national origin. Certification of nondiscrimination for your organization can be attested by signing and returning one completed copy of this letter. The other copy may be retained for your files.

The Federal requirements further state that if such certification is not provided, the organization must be notified in writing that University of Maryland Extension can no longer give assistance. We want to continue and even strengthen the fine working relationship UME has with your organization.

We respectfully request your understanding in this matter and assure you that we appreciate your continued cooperation.

(Signature of County Director or Department Head)

This is to certify that _____________________________ has a policy of open membership and does not discriminate on the basis of race, color, religion, age, sexual orientation, national origin, gender, marital or parental status, or disability.

______________________________  Signature

______________________________  Title or Office

______________________________  Date

Issued in furtherance of Cooperative Extension work, acts of May 8 and June 30, 1914, in cooperation with the U.S. Department of Agriculture, University of Maryland, College Park, and local governments. Thomas A. Fretz, Director of University of Maryland Extension, University of Maryland. The University of Maryland is equal opportunity. The University’s policies, programs, and activities are in conformance with pertinent Federal and State laws and regulations on nondiscrimination regarding race, color, religion, age, sexual orientation, national origin, gender, marital or parental status, and disability. Inquiries regarding compliance with Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Educational Amendments; Section 504 of the Rehabilitation Act of 1973; and the Americans With Disabilities Act of 1990; or related legal requirements should be directed to the Director of Human Resources Management, Office of the Dean, College of Agriculture and Natural Resources, Symons hall, College Park, MD 20742

Office of Human Resources Management, AGNR
Sample Letter

Club Bylaws

Dear __________________________:

In accordance with Affirmative Action guidelines, any club organized or sponsored by University of Maryland Extension must include in its bylaws the following nondiscrimination statement: “Membership in the club and participation in 4-H activities and events are open to all citizens without regard to race, color, gender, sexual orientation, disability, religion, age, national origin, or marital or parental status”.

A cop of the bylaws with the above statement must be on file in the County Extension Office. Please complete and return the attached form to the Extension Office by ________________________________.

Your cooperation is very much appreciated.

Sincerely,

(Your name and title)

Issued in furtherance of Cooperative Extension work, acts of May 8 and June 30, 1914, in cooperation with the U.S. Department of Agriculture, University of Maryland, College Park, and local governments. Thomas A. Fretz, Director of Maryland Cooperative Extension, University of Maryland. The University of Maryland is equal opportunity. The University’s policies, programs, and activities are in conformance with pertinent Federal and State laws and regulations on nondiscrimination regarding race, color, religion, age, sexual orientation, national origin, gender, marital or parental status, and disability. Inquiries regarding compliance with Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Educational Amendments; Section 504 of the Rehabilitation Act of 1973; and the Americans With Disabilities Act of 1990; or related legal requirements should be directed to the Director of Human Resources Management, Office of the Dean, College of Agriculture and Natural Resources, Symons hall, College Park, MD 20742
Internal Compliance Review Guide

Forms and Tools for Reviews

Forms required by the UME Affirmative Action Plan:

- “All Reasonable Efforts Checklist” (program files)
- AA-AF3 – Nondiscrimination Letter (Organizations) (Central File)
- AA=AF8 – Committee Meeting Attendance (Central File/EAC)
- AA-AF11 – Mailing List Log (Program Files)
- AA-AF15 – Training Log (Central File)
- AA-4-H-5 – Club Bylaws Letter (4-H Program Files)
- AA-4-H-4 – Public Relations Efforts by Clubs (ARE)  
  Update 10/2002 – (4-H Program Files)

Participant data reports to print out for reviews:

The following reports may be accessed on line and printed out to provide data for the county review:

MCERS

1. Total clientele contacts by racial-ethnic groups or diversity attendance.
   - State Level
   - County Level
   - Educator Level (home county and focus county)

4-H Enrollment Systems

2. Total clientele contacts by racial-ethnic groups.
   - 4-H enrollment
   - 4-H volunteers
   - 4-H bulk
   - Total bulk and members

3. 4-H club participation by racial-ethnic groups.
Internal Compliance Review Guide

AA-AF1

Internal Compliance Review Response Plan

_________________________ Date

_________________________ and/or ____________________________________
(county/city) (initiative/program optional)

1. Summary of recommendations or deficiencies:

2. Actions specified after review:

3. Progress at midyear including citation of contact data:

4. Practices that have led to improvement:

5. Future plans/actions:
Instructions: Please submit a complete AA-4-H4 to the Extension office once a year. Be sure to complete both pages – the checklist and the questions.

