

THE
UNIVERSITY
OF RHODE ISLAND

COOPERATIVE
EXTENSION

Civil Rights Handbook

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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 diversity and inclusion in the development and implementation of Cooperative Extension System programs. These programs must be handled in a manner that treats every customer 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/>.

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 therein. 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 compliance of Extension recipients. The reviews focus on aspects covered by the federal statutes prohibiting discrimination on the basis of race, color, sex, disability, religion, familial status, and national origin (including language). For a full listing, go to <http://nifa.usda.gov/resource/civil-rights-laws-authorities-and-regulations>.

USDA Civil Rights compliance reviews are conducted in a manner consistent with the following major statutes and departmental regulations:

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

Each state Extension institution is responsible for establishing internal policies and guidelines to ensure Extension programs and operations do not discriminate and that research projects and activities are done without regard to age, color, disability status, familial status, gender identity or expression, genetic information, limited English proficiency, marital status, country of ancestral or national origin, political affiliation, race, religion, sex, sexual orientation, pregnancy status, military or veteran status, status with regard to public assistance, or any other protected class, category, or 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.

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, include protected classes, categories, and characteristics that are consistent with Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of

1967, Title XI of the Education Amendments Act of 1972, the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, and all other applicable laws and regulations as listed in the University Nondiscrimination and Sexual Misconduct policies.

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, national or ethnic origin (including language), gender, gender identity or expression, religion, disability, age, sexual orientation, genetic information, marital status, citizenship status, veteran status, and any other legally protected characteristic, and from engaging in acts of retaliation for another’s making a complaint of discrimination or cooperating in an investigation of discrimination.

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. The importance of understanding and valuing diversity, its function in The University of Rhode Island Cooperative Extension’s employment and program delivery, and The University of Rhode Island Cooperative Extension’s role in compliance and documentation is critical. This manual demonstrates our commitment to civil rights compliance, and ongoing efforts to promote a culture that values diversity, equity, and inclusion. To honor our commitment and enforce the internal policies that offer protections to members of protected groups, Cooperative Extension staff are required to participate in civil rights compliance training. The most recent compliance training session was offered on February 2, 2023, virtually, from 9:30am-11:30am.

Civil rights compliance creates a foundation and legal basis for having a diverse workforce and promoting equal opportunity in service delivery, program participation, and employment practices. The Cooperative Extension encourages and appreciates diversity beyond the legal obligations imposed by state and federal laws, regulations, and enforcement agencies. Historically, groups of people have been purposefully excluded from social institutions, including education, service delivery, program participation, employment, politics, and the judicial system. 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 Civil Rights Act of 1964, which began breaking down barriers for protected groups, was signed into law less than 60 years ago. While there has been much progress, 60 years does not undo nearly four centuries of unequal access to jobs, programs, services, and education. 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 equity and respect. Leadership support and institutional capacity to promote civil rights compliance practices can be evidenced by the creation of a new Office of Equal Opportunity, which is dedicated to promoting and enforcing civil rights laws and regulations institutionally. The Office was created in July of 2022, under the leadership of President Marc B. Parlange, and reports to the Assistant Vice President Enterprise Risk Compliance.

The Office of Equal Opportunity is staffed by two (2) full time employees charged with creating programs, evaluating, and enforcing compliance with Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendment Act of 1972, the Americans with

Disabilities Act, Section 504 of the Rehabilitation Act, equal opportunity, and affirmative action compliance.

The University's Title IX Coordinator and Deputy Coordinators promote compliance of Title IX of the Education Amendments of 1972. Additionally, the Office of Community, Equity and Diversity leads and supports our efforts to move beyond compliance and foster an inclusive environment in service delivery and employment. 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.
- Remediate situations in which there is underutilization or underrepresentation.

