UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

The USDA Civil Rights Compliance Review Guide for Extension served as guidance to create this list of required files and documentation The Civil Rights/EEO Compliance documentation found in the list below must be on file in each UF/IFAS Extension office. To comply with the standards, set forth by the USDA, offices are encouraged to use this as direction. It is the responsibility of every faculty member to ensure the collection, storage, update, and content of these files. The County Extension Director (CED) has the overall responsibility for ensuring compliance. The CED is encouraged to utilize staff members for additional assistance to routinely check for missing or outdated documents within the files. Civil rights files can be maintained either electronic or hard copy or in both formats. Important civil rights files should be kept in a centralized location (such as a shared drive or Teams) so that faculty and staff can access these documents when needed. All faculty and staff should have a general understanding of the content of the files. The CED should do an annual compliance check with the faculty and staff in their office and ensure that they understand and perform their responsibilities associated with these files and make corrective measures when not. **Indicate compliance by stating one of the following in the last column: completed, in progress, not available.** The completed form should be shared with the appropriate District Extension Director (DED) by the **first Monday in April** and kept on file in your county shared drive or Teams.

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
I. Resource & Structure; Knowledge of Laws, Rules, and Regulations; Staff Training; and Staff Conferences				
a. *Guidelines for Office Civil Rights/EEO Files*	Include a copy of this Guidelines document in the file for reference on how to maintain the Office Civil Rights/EEO Files. The latest version of this document will be maintained on the Civil Rights UF/IFAS Administration page.	Update Guidelines as changes are made.	CED	
b. *Civil Rights Communications*	This file includes copies of civil rights-related communications from UF/IFAS Extension administration, UF, and USDA.	Update as communications are received. Review annually for completeness. Document review dates. Retain records for 5 years.	CED	
c. *Organizational Charts*	Include organizational charts for office, district, state UF/IFAS Extension, and IFAS levels. These charts are used by reviewers in reviewing the organizational structure to meet civil rights expectations.	Update district and state charts when provided. Update office organizational chart when staffing changes are made. Review annually for completeness. Document review dates.	CED	

UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

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d. *Federal Civil Rights Laws*: i. Nondiscrimination in Federally-Assisted Programs of USDA - 7CFR15, Subparts A, B, and C ii. Titles VI and VII of the Civil Rights Act of 1964 iii. Title IX of the Education Amendments of 1972 iv. The Americans with Disabilities Act v. Sections 504 and Section 508 of the Rehabilitation Act vi. Limited English Proficiency vii. And Justice For All poster	Download, print off and file the document found on this page that contains the URLs to each of the federal laws.	Update as necessary. Review annually for completeness. Document review dates.	CED is responsible for file content, however, all faculty and staff are expected to be familiar with the files themselves and the content of the documents.	
e. *UF/IFAS Civil Rights/EEO Policies*: i. Equal Access Assurance ii. Civil Rights Complaints in Extension Programs iii. Limited English Proficiency (LEP) iv. Affirmative Action Civil Rights File v. ADA Self-Assessment vi. All Reasonable Efforts vii. Public Notification	Download, print off and file the document found on this page that contains the URLs to each of the federal laws. **Note,** the LEP document is being finalized for posting on the extension administration website.	Update as necessary. Review annually for completeness. Document review dates.	CED is responsible for file content, however, all faculty and staff are expected to be familiar with the files themselves and the content of the documents.	

UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

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f. *Faculty/Staff Development Participation*	Participation in the professional development of all office faculty and staff shall be documented including (but not limited to) the name of training, location, and dates per person are expected. This is used to determine equal access and opportunity to participate in programmatic training.	Update as training occurs or annually and check before compliance reviews. Retain records for 5 years.	All faculty and staff are responsible. CED must ensure compliance with training.	
g. *Civil Rights/EEO Training Information*	Include information in this file about equal opportunity and diversity, equity, and inclusion training resources. This includes training from UF, UF/IFAS, UF/IFAS Extension, USDA, county government, and other agencies): • Affirmative Action • Equal Opportunity and Affirmative Action • Level Up on Presence and Belonging • Gators Together • Maintaining a Safe and Respectful Campus • USDA/NIFA Equal Opportunity Staff	Review annually for completeness. Update as needed.	CED	
h. *Staff Meeting Agendas and Minutes*	• Include copies of office faculty/staff meeting agendas and minutes when civil rights topics are discussed. This information is used by reviewers to determine if meetings are held periodically, to determine the status of civil rights implementation and compliance in Extension programs.	Maintain as meetings occur. Retain all documents for 5 years.	CED	