All 4-H clubs and activities are open to all youth and volunteers and seek to be inclusive and welcoming to everyone.

Volunteer leaders and 4-H members are asked to assist in making contacts and in helping promote the 4-H program. This checklist has been developed to assist clubs in identifying efforts made to reach out to diverse youth and to publicize 4-H activities widely and in new places.

Please make sure that you are using a short media statement on all your posters, fliers, program announcements, etc.

**“Equal Access Programs”**
*(son patrones de igualdad de participación a programas)*

And, that you are including an “accommodation” or “modification” statement in most cases:

| If you need assistance to participate in this program/meeting, please contact (Name and number) by (date – 2 weeks before your event). |
| (Si tiene una incapacidad que requiere ayuda especial para su participación en la reunión/programa, por favor comuníquese con nosotros (nombre, agencia, office) al este número (telephono numero) antes de que (date).) |

Generally, two weeks before the event is enough time to arrange a program modification, such as an interpreter, based on any request you get.

If you have any questions about what do include on the form, ask your 4-H contacts at the Extension office. Please include all your efforts to publicize your club activities and to reach out to all kinds of kids.
Public Relations Efforts by 4-H Clubs

Club Name: __________________________________ Date Submitted_________________

- Newspaper program announcement(s)
  Newspaper name(s)

- Foreign language newspaper/newsletter/radio announcements____________________

- Press release/article(s)
  Submitted to ___________________________________________________________
  Printed by _____________________________________________________________

- Announcement in church, synagogue, mosque, or other religious group bulletin, including minority religious groups

- Community newsletter article

- School announcement or newsletter article

- Posters in community
  Where were they posted? _________________________________________________

- Fliers distributed about club events/meetings
  Where were they distributed? ______________________________________________

- Membership drive

- Joint meetings with minority or integrated youth clubs or groups

- Joint activities with minority or integrated youth clubs or groups

- Moved meeting or held event in a different community specifically to make new contacts

- Sponsored booth/poster or other activity at ethnic festival or event

- Sponsored booth/poster or other activity at community festival or event

- Displays and talks about 4-H
  Where were the displays/talks presented? _________________________________

- Booths
  Where were they displayed? _____________________________________________

- 4-H Club Open House

- Personal visits (please attach names of people visited)

- Telephone calls (please attach names of people called)

- Other (please describe below)

How many new contacts did you make this year by race/ethnicity*? ________________

How many new contacts did you make this year by gender? _______________________

How many new youth joined your 4-H club this year by race/ethnicity and gender? ___________

Which public relations efforts were most successful for reaching out to diverse youth and adults?

*For example, Hispanic (Latino), African-American/Black, Asian, Native American, White, male and female

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

**AA-4-H4 cont…**

Which public relations efforts were most successful for widely publicizing your club’s activities and events?

What public relations efforts are you most likely to initiate in the next 3-6 months?

What assistance do you need to reach out to diverse youth and adults in your community?

_______________________________________________________

Leader’s Signature
Internal Compliance Review Guide

Appendix D

MCERS and 4-H Enrollment System Reports

Participant Data Reports

The following reports may be accessed on line and printed out to provide data for the county review:

MCERS

1. Total clientele contacts by racial-ethnic groups/diversity attendance (same report)
   - State level
   - County level
   - Educator level (instructor/submitter reports)

4-H Enrollment systems

2. Race/ethnicity/gender by enrollment type
   - 4-H Members
   - 4-H Volunteers
   - Total bulk and members

3. 4-H Club Participation by Racial-Ethnic Groups
Internal Compliance Review Guide

County Office Compliance Review Self-Evaluation
Calendar Year January ______ to December _______

PROGRAM PLANNING

1. How is County Extension advised on program content and implementation? (check all that apply)
   - Extension Advisory Committee
   - Partnership/representation on other county committees
   - Other (please explain ________________________________________________)

Please designate the name of each committee/group below and indicate composition by race and gender.

