

THE
UNIVERSITY
OF RHODE ISLAND
COOPERATIVE
EXTENSION

Civil Rights Compliance Handbook

Table of Contents

Introduction	3
Purpose and Relevant Legislation	3
Commitment to Civil Rights Compliance	3
Section 1: Organizational Capacity	5
Section 2: Civil Rights Knowledge and Procedures	6
Section 3: Advisory Boards and Committees	8
Section 4: Program Delivery	10
Section 5: Data Collection and Integrity	11
Section 6: Nondiscrimination Based on Sex	13
Section 7: Public Notification	14
Section 8: Accessibility for Individuals with Disabilities	17
Section 9: Language Access	18

Introduction

The U.S. Department of Agriculture's (USDA) National Institute of Food and Agriculture (NIFA) and its land-grant partners recognize the importance of meeting civil rights compliance requirements in the development and implementation of Cooperative Extension System programs. These programs must be handled in a manner that treats every program participant, service recipient, and employee with fairness, equality, and respect. This applies to all aspects of Extension programs, including identifying needs, setting priorities, allocating resources, selecting and assigning staff, conducting programs, and gathering and using feedback.

Information about USDA NIFA policies can be found at <http://www.ascr.usda.gov/>.

Qualified individuals with disabilities who wish to request the University of Rhode Island Cooperative Extension Civil Rights Compliance Handbook in an alternative format may contact Dr. Lisa Townson, Associate Dean, Extension and Agricultural Programs, by emailing ltownson@uri.edu, or calling (401) 874-2240. For TTY assistance, R.I. Relay 711.

Purpose and Relevant Legislation

The USDA Civil Rights regulations require NIFA to determine whether recipient institutions comply with the nondiscrimination and equal opportunity provisions contained herein. To implement these provisions, state Extension services and the USDA are required to carry out regular compliance review inspections that are designed to measure the overall status of civil rights compliance. The reviews focus on aspects covered by the federal statutes prohibiting discrimination on the basis of race, color, creed, sex, disability, religion, familial status, age, veteran status, disability status, genetic information, citizenship status, national origin (including language), and any other legally protected characteristic. For a full listing, visit the [USDA website](#).

USDA Civil Rights compliance reviews are conducted in a manner consistent with the following major statutes and departmental regulations, which include, but are not limited to:

- Title VI and Title VII of the Civil Rights Act of 1964
- The Age Discrimination in Employment Act of 1967
- Title IX of the Education Amendments of 1972
- The Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990, Titles I and V
- The Civil Rights Act of 1991
- The Americans with Disabilities Amendments Act of 2008
- The Age Discrimination Act of 1975
- USDA Office of the Assistant Secretary for Civil Rights Regulations and Departmental Directives

The University of Rhode Island Cooperative Extension program is responsible for working with the Office of Equal Opportunity to establish internal policies and guidelines to ensure Extension programs and operations do not discriminate and that research

projects and activities are done without regard to race, color, creed, sex, disability, religion, familial status, age, veteran status, disability status, genetic information, citizenship status, national origin (including language), and any other legally protected characteristic. Land-grants and other institutions are expected to have available the appropriate documentation, records, and sources of information related to the items included in this guide.

The University of Rhode Island acknowledges civil rights compliance requirements expand beyond the Extension program and cover the institution. As such, the University of Rhode Island prohibits discrimination under any program or activity undertaken on behalf of the institution, as outlined in the [Policy on Nondiscrimination and the Policy on Sexual Misconduct](#). Coordination of civil rights compliance must be carried out in alignment with institutional policies. The Director of the Office of Equal Opportunity is the designated Civil Rights Compliance Officer, and is available to provide technical assistance, as needed. Email: dorca_paulino@uri.edu. Phone: 401-874-4929. For TTY assistance, R.I. Relay 711.

Commitment to Civil Rights

The University of Rhode Island and the Cooperative Extension are committed to the realization of the spirit and letter of federal and state civil rights laws and regulations. The University of Rhode Island Policy on Nondiscrimination and Policy on Sexual Misconduct, which cover the Cooperative Extension, outline the discrimination and harassment grievance process, in alignment with applicable civil rights laws and regulations. Additional information can be found by visiting the Office of Equal Opportunity [“Discrimination”](#) website.

The University prohibits all forms of illegal discrimination in all University programs and activities. The University prohibits students, employees, affiliates, volunteers, visitors, service recipients, program participants, and contractors (collectively, “Covered Individuals”) from engaging in illegal discrimination (including discriminatory harassment) based on an individual’s race, color, creed, sex, disability, religion, familial status, age, veteran status, disability status, genetic information, citizenship status, national origin (including language), and any other legally protected characteristic. Engaging in acts of retaliation for another’s making a complaint of discrimination or cooperating in an investigation of discrimination is strictly prohibited. Individuals who wish to report discrimination are encouraged to visit [the Office of Equal Opportunity website](#).