In general, to fulfill these expectations all paid personnel and volunteers will make all reasonable efforts to encourage people from underrepresented groups to seek employment with the University of Rhode Island Cooperative Extension and participate in programs. All reasonable efforts include:

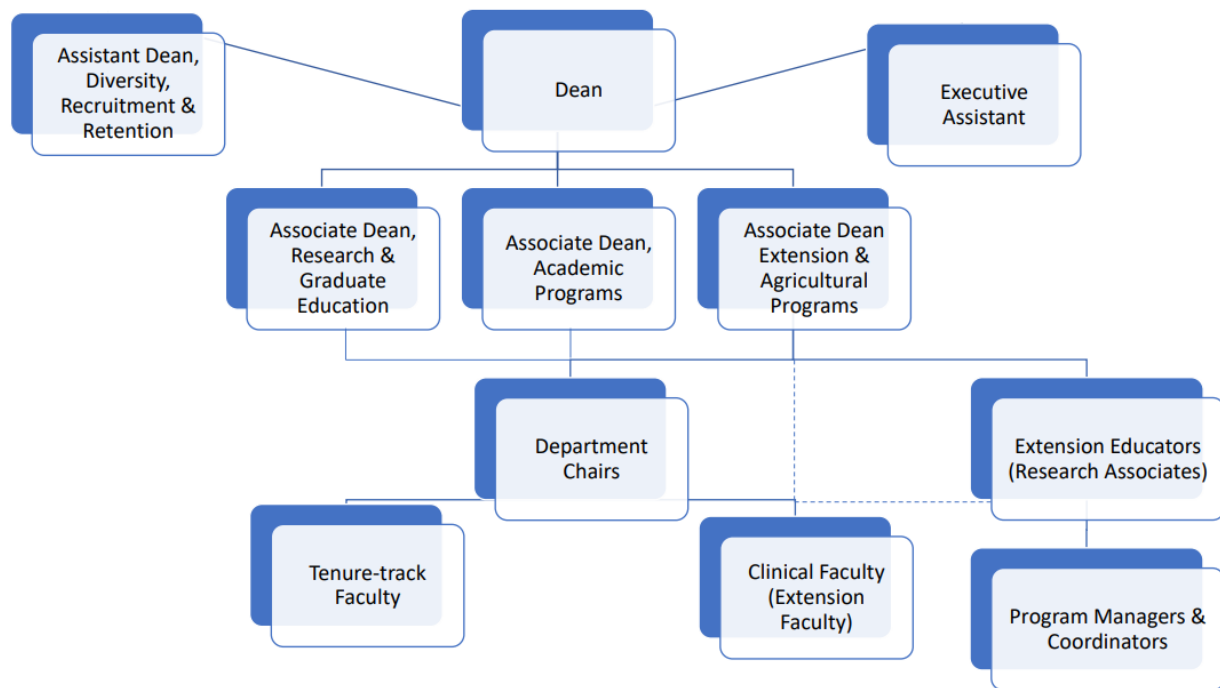
- Creating awareness (e.g., notification of opportunity by direct contact, mailings, and mass media)
- Ensuring access (e.g., appropriate selection of time and location for events; preventing inappropriate pre-employment inquiries)
- Providing utility (e.g., offering programs of interest to the targeted audience)

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 1: 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: 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: Associate Dean, Extension and Agriculture Programs

The University of Rhode Island Office of Equal Opportunity is dedicated to promoting compliance with civil rights laws and regulations. Founded in July of 2022 and reporting to the Assistant Vice President Enterprise Risk Compliance, the Office of Equal Opportunity is staffed by two (2) full time employees charged with creating programs, evaluating, and enforcing compliance with Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendment Act of 1972, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, equal opportunity, and affirmative action compliance. The University's Title IX Coordinator and Deputy Coordinators promote compliance of Title IX of the Education Amendments of 1972. The Office of Equal Opportunity receives and investigates complaints alleging discrimination due to disability status in employment and service delivery. The University understands the importance of self-reflection and evaluation in meeting our institutional obligations.

Responsible parties: Director, Office of Equal Opportunity
 Assistant Director, Office of Equal Opportunity (vacant)
 Equal Opportunity Compliance Officer

The Title IX Coordinator is dedicated to enforcing compliance with Title IX of the Education Amendments of 1972 and enforces the mandatory Preventing Sexual Misconduct Together training students and employees are required to take.

Responsible parties: Assistant Vice President of Enterprise Risk Compliance, Title IX Coordinator
Director, Office of Equal Opportunity
Deputy Title IX Coordinators

Cooperative Extension designated staff member diversity issues

The University of Rhode Island Cooperative Extension is part of the College of Environment and Life Sciences (CELS) and we work with the Assistant Dean for Diversity, Recruitment, and Retention. The Assistant Dean, working in close coordination with the Associate Dean, Extension and Agriculture Programs, serves as the first point of contact for questions and concerns and advances issues as needed to the appropriate staff member in Extension, CELS, and/or the University.

