



United States
Department of
Agriculture



Cooperative State
Research, Education,
and Extension Service

Washington, DC
20250

QCT 01 2C:3

Dr. Thomas E. Fretz
Dean and Director
Maryland Cooperative Extension Service
University of Maryland at College Park
1104 Symons Hall
College Park, Maryland 20742-5565

Dear Dr. Fretz:

Thank you for the opportunity to review a very progressive process in addressing current issues relating to Civil Rights and Affirmative Action in your MCE Affirmative Action Plan (AAP). We commend you and your staff for the care and evaluative process that went forth in developing a forward look in assuring comprehensive coverage in outreach in your program delivery methodology.

Your AAP established, in a comprehensive format the standards and procedures which govern employment and program practices in the operation of your Extension programs. Within the context of equal opportunity for both employment and program the law requires the officials of an organization to make employment decisions, to do more than ensure employment neutrality and program inclusion with regard to race, color, religion, sex, national origin, and disability. The Plan requires additional effort made to recruit, employ, promote qualified members of under represented groups and to conduct conclusive outreach efforts in programming in Extension. The emphasis in your AAP is aggressive and comprehensive in its approach to insuring comprehensive employment and program coverage, and is commendable. We are especially excited about your parity definition and the application of that process to assure the ability to determine good program methodology and to assess program outreach requirements. Further, we agree with your process of determining "all reasonable efforts" that insure that program inclusion involves minority and non minority clientele. Your process is further defined in your system of "self-evaluation." While these techniques and systems are progressive, they are not overburdening and appear to be reasonable in the ability to accomplish. The inclusion of the Limited English Proficiency Policy (LEP) is both current thinking and defined. Your emphasis on the Spanish-speaking population is most commendable. A review of your LEP Policy demonstrates its flexibility, in the framework there is a system to insure that as other racial/ethnic groups, with English as a second language, become a part of the various Maryland communities they can aggressively become a part of the Extension program. The achievements of the requirements noted in your AAP, successfully implemented, should result in a strengthened equal opportunity program and a more diverse workforce.

Dr. Thomas E. Fretz

Page 2

The Plan is approved. The Cooperative State Research, Education, and Extension Service stands ready to assist you, as needed, in the implementation of this Plan. Again, thank you and your staff for continued support of the Department of Agriculture's nondiscrimination rules and regulations.

Sincerely,

ftfl/JJ

Colien Heff; a J r
Administrator



MARYLAND COOPERATIVE EXTENSION AFFIRMATIVE ACTION PLAN

Maryland Cooperative Extension jointly plans and operates one program by the 1862 and 1890 institutions. Policies and procedures are determined and implemented through a single management organization and delivery system. Programs are planned and conducted in response to clientele needs and each institution participates in accordance with its respective resources and staff competencies. MCE is dedicated to providing high quality and effective educational programs that are in compliance with all civil rights, equal employment and affirmative action requirements.

The purpose of the guidelines in this document is to strengthen programming and ensure compliance with the requirements of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendment of 1972; Sec. 504 of the Rehabilitation Act of 1973; The Americans with Disabilities Act (ADA) of 1990; The Civil Rights Act of 1991; and, Executive Order 13166 (2000).

Approvals:

Dr. Thomas A. Fretz, Dean & Director
University of Maryland, College Park
College of Agriculture and Natural Resources

Date

Dr. Henry Brooks, 1890 Administrator
University of Maryland, Eastern Shore

Date

TABLE OF CONTENTS

Preface, iii

- I. **Actions to Ensure Maryland Cooperative Extension Faculty Conduct Programs in Compliance with Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendment of 1972; Sec. 504 of the Rehabilitation Act of 1973; The Americans with Disabilities Act (ADA) of 1990; The Civil Rights Act of 1991; and Executive Order 13166 (2000).**
- II. **MCE Non Club Based Programs Compliance with Title VI and Title IX and Program Accessibility, 4**
 - A. **Balanced Participation Principles, 5**
 - B. **Balanced Participation Parity, 5**
- III. **MCE Club Based Program Compliance With Title VI and Title IX And Program Accessibility, 6**
 - A. **Balanced Membership Principles, 6**
 - B. **Balanced Membership Parity, 6**
- IV. **Actions to be Taken to Increase/Maintain the Diversity of Special Interest and School Enrichment Programs, 9**
- V. **Actions to be Taken to Increase/Maintain the Diversity of the MCE 4-H Camping Program, 9**
- VI. **Determination of "All Reasonable Efforts", 11**
- VII. **Compliance Review Team Committee Plans to Assure Compliance With Title VI and Title IX and Program Accessibility, 13**
- Viii. **Review and Forwarding of Progress Reports, 13**
- IX. **Plan of Implementation to Ensure Nondiscrimination in Employment Practices, 14**
- X. **EEO/AA Advisors, 17**
- X I. **Limited English Proficiency,**
 - Appendix, 18
 - A. **Maryland Cooperative Extension Reporting System (MCERS) Overview [county report sample], 19**
 - B. **4-H System Reports User Guide Attachment, 23**

C.	MCE Internal Compliance Review Procedural Manual Attachment, 24
C.	"All Reasonable Efforts", 25
D.	Public Notification and Media Methods, 28
E.	Affirmative Action Documents and Forms, 32
F.	MCE Internal Compliance Review Schedule, 34
G.	Affirmative Action Interview Record, 35
H.	MCE EEO/AA Advisor Policy, 36
I.	Limited English Proficiency Policy,39
J.	MCE Diversity/Affirmative Action Glossary,44



Maryland Cooperative Extension Affirmative Action Plan

Preface

The Director of Maryland Cooperative Extension (MCE) signed the Plan for Compliance document on February 24, 1984 which stated actions needed to remedy the findings of deficiencies identified in the compliance review reports conducted by the Extension Service United States Department of Agriculture. The Plan for Compliance with Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972 was approved on March 1, 1984 by the Director of Science and Education and the Administrator of the Extension Service/USDA. This agreement outlined actions that were needed for a twelve month period to achieve full civil rights compliance in the MCE programs.

These guidelines outlined in the Maryland Cooperative Extension Affirmative Action Plan have been revised and will become effective November 1, 2000 and will be followed by all Extension Faculty and staff, volunteers and leaders. MCE will revise the Affirmative Action plan from time to time with USDA approval.

It is the policy of the University of Maryland and Maryland Cooperative Extension that all persons have equal opportunity and access to programs and facilities without regard to race, color, gender, religion, national origin, sexual orientation, age, disability, or marital or parental status. The University of Maryland is an Affirmative Action Employer. This material may be available in alternative formats. Inquiries pursuant to this plan and related policies and procedures should be addressed to: Director Human Resources Management, College of Agriculture and Natural Resources, 1122 Symons Hall, College Park, Maryland 20742.

Prepared by the College of Agriculture and Natural Resources, Office of Human Resources Management, College Park Maryland.

i **Actions to Ensure Maryland Cooperative Extension Faculty Conduct Programs in Compliance with Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendment of 1972; Sec. 504 of the Rehabilitation Act of 1973; The Americans with Disabilities Act (ADA) of 1990; The Civil Rights Act of 1991; and, Executive Order 13166 (2000).**

C. MCE administrators are expected to show strong leadership and commitment to ensure MCE's compliance with Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendment of 1972; Sec. 504 of the Rehabilitation Act of 1973; The Americans with Disabilities Act (ADA) of 1990; The Civil Rights Act of 1991; and, Executive Order 13166 (2000).

B. Each MCE faculty, staff and volunteer will be expected to exhibit a strong commitment to furthering the educational purposes of the Maryland Cooperative Extension in compliance with Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendment of 1972; Sec. 504 of the Rehabilitation Act of 1973; The Americans with Disabilities Act (ADA) of 1990; The Civil Rights Act of 1991; and, Executive Order 13166 (2000).

C. MCE advisory committees must have significant roles in MCE programs, active minority participation, and gender diversity.

1. Each County/City must have an Extension Advisory Council (EAC) and maintain the following records in County/City central Affirmative Action file.

a. Membership:

Maintain a record of membership including contact information, race, gender and ethnicity of each member, and term of committee. EAC members are to be recorded on form AA-AFB.

b. EAC meeting attendance and meeting minutes.

2. The EAC must have an active role in program development.

3. All Extension Educators must document efforts made to ensure active participation of minorities on all committees.

D. All printed materials at the County/City and State level must contain the nondiscrimination and program accommodation statement. See Appendix D.

E. MCE will make all reasonable efforts to reach minority clientele using all relevant communication techniques. MCE educators per USDA regulations 7 CFR 15 must retain documentation on clientele reached. This documentation must also include demographic information when known.

F. Public Notification:

A public notification procedure in all Extension program areas must be implemented which includes specific goals and procedures to notify the

potential recipients of program availability and the requirements of nondiscrimination on the basis of race, color, gender, religion, national origin, sexual orientation, age, disability, or marital or parental status and identify actions to advise minority clientele of program availability.

- i. Announcements of educational programs conducted by MCE will be posted in public places frequented by all racial groups.
 2. Mass media, including radio, newspapers, and television will be used when possible to inform potential beneficiaries of the program and opportunity to participate.
 3. Minority clientele will be identified and sent personal letters and circulars when feasible inviting them to participate in planned programs (date, time and place of meeting will be included).
 4. County/City Extension faculty will make personal visits when feasible to a representative number of minorities in the community served by the program to encourage balanced participation.
 5. Community groups and organizations will be contacted by Extension faculty and /or club or program leader and members to assist in informing potential minority participants of available programs and clubs of MCE.
 6. Display the "...And Justice for All" poster in offices and other facilities used by Extension in serving the public. (The procedure for filing a complaint should be clearly and completely communicated to the general public).
 7. Inform organizations, groups, associations, etc. with whom Extension cooperates in conducting educational programs or activities, of the nondiscriminatory provision of Cooperative Extension System.
 8. Use nondiscriminatory statements, photos, and graphics to convey the message of equal opportunity in informational materials released to the public.
 9. Use gender-neutral language-eliminate gender discrimination, sexually biased, and sex-stereotypical language from materials used in educational programs.
- G. All announcements of state, regional, multi-County/City and County/City meetings sponsored or co-sponsored by Maryland Cooperative Extension will include a statement regarding nondiscrimination and program accessibility and identify a contact point for persons requesting reasonable accommodations. The statement will also state that the meeting is open to all people without regard to race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin.