The Smith-Lever Act and subsequent amendments dictate that Cooperative Extension programs be designed to serve all the people. This includes all socioeconomic classes and the protected classes identified in civil rights laws and regulations. This manual demonstrates our commitment to civil rights compliance, and ongoing efforts to promote a culture that values equal opportunity for all. To honor our commitment and enforce the internal policies that offer protections to members of protected groups, Cooperative Extension staff, board members, and volunteers, are required to participate in civil rights compliance training, which can be [accessed on Brightspace](#).

All Cooperative Extension staff, board members, and volunteers, must complete the following training:

- 1) Civil Rights Laws and Research Activities: A Guide for Inclusion and Compliance
- 2) Building a Safe Workplace: Discrimination, Violence, and Hazing Prevention

The most recent live civil rights compliance training offered to Cooperative Extension staff took place on February 2, 2023, virtually, from 9:30am-11:30am. The Office of Equal Opportunity offers bi-monthly lunch-and-learn events on civil rights topics, which are advertised in Rhody Today, the University's newsletter. Cooperative Extension personnel are highly encouraged to register.

The Cooperative Extension encourages and appreciates equal opportunity beyond the legal obligations imposed by state and federal laws, regulations, and enforcement agencies. In the past, land-grant institutions, which were formed to promote access to education through the Morrill Act of 1862, denied admissions to African Americans, and other protected groups. For this reason, the University of Rhode Island and the Cooperative Extension Program require staff and volunteers to participate in civil rights compliance training and learn about our collective history and legal obligations.

The University of Rhode Island and the Cooperative Extension continue to make efforts to promote compliance with applicable civil rights laws and regulations, and to foster a culture that promotes equality and respect. Leadership support and institutional capacity to promote civil rights compliance practices can be evidenced by the creation of the new Office of Equal Opportunity, which is dedicated to promoting and enforcing civil rights laws and regulations institutionally.

The Office of Equal Opportunity was created in July of 2022, and is staffed by three (3) full time employees charged with creating programs, evaluating civil rights compliance, reporting civil rights compliance trends, and enforcing compliance with Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, the Age Discrimination Act of 1967, the Americans with Disabilities Act, the Rehabilitation Act, and other equal opportunity and civil rights compliance laws and regulations, as outlined in the Policy on Nondiscrimination.

The University's Title IX Coordinator and Deputy Coordinators promote compliance with Title IX of the Education Amendments of 1972. Additionally, the Office of Community, Equity and Diversity leads and supports our efforts to move beyond civil rights compliance and foster an environment in service delivery and employment where all can thrive. The Office of Community, Equity and Diversity, has several centers reporting to the division, which support the University of Rhode Island's efforts to create a culture that promotes equity; 1) The Women's Center; 2) The Multicultural Student Services Center; 3) The Center for Military and Veteran Education; and 4) The Gender and Sexuality Center.

The Cooperative Extension reiterates the importance of increasing self-awareness through education and training. This handbook outlines the procedures the University of Rhode Island Cooperative Extension personnel will follow to fulfill the intent and requirements of applicable civil rights laws and regulations, and provides a roadmap that shows that employees and volunteers can:

- Avoid discrimination in program delivery and employment.
- Promote equal opportunity for all.

In general, to fulfill these expectations all paid personnel and volunteers will make reasonable efforts to promote equal employment opportunities when vacancies are advertised by the University of Rhode Island Cooperative Extension. Additionally, all will be invited to participate in programs, services, and activities, without regard to protected status. All reasonable efforts include:

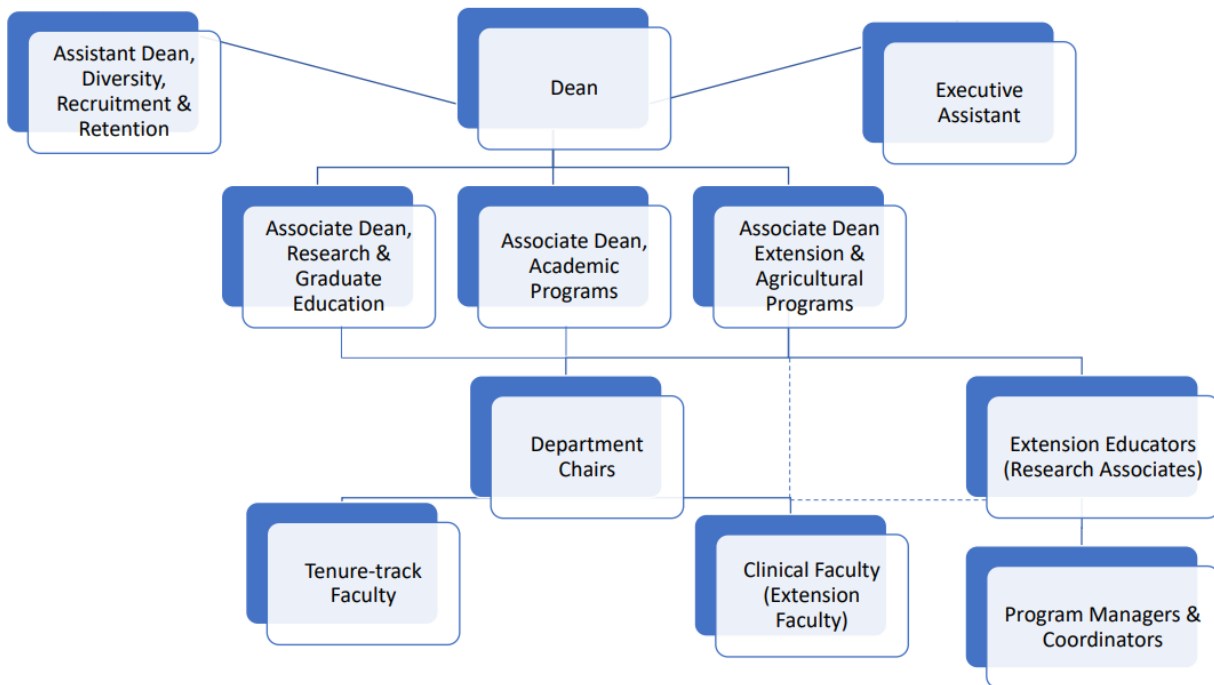
- Creating awareness (e.g., notification of opportunity by direct contact, mailings, and mass media), without regard to protected status.
- Ensuring access (e.g., appropriate selection of time and location for events).
- Providing utility (e.g., offering programs of interest to the targeted audience)
- Including consistent reasonable accommodation statements in all publications and programming. Such statements must include the points of contact individuals may contact to request a reasonable accommodation.

This handbook will also provide an overview of current institutional practices and civil rights compliance programs currently under development. This handbook is organized by the nine (9) review areas USDA NIFA considers when reviewing Extension programs for compliance with civil rights laws and regulation. Each area describes the processes and procedures The University of Rhode Island Cooperative Extension uses to ensure compliance.

All The University of Rhode Island Cooperative Extension personnel are expected to read and understand the content of this handbook. It is expected that all Cooperative Extension employees have the knowledge and commitment to comply with the federal laws and regulations.

SECTION 1A: PROGRAM ORGANIZATIONAL CAPACITY

URI College of Environment and Life Sciences



The University of Rhode Island Cooperative Extension will maintain a current organizational chart and make it available upon request.

Responsible party: CELS, Dean's Office

The University of Rhode Island Cooperative Extension will maintain current programs and staff/faculty appointments and make this information available upon request. These are reviewed periodically and when changes occur due external funding or programmatic shifts.

Responsible party (programming): Associate Dean
Extension and Agriculture Programs

SECTION 1B: CIVIL RIGHTS ORGANIZATIONAL CAPACITY

The University of Rhode Island Office of Equal Opportunity is dedicated to promoting compliance with civil rights laws and regulations, and it is staffed by three (3) full time employees charged with promoting civil rights compliance. The Office of Equal Opportunity receives and investigates complaints alleging discrimination due to any protected characteristic in employment and service delivery. A comprehensive list of services provided by the office may be found by [visiting this website](#).

Responsible parties: Director, Office of Equal Opportunity
 Assistant Director, Office of Equal Opportunity
 Business Analyst, Office of Equal Opportunity

The University's Title IX Coordinator and Deputy Coordinators promote compliance with Title IX of the Education Amendments of 1972. The Title IX Coordinator accepts complaints of discrimination or harassment on the basis of sex. Complaints received are reviewed and investigated under the Policy on Sexual Misconduct or referred to be investigated under the Policy on Nondiscrimination, if the matter reported does not meet the burden of proof as outlined in the 2020 Title IX regulations.

Responsible parties: Title IX Coordinator, Enterprise Risk Management
 Deputy Title IX Coordinators

Culture and climate

The University of Rhode Island Cooperative Extension is part of the College of Environment and Life Sciences (CELS), and works with the Assistant Dean for Diversity, Recruitment, and Retention, to respond to climate concerns that are not severe or pervasive enough to violate a civil rights law. The Assistant Dean, working in close coordination with the Associate Dean, Extension and Agriculture Programs, and the Office of Community, Equity, and Diversity, serves as the first point of contact for questions and concerns, and advances issues, as needed, to align strategy to institutional efforts.

Responsible party: Associate Dean, Extension and Agriculture Programs
 Assistant Dean, Diversity, Recruitment, and Retention.

The Office of Community, Equity, and Diversity leads the campus community in promoting a culture of respect for all.