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

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

Responsible parties: Vice President of Community, Equity and Diversity (vacant)
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 Disability, Access, and Inclusion promotes accessibility for students with disabilities.

Responsible party: Director, Accessibility, Access and Inclusion

The Human Resources Administration works with employees and affiliates to promote accessibility for individuals requesting reasonable accommodations.

Responsible Party: Director, Personnel Services

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, for Civil Rights and diversity issues

- 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 Civil Rights compliance 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 and University policies regarding nondiscriminatory employment practices as outlined in the University of Rhode Island Policy on Nondiscrimination and Policy on Sexual Misconduct. Hiring of program staff will follow the Human Resource Administration’s Hiring and Recruitment Policy, and will comply with civil rights compliance efforts and affirmative action principles as outlined in the University’s Affirmative Action Plan. Additionally, the Cooperative Extension makes efforts to diversify its workforce and promote principles of affirmative action in service delivery, employment practices.

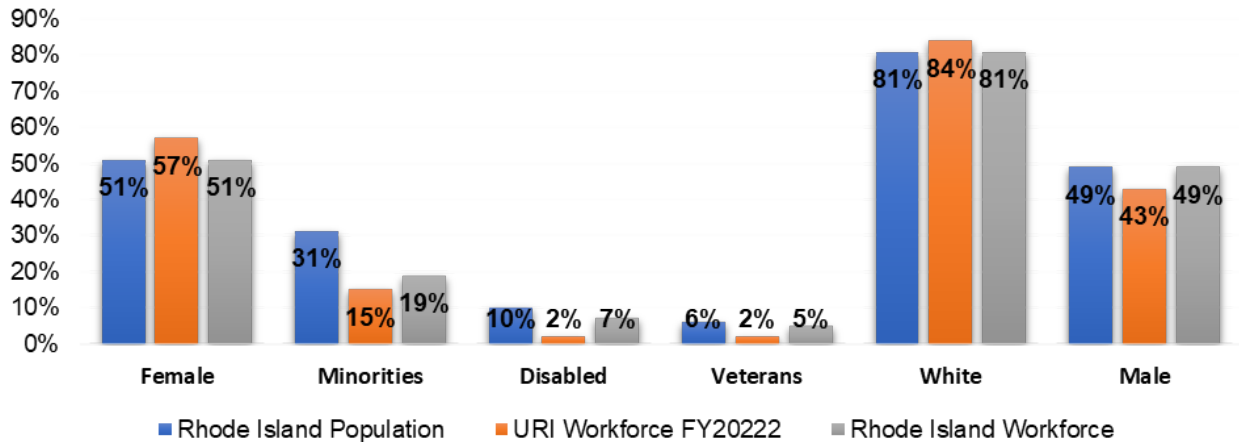
The data reported in this section consists of cross-sectional data; collected at one point in time. As of January 13, 2023, the University of Rhode Island Cooperative Extension Program reported thirty-two (32) staff, of which four (4) identified as minorities (13%), twenty-seven (27) identified as white (84%), and one (1) declined to self-identify (3%). Due to the small size of the group, demographic information will not be segregated by racial and ethnic category to protect the privacy of the employees. Of the thirty-one (31) employees who self-identified, twenty-seven (27) identified as female (84%), and four (4) identified as male (13%).

As of June 30, 2022, the University of Rhode Island had 2,762 full-time employees, which identified as follows:

University of Rhode Island Workforce	%
Female: 1,576	57%
Minorities: 388	14%
Disabled: 34	1%
Veterans: 78	3%

Male: 1,186

43%



Representation in the Workforce

- Female-identifying individuals make up 51% of the Rhode Island population, 57% of the University of Rhode Island workforce, and 51% of the Rhode Island workforce. In comparison with the Rhode Island population and workforce, female employees are overrepresented by 6%.
- Minority-identifying individuals make up 31% of the Rhode Island population, 15% of the University of Rhode Island workforce, and 19% of the Rhode Island workforce. In comparison to the Rhode Island minority population, minority employees are underrepresented by 16%. In comparison to the Rhode Island minority workforce, minority employees are underrepresented by 5%.
- Disable-identifying individuals make up 10% of the Rhode Island population, 2% of the University of Rhode Island workforce, and 7% of the Rhode Island workforce. In comparison to the Rhode Island disabled population, disabled employees are underrepresented by 8%. In comparison to the Rhode Island disabled workforce, minority employees are underrepresented by 5%.
- Veteran-identifying individuals make up 6% of the Rhode Island population, 2% of the University of Rhode Island workforce, and 5% of the Rhode Island workforce. In comparison to the Rhode Island disabled population, veteran employees are underrepresented by 4%. In comparison to the Rhode Island veteran workforce, veteran employees are underrepresented by 3%.
- White-identifying individuals make up 81% of the Rhode Island population, 84% of the University of Rhode Island workforce, and 81% of the Rhode Island workforce. In comparison to the Rhode Island white population and workforce, white employees are overrepresented by 4%.