UF/IFAS Extension
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II. Extension Staff				
a. *Position Descriptions*	Provide copies of current position descriptions of all office personnel. This information is used to determine if employees are limited to working in subject matter or geographical areas which tend to maintain a strict racial identity between the employees and minority clients.	Update as necessary. Review annually for completeness and before compliance reviews. Document review dates.	CED, provided by DED	
b. *Office Personnel Demographics*	Provide a list of all faculty and staff in the office, including race, ethnicity, gender, and program area of each person. This information is used to assess the diversity of the UF/IFAS Extension office workforce.	Update office personnel list when staffing changes are made. Review annually for completeness and before compliance reviews. Document review dates.	CED	
III. Advisory Committees, Boards, and Relevant Committees				
a. *Advisory Board/Committee Membership Policies*		Review and update as necessary, at least annually, and before compliance reviews. Document review dates.	The responsibility lies with all faculty/staff members who are responsible for planning and advisory committees. CED will oversee.	
b. *Advisory Board/Committee Demographics*	Provide a list of all UF/IFAS advisory boards/committees by race, ethnicity, and gender. Groups should include Overall Advisory Board, Program Area advisory committees, etc. Also, document All Reasonable Efforts taken to build committees/boards that are representative of the diverse population of the office.	Review and update as necessary, at least annually, and before compliance reviews. Document review dates.	The responsibility lies with all faculty/staff members who are responsible for planning and advisory committees. CED will oversee.	
IV. Program Complaints				

UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
a. *Program Complaints Procedures*	Include a hard copy of the UF/IFAS Civil Rights Plan in the file. Program and employment complaint information for the public is located on the "And Justice For All" poster. Online complaint procedures and fillable forms can be located here.	Review procedures annually to be sure they are up to date. Document review dates.	CED All faculty/staff should be knowledgeable of the procedures.	
b. *Program Complaints*	Include documentation of all office civil rights/EEO program discrimination complaints. If no complaints exist in a year, document as such.	Maintain an annual record as complaints occur. Retain records for 5 years.	CED	
c. *"And Justice For All" and Other Related Posters*	Required posters include: *And Justice For All* and *Employment Law Posters*. Also, provide a list of other routine Extension meeting spaces where the *And Justice For All* poster is displayed. This poster should also be inserted in PowerPoints for virtual and off-site programs if one is not displayed at the check-in.	Review posters and update the "other meeting site" list as necessary annually. Document review dates.	CED	
V. Equal Opportunity / Diversity Plan				
a. *Diversity Action Plan*	Download, print off, and file the document found on this page that contains the URL to the Diversity Action Plan, or print out a hard copy if you prefer.	Update as necessary. Review annually for completeness. Document review dates.	CED	

UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK

b. *UF Civil Rights/EEO Plans*
  i. *For Women and Minorities*
  ii. *For Persons with Disabilities*
  iii. *For Veterans*
	Download or print off, and file the document found on this page that contains the URL to the Diversity Action Plan, or print out a hard copy if you prefer.	Update as necessary. Review annually for completeness. Document review dates.	CED	

c. *UF/IFAS Mission Statement*	Download or print off, and file the UF/IFAS mission	Update as necessary. Review annually for completeness. Document review dates.	CED	
d. *Non-Discrimination Assurances*	Download or print off and file the Regulations of the University of Florida (1.006 Non-Discrimination/Harassment/Invasion of Privacy Policies) Maintain copies by Program Area of signed Compliance Letter forms from all groups to which the office collaborates or delivers programs/services. Maintain a list of those organizations that refused to sign the Compliance Form. The organization's forms must be updated every three years or with a change of leadership.	Review file and update as necessary, at least annually, and before compliance reviews. Document review dates.	Faculty/staff should seek signed EAA forms from organizations that they work with. CED will oversee.	
e. *Plan of Work*	Include a copy of the annual Plan of Work (POW) of each agent faculty member in the office. The PAP includes a description of a program's underserved audiences and specific efforts to be undertaken to reach those audiences.	Update annually when PAP has been approved by the agent's DED and when changes to the PAP are made. Retain records for 5 years.	All office faculty members	
VI. Accessibility for the Disabled				
a. *ADA Self-Assessment of Programs and Facilities*	The file should include completed ADA Self-Evaluation forms for the Office and routinely used Extension meeting spaces. Identified deficiencies should be noted and actions taken to resolve issues also noted.	Update as necessary. Review annually for completeness. Document review dates.	CED	
b. *UF ADA Mission Statement*	Download or print off, and file UF ADA Mission Statement found on this page.	Update as necessary. Review annually for completeness. Document review dates.	CED	