Responsible parties: Vice President of Community, Equity and Diversity
 Assistant Vice President of Community, Equity and Diversity
 Director of the Women's Center
 Director of the Multicultural Student Services Center
 Director of the Veteran Student Services Center
 Director of the Gender and Sexuality Center

The Office of Equal Opportunity promotes institutional compliance with accessibility related laws and regulations. More information about all of the ADA Partners on campus can be found on [the Office of Equal Opportunity ADA Compliance website](#). Cooperative Extension personnel, volunteers, board members, and service recipients are highly encouraged to familiarize themselves with the [ADA Compliance website](#).

The Office of Disability, Access, and Inclusion promotes accessibility for students with disabilities as it relates to their academic coursework. Additional information may be found by accessing the [Disability, Access, and Inclusion Website](#).

Responsible party: Director, Disability, Access and Inclusion
 Assistant Director, Disability, Access and Inclusion
 Three Coordinators, Disability, Access and Inclusion
 Intake Specialist, Disability, Access and Inclusion
 Graduate Assistant, Disability, Access and Inclusion
 Driver, Disability, Access and Inclusion

The Office of Human Resources works with employees and internal payroll employees to promote accessibility for individuals needing reasonable accommodations in the employment context. Additional information can be found by visiting [the Workplace Accommodations website](#).

Responsible Party: Director, Compensation, Office of Human Resources
 Wellbeing Specialist, Office of Human Resources

COMMUNICATION BETWEEN ASSOCIATE/ASSISTANT DEANS AND FRONTLINE STAFF

The Associate Dean communicates regularly with CELS leadership, management, and all staff in a variety of ways, including: (1) Serving as a member of the Dean’s Administrative Team; (2) delivering regular updates and trainings to all Extension personnel during monthly written updates; (3) answering questions in close coordination with the Assistant Dean for Diversity, Recruitment, and Retention culture and climate issues; (4) referring staff, service recipients, and volunteers to the Office of Equal of Opportunity when civil rights questions or concerns are shared; (5) meeting as needed in groups and individually with college leadership, management, and other staff; (6) updating this handbook as laws, regulations, policies, and practices change, and communicating these changes to all Extension personnel; and (7) holding periodic meetings to discuss programming documentation and planning.

Responsible party: Associate Dean, Extension and Agriculture Programs

NONDISCRIMINATORY EMPLOYMENT PRACTICES

The University of Rhode Island Cooperative Extension follows all federal and state laws and regulations as outlined in the University Rhode Island Policy on Nondiscrimination and Policy on Sexual Misconduct. Hiring of program staff will follow the Policy on Employee Recruitment, Selection, and Hiring, in accordance with the Civil Rights Compliance Toolkit for Employee Recruitment, Selection, and Hiring. Additionally, the Cooperative Extension makes efforts to promote principles of permissible affirmative action employment.

GOALS

As the State’s land-grant institution, and Cooperative Extension Program, it is our collective

goal to provide equal opportunity for all, in employment and service delivery, without regard to protected status. For additional information regarding nondiscrimination and equal opportunity in employment and service delivery, visit the [Office of Equal Opportunity](#) website.

Responsible party: Director, Office of Equal Opportunity
 Vice President, Office of Human Resources

Section 2: Civil Rights Knowledge and Procedures

Civil Rights Compliance Training

All staff will participate in [Civil Rights compliance training](#) offered by the Office of Equal Opportunity and the Office of Human Resources upon hire. The training will be conducted remotely via Brightspace and will include an overview of relevant laws and regulations, responsibilities of all University employees, including Cooperative Extension, and how the organization will meet its legal obligations. Additionally, the Office of Equal Opportunity, in collaboration with University stakeholders, will host periodic lunch-and-learn events virtually, which will be open to the University community and will expand institutional knowledge of responsibilities and obligations under applicable civil rights laws and regulations.

Responsible parties: Office of Equal Opportunity

Communication between Associate/Assistant Deans and Frontline Staff

The Associate Dean communicates regularly with CELS leadership, management, and all staff in a variety of ways, including:

- Serving as a member of the Dean's Administrative Team
- Delivering regular updates and trainings to all Extension personnel during monthly written updates
- Answering questions in close coordination with the Assistant Dean for Diversity, Recruitment, and Retention, and the Office of Community, Equity, and Diversity, as it relates to climate and culture topics
- Meeting as needed in groups and individually with College leadership, management, and other staff
- Updating this handbook as laws, regulations, policies, and practices change, and communicating these changes to all Extension personnel
- Holding periodic meetings to discuss programming documentation and planning

Responsible party: Associate Dean, Extension and Agriculture Programs

Volunteers acknowledge their responsibility to follow all University policies and procedures, including all institutional Civil Rights requirements as described in the Office of Equal Opportunity website.

Access to Cooperative Extension Documentation

All documentation regarding available training, educational resources, processes and procedures, and roles and responsibilities will be stored and available on the University of Rhode Island Cooperative Extension's internal website.