1. The Assistant Directors will ensure all state specialists within the program unit are informed of this requirement and may request a copy of any announcement of public meetings which are either sponsored or co-sponsored by the specialist (a County/City or multi-County/City event being conducted at the request of County/City faculty will be the responsibility of the County/City faculty and not the specialist).
 2. Regional Specialists are responsible for ensuring that all public announcements relative to meetings and program participation will include the nondiscrimination and program accessibility statement for meetings either sponsored or co-sponsored by the regional specialist (a County/City or multi-County/City event being conducted at the request of County/City faculty will be the responsibility of the County/City faculty and not the regional specialist). Each regional specialist will be accountable for monitoring and maintaining these announcements where applicable.
 3. County/City faculty are responsible for ensuring that all public announcements relative to meetings and program participation will include the nondiscrimination and program accessibility statement. Sample copies of such announcements will be collected and maintained for civil rights audit purposes. Each County/City faculty member will be accountable for monitoring and maintaining these announcements.
- H. All MCE personnel (Faculty and staff) and volunteers are instructed not to provide assistance to any organization or private group that excludes any person from membership or participation because of race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin.
1. A document of nondiscrimination must be signed by organizations who receive MCE programs. Copies of the signed statement will be maintained by the County/City Extension Director in the central files. These signed documents must be renewed every 5 years from the date of signing.
 2. All Extension Clubs must sign the letter of nondiscrimination (See appendix F) and a copy will be on file in the club affirmative action files. These documents must be retained and renewed *every* 5 years.
- I. All MCE faculty members' position descriptions must include a Diversity and Affirmative Action initiative objective. The individual faculty member's Annual Faculty Report (AFR) must include language to ensure that "all reasonable

efforts" are made to encourage balanced participation by minority populations in all aspects of MCE programs.

1. For state faculty position descriptions and individual plans/report, it will be the responsibility of the Assistant Director for the program area to monitor position descriptions and ensure that individual plans include an affirmative action objective and that the objective contains sufficient detail to establish active efforts to encourage open participation by minority group members.
 2. The Regional Extension Director is responsible for ensuring County/City faculty position descriptions include a Diversity and Affirmative Action initiative objective. The Regional Extension Director, will be responsible for ensuring that each County/City faculty member has included a valid and pro-active affirmative action and diversity objective in their Annual Faculty Report.
- J. All County/City Faculty must keep an accurate record of all educational face-to-face contacts, meetings, and events and record attendance by race and gender. County/City Faculty will use the Maryland Cooperative Extension Educational Reporting System (MCERS) and the 4-H Enrollment System for recording the above contacts. State and Regional Specialists must keep contact information via MCERS. MCE program data is recorded in MCERS on a program initiative basis. Comparisons to the population will be done on a program initiative basis. Reports are generated on an instructor, County/City or State basis. 4-H will utilize reports from the 4-H Enrollment System. EFNEP will utilize reports from the EFNEP Reporting System--- ERS (See appendices A, B and F).
- K. Training and Reference
MCE County/City offices shall maintain a list of Affirmative Action documents for training and reference:

II. MCE Non-Club Based Programs' Compliance with Title VI and Title IX and Program Accessibility

This document provides actions to be taken in MCE non-club based programs to comply with the Affirmative Action guidelines to ensure minority participation. These programs include initiatives in Agriculture and Natural Resources, Family and Consumer Sciences and other program areas which may be identified by MCE. The community has been defined as the County/City for MCE non-club based programs. Population data used to review clientele's participation each program initiative will be identified by the Assistant Director/sand will be updated as needed. See appendix A.

Balanced Participation Principles:

Commitment to the accomplishment of "balanced programs" is based upon the following principles:

- (1) all MCE programs are open to all eligible citizens without regard to race, color, sex, disability, religion, age, sexual orientation, national origin, or marital or parental status.
- (2) participation in MCE programs is voluntary, and with aggressive efforts by Extension personnel and volunteers balanced participation can be achieved; and
- (3) the goal is to have participation contacts in reasonable proportion to the distribution of minority and gender groups in the potential clientele base.

Balanced Participation Parity:

A MCE program initiative 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 base. 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.

Self-Evaluation:

MCE faculty, County CEDs and REDs should conduct self-evaluations for parity by 1) analyzing MCERS demographic reports, reviewing documentation of "All Reasonable Efforts" (ARE) and using the ARE guide in Appendix D.

A. Actions to be Taken to Determine Program Participation

1. Faculty should review program participation data recorded in MCERS by MCE initiative for parity. REDs will review program participation data by MCE initiative with the faculty in the fall as part of the Affirmative Action Review conducted by REDs.
2. The data must be kept up-to-date, readily accessible, and/or filed in each faculty member's Affirmative Action file to be submitted as requested.

B. When parity is not achieved, "All reasonable efforts" must be documented and available in County/City files for review purposes. Extension Counties and

Baltimore City will maintain Affirmative Action files as needed. (See section VI, "Determination of "All Reasonable Efforts")

- C. CED's and RED's will use "Internal Compliance Review Response Plan" (form AA-AF 1) to respond to and track progress on review recommendations.

III. MCE Club Based Program Compliance With Title VI and Title IX And Program Accessibility

This document details actions to be taken to integrate Extension Club based programs with significant minority populations. The intent is to make "all reasonable efforts" to achieve and maintain "balanced membership" for all racial groups in Extension Clubs. A community is defined as the County/City. Individual counties may define sub-areas of the County/City with supporting demographic data. Population data for each club based program will be identified by the Assistant Director and will be updated as needed. See 4-H System Reports User Guide (Appendix B).

Balanced Membership Principles:

Commitment to the accomplishment of "balanced club membership" is based upon the following principles:

- (1) all MCE club based programs are open to all eligible citizens without regard to race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin;
- (2) participation in MCE club based programs is voluntary, and with aggressive efforts by Extension personnel and volunteer 4-H leaders balanced participation can be achieved; and
- (3) the goal is to have participation contacts in reasonable proportion to the distribution of minority and gender groups in the potential clientele base.

Balanced Membership Parity:

An MCE club program 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 base in the community. This is the minimum desired baseline for minority program participation. This ratio 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 clubs within integrated communities must have a "balanced membership" or have documentation that "all reasonable efforts" to integrate membership have been ongoing and in good faith.

Self Evaluation:

MCE faculty, County CEDs and REDs should conduct self-evaluations for parity by 1) analyzing MCERS demographic reports, reviewing documentation of "All Reasonable Efforts" (ARE), and using the ARE guide in Appendix D.

A. Actions Taken to Determine Location and Racial Composition of MCE Clubs.

1. Faculty should review program participation data recorded in MCERS by MCE initiative for parity. REDs will review program participation data by MCE initiative with the faculty in the fall as part of the Affirmative Action Review conducted by REDs.
2. Identify the Clubs in each area and post on the County/City map. This must kept up-to-date. The map should be retained in the Extension Office. The enrollment data must be recorded in the "4-H Members Affirmative Action Summary" and printed out from the 4-H enrollment system database.
3. Identify the club leaders by units, indicate the county or sub-area location, race, and sex of the individuals and attach to the "4-H Volunteers Affirmative Action Summary Report" (from the 4-H enrollment database).
4. The reports should be kept in the program Affirmative Action files and submitted as requested.

B. Action to be Taken to Support Integrated Clubs with "Balanced Membership"

1. All MCE clubs must have or adopt bylaws that include the following statement of non-discrimination: "Membership in this club and participation in activities and events are open to all citizens without regard to race, color, gender, religion, national origin, sexual orientation, age, disability, or marital or parental status ." The bylaws containing the statements must be filed by clubs in the County/City Extension Office.
2. The County/City Extension Director will inform, in writing, the newly appointed club leaders in the County/City of the Maryland Cooperative Extension of the commitment to comply fully with Title VI and Title IX and program accessibility requirements, as they relate to the operations, programs, and Extension sponsorship on a non-discrimination basis. Copies of these letters are to be maintained in the County/City Extension Office central files.
3. Meetings should be held during the year with the volunteer leaders in the County/City in order to assist the leaders in understanding the development of goals and strategies for achieving "balanced membership" and inform the volunteers of ways to document "all

reasonable efforts". Each volunteer leader must sign the enrollment form which states that the membership is open to any youth regardless of race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin.

4. A copy of the signed volunteer enrollment form will be filed in the club file ;"Sample Letter for Clubs" (Non-discrimination).
5. All new clubs organized in multi-racial communities must make "all reasonable efforts" prior to their formation as an Extension sponsored and assisted club to have a racially balanced membership. Any club in a multi-racial community which seeks to become sponsored by MCE and which does not have a racially balanced membership must establish that it used "all reasonable efforts" to interest minority individuals in joining the club. Before any new proposed club may be sponsored, the faculty member shall certify in writing to the County/City Extension Director and Regional Extension Director what efforts the club made to get racial minorities and non-minorities to join the club. The faculty member should document all reasonable efforts. The County/City Extension Director and Regional Extension Director determine if "all reasonable efforts" have been made before the club will be eligible to receive MCE sponsorship and assistance. The County/City Extension Director shall maintain and retain all records of the "all reasonable efforts" documented by the County/City faculty member and the club. This will be certified by the RED. Once a club is established, it will be under a continuing obligation to use "all reasonable efforts" to recruit racial group members not represented or under represented for membership in the club.
6. It will be inconsistent with this plan for any Maryland Cooperative Extension employee or volunteer to encourage or assist any person to join a Club on a non-participatory basis for the purpose of meeting any goal established under this plan. Further, the Maryland Cooperative Extension Service shall not encourage or condone the above.