A. Committee/group name ______________________________________________________

<table>
<thead>
<tr>
<th></th>
<th>White</th>
<th>African American/Black</th>
<th>Asian American/Pacific Islander</th>
<th>Other</th>
<th>Race not reported</th>
<th>Hispanic</th>
<th>Total by Gender</th>
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Note frequency of EAC committee meetings (if you do not have an EAC, check “other” and note frequency):

- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)

B. Committee/group name ______________________________________________________

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<th></th>
<th>White</th>
<th>African American/Black</th>
<th>Asian American/Pacific Islander</th>
<th>Other</th>
<th>Race not reported</th>
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Office of Human Resources Management, AGNR
Internal Compliance Review Guide

Note frequency of meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)

C. Committee/group name ____________________________________________________

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<th>White</th>
<th>African American/Black</th>
<th>Asian American/Pacific Islander</th>
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Note frequency of meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)

2. **Committee members are chosen in the following ways (check all that apply):**

- Elected
- Appointed by Extension
- Volunteer to serve
- Other (please explain) _____________________________________________________

**Staff Involvement**

3. **Characterize the way(s) that Extension Educators meet together to interact in planning programs.**

- Joint departmental meetings of ALL educators to share program planning information and identify areas for collaboration occur:
  - More than once annually
  - Quarterly
  - Other (specify) __________________________________________________________
  - Departmental meetings of County Educators planning collaborative programs

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

- By specialty
- Across specialties
- Meetings with Educators of other counties to plan programs
- By specialty
- Across Specialties

**Item for Reviewer Completion Only**

Share two examples of joint program planning efforts from this review year:

1. 
2. 
3. 

4. How is the County Extension Faculty planning to enhance its collaborative planning efforts in the next year?
   
   - Plan more across specialty (4-H, FCS, etc.)
   - Plan more cross-county/regional efforts
   - Do joint planning with greater frequency
   - Other ________________________________

**Educator Assignment, Communication and Training**

Note the composition of total Extension Faculty and Staff in county. (List all faculty and staff regardless of who funds their position).

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<th>Name</th>
<th>Wht</th>
<th>African/Blk American</th>
<th>Asian/Pacific Islander</th>
<th>Nat. Am/Alk. No Race</th>
<th>Hisp</th>
<th>M/F</th>
<th>Title/Prog. Area</th>
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Office of Human Resources Management, AGNR
5. **Do staff assignments foster work across racial lines?**
   - Yes
   - No
   - Check here if there are no minority educators on staff

6. **How is work across racial lines fostered?**
   - Through plans of work
   - Through specific project assignments
   - Through faculty review mechanism (evaluations)
   - Other
     - (specify)__________________________________________________________
   - Check here if there are no minority educators on staff

7. **Who makes work assignments? (check all that apply)**
   - ADO
   - AED
   - CED
   - Other
     - (specify)__________________________________________________________

8. **Do Educators who have responsibility in the same program areas receive the same official information regardless of race, color, national origin, disability, or gender?**
   - Yes
   - No
   - Don’t Know
   - If no/don’t know please explain: ___________________________________________________

**Items for Reviewer Completion Only**

9. List two examples where all Educators were notified of administrative actions or received other official communications in regard to Title VI (nondiscrimination in programs based on race, color, national origin) and Title IX (nondiscrimination in programs based on gender):
   a.________________________________________________________________________________
   b.________________________________________________________________________________
10. Indicate where the list of training attended by County Extension Personnel during the last year is located (use form provided in ICR Procedural Manual).

11. Training meetings attended by County Faculty and Staff during the review year indicate that: (check all that apply)
   - Staff had equal access to Civil Rights and diversity-related training opportunities
   - Staff had equal access to professional development opportunities… regardless of race, color, national origin, gender or disability
   - Staff did not have equal access to Civil Rights and diversity-related training opportunities explain: _____________________________________________________________
   - Staff did not have equal access professional development opportunities explain: _____________________________________________________________

12. List the name of the EEO/AA Advisor in your county and indicate where full listing of EEO/AA Advisors is posted for your staff:

   ________________________________________________________________

Item for Reviewer Completion Only

13. What Extension policies and procedures ensure that staff participates in educational programs/training on a nondiscriminatory basis?