Responsible party: Associate Dean, Extension and Agriculture Programs

Communication Between Associate/Assistant Deans and Frontline Staff

The Associate Dean communicates regularly with CELS leadership, management, and all staff in a variety of ways, including:

- Serving as a member of the Dean's Administrative Team
- Delivering regular updates and trainings to all Extension personnel, during monthly written updates
- Answering questions in close coordination with the Assistant Dean for Diversity, Recruitment, and Retention, and the Office of Community, Equity, and Diversity, regarding climate and culture topics
- Meeting as needed in groups and individually with College leadership, management, and other staff
- Updating this handbook as laws, regulations, policies, and practices change, and communicating these changes to all Extension personnel
- Holding periodic meetings to discuss programming documentation and planning
- Conducting periodic evaluations of data quality control and discussing Cooperative Extension staff responsibilities in promoting meaningful language access
- Working with the Office of Equal Opportunity to proactively evaluate civil rights compliance efforts

Responsible party: Associate Dean, Extension and Agriculture Programs

Filing Discrimination, Harassment, and Retaliation Complaints in Service Delivery or Employment at the University of Rhode Island

The University of Rhode Island Cooperative Extension notifies program participants of nondiscrimination practices and complaint procedures by including the following language in presentations, publications, websites, and other program materials:

Complaints involving prohibited discrimination, including harassment or retaliation, against a group or class of individuals that reflects an apparent pattern or practice of discrimination will be investigated and addressed in accordance with the [Policy on Nondiscrimination](#) and the [Policy on Sexual Misconduct](#). Specific information regarding reporting procedures can be found in the Procedures accompanying the [Policy on Nondiscrimination](#) and the [Policy on Sexual Misconduct](#). To file a complaint or discrimination, harassment, or retaliation, visit: <https://web.uri.edu/equal-opportunity/discrimination/>.

Reporting Discrimination Externally

All individuals shall be informed regarding their right to seek redress through the following external enforcement agencies:

United States Department of Agriculture
Office of the Assistant Secretary for Civil Rights
Attn: Director, Center for Civil Rights Enforcement
1400 Independence Avenue, SW
Washington, D.C. 20250-9410
Fax:202-690-7442
Email: program.intake@usda.gov
<https://www.usda.gov/non-discrimination-statement>

Office of Civil Rights, Region I
US Department of Education
5 Post Office Square, 8th Floor
Boston, MA 02109-3921
Tel.: (617) 289-0111
Fax: (617) 289-0150
<http://www2.ed.gov/about/offices/list/ocr/docs/howto.html>

United States Equal Employment Opportunity Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
Phone: 1-800-669-4000
Fax: 617-565-3196
<http://www.eeoc.gov/field/boston/index.cfm>

Rhode Island Commission for Human Rights
180 Westminster Street, 3rd Floor
Providence, Rhode Island 02903
Tel: 401-222-2661 // 401-222-2664
Fax: 401-222-2616
<http://www.richr.ri.gov/>

U.S. Department of Homeland Security
Office for Civil Rights and Civil Liberties
Compliance Branch
245 Murray Lane, SW Building 410, Mail Stop #0190
Washington, D.C. 20528
CRCLCompliance@hq.dhs.gov
Fax: 202-401-4708

Equal Opportunity in Employment Practices: All job postings include the following temporary statement, which is under review by the administration:

The University of Rhode Island is an equal-opportunity employer committed to community, equity, and diversity. It is the policy of the University of Rhode Island to provide reasonable accommodation when requested by a qualified applicant or employee with a disability. Additional information regarding civil rights compliance can be found by visiting: <https://web.uri.edu/equal-opportunity/>. To learn more about hiring and recruitment at the University of Rhode Island, visit: <https://web.uri.edu/hr/>.

Responsible party: Director, Equal Employment Opportunity
 Vice President, Office of Human Resources

The Associate Dean, Extension and Agriculture Programs, and the Director of the Office of Equal Opportunity will review Civil Rights folders on a three-year rotating basis to ensure policies and procedures outlined in this handbook are being followed, and have been implemented in alignment with institutional civil rights compliance requirements.

- Responsible parties: Associate Dean, Extension and Agriculture Programs
 Director of the Office of Equal Opportunity

Section 3: Advisory Boards and Committees

URI's College of Environment and Life Sciences has an Executive Council, made up of department chairs, faculty senate representatives and Cooperative Extension staff/faculty. The Cooperative Extension and Outreach Coordinating Committee is elected by faculty and is made up of internal faculty and programmatic lead staff and administrators for Cooperative Extension. In addition, an external subcommittee is made up of stakeholders and cooperators from across the state and programmatic interest.

The Cooperative Extension and Outreach Coordinating Committee shall have the responsibility for advising and assisting the Dean, Associate Dean for Outreach, and the Associate Director of RI Cooperative Extension in planning and reviewing Cooperative Extension and other Extension-related programs of the College, for formulating procedures in broad areas of Extension, making recommendations for allocation of Cooperative Extension facilities, personnel, and resources and for advising the Dean on personnel and educational needs of staff.