C. Action Taken to Integrate Single Race Clubs Located in Integrated Communities.

1. MCE faculty and volunteer leaders will make "all reasonable efforts" (to be documented) to obtain a racially balanced membership as previously described. A signed statement by the Club Leader indicating the club does not discriminate on the basis of race, color, gender, religion, national origin, sexual orientation, age, disability, or marital *or* parental status must be in the club file. This signed statement

is renewed every five years from the date of the signing or when the leadership changes.

2. Officers and organization leaders of all single race clubs located in integrated communities should be visited by County/City faculty to assist the leader and members in understanding civil rights guidelines and the definition of "community" for purposes of program delivery. These visits should be done during fall and winter. The faculty member will assist the club in making program plans and help in achieving this end result. See requirements for "all reasonable efforts" on the following pages. In the case where the volunteer does not document "all reasonable efforts" it is the ultimate responsibility of the Extension Faculty to document "all reasonable efforts" or terminate the club.
3. At the end of the program year, Clubs which remain of one race in an interracial community should be encouraged to merge with another club in the same community to form a new club more representative of the racial makeup of the community population. This will be carried out only when reasonable and practical.
4. All clubs identified as eligible for sponsorship by Maryland Cooperative Extension that remain single race will demonstrate with sufficient documentation that it made "all reasonable efforts" to integrate membership (see section VI "Determination of All Reasonable Efforts"). The County/City faculty member, County/City Extension Director and the Regional Extension Director shall be initially responsible for making the determination to terminate clubs not meeting the requirements of this plan. "All Reasonable Efforts" will be evaluated in fall of each year and termination letters will be mailed by November 30.
 - a. Clubs that are terminated must have a written statement of the action containing the names, membership, racial composition of each club, and date of action. A registered letter should be sent to the volunteer leader of the club indicating that sponsorship and further assistance from the Maryland Cooperative Extension is being denied. This letter should be signed by the County/City faculty member, County/City Extension Director, and the Regional Extension Director. All termination letters must be mailed by November 30. Copies of the registered letter and accompanying statistical data concerning the club's membership

should be forwarded to the Director of Human Resources and the Associate Director.

- b. For those clubs which have demonstrated "all reasonable efforts" to achieve an integrated membership, yet have not attained such a membership, MCE shall continue to provide full Extension sponsorship and assistance. However, continued sponsorship and assistance are expressly contingent upon each club's agreement to continue to use and document "all reasonable efforts" to recruit under - represented racial group members for membership in clubs, and continued compliance with all of the requirements of the plan. The faculty shall maintain records of the club name and location, membership, and composition by race and gender of each club.

IV. Actions to be Taken to Increase/Maintain the Diversity of Special Interest and School Enrichment Programs

MCE is committed to open access to all programs. "All reasonable efforts" must be followed to assure that all educational programs involve minorities. MCE faculty, staff and volunteers must ensure that efforts are made to include minorities in special interest and school enrichment programs. See the "all reasonable efforts" requirements in section VI.

V. Actions to be Taken to Increase/Maintain the Diversity of the MCE 4-H Camping Program

- A. County/City 4-H faculty will implement a 4-H member awareness and recruitment program designed to achieve more balanced minority participation in the 4-H camping program. The awareness and recruitment will begin at least 60 days prior to the beginning of the camp. These efforts will include, but not be limited to, the following steps:
 1. Conduct orientation/planning sessions involving 4-H faculty and 4-H volunteer leaders, for the purpose of attaining a more racially balanced participation of 4-H members in 4-H camps.
 2. Announce 4-H camping program schedules in a comprehensive manner noting that the camps are open to all 4-H Club members regardless of race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin.
 3. Post announcements in public places and locations frequented by youth.
 4. Place announcements in 4-H and Extension newsletters.

5. Take steps to ensure that minority 4-H youths and families on Extension's mailing lists receive 4-H camping schedules and announcements.
- B. Prior to the beginning of 4-H camp the 4-H Educator will develop a method for housing 4-H camping participants which will result in cabins being racially integrated.
- C. A copy of the methods used in item 1 and 2 and a record of campers' housing indicating race should be filed in the County/City AA file.

Vi. Determination of "All Reasonable Efforts"

As a matter of policy, the Maryland Cooperative Extension personnel and volunteer staff must make "all reasonable efforts" (to be documented as outlined below) to involve and increase participation of minorities in Extension Educational programs. The "all reasonable efforts" will be made to obtain participation representative of the community population. All County/City Faculty must document "All Reasonable Efforts".

A. 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.

B. When Required

1) "All Reasonable Efforts" (ARE) need to be documented when Extension program initiative/s, including individual 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. "All reasonable efforts" will continue to be conducted until the program initiative/s or club membership reflects the racial composition of the community and "balanced membership" should be maintained. 2) Document ARE when new clubs are formed, "all reasonable efforts" must be conducted and documented prior to formal organization of the club and 3) "All reasonable efforts" are conducted to integrate all Extension sponsored meetings and committees.

C. Responsibility

It is the responsibility of the County/City Extension Faculty to conduct "all reasonable efforts". Lay leaders and members may volunteer to assist and should be encouraged to do so. Written records of visits, etc. made by volunteer leaders and members may be used as

documentation and retained by Extension for faculty reports and audit purposes.

D. Records

"All reasonable efforts" must be documented by Extension faculty and the documentation kept in County/City files for review purposes.

Steps included in "All Reasonable Efforts" (See Appendix D for the "All Reasonable Efforts Guide"):

1. Conduct planning sessions involving faculty, staff and where applicable volunteer and prospective leaders representing various racial groups participate for the purpose of 1) attaining a comprehensive program with relevant projects and activities, and 2) involving a racially "balanced clientele".
2. Take action on a continuing basis to ensure that all people, especially minorities, are aware of the MCE programs.
3. Mailing Lists:
Efforts will be made to identify and include in Extension's mailing lists all, or as many as possible, minority farmers and other minority clientele. Sources will include participants in Extension sponsored events, other USDA agencies, referrals from other minorities, and personal contacts.
4. Demonstrations:
When field demonstrations are planned, efforts will be made to assure that they are also held in racially mixed and minority communities. Every effort will be made to have demonstrations on facilities owned by minorities if such facilities are available.
5. Personal Contacts:
Personal contacts via personal letters, phone calls and visits to clientele will be used to encourage minorities to participate in Extension sponsored events.
6. Referrals:
Extension will request other agencies, businesses, organizations and individuals, especially minorities who have contacts with minority farmers on agriculture matters to encourage their participation in Extension sponsored events.
7. Extension Events:
Extension sponsored meetings and events will be held in convenient locations and facilities in the County/City that will encourage minority farmers to participate. Site is to be accessible to persons with disabilities and program announcements will contain a contact point for requesting accommodations for persons with disabilities.

8. Work with leaders to encourage them to plan joint activities with clubs of different or mixed race.
9. When conducting club membership drives and promotional programs, emphasize reaching the unreached, specifically the minority group members.
10. Conduct volunteer leaders recruitment activities to increase participation of the minorities most inadequately represented in the present leadership.
11. Select meeting place (s) that is acceptable to all interested clientele. This may include rotation of meeting locations.
12. Announce meetings on a regular basis stating that the meeting is open to all individuals regardless of race, color, gender, religion, national origin, sexual orientation, age, disability, or marital or parental status. Include time of the meeting, place and date to ensure that all people, especially minorities, are aware of the meeting.

E Self Evaluation Purpose

The purpose of "all reasonable efforts" self evaluation is to determine if MCE clubs, and Extension programs reflect the racial composition of the identified population and if "All reasonable efforts" have been documented. The evaluation is done by Regional Extension Directors and/or County/City Extension Directors with MCE faculty to determine if service will be continued for the following year. The reviews and evaluation will be done by the REDs and CEDs throughout the year.

VII. Compliance Review Team Committee Plans to Assure Compliance With Title VI and Title IX and Program Accessibility

- A. The Director of MCE has appointed a compliance review committee and implemented a systematic procedure for reviewing MCE programs to assure the requirements of this MCE Affirmative Action Plan are met. Each team shall consist of three persons. All units will be reviewed on a four year rotation system. See Appendix G.
- B. The Internal Compliance Review Committee is an official team of state and field faculty of Maryland Cooperative Extension (MCE). The responsibility of the team is to ensure that MCE meets the affirmative action requirements of:
 - 1.) Title VI of the Civil Rights Act of 1964;2.) Title IX of the Education Amendment of 1972;3.) Sec. 504 of the Rehabilitation Act of 1973;4.) The Americans with Disabilities Act (ADA)of 1990; 5.) The Civil Rights Act of

1991; and, 6.) Executive Order 13'166. Committee members are tenured faculty members employed by MCE and appointed by the Director of MCE.

- c. The Internal Compliance Review Team will verify that the requirements set forth in the MCE Affirmative Action Plan are being carried out and that required program documentation is being maintained.

VIII. Review and Forwarding of Progress Reports

The Director for MCE shall review the progress reports of the Compliance review team. The reports are also reviewed by the Director, Human Resources. The Associate Director and Regional Extension Directors are responsible for ensuring that actions are taken to correct noncompliance. If it is determined that the requirements of the Plan have not been met, the Director shall take action forthwith to correct the noncompliance.

IX. Plan of Implementation to Ensure Nondiscrimination in Employment Practices

- A. The legal guidelines of the Equal Employment Opportunity Program under USDA Rules and Regulations, Title 7 CFR, part 18, are twofold:
1. To eliminate all existing discriminatory conditions in all aspects of employment, whether purposeful or inadvertent. This requires a careful and systematic examination of all employment policies and practices to assure their continuing operation does not function to the detriment of any persons on the grounds of race, color, gender, disability, religion, age, sexual orientation, national origin, or marital or parental status.
 2. To develop and implement affirmative actions which will be taken to recruit, employ, and promote qualified members of groups formerly restricted or excluded, even if that restriction or exclusion cannot be traced to particular discriminatory actions on the part of the Cooperative Extension. Such positive action will overcome the neutrality in employment and provide positive, results-oriented steps toward the elimination of employment barriers to minorities.