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c. *Reasonable Accommodation Requests and Actions*	Provide a list in the file of all program accommodation requests, actions taken, and pertinent dates. If none exist, document as such.	Maintain as accommodation requests are made. Retain records for 5 years.	Faculty/staff member for whose program the accommodation is made is responsible. CED will oversee.	
VII. Program Areas				
a. *Major Subject Matter Programs in Office*	By UF/IFAS Extension Program Areas, provide a list of major subject-matter programs, including grant-funded programs, offered in the office. This information is used by the reviewer to have a complete picture of the Extension program in the office.	Review and update as necessary at least annually and before compliance reviews. Document review dates. Retain records for 5 years.	The faculty or staff member who gives leadership to the Program Area is responsible. CED should review for completeness.	
b. *All Reasonable Efforts Procedure*	Download or print copy of [All Reasonable Effort Policy](#). This policy is being updated.	Update as necessary. Review annually for completeness. Document review dates.	CED	
c. *All Reasonable Efforts Examples*	Specific "All Reasonable Efforts" (ARE) to reach underrepresented audiences should be filed by Program Area for each faculty member.	The file should be maintained up to date throughout the year. Review annually and before compliance reviews for completeness. Document review dates. Retain records for 5 years.	The faculty or staff member who gives leadership to the Program Area is responsible for ARE records for their program area.	

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d. *UF/IFAS Extension Sponsored Club and Organization Demographics*	List all Extension sponsored clubs and memberships, including 4-H & FCE clubs, 4-H leaders associations, Food and Nutrition Program (FNP), Master Gardener, Master Naturalist (and any other Master groups) volunteer groups, and associations, etc., by race, ethnicity, and gender. Data should be filed by Program Area. For community-based 4-H clubs, provide the number of clubs in interracial communities and membership by race, ethnicity, and/or gender; and for clubs in non-interracial communities provide the number of clubs and membership by race, ethnicity, and/or gender.	Organize by Program Area. Review and update as necessary, at least annually, and before compliance reviews. Document review dates. Retain records for 5 years.	The faculty or staff member who gives leadership to the Extension sponsored group is responsible. CED will oversee.	
e. *All Reasonable Efforts Taken to Integrate UF/IFAS Extension Sponsored Clubs and Organizations.*	By Program Area, and with the assistance of volunteer club/group leaders, document the parity of clubs and other UF/IFAS Extension sponsored organizations, and the All Reasonable Efforts taken to bring clubs into parity.	Update annually, typically at the end of the club or organization's yearly cycle. Retain records for 5 years.	The faculty or staff members who give leadership to clubs or other UF/IFAS Extension sponsored organizations are responsible. CED will oversee.	
f. *Volunteer Affirmative Action Civil Rights Guidelines and Training*	By Program Area, include any written Civil Rights guidelines and training provided to UF/IFAS Extension sponsored organization/Club leaders and volunteers (4-H, Master Volunteers, Advisory members, etc.). Include copies of training materials, dates of and location of training, & lists of participants.	Update as efforts are implemented. Review annually for completeness and before compliance reviews. Document review dates. Retain records for 5 years.	The faculty or staff member who gives leadership to volunteers is responsible. CED will oversee.	

g. *Demographic Data and Outreach Efforts for Specific 4-H Groups and Programs Groups/Programs include:*
  i.   *Total enrolled 4-H members and leaders*
  ii. *4-H resident and day camp participants, counselors, and leaders*
  iii. *4-H Camp scholarship awardees*
	These requirements are 4-H specific. Demographic data must be provided on an annual basis for each of the 4 categories of participants (i.-iv.). 4-H Online should be the source for most of these data. In addition, provide written documentation of efforts taken to move or maintain these groups to parity with the potential audience.	Provide enrollment data annually at the end of the 4-H year. Update participant data for events ii. – iv. when event is completed. Review annually for completeness and before compliance reviews.	The 4-H Agent or staff member who is responsible for the 4-H program in the office. CED will oversee.	