The full committee (including extramural cooperators) will meet at least two times per year with an agenda solely focused on programmatic priorities. The internal (staff and faculty) members will meet at least two additional times per year to discuss recommendations that are internally focused (e.g. policies, facilities allocation, personnel, etc.).

Council selection process encourages equal opportunity to participate, without regard to protected status. The Cooperative Extension and Outreach Coordinating Committee is composed of two (2) elected faculty or senior staff members actively engaged in Cooperative Extension from different departments, five extramural cooperators, the Cooperative Extension program leaders, and the Associate Dean for Cooperative

Extension and Agricultural Programs who serves in an ex-officio capacity. The extramural members of the committee are appointed by the Dean for staggered three-year terms.

Responsible parties: Dean, College of the Environment and Life Sciences
Associate Dean, Extension and Agriculture Programs

Section 4: Program Delivery

Participants in clubs, activities, and programs reflective of the demographics of the potential service population (parity).

Representation: The University of Rhode Island Cooperative Extension will strive to promote equal opportunity in programs.

Accommodation Requests: Extension personnel and the organization will provide reasonable accommodations when requests are made Relevant information, records, and data will be collected and stored in a separate protected system for those requesting accommodations. The system will be queried for reports annually. The Cooperative Extension will include the outreach statement below in English and Spanish to engage service recipients and program participants in the accommodation process.

The University of Rhode Island (URI) encourages all people to participate in its programs and activities. If you anticipate needing any type of accommodation to participate in a program, service, or activity offered by the Cooperative Extension, or to request language assistive services, please contact **the individuals below:**

Land Stewardship/Master Gardener

- Kate Hardesty, [Insert Title]
- Phone Number: [Insert]
- Email: keventurini@uri.edu

Water Resources

- Alissa Cox, [Insert Title]
- Phone Number: [Insert]
- Email: alibba@uri.edu

Energy Literacy

- Kate Hardesty, [Insert Title]
- Phone Number: [Insert]
- Email: keventurini@uri.edu

Food Systems and Agriculture

- Lisa Tewksbury, [Insert Title]
- Phone Number: [Insert]
- Email: lisat@uri.edu

Healthy Lifestyles (Nutrition)

- Ruthann Marchetti, [Insert Title]
- Phone Number: [Insert]
- Email: ruthann.marchetti@uri.edu

4-H

- Kristy Horan, [Insert Title]
- Phone Number: [Insert]
- Email: kstone@uri.edu

Contact must be made at least five (5) business days in advance of the date of required services or anticipated participation. Reasonable efforts will be made to accommodate individuals who miss this deadline. For TTY assistance, contact R.I. Relay Services at 711.

The Office of Equal Opportunity offers technical assistance on navigating the interactive process to personnel processing reasonable accommodation requests.

Responsible party: Cooperative Extension Personnel
Office of Equal Opportunity

While registration systems capture participation data, Extension personnel will continue to manually enter the appropriate participation data in a shared Google drive. Activity reporting should be entered as activity occurs.

Responsible parties: Programming staff

A yearly assessment of Extension programs will be conducted to determine if parity has been reached by program areas. These assessments will be shared with College and Extension leadership, who will share the reports with staff and engage in conversations about the results and how they can be improved.

Responsible parties: Associate Director, Extension and Agriculture Programs

4-H Clubs

The University of Rhode Island Cooperative Extension staff responsible for organizing and/or running 4-H clubs will ensure reasonable efforts are undertaken to integrate clubs so they are reflective of the communities served. The Rhode Island 4-H Office conducts regular audits to ensure reasonable efforts are undertaken to integrate clubs so they are reflective of the communities served.

Responsible party: 4-H Programming staff

All 4-H clubs, activities, and programs are open to all individuals, regardless of their race, ethnicity, gender, and/or disability. The University of Rhode Island Cooperative Extension staff responsible for organizing and/or running programs, activities, and clubs will ensure all 4-H clubs, activities, and programs are open to all individuals, regardless of their race, ethnicity, gender, and/or disability.

Responsible party: 4-H Programming staff

Section 5: Data Collection and Integrity

All participation data are collected in Z-suite which allows segmentation of data by desired Civil Rights data. If the program is an in-person workshop, conference, or other event, the approved registration system must be utilized to collect and verify registrations. Race, national origin, and sex data must be collected in alignment with the “Best Practices for Data Collection” guidance document issued by the Office of Equal Opportunity. Exceptions included the following:

- Collection of 4-H data

4-H data are captured in an external youth management system (Z-suite). Families use this system to enroll their children in 4-H clubs and projects. We are able to extract member and volunteer demographic data, as well as summarized demographic data for each club.

Responsible party: 4-H Programming staff

Collection of Master Gardener data

The Master Gardener program relies heavily on volunteer efforts captured through an external platform, “Master Gardener Portal (MGP).” A yearly report of summarized data is extracted from the MGP at the end of the program year and imported into a shared Google drive as a single- participant entry.