- Male-identifying individuals make up 49% of the Rhode Island population, 43% of the University of Rhode Island workforce, and 49% of the Rhode Island workforce. In comparison to the Rhode Island male population and workforce, white employees are underrepresented by 6%.

Goals

It is important to recognize the workforce estimates reported by the U.S. Census Bureau only include individuals ages 18-64, who are eligible to work. Individuals under the legal age required to be eligible to work or those who retired are excluded from the Rhode Island workforce count. The University of Rhode Island will continue to make efforts to hire, recruit, retain, and promote employees without regard to race, color, age, country of ancestral or national origin, genetic information, religion, disability status, military status, marital status, pregnancy status, political affiliation, whistleblower activity, status with regard to public assistance, sexual orientation, gender identification or expression, or any other protected class, category, or characteristic. As the State's land-grant institution, and Cooperative Extension Program, it is our collective goal to develop a workforce that mirrors the Rhode Island workforce, which represents the available selection pool, while continuing to make efforts to develop a pipeline of employees. [Fair Employment Practices and Affirmative Action in Employment at](#) the University of Rhode Island. See the Affirmative Action Plan for more information. A copy of the latest plan may be obtained upon request.

- Hiring managers will consider all opportunities to recruit a diverse set of candidates for all positions through external advertising, networking, and communicating opportunities to other institutions, agencies, and businesses.
- Supervisors will ensure there is equality, fairness, and respect in the use of Extension work facilities, including support for employees with disabilities and the dissemination and use of office equipment and office space. Cooperative Extension leadership work with the Human Resources Administration to provide reasonable accommodations.
- The University of Rhode Island has established processes for employment-related complaints regarding harassment, discrimination, and other employment-related issues. The University policy that outlines the steps to be taken are the [Policy on Nondiscrimination](#) and the [Policy on Sexual Misconduct](#). Both policies cover all activities in service delivery and employment practices. Additionally, the University of Rhode Island Human Resource Administration offers the following [Grievance Procedure](#) for nonunion employees, for matters that fall outside of the scope of the policies on Nondiscrimination and Sexual Misconduct.
 - Responsible party: Office of Equal Opportunity and the Human Resources Administration

Section 2: Civil Rights Knowledge and Procedures

- Sufficient training on Civil Rights requirements
 - All staff will participate in [Civil Rights compliance training](#) offered by the Office of Equal Opportunity upon hire, and every five (5) years thereafter. The training will be conducted in hybrid form 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, for Civil Rights and diversity issues
 - 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 Civil Rights compliance documentation and planning
 - Responsible party: Associate Dean, Extension and Agriculture Programs
- Volunteers acknowledge their responsibility to follow all University and The University of Rhode Island Cooperative Extension policies and procedures, including all Civil Rights requirements.
- Needed access for staff to civil rights documents and information
 - All documentation regarding Civil Rights requirements, 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, for Civil Rights and diversity issues
 - 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 Civil Rights compliance documentation and planning
- Conducting periodic evaluations of data quality control and discussing Cooperative Extension staff responsibilities in promoting meaningful language access
 - Responsible party: Associate Dean, Extension and Agriculture Programs, Office of Equal Opportunity
- Procedures in place for filing employment and program discrimination complaints
 - 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:
 - *The University of Rhode Island Cooperative Extension is committed to equal access and opportunity, and to ensuring all reasonable effort is made to deliver and to provide access to Extension programs and services for all individuals. URI Cooperative Extension strives to ensure that all educational programs, services, activities and materials we offer to the public are identified, developed, delivered, and evaluated in an inclusive, equitable, and socially just manner.*
 - The University of Rhode Island and the Cooperative Extension prohibit students, employees, affiliates, volunteers, visitors, service recipients, program participants, and contractors (collectively, “Covered Individuals”) from engaging in illegal discrimination and harassment (including discriminatory harassment) based on an individual’s race, color, creed, national or ethnic origin (including language), gender, gender identity or expression, religion, disability, age, sexual orientation, genetic information, marital status, citizenship status, military or veteran status, and any other legally protected characteristic, and from engaging in acts of retaliation for another’s making a complaint of discrimination or cooperating in an investigation of discrimination.