The proposed action under this section is to strengthen and renew efforts to assure equal employment opportunity in all aspects of MCE's operations affecting the assignment, placement, development, advancement, and overall treatment of MCE's employees, thereby assuring that Extension program clientele have full access to and are benefitting from the technical competency of MCE personnel without regard to race, color, gender, disability, religion, age, sexual orientation, marital or parental status, or national origin. Access to employment opportunities is an integral part of the day-to-day management of the MCE system. One of the major commitments to affirmative action is to assure that meaningful progress is a characteristic of the affirmative action program. To achieve this and other objectives, it is essential that.

all MCE managers and supervisors actively carry out their responsibilities in this important area.

B. Non-Exempt Hiring (County/City Offices)

To ensure consistency in hiring procedures of all non-exempt employees the County/City Extension Directors must adhere to University of Maryland Policies; follow the procedures outlined in the University of Maryland Procedures and Guidelines for Conducting Searches at The University of Maryland; and follow College of Agriculture and Natural Resources Administrative Procedures. Regional Extension Directors and County/City Extension Directors will be responsible for ensuring (documentation) that nondiscriminatory hiring procedures for non-exempt employees at the County/City level are carried out. The pool of applicants will be reviewed to ensure nondiscrimination. These records will be kept in the RED's file to be reviewed by the Director of Human Resources.

The following must be completed:

1. Application for Employment with the University of Maryland from each applicant.
2. Standard Typing Test or other employment test as needed for applicants.
3. Summary of search process and meeting minutes.
4. UMCP "List of Eligibles" with affirmative action information or Non-Exempt MCE Affirmative Action Summary Report (See Appendix H).

C. Action Plan to Enhance EEO Efforts

The MCE shall take the following affirmative steps with regard to its employment practices in order to eliminate the effects of the past and in order to assure equal employment opportunity in the future.

1. Generally

For the purpose of this plan, the recruitment, hiring, and promotion objectives are not and will not be treated as quotas. They are, rather, guidelines to assist in the measurement of MCE's progress toward achieving a reasonable representation of minorities, women and men in the Extension workforce. Accordingly, the implementation of the terms of this plan does not obligate the MCE to hire unnecessary personnel; to hire assign, transfer, or promote any person who is not qualified by valid qualification standards or to grant a preference in hiring,

assignment, or promotion to a person who is less qualified over a more qualified person.

2. Recruitment

- a. For all MCE professional positions, including County/City, specialist, district, and State level positions, MCE shall recruit as needed at forums where potential applicant pools exist. MCE will make efforts to recruit male applicants in under-represented subject areas.
- b. All MCE vacancy announcements for professional County/City, district, specialist, and State level positions shall be disseminated to all colleges and universities in the United States which have programs in Agriculture and F.C.S. and which have a substantial number of minority students. Such correspondence shall clearly indicate that the MCE is an equal employment opportunity employer and should encourage minority applicants for all positions.
- c. MCE faculty and professional positions will be advertised for a minimum 25 days.

D. Hiring

MCE will follow the search and screen procedures outlined by the University of Maryland, College Park for all MCE positions. All hires are reviewed by the Director of Human Resources subject to approval by the MCE Director.

1. The MCE shall encourage applications to professional positions from all persons meeting entry level degree standards. All MCE applicants shall receive consideration if they meet the minimum qualifications of the MCE.
2. Consistent with the recruitment efforts set forth above, the MCE will make reasonable efforts to recruit and employ minority specialists and County/City educators.
3. MCE shall continue to have and to ensure written nondiscriminatory standards for the hiring of minorities and women and shall present these to "search committees" and MCE supervisors making employment decisions. Similar directions will be given in those program areas where men are under-utilized.
4. MCE shall keep records of the search outcome for permanent MCE professional positions. These records shall be maintained at the respective department/unit office in accordance with UMCP procedures. The Director of Human Resources shall review the files as needed. Copies of all search documentation shall be forwarded to the

Director of Human Resources. All search files shall be available for civil rights reviews/audits.

E. Assignments

The MCE shall assign agents on a nonracial basis to all counties in Maryland. Minorities shall be considered and assigned to all areas of responsibility according to their expertise without regard to race and gender.

G. Reassignments

Faculty may request reassignment to open MCE field faculty positions in accordance with MCE "Policy on Reassignment of Faculty" and MCE Procedure for Reassignment of Faculty to Fill Open Positions".

H. Other Action

1. All MCE Regional Directors and MCE's policy managers will provide equal opportunity for all persons, to prohibit discrimination in employment decisions, and to fulfill the requirement to promote the full realization of the MCE, Affirmative Employment Plan.
2. The Director of MCE, shall periodically review program activities of all personnel to determine whether there are conditions preventing any employee from fully carrying out his/her assignment because of his/her own race, color, gender, disability, religion, age, sexual orientation, national origin, or marital or parental status. Where these conditions exist, (a) identify specific personnel and the circumstances involved, and (b) take action to develop plans to overcome the conditions. The individuals concerned should participate in identifying the barriers and in developing the plan of action to overcome them.
3. The Director of MCE shall continue to ensure that Extension offices do not discriminate on the basis of race, color, gender, disability, religion, age, sexual orientation, national origin, or marital or parental status with respect to any of the employees' assignments such as assignment of office space, use of facilities, or provisions for secretarial assistance, travel allowances, and other staff facilities.
4. The Director of MCE shall ensure that recruitment activities are designed to reach, attract, and employ candidates for all MCE positions, from all MCE geographical areas serviced.
5. The Director of MCE shall ensure that all employees have equal access for opportunity to enhance their skills to perform at their highest potential and to advance in accordance with their abilities.

X. EEO/AA Advisors

MCE shall designate and train a sufficient number of accessible EEO/AA Advisors to informally resolve EEO-related complaints and give advice on AA matters. Counselors should include appropriate minority groups and women. See Appendix I.

XI. limited English Proficiency

MCE shall develop capacity to offer educational programs to Spanish-speaking clientele as per the MCE Limited English Proficiency Policy (Appendix J), which emphasizes health and safety-related materials be developed as an element of audience expansion. MCE's policy uses Department of Justice criteria based on Executive Order 13166.

APPENDIX A

**MARYLAND COOPERATIVE EXTENSION
REPORTING SYSTEM (MCERS)
MANUAL**

[Available in the County/Department]

MCERS SYSTEM OVERVIEW

The section provides an overview of the MCERS system and its reporting requirements. In addition, specific terminology such as teaching events, instructors, submitters, and partners are defined as they relate to this system.

Purpose of MCERS

The Maryland Cooperative Extension Reporting System (MCERS) is a web-based system designed to capture participant data for 1862 and 1890 MCE educational programs.

The objective of program participation data collection is "to identify eligible populations and **measure delivery of program benefits ...** to minority individuals...compared to benefits delivered to non-minority individuals..." as required under the U.S. Department of Agriculture's Administrative Regulations (Title 9, Chapter 2, section 1, paragraph 21.a).

To be more specific, MCERS

Provides a system for organizing MCE's educational program information

Summarizes demographic data on MCE's audiences for program direction and management

Documents basic educational methods used by MCE

Provides summaries based on MCE's stated plan of work for reporting to the United States Department of Agriculture; and

Identifies eligible populations and enables MCE to measure the delivery of program benefits to minority individuals compared to benefits delivered to non-minority individuals

Reporting Requirements

MCERS demographic reports are used to guide AGNR and MCE Administrators in achieving a balanced outreach to the people of Maryland; and, for Internal Compliance Review, to document participation in MCE Initiatives by race, ethnicity (Hispanic) and gender.

All MCE educational *teaching events* in which there is *face-to-face contact* with participants **must be reported through this system.** This system provides for the reporting of race/ethnic breakdowns as well as total number of participants, total number of minutes, and the assignment to a specific initiative or outcome.

Annual Reporting Deadline

Faculty must enter participant data by race and ethnicity for all teaching events on a regular basis for the current year (January 1-December 31). **All participant data for programs must be entered into the MCERS System by March 1** for the prior year; e.g. by March 1, 2002 for all events that took place in 2001. Data for the prior year is **frozen on March 1**, so that *static reports* for that period do not have to calculate every time the data is requested.

Active reports calculate data for any given period in the *current* event year. Examples are: "Total Clientele Contacts by Race-Ethnic Groups" Instructor, Submitter, and County-level reports.

What qualifies as a Teaching/ Learning Event?

Teaching/learning events are those efforts of Instructors/ Submitters that direct learning to a chosen audience:

Classes or discussion groups taught/led by instructor(s)

Classes, workshops, committee meetings, etc., facilitated by instructor(s)

One-on-one instruction may be reported *provided the contact is face-to-face*

Demonstrations, field days, and related events at which learning occurs

One-on-one instruction over the telephone or using electronic mail with a *known client*, typically a followup call where *instruction occurs*

What *does not* qualify as a Teaching/ Learning Event?

A telephone conversation
A county, state or other fair event (e.g., health fair)
A situation in which you aren't teaching, but are only distributing materials
A radio show appearance
A television show appearance
A planning or committee meeting

Please report these activities on the Annual Faculty Report (AFR).

What should be reported on the Annual Faculty Review?

Indirect contacts (such as those listed above) that are difficult to quantify and to identify as to race/ethnicity of the "participant" should be reported on the AFR. Teaching events for participants not reflected state or county MCERS census data (e.g., overseas events) should also be reported on the Annual Faculty Report.

Programs that are expanded by training instructors to go out and teach others fall into three categories:

Instructors trained by MCE employees that implement program(s) under the auspices of other agencies or through partnerships where other entities are primary may not enter participant data in MCERS. Participants in these programs should be reported on the AFR.

Train-the-trainer class(es) implemented by MCE instructors may be entered into MCERS because there is face-to-face contact and the demographics of the participants can be ascertained. (In-service training for MCE employees is not reported in MCERS, but on the AFR.)