   ________________________________________________________________

14. When was your Civil Rights Central File last updated?
   - During the last review year
   - During the last two years
   - During the last three years
   - None of the above
   - We do not have a Central Civil Rights file

15. The following documents MUST be housed in TWELVE folders in a Central Civil Rights file. Indicate with a check, each item below that resided in your Central Civil Rights file:
   - Copy of the Civil Rights Act of 1964
   - Copy of USDA Secretary’s Memorandum (USDA Policy on Civil Rights)
   - Copy of Title VII, CFR 15 “Nondiscrimination in Employment”
   - Copy of IX Equal Opportunity, USDA-AR (booklet)
   - UME/State Affirmative Action Plan and Update
   - List of training received by faculty and staff
Internal Compliance Review Guide

- Program Accessibility file with “making Programs Accessible” “ADA Fact Sheet” and “Translation Resources for UME”
- Internal Compliance Review County Plans and Reports (last four years)
- Racial and ethnic data for county population (MCERS Reports show census data)
- Reports showing program reach (MCERS county level program summary) and reports/plans for reaching parity (also called “Targeting for Minority Benefits Report”)
- EAC Member list by race and gender; meeting minutes; agendas, etc.
- Organizational Open Membership Statement Letters (nondiscrimination letters from partnering organizations)

Items that you will want to have updated and adjacent to Central File are: Plans of Work, Position Descriptions.

Keep a total of four years of all records (current year plus three prior years).

Staff Housing and Facilities

16. All employees housed in office space according to function without regard to race, color, national origin, gender or disability?
   - Yes
   - No
   If no, please explain: ____________________________________________________________

17. Is administrative support staff assigned to work across racial lines to support the work of the office?
   - Yes
   - No
   - Not applicable (no inter-racial staff)
   - If no please explain: ____________________________________________________________

18. Do Educators have equal access to the follow resources? (check to indicate “yes” for an item).
   - Supplies
   - Equipment
   - Facilities (demo kitchen, plots, etc.)
   - Administrative support staff
   - Travel allowances
   - Publications
   - Telephone/internet/fax
   - Other (specify) _______________________________________________________________

Office of Human Resources Management, AGNR
County Program Action

19. Does County Extension Faculty, in an official capacity, sponsor, support, financially assist, or participate in any conferences, conventions, organizations, or meetings where participants are segregated, excluded or treated differently due to race, color, national origin (language), gender, religion or disability?

  o Yes
  o No
  o If yes, please explain: ______________________________________

20. In the past year has Extension sponsorship (financial or non-financial) or participation in an organization been withdrawn because of segregation, exclusion, disparate treatment, based on race, color, national origin (language), gender, religion or disability?

  o Yes
  o No
  o If yes, please explain: ______________________________________

21. List the organizations and groups the County Extension staff has been working with periodically or on a regular basis. Check that these organizations have a signed nondiscrimination letter on file.

<table>
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<tr>
<th>Name of Group</th>
<th>Interest/Program Area</th>
<th>Date of Last Letter</th>
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Office of Human Resources Management, AGNR
Public Notification

22. Below is a representative list of materials released to the public which indicate that Extension programs are open to all regardless of race, color, national origin (language), gender, religion or disability. (or see folder title __________________________ adjacent to Central File).
   1.__________________________________________________________
   2.__________________________________________________________
   3.__________________________________________________________
   4.__________________________________________________________
   5.__________________________________________________________

Comments:

23. Below is a list of grassroots organizations that have received mail publicizing new programs and program changes. (or see folder title __________________________ adjacent to Central File).
   1.__________________________________________________________
   2.__________________________________________________________
   3.__________________________________________________________
   4.__________________________________________________________
   5.__________________________________________________________

24. Below is a list of news media, including minority group news media that received information on new programs and program changes:
   1.__________________________________________________________
   2.__________________________________________________________
   3.__________________________________________________________
   4.__________________________________________________________
   5.__________________________________________________________

25. The USDA poster “And Justice for All” is posted in the following locations(s) in the County Extension Office:
   1.__________________________________________________________
   2.__________________________________________________________
   3.__________________________________________________________
Internal Compliance Review Guide

26. List ways in which you have provided accommodation to clientele attending your programs in the last year:

1. __________________________________________________________________________
2. __________________________________________________________________________
3. __________________________________________________________________________
4. __________________________________________________________________________
5. __________________________________________________________________________

27. Is the County Extension Office accessible to people with disabilities? (check all accommodations that are currently in place).