All Extension participants and members of the university community may raise concerns of discrimination, harassment, and bullying with the Office of Equal Opportunity or Title IX Coordinator. The Cooperative Extension has copies of the Policy on Nondiscrimination and Policy on Sexual Misconduct readily available in public posting locations and on our website. Additionally, USDA posters and contact information of reinforcement agencies is also available in public posting locations and in our website. To file a discrimination or sexual misconduct complaint, individuals may contact:

Reporting Nondiscrimination: Dorca Paulino-Smalley, Director, Office of Equal Opportunity, 401-874-4929, dorca_paulino@uri.edu. <https://web.uri.edu/equal-opportunity/>

Reporting Sexual Misconduct: Kara Larsen, Assistant Vice President, Enterprise Risk Management, 401-874-5593, larsen@uri.edu, or may report Sexual Misconduct following this link: <https://web.uri.edu/titleix/>.

Reporting Bias: The University of Rhode Island also offers staff, students, program participants, or individuals benefiting from service delivery the opportunity to file a Bias

Incident Report, if they wish to report events that do not meet the legal definitions of discrimination or sexual harassment. Complaints may be filed online by [following this link](#).

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: CR-Info@USDA.gov
<https://www.usda.gov/oascr>

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 statement:
 - *The University of Rhode Island is an equal opportunity employer committed to community, equity, and diversity and to the principles of affirmative action.*
 - Additional information regarding the University's Affirmative Action Program and hiring and recruitment practices may be obtained by requesting a copy of the University's latest Affirmative Action Plan.
 - Responsible party: Director, Equal Employment Opportunity and the Assistant Vice President of the Human Resources Administration
- The Cooperative Extension is working with the Office of Equal Opportunity to develop an internal review document.
- Sufficient internal compliance reviews conducted
 - Each Extension program unit will conduct internal audits on a rotating basis of one program unit per year to ensure the Civil Rights plan is being implemented.
 - Responsible parties: Program Staff and Director of the Office of Equal Opportunity
 - The Associate Dean, Extension and Agriculture Programs will review Civil Rights folders on a three-year rotating basis to ensure policies and procedures outlined in this handbook are being followed.
 - Responsible party: Associate Dean, Extension and Agriculture Programs
 - The Associate Dean, Extension and Agriculture Programs will keep on file federal review policies and guidelines, past federal audit reports, and the state response to those reports.
 - Responsible party: Associate Director, Extension and Agriculture Programs

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 interests.

- 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 policies 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 diversity and/or adequate representation of the service population
 - 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.
 - Efforts made to obtain diversity on councils/committees and/or address barriers to adequate representation.
 - Responsible parties: Dean, CELS and 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 ensure balanced membership and parity in programs. The Office of Equal Opportunity will conduct internal demographic analyses and periodic audits to address areas of underutilization. Parity is achieved when club/group membership matches the demographics of the population.
 - Accommodation Requests: Extension personnel and the organization will be able to determine participation data and special accommodations requests for events by program area. 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 or have questions about accessibility inclusion, please contact [insert first and last name] at [insert telephone number or other contact information here such as an email address].

If you speak a language other than English as your primary language and require interpretation or translation services, contact [insert first and last name] at [insert telephone number or other contact information here such as an email address].

Contact must be made at least five (5) business days in advance of the date of required services or anticipated participation. Interpretation and accommodation services are offered at no cost and are available upon request. If requests are received after this date, we might not have enough time to make the necessary arrangements.