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
iv. *4-H district and state events participation by members and leaders (4-H University, District and state competitions, National 4-H events, etc.)*		Document review dates. Retain records for 5 years.	CED makes sure documentation from the 4-H agent is filed.	
VIII. Participation Data				
a. *Clientele Collection and Reporting Procedures*	Include in the file a printed copy of Reporting Clientele Contacts in Workload and copies of contacts collection forms used in the office. Document reporting procedures for all faculty and staff in the office, i.e., who reports in the online contacts reporting system? How do staff report contacts? How do volunteer contacts get reported, etc.?	Review and update as necessary, at least annually. Document review dates.	CED (should confirm that processes are in place to capture all office customers.	
b. *Potential Audience Data*	Using the latest U.S. Census, U.S. Agriculture Census, and other data sources, document for each UF/IFAS Extension Program Area the total number and percentage of persons by race, ethnicity, and gender who are potential recipients.	Update when new census data are available. Review annually for completeness and before compliance reviews. Document review dates. Retain records for 5 years.	Each faculty or staff member who reports clientele contacts is responsible for their own relevant potential audience data. CED will oversee.	
c. *Actual Participation Data*	Include the annual clientele contacts reports by race, ethnicity, and gender for each faculty and staff (including FNP). If any staff member reports clientele contacts to a faculty member, provide a summarized annual report of contacts collection records with ethnicity, race, and gender data.	Update annually and before compliance reviews. Retain records for 5 years.	Each faculty or staff member who reports clientele contacts is responsible for their own relevant potential audience data. CED will oversee.	
d. *Reports Evaluating Clientele Participation*	This file includes the analysis that should be conducted annually to evaluate actual clientele participation in comparison to the potential clientele and the extent that the programming is within parity objectives. Organize in the file by Program area.	Update annually as the end of year records are available. Retain records for 5 years.	All faculty/staff members for each program area represented in the Office. CED will oversee.	

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e. *Elderly (senior citizen) and Disabled Client Participation*	Document examples of program participation by elderly (senior citizen) clients per Program Area. Document instances of program participation by disabled persons by program area.	Maintain elderly (senior citizen) clientele participation *examples* on an annual basis and before compliance reviews. Document disabled persons participation on an "as occurs" basis. Retain records for 5 years.	Each faculty or staff member who reports clientele contacts is responsible for their own relevant potential audience data. CED will oversee.	
f. *Program Participation Records*	For all faculty and staff, include sign-up sheets, attendance logs, or other collection records of program attendees to provide an auditable trail for clientele contacts reports. This documentation should be able to verify for audits how one arrived at the racial/ethnic & gender breakdown reported on a clientele contact report.	Files as they occur. Review annually for completeness. Retain records for 5 years.	Faculty and staff members are responsible for providing the CED with these records.	
IX. Public Notification				
a. *Public Notification Plan and Policy*	Download or print and file copy of the Public Notification policy Add the Public Notification report from the annual report	Update as necessary. Review annually for completeness. Document review dates.	CED	
b. *Public Notification Examples*	Organized by Program Area, include examples of Public Notification communications that are used to advise individuals, groups, and organizations about program availability on a nondiscriminatory basis and notifies them of the procedures for filing a complaint. Examples should include all major communication methods (flyers, newspaper articles, newsletters, social media, radio & TV programming, etc.)	Update as examples occur. Review annually for completeness and before compliance reviews. Retain records for 5 years.	Faculty and staff members are responsible for Public Notification examples by Program Area. CED will oversee.	
c. *UF/IFAS Extension Non-discrimination Statement on Publications*	Download or print and file the [official nondiscrimination statement (EEO) used on publications](#)	Update as necessary. Review annually for completeness. Document review dates.	CED	
d. *Media Outlets*	Include a list of all newspapers, radio, and television stations that serve the office including contacts, addresses	Update as necessary. Review annually for	All faculty/staff can contribute to the list.	