- Parking spaces are clearly designated with proper sign and are at least 13’ wide
- At least one of eight spaces is van-accessible with 98” vertical clearance for chair lift
- There is 8’-wide ramp access with a 5’ landing
- Door is automatic or equipped with a bell to allow easy entry
- There are no stairs or barriers between the parking place and the front reception desk

**Signs indicate (check all that apply)**

- Handicapped restroom
- Text telephone
- Sound system for hearing impaired
- Honk/ring bell if you need assistance
- If you need assistance please ask
- Other _______________________________________________________________________

**Reception areas has (check all that apply)**

- Clipboard for communication
- Cup dispenser next to water fountain
- Low, accessible brochures
- Educational materials in alternative formats such as audiotapes, large print
- Educational materials in other languages
- Other _______________________________________________________________________

Office of Human Resources Management, AGNR
28. We have relocated the following programs to accessible facilities during the past year (note program title and location):

1. 
2. 
3. 

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

**Item for Reviewer Completion Only**

29. We have instituted the following practices to improve the reach and inclusiveness* of Extension initiatives in the last year:

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Program Title</th>
<th>Practice</th>
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<tbody>
<tr>
<td>1._________</td>
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</table>

*Inclusive practices include, but are not limited to: moving the location to a more accessible facility or diverse community; offering materials in alternative formats such as large print, audiotape, translation; accommodating clients with disabilities; using new minority media for public notification; establishing new, more diverse network of volunteers or prospective clients to publicize and participate in program; altering content to achieve broader appeal or to reflect cultural sensitivity.
30. Indicate the composition of the committees planning programs for youth, including the 4-H Leader’s Council and related committees.

A. Committee/group name ____________________________________________________________

<table>
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<th>White</th>
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Note frequency of committee meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)

B. Committee/group name ____________________________________________________________

<table>
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Note frequency of meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)
Internal Compliance Review Guide

C. Committee/group name __________________________________________________________

<table>
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</table>

Note frequency of meetings:
○ Once a year
○ Twice a year
○ Three to six times per year
○ Other ______________________ (specify frequency)

31. Committee members are chosen in the following ways (check all that apply).

○ Elected
○ Appointed by Extension
○ Volunteer to serve
○ Other (please explain) _____________________________________________________

32. All 4-H materials carry a non-discrimination statement:

○ Yes
○ No
○ If no, please explain _______________________________________________________

33. Please list any clubs that have not achieved parity in membership:

1. __________________________________________________
2. __________________________________________________
3. __________________________________________________
Internal Compliance Review Guide

34. Please attach 4-H Club enrollment data and indicate where “All Reasonable Efforts” documentation is located. (Attach club rosters or 4-H club enrollment report and highlight clubs that have not achieved parity).
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________
   4._____________________________________________________________________________
   5._____________________________________________________________________________

35. Please list any camp sessions that have not achieved parity in the last year:
   1._____________________________________________________________________________
   2._____________________________________________________________________________

36. Please attach 4-H camp enrollment data and indicate where “All Reasonable Efforts” documentation is located.

37. Please list any special interest/non-club activities that have not reached parity in the last year:
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________
   4._____________________________________________________________________________
   5._____________________________________________________________________________

38. Please attach 4-H special interest/non-camp enrollment data and indicate where “All Reasonable Efforts” documentation is located.

39. Scholarships/fee waivers are given to 4-H camp participants to overcome economic barriers to participation: these are awarded in a non-discriminatory manner in terms of race and gender.
   o Yes
   o Based on need
   o Based on request
   o First come, first served basis
   o Other
   basis____________________________________________________________________
   o No
Internal Compliance Review Guide

- Percentage by gender not in proportion to population
- Parity not achieved in percentage awarded by race
- Other, please explain _____________________________________________________

40. Below is a representative list of materials released to the public which indicate that 4-H programs are open to all regardless of race, color, national origin (language), disability, or gender. (or see folder title ____________________________ adjacent to Central File).

1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________

41. The composition of the volunteers supporting 4-H activities is as follows: (you may attach 4-H System Report “Race/Ethnicity/Gender by Enrollment Type; Compared to Census Data” and “4-H Volunteers Affirmative Action Summary” by county)

<table>
<thead>
<tr>
<th>Race</th>
<th>White</th>
<th>African American/Black</th>
<th>Asian American/Pacific Islander</th>
<th>Other</th>
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</table>

42. List ways in which you have provided accommodation to clientele attending your programs in the last year:

1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________

Item for Reviewer Completion Only

43. We have instituted the following practices to improve the reach and inclusiveness of 4-H initiatives in the last year:

Office of Human Resources Management, AGNR
See item number 29 for examples of inclusive practices. Attach additional pages if you want to list more than three.