3. Programs where MCE instructors implement both the train-the-trainer and where MCE employees and volunteers subsequently implement the program *as an MCE event* may enter all participant data into MCERS.

Instructors and Submitters

Instructors are those individuals designated as teachers for a program event, while a *submitter* is the person reporting the event to MCERS. Each event can have more than one instructor, however, only one person (usually the organizer), should submit the data to MCERS. In many cases, particularly single instructor events, the submitter and the instructor are the same person.

Who Acts as Instructor?

Faculty, Faculty Extension Assistants (FEA's), Program Assistants/Nutrition Assistants supervised by Faculty, and Regional Specialists may all act as instructors. State-based Professors and Specialists and anyone else providing educational programs under MCE or MCE-managed funding are also considered *instructors*.

Who Acts as Submitter?

The MCE employee who organizes a multi-instructor program event is responsible for setting up the program event, assigning it to an initiative and identifying all instructors for the event. The purpose of the Submitter is to report the participant numbers (single audience) for multiple instructors *once* to avoid duplication. (See FAQ section for more details.)

Programs organized by MCE faculty and carried out by volunteer educators should be submitted by the organizing MCE faculty member or program specialist. Submitters may be:

Extension Educators
Extension Specialists
Program Assistants
Faculty Extension Assistants
Nutrition Assistants (EFNEP)

Note: Instructors for multi-instructor events should monitor MCERS carefully to ensure that the designated submitter enters participant data *within two weeks* of the program completion.

What is a "Partner"?

The MCERS system allows the submitter to identify partners who may be organizations, groups, or individuals who *are not employees* of MCE or The College of Agriculture and Natural Resources.

Demographic Data Collection

MCERS utilizes demographic data categories developed by the U.S. Office of Management and Budget that are also used to collect census data. MCE can easily compare actual educational contacts to census data about the potential participants in the county. For more information on data collection see the 2002 MCE Affirmative Action Plan in the county Central Civil Rights file or on the MCE website.

How are programs categorized for MCERS Reporting?

The Outcomes 2002 Framework for our Future report identified 7 initiatives to guide the development of extension programs for the 5 years (through 2002). Each of these 7 initiatives was further defined to provide specific outcomes.

The seven initiatives are:

- Managing change in agriculture to enhance profitability and environmental quality
- Improving food safety, diet, and optimal health
- Promoting environmental stewardship and wise use of natural resources
- Enabling local leaders and decision makers to achieve beneficial community outcomes
- Building and sustaining the family and its resources
- Improving aquatic resource production and stewardship
- Enabling youth to reach their full potential as individuals and citizens

When entering MCERS event data, the submitter will be required to choose an appropriate initiative and outcome for each event. Each event can be further sub-divided for multiple initiatives or outcomes.

Note: If you are not sure what Initiative or Outcome a program should be reported under, please discuss with your CED, RED, or Program Director.

Outcomes 2008

The Outcomes 2002 was a 5-year plan that is expiring at the end of 2002. A team has been established to develop a strategic plan for MCE for the next five years. This is being called Outcomes 2008. This system will be modified to meet the needs of Outcomes 2008 when those plans are finalized.

APPENDIX B

4.H System Reports User Guide

[Available in the County office]

APPENDIX C

MARYLAND COOPERATIVE EXTENSION INTERNAL COMPLIANCE REVIEW PROCEDURAL MANUAL

[Available in the County office]

APPENDIX D

"All Reasonable Efforts"

All Reasonable Efforts are actions an Maryland Cooperative Extension Educator takes to ensure that all Extension educational programs are conducted in interracial areas and that participation reflects the racial composition of the community. See section VI for information on "All Reasonable Efforts"

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

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 individual 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) 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; and 4) ARE is done to document efforts to involve minority groups in MCE program initiative/s.

Responsibility:

Educators should maintain documentation in their program files.

All Reasonable Efforts Documentation:

Because every initiative and club are 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 Educators to document "All Reasonable Efforts." Educators

should also maintain samples of program materials such as news releases, agendas, etc. These items are subject to review as well as any other documentation to confirm that "All Reasonable Efforts" were made to reach potential clientele.

program planning committee members, volunteers, agency partners and others.

APPENDIX D
(CONTINUED)

MCE "ALL REASONABLE EFFORTS" GUIDE					
INITIATIVE/PROGRAM:		DATE OF PROGRAM:		COUNT/CITY (LOCATION OF EVENT:	
Public Notification/ Marketing Effort/s:	U	Contacts/ Networking Effort/s:	U	Participation Effort/s:	U
Planning documents		Visits		Agendas	
Flyers		Phone contacts***		Sign in sheets	
Advertisements/announcements/flyers in a public place		Notes on referrals		Volunteer and committee rosters by race and gender	
Mailing lists		Partnering with the community/groups		Member lists by race and gender	
Presentations you did in connection with marketing		Printouts of e-mails you sent to prospective partners, volunteers, and others		Participant count by race, gender and ethnicity.	
Sample letters and cards you sent				Reporting into MCERS	
Printouts of web-based promotion you did				Translation/ Interpretation Services	
Newspaper articles					
See Appendix E					

***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,

APPENDIX E

PUBLIC NOTIFICATION AND MEDIA METHODS

- T 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, 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.
- T Develop announcements, flyers and posters to be placed in public places frequented by all racial groups.
- T Write personal letters to individuals of the minority race inviting them to participate.
- T Make personal visits to a representative number of minority clientele in the defined community in which the club serves to encourage participation.
- T Contact community groups for assistance in informing potential minority clientele of available programs.

Media Statements for Flyers, Posters, and Press Releases

Long Civil Rights Statements:

Questions about 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.

O' The University of Maryland, Agricultural Experiment Station, and Maryland Cooperative Extension are Equal Opportunity, Affirmative Action Employers. Persons with disabilities who require alternate means of communication of

program information should contact us at (telephone number-voice); (telephone number-FAX); (e-mail address-e-mail) or use the Maryland Relay Service at 7-1-1 for text telephone service to our voice number."

Short Civil Rights Statements

O "It is the policy of the University of Maryland, Agricultural Experiment Station and Maryland Cooperative Extension, that no person shall be subjected to discrimination on the grounds of race, color, gender, religion, national origin, sexual orientation, age, marital or parental status, or disability."

O "Equal opportunity employers"

O "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*

O "If You Need Special Assistance to Participate In The (Meeting/Program), Please Contact (Name, Agency/Office) At (Telephone Number) By (Date)"

Media Statements for Flyers, Posters, and Press Releases (Spanish)

Declaracion Larga (long statement)

O "La Universidad de Maryland, la Estacion Agrfcola Experimental de Maryland, y la Extension Cooperativa prohfben la discriminacion en sus programas y actividades a base de raza, color, sexo, religion, origen, orientaci6n sexual, estado civil o familiar, edad, o incapacidad. (Todas las bases de prohibicion nose aplican a todos los programas.) La Universidad de Maryland prohfbbe discriminaci6n en empleo y en los programas.

Palabras sobre requerimientos legales deberan ser dirigidas al Director de Recursos Humanos de la Oficina del Vise Canciller de Agricultura y Recursos Naturales,

Symons Hall, College Park, MD 20742. "

O (or)

O' La Universidad de Maryland, la Estacion Agrfcola Experimental de Maryland, y la Extension Cooperativa prohfben la discriminacion en sus programas y actividades a base de raza, color, sexo, religion, origen, orientacion sexual, estado civil o familiar, edad, o incapacidad. Las personas con las incapacidades que requieren medias de comunicacion de la informacion de sus programas deben comunicarse con nosotros al numero (voice telephone number). Utilice, por favor, Servicio de Relay en Maryland a 7-1-1 + nuestro numero para hacer una llamada "texta."

Declaraci6n Corta (short statement)

O " Es la polftica de La Universidad de Maryland, la Estacion Agrfcola Experimental de Maryland, y la Extension Cooperativa que ninguna persona estara expuesto a discriminacion debido a la raza, el color, el sexo, la religion, el origen, la orientacion sexual, el estado civil o familiar, la edad, o la incapacidad. "

O (or)

O "Son patrones de igualdad de participaci6n a programas, y de oportunidades empleadoras. "

ADA Statement

O " Si tiene una incapacidad que requiera ayuda especial para su participaci6n en la reunion/ programa, por favor comunfquese con nosotros (name, agency, office) al este numero (telephone number) antes de que (date).

Spanish Materials Statement

Some materials may be available in Spanish on request.

T

0 "Algunos materiales en espaC•ol son disponible a petici6n. II

APPENDIX F

AFFIRMATIVE ACTION DOCUMENTS AND FORMS PARTICIPANT DATA REPORTS

! MCERS
0 "Diversity Attendance"
T State Level
T County Level
T Multi-County Level
T Instructor Level
T Submitter
!
0 4-H Enrollment System
T "Race/Ethnicity/Gender by Enrollment Type; Compared to Census"
T 4-H Enrollment
T 4-H Volunteers
T 4-H Bulk
T 4-H Total Bulk and Members
0 "4-H Members Affirmative Action Summary" (clubs)
! EFNEP Reporting System "Summary of Adult Participant Profiles"

AFFIRMATIVE ACTION DOCUMENTS

(County Central File Documents)

T Civil Rights Act of 1964
0 Title VI (programs)
0 Title VII (employment)
T Copy of USDA Secretary's Memorandum (USDA Policy on Civil Rights)
T "Making Programs Accessible (AGNR-MCE guide)
T ADA Fact Sheet
T ADA Self-Evaluation
T UMCP Policy on Gender Orientation
T SIECUS Fact Sheet on Gender Orientation and Identity
T USDA Department Regulation 4360-3 "Communicating with Under-Served
Communities
T MCE Limited English Proficiency Policy
T "Translation Resources for MCE" (AGNR-MCE guide)
T Title IX Equal Opportunity, USDA-AR (booklet)
T Title IX Self-Evaluation
T MCE Affirmative Action Plan
T MCE EEO Advisor Contact List
T Internal Compliance Review Procedural Manual_(AGNR-MCE guide)