- Responsible party: Cooperative Extension and 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 are integrated (reasonable efforts)
 - 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 ensure will 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. During registration, registrants are asked the appropriate Civil Rights questions regarding race, ethnicity, gender, and age. 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 Civil Rights data, as well as summarized Civil Rights data for each club.
 - Responsible party: 4-H Programming staff
 - Collection of Master Gardener data

- Data integrity
 - Data systems are continually monitored to ensure data integrity.
 - Responsible party:

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.
 - 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
 - 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 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 Sexual Misconduct Policy.
 - Responsible party: Programming staff
- 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
- Recipients have adequate sexual harassment policy
 - The University of Rhode Island Cooperative Extension abides by The University of Rhode Island [Sexual Misconduct policy, as well as the University’s Nondiscrimination Policy](#), which prohibits discrimination based on race.
- Sexual harassment and misconduct complaints are handled appropriately
 - The University of Rhode Island Cooperative Extension abides by [The University of Rhode Island Sexual Misconduct Policy](#).
- Staff have had adequate Title IX training
 - All staff will participate in Preventing Sexual Violence Together training upon hire and annually thereafter. The training will be conducted through an online course that describes relevant Title IX laws and regulations, the responsibilities of The University of Rhode Island and its employees, and how the university will meet these responsibilities. All employees will have [ongoing access to the training](#) as a resource.
 - Responsible parties: URI Title IX Coordinator

Section 7: Public Notification

- Nondiscrimination statement is utilized on 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](#).
 - Responsible party: Marketing and Communications unit, programming staff
- USDA's ". . . And Justice for All" poster is utilized to notify the public of their rights and complaint procedures
 - The USDA's ". . . And Justice for All" 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, and the appropriate statements should be applied to all publications, advertising, press releases, and other materials. The statements can be found at on the College of Environment and Life Sciences website [here](#).
 - In addition, the University of Rhode Island Cooperative Extension PowerPoint template found [here](#) has the appropriate statement slides and talking points.
 - Responsible parties: Marketing and Communications unit, programming staff
- Outreach conducted to traditionally underserved communities; collaborations made with community groups
 - Each program unit will develop and maintain a "grassroots" list of minority and underrepresented 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
 - In meetings with other community organizations or agencies on which Extension educators serve, information about Extension programs and their availability for minority and underrepresented groups will be stressed.
 - Responsible party: Programming 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 unit, programming staff

- Artwork and other graphics should be representative of the diversity of constituency groups. Representations should not make assumptions about the economic status or subject matter interests of any particular group. Representative copies demonstrating diversity in artwork/graphics will be kept in the appropriate Civil Rights folder.
 - Responsible party: Marketing and Communications unit
- The University of Rhode Island Cooperative Extension personnel will keep documentation regarding their efforts to inform organizations, the county, communities, and/or key contacts about Extension programs and our nondiscrimination policies.
 - 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 audit 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.
 - Samples of marketing materials developed locally (i.e., not managed through the Marketing and Communications unit) should be kept by individual program staff and available upon request.
 - University statements: The appropriate statements should be applied to all publications, advertising, press releases, and other materials. The statements with a guide on how to apply the statements can be found [here](#).

Section 8: Accessibility for Individuals with Disabilities

- Sufficient reasonable accommodations policies and procedures are in place
 - Registration events (workshops, conferences, webinars): Events managed through the University of Rhode Island Cooperative Extension registration system (Cvent) provide customers the opportunity to make accessibility requests during the registration process. See the URI Event Accessibility Toolkit for more information regarding guidance provided to programming staff:
<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:6c479e87-74d1-3c9a-81be-204c84cecaf8>
 - 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
- Statement of reasonable accommodation is used on documents and/or websites announcing activities or events
 - The University of Rhode Island Cooperative Extension notifies program participants of accommodation practices and procedures, and the appropriate statements should be applied to all publications, advertising, press releases, and other materials. The statements can be found [here](#).
 - Responsible parties: Programming staff
 - All staff will participate in Civil Rights compliance training upon hire and annually thereafter. The training will be conducted through an online course that describes relevant laws and regulations, the responsibilities of The University of Rhode Island and its employees, and how the organization will meet these responsibilities.
 - Responsible parties: Associate Dean, Extension and Agriculture Programs
- Requests for reasonable accommodation are handled appropriately
 - Participants can submit accommodation requests when they register through University-approved registration systems (Cvent). The University structure is set up to handle accommodation requests as described below:

Internal Partners ADA Partners

Community, Equity and Diversity: Reporting to the President, the Office of Community, Equity and Diversity, is tasked with promulgating University-wide diversity initiatives that directly align with the University's transformational goals and academic strategic plan. As a member of the President's Leadership Council, the Chief Diversity Officer is responsible for promoting critical consciousness,

cultural humility, and compassion, for a socially just and equitable campus community. To contact the division of Community, Equity and Diversity, email uriced@etal.uri.edu or call (401) 874-7077.