44. Enrollment/participation data indicate balanced participation by gender in 4-H activities (check if yes):
   - Clubs
   - Non-club activities
   - Camps
   - Special interest

45. Please explain any activity area not checked and indicate where “All Reasonable Efforts” documentation is housed.

46. Awards indicate balanced consideration by gender in 4-H competitions (check if yes):
   - Clubs
   - Non-club activities
   - Camps
   - Special interest

47. Please explain any activity area not checked:
   1. ____________________________________________
   2. ____________________________________________
Internal Compliance Review Guide

Family and Consumer Sciences

48. Indicate the composition of the committees planning programs for FCS Initiatives.

A. Committee/group name________________________________________________________

<table>
<thead>
<tr>
<th></th>
<th>White</th>
<th>African American/Black</th>
<th>Asian American/Pacific Islander</th>
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Note frequency of committee meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)
- 

B. Committee/group name ________________________________________________________

<table>
<thead>
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<th></th>
<th>White</th>
<th>African American/Black</th>
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Note frequency of meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)
- 

49. Committee member are chosen in the following ways (check all that apply)

- Elected
- Appointed by Extension
- Volunteer to serve
- Other (please explain) ________________________________________________________

Office of Human Resources Management, AGNR
50. All FCS materials carry a non-discrimination statement:
   ○ Yes
   ○ No
   ○ If no, please explain

51. Below is a representative list of materials released to the public which indicate that FCS programs are open to all regardless of race, color, national origin (language), gender, religion or disability (or see folder title___________________________________).
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________
   4._____________________________________________________________________________
   5._____________________________________________________________________________

Comments:

52. Below is a list of grassroots organizations that have received mail publicizing new FCS programs and program changes (or see folder title _____________________________).
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________

53. Attach pertinent FCS mailing lists that show the composition of clientele reached through mailings.

54. Below is a list of news media, including minority group news media, that received information on new FCS programs and program changes:
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________
   4._____________________________________________________________________________
   5._____________________________________________________________________________

55. Please list any FCS Initiatives that have not achieved parity in participation:
   1._____________________________________________________________________________
   2._____________________________________________________________________________
   3._____________________________________________________________________________
   4._____________________________________________________________________________

Office of Human Resources Management, AGNR
56. Please attach FCS Initiative participation data and indicate where “All Reasonable Efforts” documentation is located. (See Appendix D for MCERS Report titles).

57. List ways in which you have provided accommodation to clientele attending your programs in the last year:
1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________

58. Enrollment/participation data indicate balanced participation by gender in FCS initiatives.
   o Yes
   o No
   o If no, indicate where “All Reasonable Efforts” documentation is filed

Office of Human Resources Management, AGNR
59. We have instituted the following practices to improve the reach and inclusiveness of FCS initiatives in the last year (see item 29 for examples/attach pages if you need to).

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Program Title</th>
<th>Practice</th>
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EFNEP

60. Attach pertinent EFNEP enrollment and mailing lists that show the composition of clientele reached (ERS summary reports).

61. List three ways you have conducted outreach to the community to enroll EFNEP participants:
1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________

62. Please list key agencies you have partnered with to expand the reach of EFNEP and to attract or serve clients in the program:
1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________
6._____________________________________________________________________________
7._____________________________________________________________________________
8._____________________________________________________________________________
9._____________________________________________________________________________
10._____________________________________________________________________________
63. List ways in which you have provided accommodation to clientele participating in EFNEP programs in the last year (readers, interpreters, low literacy materials, materials in other languages, non-print materials, involvement of children or babysitting services during meeting, etc):

1. __________________________________________________________________________
2. __________________________________________________________________________
3. __________________________________________________________________________
4. __________________________________________________________________________
5. __________________________________________________________________________
Agriculture and Natural Resources

64. Indicate the composition of the committees planning programs for Agriculture and Natural Resources Initiatives.

A. Committee/group name________________________________________________________

<table>
<thead>
<tr>
<th></th>
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Note frequency of committee meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)

B. Committee/group name __________________________________________________________

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Note frequency of meetings:
- Once a year
- Twice a year
- Three to six times per year
- Other ______________________ (specify frequency)
65. Committee members are chose in the following ways (check all that apply):

- Elected
- Appointed by Extension
- Volunteer to serve
- Other (please explain) ___________________________________________________________________

66. All Agricultural and Natural Resources Initiatives materials carry a non-discrimination statement:

- Yes
- No
- If no, please explain__________________________________________________________________

67. Below is a representative list of materials released to the public which indicate that AGNR programs are open to all regardless of race, color, national origin (language), gender, religion or disability (or see folder title__________________________________________).