AFFIRMATIVE ACTION FORMS/LETTERS

T ICR Response Plan [AA-AF1]
T Nondiscrimination Letter [AA-AF3]
T Committee Meeting Attendance [AA-AFB]

T	Mailing Log List	[AA-AFi "1]
T	Training Log	[AA-AFi 5]
T	Club Bylaws letter	[AA-4-H 5]
T	Public Relations Efforts by Clubs	[AA-4-H 4]
T	"All Reasonable Effort Guide" Checklist	

APPENDIX G

County Review Schedule			
2004			
Regional	Howard	Saint Mary's	Washington
Scheme	Prince George's	Talbot	Wicomico
2005			
Grouped	Cecil	Allegany	
Scheme	Queen Anne	Garrett	
Begins	Kent	Carroll	
2006			
	Anne Arundel	Caroline	
	Baltimore City	Dorchester	
	Calvert	Talbot	
2007			
	Frederick	Somerset	
	Montgomery	Wicomico	
	Washington	Worcester	
2008			
	Baltimore County	Charles	
	Harford	Prince George's	
	Howard	Saint Mary's	

Revised June 2003

APPENDIX I

MCE EEO/AA Advisor Policy

Administrative Procedure-College of Agriculture and Natural Resources

Sub-unit: Maryland Cooperative Extension

Subject: EEO/ AA Advising Policy and Procedures

Effective Date: January 21, 2001

Purpose

- ! Provide a means for resolving individual employment problems related to equal opportunity quickly, informally, and at the local level.
Ensure that all AGNR employees have access to trained EEO/AA Advisors at the county and/or regional level.
- ! Establish procedures for EEO/AA advising in the counties, and coordination between EEO Advisors and the Human Resources Office, AGNR.
- ! The role of the EEO/ AA Advisor is strictly advisory, not a substitute for contact with a Human Resources professional; and, does not preclude an individual pursuing all avenues to resolve a charge. The EEO/ AA Advisor will provide the information and resources to facilitate the resolution and/ or processing of a complaint or charge. Most importantly, the advisor has no decision-making role. EEO/AA Advisors will use the "EEO Advising Guide" and related resources provided by the Human Resources Office to assist Faculty and Staff in succinctly stating allegations of discrimination, completing initial fact-finding concerning discriminatory incidents, and providing resource and referral support to aggrieved employees. (This guide describes guidelines and boundaries for EEO/ AA Advisors, and gives them guidelines for coordinating with the Human Resources Office, AGNR.)

Actions taken pursuant to this procedure will be consistent with Maryland Cooperative Extension's commitment to give all Faculty and Staff equal opportunity and access to employment and program opportunities without regard to race, color, gender, national origin, age, or disability.

Identification and Prevention of Discriminatory Practices

Discrimination based on race, color, gender, national origin, age, or disability is prohibited under the following laws:

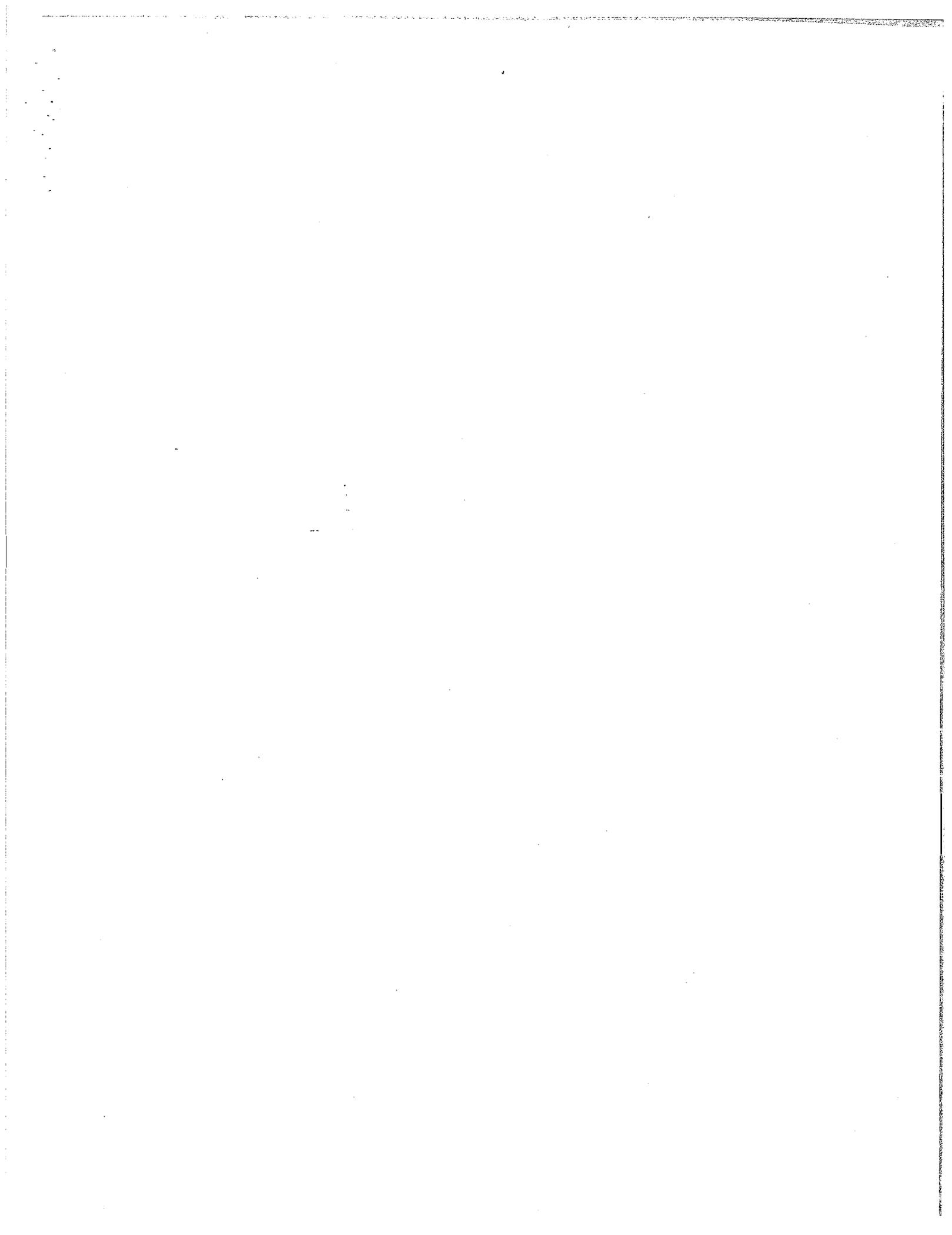
- Titles VI and VII of the Civil Rights Act of 1964
- Title IX of the Education Amendment of 1972
- The Americans with Disabilities Act
- The Age Discrimination in Employment Act
- Section 504 of the Rehabilitation Act of 1973
- The Equal Pay Act

These laws cover discriminatory practices such as gender harassment and religious discrimination, and include an *overall prohibition against retaliation* against an employee for filing an EEO-related complaint. Federal Laws prohibit discrimination in the following areas:

- ! Hiring and firing

!

Compensation, assignment, or classification of employees



- ! Transfer, promotion, layoff, or recall
- ! Job advertisements
- ! Recruitment
- ! Testing
- ! Use of company facilities
- ! Training and apprenticeship programs
- ! Fringe benefits
- ! Pay, retirement plans, and disability leave
- ! Other terms and conditions of employment

Implementation

USDA's nondiscrimination regulations require the Maryland Cooperative Extension to ensure prompt, fair, and impartial processing of discrimination allegations and to provide EEO advising at the local level.

Responsibilities of Directors (RED and CED)

Directors must ensure that the counties under their leadership have a sufficient number of EEO/AA Advisors available and that advisor slots are filled when vacated due to retirement, extended leave, reassignment, OR on a three-year rotation, whichever comes first.

Directors must ensure that they, and all faculty with supervisory duties, take advantage of and have access to, training and information needed to utilize and support the EEO/AA advising process.

Directors are responsible for using staff conferences and other periodic meetings to communicate to faculty and staff regarding the use of the EEO/AA informal advising process. Furthermore, all faculty and staff must be informed of their right to work in a place that is free of discrimination and harassment, and the attendant responsibility they bear as individuals to support a positive climate.

Responsibilities of Human Resources Office

The Human Resources Director/ Civil Rights Director, and the Coordinator, Diversity Programs and Training will work directly with EEO/AA Advisors to ensure that they are trained on how to initiate and process a discrimination allegation and conduct related activities needed to perform in their role. The Human Resources Office will provide training, operational support, resources, and assistance as needed for EEO/AA Advisors.

Responsibilities of Advisor

The EEO/AA Advisor will report all EEO/Civil Rights-related issues to the Director, Human Resources Management, his successor, or designee. The Advisor will maintain confidentiality regarding all EEO/ AA advising activities, including protecting the anonymity of the aggrieved person, if requested.

The EEO/AA Advisor will advise employees of all classifications, and job applicants, regarding EEO/AA matters. The EEO Advisor will:

- ! determine if the charge may be processed through informal advising,
- ! develop a clear and concise statement of the discriminatory event,
- ! check the facts of the situation in a preliminary manner,
- ! conduct a final interview with the aggrieved person,
- ! write an informal letter of agreement between the aggrieved party and those charged with acting in a discriminatory manner and
- ! provide a report to the Director Human Resources (his/her successor or designee) of the informal resolution of the charge

APPENDIX I ~~College of Agriculture and Natural Resources~~
MCE EEO/AA Advisory Policy

The advisor must accomplish these steps within thirty calendar days of the initial interview with the aggrieved person. In cases where an informal resolution is not reached, the advisor will inform the Human Resources Director (his/her successor or designee) of any aggrieved person's intent to file a formal complaint, forwarding the entire advising file to the Director of Human Resources.

Note: Discrimination charges under the Age Discrimination in Employment Act (ADEA) and may file a formal complaint through the EEOC or may proceed directly to civil litigation upon giving a thirty- day notice to the EEOC. ADEA charges are not subject to the informal advising process.