Responsible party: Master Gardener Programming staff

Collection of EFNEP data

Participant data are housed on a government-hosted external system (WebNEERS). Summarized participant data are entered manually by nutrition education supervisors on behalf of nutrition education advisers.

Responsible party: EFNEP Programming staff

Collection of Volunteer Data

Volunteer and club management data are collected across several systems.

- Parity analysis of registration data
 - The most recently available census data are used with organization data to monitor parity across the state. Parity evaluation is completed for advisory board, volunteer, and participation data.
 - Participants self-identify their race, ethnicity, and gender information through an approved registration system during the registration process; participants have the option to not to answer if they do not want to provide the information. The self-identification process is the only acceptable method for collecting this information.

Responsible party: Program Staff

Race and ethnicity data collection

Race and ethnicity data are collected in all systems and forms as separate categories, in alignment with the “Best Practices for Data Collection” guidance document issued by the Office of Equal Opportunity. An individual can self-identify under one (1) of six (6) racial categories or one (1) ethnic category:

1. Black or African American (Not Hispanic or Latino)
2. Hispanic or Latino
3. American Indian or Alaska Native (Not Hispanic or Latino)
4. Asian (Not Hispanic or Latino)
5. White (Not Hispanic or Latino)
6. Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino)
7. Two or More Races (Not Hispanic or Latino)

Responsible party: URICE Staff

Data Integrity

Data systems are continually monitored to ensure data integrity.

Responsible party: Associate Dean, Extension and Agriculture Programs

Section 6: Nondiscrimination Based on Sex

No program, activity, club, or group names contain sex-stereotyped names or illustrations. The University of Rhode Island Cooperative Extension staff responsible for organizing and/or running programs, activities, and clubs will ensure programs, activities, and clubs do not contain sex- stereotyped names or illustrations. All activities must be carried out in alignment with the Policy on Sexual Misconduct.

The Pennsylvania 4-H Office conducts regular audits of county-based activities to ensure programs, activities, and clubs do not contain sex-stereotyped names or illustrations.

Responsible party: Programming Staff and Title IX Coordinator

Accountable party: Assistant Directors of Programs

All programs and activities are implemented in a manner that ensures nondiscrimination on the basis of sex. The University of Rhode Island Title IX Coordinator and the Cooperative Extension staff responsible for organizing and/or running programs and activities will ensure programs and activities are implemented in a manner that ensures nondiscrimination on the basis of sex and complies with the University’s Policy on Sexual Misconduct.

Responsible party: Programming Staff and Title IX Coordinator

There are no sex-separate programs, activities, contests, or awards. The University of Rhode Island Cooperative Extension staff responsible for organizing and/or running programs, activities, and clubs will ensure programs, activities, and clubs do not contain sex- stereotyped names or illustrations. The Rhode Island 4-H Office conducts regular audits of county-based activities to ensure programs, activities, and clubs do not contain sex-stereotyped names or illustration.

Responsible party: Programming Staff and Title IX Coordinator

Policy on Sexual Misconduct

The University of Rhode Island Cooperative Extension abides by The University of Rhode Island [Policy on Sexual Misconduct and Policy on Nondiscrimination](#), which prohibit discrimination and harassment due to protected status.

Title IX Training

All staff will participate in “[Building a Safe Workplace: Discrimination, Violence, and Hazing Prevention](#)” training upon hire and annually thereafter.

Responsible parties: Title IX Coordinator, Office of Equal Opportunity, and Office of Human Resources

Section 7: Public Notification

Nondiscrimination Statement: Websites and Publications

The University of Rhode Island Cooperative Extension notifies program participants of nondiscrimination practices and complaint procedures, and the appropriate statements should be applied to all publications, advertising, press releases, and other materials. The statements can be found on the College of Environment and Life Sciences website [here](#), must include the following text:

To learn more about filing a complaint of discrimination, harassment, or retaliation at the University of Rhode Island, visit: <https://web.uri.edu/equal-opportunity/discrimination/>.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases

apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Responsible party: Associate Dean, Extension and Agriculture Programs
Director, Office of Equal Opportunity
Programming Staff

USDA Poster

The "And Justice for All" USDA poster ([AD-475A](#)) must be posted in publicly available spaces and the Cooperative Extension website. The poster is displayed and easily visible in each area of any Extension facility the public visits (front office or lobby and conference room). Posters may be taken and displayed when programs are offered in the community.

Responsible parties: Programming staff

Participants in virtual environments are properly notified

The University of Rhode Island Cooperative Extension notifies program participants of nondiscrimination practices and complaint procedures by linking the Office of Equal Opportunity Discrimination tab in virtual environments, and including the appropriate statements in all publications, advertising, press releases, and other materials. The statements can be found below:

To learn more about filing a complaint of discrimination, harassment, or retaliation at the University of Rhode Island, visit: <https://web.uri.edu/equal-opportunity/discrimination/>.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and

employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotope, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Outreach is conducted to promote equal access without regard to protected status. Each program unit will develop and maintain a “grassroots” list of agencies, organizations, and groups to whom program announcements and newsletters will be routinely sent to inform group members or participants in their program of educational programs and opportunities. Such program announcements and letters of outreach will include Extension’s contact information, website information, and the Affirmative Action statement.