1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________
Comments:_____________________________________________________________________

68. Below is a list of grassroots organizations that have received mail publicizing new AGNR programs and program changes (or see folder title__________________________________).

1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________

69. Attach pertinent AGNR mailing lists that show the composition of clientele reached through mailings.

70. Below is a list of news media, including minority group news media that received information on new AGNR programs and program changes.

1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________

Office of Human Resources Management, AGNR
71. Please list any AGNR Initiatives that have not achieved parity in participation:
1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________

72. Please attach AGNR Initiative participation data and indicate where “All Reasonable Efforts) documentation is located. (MCERS) Demographic Report by County and Initiative). Include Urban Horticulture and Master Gardeners.

73. List ways in which you have provided accommodation to clientele attending your programs in the last year:
1._____________________________________________________________________________
2._____________________________________________________________________________
3._____________________________________________________________________________
4._____________________________________________________________________________
5._____________________________________________________________________________

74. Enrollment/participation data indicate balanced participation by gender in AGNR initiatives.
   o Yes
   o No
   o If no, indicate where “All Reasonable Efforts” documentation is filed:
     o _______________________________________________________________________

Item for Reviewer Completion Only

75. We have instituted the following practices to improve the reach and inclusiveness of AGNR initiatives in the last year (see item 29 for examples/attach pages if you need to):

<table>
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<tr>
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Office of Human Resources Management, AGNR
Internal Compliance Review Guide

ADA Self-Evaluation

Each UME County Office should complete this brief ADA self-evaluation on an annual basis and file a copy in the Central Civil Rights File after forwarding a copy to their ADO. Please keep ADO apprased of deficiencies.

ADA regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable.

The process of determining what changes are readily achievable is not a one-time effort; access should be re-evaluated annually. Barrier removal that might be difficult to carry out now may be readily achievable later.

The ADA barrier removal requirement (1995) for existing facilities supersedes less stringent local or state codes.

Instructions: Please check all statements to which you can answer “yes”.

Access Route, Parking and Entrances

- The access route to the entrance is free of barriers
- There is a ramp to ensure access for those using walkers, wheelchairs, crutches, etc.
- The ground on the access route is even and the surface is not slippery
- There are handicapped parking spaces available
- These spaces are designated with signs
- These spaces are designated with pavement markings
- All inaccessible entrances have signs indicating the location of the nearest accessible entrance
- The only accessible entrance is a service entrance.

Door and Elevators

The door is equipped with (check all that applies):

- Automatic opener
- A bell
- An intercom
- Level handle
- Handle at low spot accessible to person using a wheelchair
- Doorknob at normal height
Internal Compliance Review Guide

- Low threshold to allow wheelchair access
- The door is wide enough to allow wheelchair access
- There is a working elevator
- There are ramps, lifts, or elevators to all public levels
- There are visible and audible door opening/closing indicators
- The elevator’s emergency intercom or phone is usable without voice communication
- The elevator’s emergency intercom/phone is identified by Braille and raised letters

Restrooms, Fountains and Meeting Spaces

- At least one restroom is fully accessible
- Lever handles throughout
- Space to turn and maneuver wheelchair
- Lavatory height is accessible
- Toilet height is accessible
- There is at least one drinking fountain that is wheelchair accessible
- There is at least one meeting room that is accessible for public functions
- Meeting space(s) has aisles wide enough to accommodate wheelchair

Communications Accommodation

There is an emergency warning system

- Equipped with flashing lights
- Equipped with audible signals
- Maryland Relay is available
- Signs indicate that relay services are available
- Signs indicate website addresses to access materials and information
- Brochure racks are located so as to be accessible to someone using a wheelchair
- Publications are available in other formats:
  - Large print
  - Braille
  - Audiotape
  - Captioned video
  - Dubbed/voiced-over video
  - Electronic media/web-based versions
  - Other

Adapted from “Checklist for Existing Facilities version 2.1,” Adaptive Environments Center, Inc. for the National Institute on Disability and Rehabilitation Research, August 1995.
Internal Compliance Review Guide

**TITLE IX Self-Evaluation (County and Program Level)**

Each UME County Office should complete this Title IX self-evaluation on an annual basis for all Initiatives/Program Areas and file a copy in the Central Civil Right File Title IX Folder. Please inform ADO of deficiencies and issues during the interim review.