Responsibilities of the Aggrieved Person

The person who believes he/ she has been the subject of a discriminatory action *must contact the EEO Advisor within 45 days of the date of the alleged discriminatory event.* This period may be based on the effective date of the alleged discriminatory personnel action/ event or upon the date an aggrieved individual knew or reasonably should have known of the discriminatory event. The aggrieved person must cooperate with the EEO Advisor for the 21 (business days) to 30 day (calendar days) fact-finding period. If an informal resolution cannot be achieved, the aggrieved person may choose to file a formal complaint through the Equal Employment Opportunity Commission after 30 calendar days, following all EEOC guidelines in doing so (see Appendix A).

Technical Assistance and Resources

EEOC technical assistance is available at <http://www.eeoc.gov/>

USDA "EEO counseling" manual

AGNR HR resources, "EEO- advising Guide" and advisor resources on web at www.agnr.umd.edu/fiscaloffice
"diversity" button

Any questions or concerns pursuant to this policy should be addressed to the College of Agriculture and Natural Resources, Office of the Dean and Director, Human Resources Management, Symons Hall, College Park, Maryland 20742.

Administrative Procedure-College of Agriculture and Natural Resources

Sub-unit: **Maryland Cooperative Extension**

Subject: **Limited English Proficiency**

Effective Date: April 25, 2003

A Purpose

To define and develop procedures that Faculty and Staff need to extend educational programs to people with limited English proficiency, thus expanding the audience for these programs.

The intent of this policy is to ensure that residents of the state who do not speak or read English proficiently have access to targeted educational programs, and that public notification and eligibility information are provided in other languages where substantial numbers of LEP clientele exist. The production of multilingual publications and documents, and interpretation of educational programs will be provided to the degree that funding and current laws and regulations permit.

Initially, this policy applies to Spanish language programs related to health and safety. The scope of this policy is based on Department of Justice criteria (see "Technical Assistance" section for links to criteria) and the consideration that there are limited resources available for the effort until more are developed. The policy may be revised to include other programs and languages. The policy is meant to guide the College in achieving the following capacity-building objectives:

- **Encourage AGNR and MCE faculty and staff to work together** to support educational outreach to Latino and Hispanic communities of limited English proficiency persons.
- Establish procedures for production in Spanish of communications (electronic, print, verbal) that inform Spanish-speaking LEP persons of College programs and services.
- Establish procedures for production {or translation and interpretation} of Spanish educational materials for targeted programs
- Establish guidelines to ensure that interpretation/translation services, when used, are of acceptable quality.

Non-Discrimination Bases

Discrimination in programs based on national origin is prohibited under the following laws and policies:

Executive Order 13166 (2000)
Title VI of the Civil Rights Act of 1964
The Food Stamp Act of 1977
The Equal Educational Opportunities Act of 1974
The University of Maryland Human Relations Code

See "Technical Assistance" section for links to these resources.

B. Determining Need

When a significant *program target population* exists, or when the county census indicates a significant Spanish-speaking population exists, it is expected that the county will make an effort through its Plans of Work to extend critical educational programming about health and safety to that population. Programming about specific subject matter may be directed at a population due to its health risks or occupational health needs.

C. Implementation

Responsibilities of MCE Directors (Program Directors, REDs and CEDs)

Directors will determine which programs are affected by this policy and identify programs that will be offered in Spanish where target populations exist.

Directors will review Plans of Work of Faculty who have a significant *program target population* to determine that they have identified programs that they will offer in Spanish. Directors should assist faculty in identifying funding opportunities such as adding bi-lingual program plans and costs to existing grants; applying for new grants that support education in diverse communities; and, identifying and collaborating with federal agency partners who are implementing LEP Plans in order to utilize their resources when beneficial to both partners.

For targeted programs in Spanish: Directors are responsible for defining unit needs related to producing public relations (notification) and educational materials in Spanish and developing procedures for working with other College units to produce these, as well as tracking expenses and projecting costs for LEP efforts.

Responsibilities of Faculty

Faculty working in subject-matter areas of importance to Spanish-speaking clientele (or in high Latino population counties) are responsible for planning program needs in advance in order to integrate the demands of a bi-lingual effort into the curriculum development process. Faculty should collaborate across county and regional lines whenever possible to reach as many LEP Persons as possible, thus lowering the program cost-per-participant for translation and interpretation expenses.

MCE Faculty members are responsible for participating in professional development activities and training to develop knowledge and skills related to curriculum development and instructional methods for implementing programs across cultures.

Responsibilities of MCE Associate Director

The Associate Director will implement this policy throughout MCE units by establishing appropriate procedures (e.g., establishing procedures regarding production of publications in Spanish; identifying granting institutions with an interest in funding LEP programs; monitoring and evaluating LEP program participation).

Monitor LEP efforts as identified in Plans of Work and develop resources to support Faculty in fulfilling needs related to Limited English proficiency efforts.

Responsibilities of Human Resources Office

The Human Resources Director/ Civil Rights Director, and the Coordinator, Diversity Programs and Training will work with Department/Unit Heads, Program Directors, the Executive Council, and Faculty and Staff to implement this policy as part of the College's Diversity Initiative.

APPENDIXJ limited English Proficiency

Develop and implement internal training programs to assist Faculty in developing new educational programs and in adapting and marketing existing programs to Hispanic clientele.

Professional development opportunities, working aids and resources for faculty will be made available under the auspices of the Office of Human Resources and the Coordinator of Diversity Programs and Training.

D. Technical Assistance and Resources

Tips for Translation Quality

Units Heads, Directors, and Faculty conducting programs in Spanish are responsible for ensuring that the quality of translation (print) and/or interpretation (voice) is sufficient to meet the needs of participants, and is at least of the same quality as the materials in English.

Volunteer and low-cost resources should be utilized whenever persons providing interpretation and translation are sufficiently fluent in English to do so with accuracy. Interpreters and translators of professional quality should be used whenever possible, and funding developed to pay for this to ensure that the quality of Spanish materials is on a par with those produced in English. Translators and interpreters should be able to guarantee the accuracy of their work.

Assessment of participant needs should be made in advance to determine reading-levels, degree of literacy, and region of origin. For persons who are learning English as a second language, bilingual materials may be advantageous.

Referenced Resources

- Department of Justice criteria at <http://www.usdoj.gov/c1i/cor/i3166.htm>
- USDA link to DOJ http://www.usda.gov/da/cr/limited_proficiency.htm
- Executive Order 13166 <http://www.usdoj.gov/crt/cor/Pubs/eolep.htm>
- AGNR Human Resources guide *Language Resources for MCE: Translation and Interpretation Options and Costs* at <http://www.agnr.umd.edu/MCE/intranet/index.cfm?Parent=i48&ID=211>
Click on "Translation Options" on sidebar
- AGNR HR Spanish-English publications and other resources for faculty at <http://www.agnr.umd.edu/MCE/intranet/InIndex.cfm?ID=148> and click on "EspaZol" at top right of page
- UMCP Human Relations Code
<http://www.inform.umd.edu/PRES/policies/vi100b.html>

Should you have questions about this policy, please contact Nancy Corley, Coordinator of Diversity Programs and Training, at (301) 405-1176 or at the following e-mail address. You may request a print copy of any laws or policies relating to this policy by e-mailing her at ncorley@umd.edu

E. Faculty Planning Guidelines

Limited English Proficiency planning is an integral part of strategic planning and aligning and integrating Plans of Work with the MCE Strategic Plan and Federal and State Initiatives. MCE Leadership will establish an LEP implementation plan based on the Limited English Proficiency Policy that will enable the policy to be implemented in an orderly manner and will provide guidance for securing resources and assistance from both inside and outside MCE and AGNR.

MCE Faculty and Staff will identify priorities in concert with their Program Leaders based on the LEP policy criteria in order to extend educational programs to people with limited English proficiency.

APPENDIX limited English Proficiency

"Program target population" is defined as a significant proportion of clientele who speak Spanish, but not necessarily a significant percentage of the county population. **Programming about specific subject matter may be directed at a population due to its health risks or occupational health needs.** When a significant *program target population* exists, or when the county census indicates a significant Latino population exists, it is expected that the county will make an effort through its Plans of Work to extend critical educational programming about health and safety to that population.

For example, the 2002 census shows the following number of Hispanics in Maryland's most populous Latino counties.

1. Montgomery	100,604	Region II
2. Prince Georges	57,057	Region II
3. Baltimore County	13,774	Region I
4. Anne Arundel	12,902	Region II
5. Baltimore City	11,061	Region II
6. Howard County	7,490	Region II
7. Frederick County	4,664	Region I
8. Harford County	4,169	Region I

Faculty Planning Outline

- TIdentify LEP program priorities
- TIdentify internal units who can contribute to the plan implementation
- TDetail procedures
- TList responsibilities of each unit/ position title
- TIdentify Funds and Grantors
- TIdentify coordination within organization needed to secure grant support
- TWork out details of budgetary allocations within MCE budget
- TIdentify procedures needed to secure sufficient assistance from AGNR departments
- TList details/coordination/procedures to accomplish specific functions (e.g., getting a document translated and published)

Other Considerations for Faculty

Note: Individual faculty are not constrained by the LEP policy from pursuing program expansion to other language groups based on their Plan of Work, provided they secure grant monies to fund their efforts.

Faculty who have special knowledge of Hispanic culture or the Spanish language, or whose subject matter specialization is pertinent to the health and safety of Latino communities, are asked to make their expertise available through collaboration on projects, grants, and research that benefit Hispanic persons and communities.

Faculty producing instructional materials and programs for limited English proficiency persons should ensure that instructional content has been culturally adapted to be consistent with the target clientele's values and beliefs, as well as conveying information that increases the group's understanding of how to operate in American culture.

APPENDIX J limited English Proficiency

Faculty will explore the provisions of Limited English Proficiency Plans of Federal Agency partners in order to secure benefits for programs being implemented with Federal partners.