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
	and phone numbers. Seek out media targeting underserved audiences.	completeness. Document review dates.		
e. *UF/IFAS Extension ADA Statements*	Download or print off, and file the UF/IFAS Extension ADA statements for promotion of UF/IFAS Extension events/programs and ADA statement for accessing UF/IFAS Extension services	Update as necessary. Review annually for completeness. Document review dates.	CED	
X. Mailing Lists				
a. *Policy and Procedures for Mailing Lists*	Download or print off, and file two documents: 1) Freedom of Information Requests and 2) Mailing List Log.	Update as necessary. Review annually for completeness. Document review dates.	CED	
b. *Demographics of Mailing Lists*	By Program Area, file a Mailing List Log to document demographics of all mailing lists, including electronic and "snail-mail" lists. These documents allow the reviewer to determine that racial/ethnic minorities and both sexes are appropriately included.	Review and update as necessary, at least annually, and before compliance reviews. Document review dates. Retain records for 5 years.	Each faculty or staff member who has programming responsibility to clients represented on a mailing list is responsible. CED will oversee.	
XI. Title IX				
a. *Title IX Compliance Policy and Procedures*	[Download or print off, and file the document found on this page](#) that contains the URL to the UF Title IX Compliance Policy, or print out a hard copy if you prefer. Additional information can be found at the [UF Title IX Rights Page](#)	Update as necessary. Review annually for completeness. Document review dates.	CED	
b. *UF Affirmative Action Plan for Women*	[Download or print off, and file the document found on this page](#) that contains the URL to the UF Affirmative Action Plan for Women or print out a hard copy if you prefer.	Update as necessary. Review annually for completeness. Document review dates.	CED	

UF/IFAS Extension
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FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
XII. Internal Reviews				
a. *Internal Compliance Review Policies and Procedures*	Print off and file a hard copy of the UF/IFAS Extension Plan for Internal Civil Rights Compliance Reviews in the file.	Update as necessary. Review annually for completeness. Document review dates.	CED	
XIII. Limited English Proficiency (LEP)				
a. *LEP policy*	Include a printed copy in file of the UF/IFAS Extension LEP Policy	Update as necessary. Review annually for completeness. Document review dates.	CED	
b. *LEP Program Accommodations*	Using the **LEP Accommodation Request Record** provide documentation of all LEP accommodation requests by Program Area, all reasonable efforts taken, and pertinent dates. If none occurred during the year, document as such.	Maintain as LEP accommodation requests are made. Review annually for completeness. Document review dates. Retain records for 5 years.	Faculty/staff member for whose program the LEP accommodation is made is responsible. CED will oversee.	

UF/IFAS Extension
Guidelines for Office Civil Rights/EEO Compliance Files – Annual Compliance Check

FOLDER/FILES/SUB-FILES*	REQUIRED	MANAGEMENT	RESPONSIBLE	YEARLY COMPLIANCE CHECK
c. *Non-English Technical Materials*	Include in file copies of program and subject matter-related materials in languages other than English, produced in, or acquired by, the office. Also, include a list of electronic sources of Non-English Extension materials	Update as necessary. Review annually for completeness. Document review dates.	Faculty and staff are responsible for the Program Area. CED will oversee.	
d. *Frequency of LEP Contacts*		Maintain as LEP contacts occur. Review annually for completeness. Document review dates. Retain records for 5 years.	All Faculty/staff members. CED will oversee.	
e. *Number or Proportion of LEP persons*	The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee/recipient should be documented.	Update when new census data is available. Review annually for completeness. Document review dates. Retain records for 5 years.	CED	
XIV. Interaction with FAMU				
a. *Examples of Joint UF/IFAS & FAMU Extension Programs*	Document in this file all instances where FAMU Cooperative Extension resources were utilized, including consulting with a FAMU specialist, working with a FAMU small farms technician, or jointly delivering a program together, or when FAMU- sponsored programs are advertised by the office.	Update as joint efforts take place. Review annually for completeness. Document review dates. Retain records for 5 years.	All faculty and staff. CED will oversee.	

County: _____

County Director: _____   Date: _____