Responsible party: Program staff

The University of Rhode Island Cooperative Extension personnel will ensure they do not use stereotyped language and illustrations within Extension publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.

Responsible parties: Marketing and Communications and programming staff

- Responsible party: Extension personnel
 - The University of Rhode Island Cooperative Extension personnel will implement programs, methods, content, and places of services in a manner that ensures nondiscrimination.

- Responsible party: Extension personnel
 - Marketing and Communications
 - Most marketing and communications activities are managed by two staff who coordinate web page updates, social media, and publications, along with CELS Communications Fellows (students working with Associate Deans).
 - Samples of marketing materials: Original files or samples of marketing materials are stored for review purposes.
- Samples of marketing materials (flyers, brochures, direct mail, email campaigns, etc.) created and managed by the Marketing and Communications unit are available upon request.

Section 8: Accessibility for Individuals with Disabilities

Extension personnel and the organization will provide reasonable accommodations when requests are made. Relevant information, records, and data will be collected and stored in a separate protected system for those requesting accommodations. The system will be queried for reports annually. The Cooperative Extension will include the outreach statement below in English and Spanish to engage service recipients and program participants in the accommodation process.

The University of Rhode Island (URI) encourages all people to participate in its programs and activities. If you anticipate needing any type of accommodation to participate in a program, service, or activity offered by the Cooperative Extension, or to request language assistive services, please contact **the individuals below**:

Land Stewardship/Master Gardener

- Kate Hardesty, [Insert Title]
- Phone Number: [Insert]
- Email: keventurini@uri.edu

Water Resources

- Alissa Cox, [Insert Title]
- Phone Number: [Insert]
- Email: alibba@uri.edu

Energy Literacy

- Kate Hardesty, [Insert Title]
- Phone Number: [Insert]
- Email: keventurini@uri.edu

Food Systems and Agriculture

- Lisa Tewksbury, [Insert Title]
- Phone Number: [Insert]
- Email: lisat@uri.edu

Healthy Lifestyles (Nutrition)

- Ruthann Marchetti, [Insert Title]
- Phone Number: [Insert]
- Email: ruthann.marchetti@uri.edu

4-H

- Kristy Horan, [Insert Title]
- Phone Number: [Insert]
- Email: kstone@uri.edu

Contact must be made at least five (5) business days in advance of the date of required services or anticipated participation. Reasonable efforts will be made to accommodate individuals who miss this deadline. For TTY assistance, contact R.I. Relay Services at 711.

The Office of Equal Opportunity offers technical assistance on navigating the interactive process to personnel processing reasonable accommodation requests.

Responsible party: Cooperative Extension Personnel
Office of Equal Opportunity

Programming personnel are highly encouraged to familiarize themselves with the ADA Partners and resources found on the University's [ADA Compliance website](#), which also includes an [Event Planning Accessibility Toolkit](#).

Responsible parties: Programming staff

Non-registration requests: If a customer makes a request outside the registration process (e.g., registers in person), The University of Rhode Island Cooperative Extension personnel should follow the appropriate process to evaluate and fulfill the request.

Responsible parties: Programming staff

Tracking of requests: Each request will require the specific communications regarding the request, the action taken to fulfill the request, and the outcome of the request to be logged.

Responsible parties: Programming staff

Language Access

The University of Rhode Island is committed to maintaining an environment free from discrimination and ensuring meaningful access to programs, services, and activities, without regard to protected status. No person shall be denied equal access based on their ability to communicate in the English language (Limited English Proficient ["LEP"] individuals) or due to hearing/speech impairment (Hearing/Speech Impaired ["HSI"] individuals).

The Office of Equal Opportunity provides strategic leadership and technical assistance to support the implementation of the University of Rhode Island's Policy on Language Access and its Language Access Plan. The Office of Equal Opportunity works collaboratively with University departments and Cooperative Extension staff to promote meaningful language access and remove language barriers that may impede equitable participation

Cooperative Extension personnel engaging with LEP and HIS individuals must familiarize themselves with the following resources found on the University's [Language Access website](#):

- The Language Access Policy
- The Language Access Plan and Four Factor Analysis
- The State of Rhode Island Master Price Agreements
- The Language Access Training Module found in the ["Civil Rights Laws and Research Activities: A Guide for Inclusion and Compliance."](#)

The Cooperative Extension has introduced the following Bilingual Materials: https://drive.google.com/drive/folders/1HtXaOWYuMhu3mNlit0R9P7sdz7u6gg0K?usp=drive_link.