Faculty Professional Development

Program Leaders, CED's, and RED's will work together to establish a series of faculty and staff in-services to assist faculty in developing expertise about Hispanic and other cultures. Include offerings that enable them to adapt and develop materials for multi-cultural and mixed literacy audiences. Some of these are already available Internally through the Office of Human Resources Management. Offerings could be expanded to bring in expertise from external sources, or by sending faculty to some external professional development sessions and having them share expertise with colleagues through structured, in-service training.

Program Leaders and Faculty will identify internal and external "cultural Informants," client-advisors, colleagues in other institutions, (e.g., 1890 for mixed literacy methods) and others who have expertise related to cultural skills, program formulation, instructional design, and delivery methods. Involve these people in in-service training, situational analyses prior to curriculum development, etc.

APPENDIX K

MCE DIVERSITY/AFFIRMATIVE ACTION GLOSSARY

{MCE Diversity/Affirmative Action Glossary compiled by College of Agriculture and Natural Resources-Human Resources Management Office, College Park, Maryland}

Accessibility

The extent to which an employer's facility is readily approachable and does not inhibit the mobility of individuals with disabilities, particularly such areas as the personnel office, work site, and public areas.

Affirmative Action (AA)

Actions, policies, and procedures undertaken by an employer in recruiting, hiring, promotions and all other personnel actions that are designed to achieve equal employment opportunity and eliminate the present effects of past discrimination. Affirmative action requires: (1) thorough, systematic efforts to prevent discrimination from occurring or to detect and eliminate it as promptly as possible; and (2) recruitment and outreach measures.

American Indian or Alaskan Native

A person having origins in any of the original peoples of the Americas (North, South or Central America) who maintains cultural identity through tribal affiliation or community attachment.

Asian or Pacific Islander

A person with origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Republic, and Samoa; and, on the Indian subcontinent, includes India, Pakistan, Bangladesh, Sri Lanka, Nepal, Sikkim, and Bhutan.

Black (or African-American)

An individual, not of Hispanic origin, with origins in any of the black racial groups of Africa.

Civil Rights Act of 1964

Civil Rights Act of 1964 is a comprehensive federal law which makes it illegal to discriminate on the basis of race, color, religion, gender and national origin. Title VII of the law was the first to specifically ban discrimination in the employment setting and is enforced

by the Equal Employment Opportunity Commission (EEOC). Title VI bans discrimination in programs and services.

Community

The community is defined as the County/City for MCE non-club based programs.

Corrective Action

Correction of deficiencies identified during a compliance review of an affirmative action plan.

Disability

A disability is a physical or mental impairment, which substantially limits one or more major life activity, a record of having such an impairment, or being perceived as having such impairment.

Disabled Veteran

A person whose discharge or release from active duty was for a disability incurred or aggravated in the line of duty and who is entitled to a 30% or more disability payment under the regulations of the Veteran's Administration.

Discrimination

Illegal treatment of a person or group of persons based on race, gender, or other prohibited factor.

Disparate Impact

A theory or category of employment discrimination. Disparate impact discrimination can be found when an employer's use of an otherwise neutral selection standard-such as a test, an interview, or a degree requirement-disqualifies members of a particular race or gender at a significantly higher rate than others and is not justified by business necessity or job-relatedness. An intent to discriminate is not necessary to this type of employment discrimination. The disparate impact theory can be used to analyze both objective and subjective selection standards.

Disparate Treatment

A theory or category of employment discrimination. Disparate treatment discrimination can be found when an employer or employer treats an individual or group differently because of its race, color, religion, gender, national origin, disability, or veteran status. An intent to discriminate is a necessary element in this type of employment discrimination, and can be shown by direct evidence or inferred through statistical, anecdotal, and/or comparative evidence.

Employer

Under EEOC Policy Guidelines, a person or persons engaging in an industry affecting commerce who has 15 or more employees for each working day in each of the 20 or more weeks in the preceding year, or any agent there of. Includes state and local governments, any federal agency subject to the provisions of Section 717 of the Civil Rights Act of 1964,

as amended. Also includes any federal employer or federally assisted construction employer *covered* by Executive Order 11246, as amended.

Employment Practice

Any recruitment, hiring, selection practice, transfer or promotion policy, or any benefit provision or other function of the employer's employment process which operates as an analysis or screening device.

Equal Employment Opportunity

A system of employment practices under which individuals are not excluded from any participation, advancement, or benefits due to race, color, religion, gender, national origin, or any other action which cannot lawfully be the basis for employment actions.

Equal Employment Opportunity Commission (E.E.O.C.)

Established by Congress, the EEOC is made up of members appointed by the President and receives, processes, and investigates charges of employment discrimination under Title VII of the Civil Rights Act of 1964, Title I of the Americans with Disabilities Act, the Equal Pay Act of 1963, and the Age Discrimination in Employment Act of 1967. If the commission determines that there is reasonable cause to *believe* that the law has been violated, it first tries to obtain remedies for the affected individuals through conciliation and can bring suit in federal district court if conciliation efforts fail.

Interpretations of Title VII expressed by the EEOC that don't have the force of law, but tend to be supported by the courts. These positions are outlined in various EEOC publications ("Discrimination because of Religion", etc.)

Ethnic Group

A group identified on the basis of religion, color or national origin ex: Hispanic origin.

Good Faith Efforts

Actions voluntarily developed by employers to achieve compliance with equal employment opportunity and affirmative action clauses. The basic components of good-faith efforts are: (1) outreach and recruitment measures to broaden candidate pools from which selection decisions are made to include minorities and women; and (2) systematic efforts to assure that selections thereafter are made without regard to race, gender, or other prohibited factors. Results of these efforts are measured in terms of their effectiveness in assisting the employer in meeting or making progress toward targets set to correct underutilization.

Hispanic

A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race. This does not include persons of Portuguese descent or persons from Central or South America who are not of Spanish origin or culture.

Life Activity

For purposes of Section 503 of the Rehabilitation Act and ADA, functions which are limited by a person's disability such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

limited English Proficient Person

Person for whom English is a second language and whose ability to speak and understand English is limited. LEP persons are protected under Executive Order 13166 which stipulates that legal, medical, health, and safety-related information be provided in the native language. Information related to eligibility, application to, and notification of programs should also be provided.

MCE 4-H Club

An organized group with elected officers and written bylaws. Must have at least five members between the ages of 8-18 and hold at least six regularly scheduled meetings annually. Adult leadership is provided by at least one MCE volunteer organizational leader and one or more program/activity/resource leaders. Club utilizes a planned, written educational program that provides a variety of learning experiences.

MCERS

Maryland Cooperative Extension Educational Reporting System (MCERS): MCE program data is recorded in MCERS on an initiative basis. Comparisons to the population will be done on an initiative basis.

Minorities

Men and women of those minority groups for whom EE0-1 reporting is required; that is, black, Hispanic, Asian or Pacific Islander, American Indian or Alaskan Native. The term may refer to these groups in the aggregate or to an individual group.

National Origin

The country-including those that no longer exist-of one's birth or of one's ancestors' birth. "National origin" and "ethnicity" often are used interchangeably, although "ethnic group" can refer to religion or color, as well as country of one's ancestry.

Noncompliance

Failure to follow equal employment opportunity or affirmative action guidelines and the regulations applicable to them.

Parity

The number of minority members per OMB category (e.g., race/gender/ethnicity) participating per initiative falls within the range of $\pm 5\%$ of the total targeted population (e.g. County census). The minimum desired baseline is -5% minority participation of the targeted population.

Protected Class

Groups of people protected from discrimination under government regulations and laws. For example: the specific groups are defined as women, Blacks, Hispanics, Asians/Pacific

Islanders or American Indians/Alaskan Natives, people over 40, the disabled as defined under Section 503 of the Rehabilitation Act and disabled veterans and Vietnam era veterans as defined under the Vietnam Era Veterans Readjustment Assistance Act.

Qualified Disabled Veteran

A special disabled veteran who is capable of performing a particular job with or without a reasonable accommodation to his or her disability. A Qualified Disabled Veteran is a disabled veteran capable of performing a particular job, with or without reasonable accommodation.

Qualified Disabled Person

A Qualified Disabled Person is an individual with a disability who is capable of performing a particular job, with or without reasonable accommodation.

Race

Race is a division of humankind with certain distinguishing characteristics in common which indicate distinctive origins.

Reasonable Accommodation

Used in connection with affirmative action for disabled persons: Changes in the job or workplace which enable the person with a disability to perform the job for which they are otherwise qualified. Such accommodations should be such that they do not create a business hardship and may involve such actions as adjusting the physical environment, equipment, schedules, or procedures.

Used in connection with discrimination based on religion: Requirement that employer grant an employee time off for religious reasons. These accommodations may be adjustments to hours or days worked or other similar actions which will make it possible for employees to fulfill their religious obligations.

Religion

Includes all aspects of religious observance and practice, and religious beliefs.

Genderual Discrimination

Discriminatory or disparate treatment of persons based on their gender.

Systematic Discrimination

Employment policies or practices that serve to differentiate or to perpetuate a differentiation in terms or conditions of employment of applicants or employees because of their status as members of a particular group. Such policies or practices may or may not be fair and neutral on their face, and intent to discriminate may or may not be involved. Systematic discrimination, sometimes called class discrimination or a pattern or practice of discrimination, concerns a recurring practice or continuing policy rather than an isolated act of discrimination.

Underutilization

APPENDIX K (Continued)

Having materially fewer minorities or women in a particular job group than reasonably would be expected based on their availability in the community.

Undue Hardship

In order for an employer to legally refuse to accommodate an applicant's or an employee's disability or religious beliefs, the employer must be able to show that such an accommodation would place a severe burden on the operation of the business.

Unlawful Employment Practice

Any policy or practice that has discriminatory intent or effect and cannot be shown to be essential to the successful performance of the job in question.

White

An individual, not of Hispanic origin, with origins in any of the original peoples of Europe, North Africa, or the Middle East.