**Check all to which the answer is ‘yes’**

- There is a copy of USDA’s Title IX Plans and Procedures booklet in the Central Civil Rights File
- Faculty follow program planning and evaluation guidelines in the USDA’s Title IX Plans and Procedures booklet to prevent gender discrimination in programs
- Faculty and staff are informed of Title IX requirements and know how to achieve compliance
- Faculty and staff understand internal resolution procedures for filing a complaint (EEO/AA Advisors)
- Procedures for handling complaints are included in volunteer training and are known to clientele and others involved in our programs.
- We review all practices as they relate to gender discrimination at the county and program level on a regular basis and integrate improvements
- We have reviewed the Internal Compliance Review County Self-Evaluation items related to gender non-discrimination and advise “Internal Compliance Review Response Plans” (form AA-AF1) for any Initiative or program areas that need correction.
- We have reviewed MCERS Reports for the past Internal Compliance Review year and have developed plans (AA-AF1) for any Initiatives that have not achieved gender parity
- Faculty are documenting “All Reasonable Efforts” for any Initiatives not currently achieving gender parity

➢ Please attach AA-AF1’s as indicated by statements you cannot check off, and review Title IX compliance on an annual basis.
➢ File in Central File folder titled “Copy of Title IX Equal Opportunity USDA-AR Booklet” with copy of last county review Self-Evaluation Questionnaire (this contains many Title IX questions).
Internal Compliance Review Guide

Update of Central File and Internal Compliance Review Materials

Keep the following information and file in the following title folders (see attached index):

1. UME Affirmative Action Plan should be kept in current Affirmative Action Plan Central File folder – 2001 plan was accepted in 2003 by USDA.
3. County maps showing 4-H clubs locations should be updated for the 2000 Census and posted. No other maps are needed: use MCERS reports with county demographic percentages.
4. Keep all green Central Civil Rights folders furnish during 2003-2004 as part of Central File Cleanup seminars. Follow instructions in the index folder for filing the five items generated by the county office (e.g., follow up letters for ADO interim reviews and descriptions of what the county has done to correct deficiencies from Internal Compliance Reviews). Ensure that job descriptions and Plans of work are filed adjacent to the Central File.

EXAMPLE: Keep five years of records. Note that compliance reviews are done for the prior year.

Keep ALL Federal Review Records generated by actual federal review audits (done by USDA), including the recommendation from the UME Federal review done in 1998.

Archive anything prior to Internal Compliance Review Year 2002 that you feel uncomfortable throwing away. This means putting old files in labeled boxes.

All Central File documents are available on the web. The point of having a Central File is to provide Civil Rights reference materials to Faculty and Staff: ensure that everyone knows where the file is and what is in it! Reviewers will be checking to ensure that all Faculty and Staff are familiar with the file and its contents.

Files the county needs to provide documentation for:

1. “List of Training Received by Faculty and Staff” (AA-AF15)
2. Internal Compliance Review County Plans and Reports (last four years)
3. Racial and ethnic data for county population

Office of Human Resources Management, AGNR
Internal Compliance Review Guide

- Year 2000 Census figures
- Only 4-H Clubs require a map of locations

4. Reports showing program reach (MCERS county-level program summary)
5. EAC member list by race and gender; meeting minutes; agendas, (AA-AF8)
6. Organizational Open Membership Statement Letters (nondiscrimination letters from partnering organizations updated to no more than five years old)
7. ADA Self-Evaluation for your office (every three years)

Throw away county population data maps based on the 1990 Census. Ensure that you have a 4-H club locations map based on the 2000 Census. Precinct data is no longer being used as of the 2001 review cycle. Use county population demographics.

Note: The “Interim Compliance Review Worksheet” (checklist) that the ADO completes should be kept in a separate folder from Internal Compliance Review Reports. Letters related to these interim reviews by ADO should also be filed with the interim review checklist in the AED or CED’s office.

Access all materials needed for reviews on the Human Resources Menu at the AGNR Administrative Service webpage:

http://agnr.umd.edu/administrative-services/ume-compliance

Refer to the Central Civil Rights file on the web for latest updates by clicking on “Internal Compliance Review”

All FORMS for Internal Compliance Reviews are also in this main collection.