Office of Equal Opportunity: Dorca Paulino-Smalley, Director of the Office of Equal Opportunity, has been designated as the Coordinator of enterprise compliance with the Americans with Disabilities Act and the Rehabilitation Act and serves as the institutional Section 504 Coordinator. The Office of Equal Opportunity is responsible for investigating complaints of discrimination or harassment on the basis of disability (and other protected categories) in employment and service delivery. The Office of Equal Opportunity works with the individuals below to promote accessibility inclusivity in service delivery and employment. Visit the Office of Equal Opportunity website for more information or contact dorca_paulino@uri.edu or call (401)874-4929.

Office of General Counsel: The General Counsel is the chief legal officer of the University and is responsible for the coordination and management of all legal issues affecting the University. Lauren Jensen, Esq., Associate General Counsel, is the designated Office of General Counsel liaison for any questions relating to compliance with the ADA, Section 504, and any other state and federal laws that provide protections for individuals with disabilities. She can be contacted by email at ljensen@uri.edu or call (401) 874-4491.

Disability, Access, and Inclusion: Dr. Paige Ramsdell, Assistant Dean, Disability, Access, and Inclusion, promotes compliance with Section 504 of the Rehabilitation Act by accepting, reviewing, and approving reasonable accommodation requests made by students. For more information regarding the student reasonable accommodation process visit the Disability, Access, and Inclusion website, email dai@uri.edu, or call (401) 874-5694.

Office of Human Resource Administration: Laura Kenerson, Director of Personnel Services, is the designated Section 501 and Section 503 Coordinator, responsible for approving and monitoring reasonable accommodation requests made by University personnel and applicants. Requests for work accommodation are made in writing to the Director of Personnel Services in Human Resource Administration who consults with appropriate officials to consider the request. Once an accommodation is made for an employee, its effectiveness is periodically monitored by both the employee and the Office of Human Resource Administration. For more information, visit the Human Resource Administration website, Reasonable Accommodations for Employees with Disabilities tab, or contact the Director of Personnel Services by email at kenerson@uri.edu or call (401) 874-5271.

Facilities Group: The Facilities Group is responsible for ensuring Americans with Disabilities Act standards for accessible design are met in accordance with Title II and Title III regulations, which require that people with disabilities have access to spaces to allow equal participation in University events. To contact the Facilities Group at the University, please visit <https://web.uri.edu/facilities/work-order-request-form/> to submit a work request or call (401) 874-4060.

Web Communications Services: Brandon J. C. Fuller, Manager of Web Communications, is responsible for promoting website accessibility. For questions regarding website accessibility resources at the University, email bjcfuller@uri.edu or call (401)874-2258.

Barriers for individuals with disabilities considered when planning University sponsored programs and activities. For example, common requests, such as large-print handouts or seating close to the front of the venue, the educator and staff work together to meet the request.

Language Access

The Office of Equal Opportunity is working with University stakeholders to introduce an institutional Language Access Plan. See Language Access Policy scheduled to be approved on November 7, 2023. At this time, University officials have been complying with the attached policy and procedures, which will become part of an institutional Language Access Plan. The Cooperative Extension is committed to maintaining an environment free from discrimination. Consistent with that commitment, the University prohibits all forms of discrimination in all University Programs or Activities and Services. No person shall be denied equal access to Services 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).

Attachments

- Language Access Policy:
https://docs.google.com/document/d/1hfRzu4UyNZehJGO_hGUIJMPEa9xXqHbe/edit?usp=drive_link&oid=104472886353563589656&rtpof=true&sd=true
- Language Access Procedures and Four Factor Analysis:
https://drive.google.com/file/d/1S5ctOfcCphhotlgrA5H-n6cv9369gLHC/view?usp=drive_link
- Resources:
https://drive.google.com/file/d/1w_NBHquaMf-HUXvqcyCBZG0XCWRkfaJR/view?usp=drive_link
- Cooperative Extension Bilingual Materials:
https://drive.google.com/drive/folders/1HtXaOWYuMhu3mNIit0R9P7sdz7u6gg0K?usp=drive_link
- Civil Rights Compliance and Language Access Training Slides:
https://drive.google.com/file/d/1aW4ZgJcI-GbJdmcCJbCUBHIBNaUan8Is/view?usp=drive_link