

University of New Hampshire Cooperative Extension

Action Plan of Civil Rights Corrective Measures In Response to April 2000 Compliance Review

Contents

Background

 Purpose of This Document

 Scope of UNH Cooperative Extension Plan

Immediate Actions: Notifications/Directives/Awareness

Recommended Reviews

Plan Components

Process Components

Evaluation

Appendix I - Compliance Review Report

Appendix II B Affirmative Employment Plan for Employment of
 Women and Minorities in UNH Cooperative Extension

Appendix III - Related UNH Policies

University of New Hampshire Cooperative Extension

Action Plan of Civil Rights Corrective Measures In Response to April 2000 Compliance Review

Background

Purpose of This Document

This report is to document the development of a plan to address the recommendations which were presented in the *CSREES Civil Rights Compliance Review Report of the University of New Hampshire Cooperative Extension (UNHCE)*.

The review was conducted by Vivian Salters in the year 2000 at the state office on the university campus. It involved the entire Leadership Team of UNH Cooperative Extension and others. It consisted of group and individual interviews and review of data. The report is included in Appendix I of this document.

Scope of the UNH Cooperative Extension Plan

Related to employment

This plan addresses the equal opportunity employment findings and recommendations provided by CSREES in the Civil Rights Compliance Review Report. The focus is employment and personnel-related practices. UNH Cooperative Extension's Civil Rights effort encompasses the breadth of policies, practices and processes that affect programs, hiring, supervision, employee recognition, volunteer management, marketing and much more. While these areas are important they are not a component of this employment-related plan.

Relationship to UNH policies

UNH Cooperative Extension is a component of the University System of New Hampshire (USNH). As such, Extension is obligated to abide by the policies and procedures established by USNH. This plan will include Extension-specific practices and actions, all of which are in keeping with USNH policies. A partial text of USNH policies is included in the Appendix of this report.

Targeted audiences

In this plan are components that engage UNH Cooperative Extension in identifying underserved and/or minority audiences, gender-related problems, barriers and strategies for improvement. Demographic information, Extension reports on audience composition, work with other agencies and organizations and staff knowledge will be used to identify areas which should be addressed. For example, programs in inner city Manchester, NH may need to be implemented to make

minorities more aware of UNH Cooperative Extension, not only for programming, but also to enhance employment applicant pools.

Targeted Extension people

Not everyone in UNH Cooperative Extension is involved in hiring, supervision, management or other areas which directly affect personnel action. For those areas which require action affecting employment and personnel, it makes sense for UNH Cooperative Extension to target those people as responsible parties in training, communication, evaluation and accountability. Included would be the UNH Cooperative Extension Leadership Team, those who supervise or have the potential to supervise employees. For those areas which involve employee rights, grievance process or general practices, all staff will be targeted.

Recommendation categories

This plan is organized to group similar recommendations and related actions together so the plan can be implemented in a coordinated manner. The following categories were used:

Immediate Actions: Notifications/Directives/Awareness

Recommended reviews

Plan Components

Process Components

Evaluation

Each recommendation is referenced to the page and number in the compliance report. Every recommendation in the review is addressed with each having an action to be taken. Responsible party or parties and time commitments are specific.

Other

UNH Cooperative Extension has chosen January of each year to renew an emphasis on Civil Rights. In keeping with the Martin Luther King holiday, by combining with the media and other events, UNH Cooperative Extension can better bring attention to the importance and actions needed to have a successful civil rights effort in programming and employment.

Immediate Actions: Notifications/Directives/Awareness

***Recommendation from the Compliance Report:* Issue to all employees a written EEO policy statement under the signature of the Director which sets forth the director's commitment to non-discrimination in program and employment practices. (Page 6, #3)**

Action to be taken: Dean and Director of UNH Cooperative Extension will send to all UNH Cooperative Extension employees a letter describing the priority of civil rights in Extension. He will refer to Secretary Glickman's commitment to Civil Rights as his priority. He will indicate his own commitment to civil rights and tolerance in programming, targeting

audiences and in hiring and employment practices. Included will be a reference to the process for filing an employment complaint.

This letter will be a component of the UNH Cooperative Extension web site, as will the process for filing grievances.

A follow-up statement will be made by the Dean and Director in conjunction with the Martin Luther King Holiday. This statement will appear in a January, 2001 Extension Biweekly Update and in subsequent January issues.

The web site will be reviewed to make the grievance policy and procedures as accessible and user friendly as is practical.

Responsible party or parties: Dean and Director John Pike, and CIT Supervisor, David Foote.

Timeline: November, 2000. Follow-up message will be provided to staff January, 2001. The web site will be reviewed and amended as appropriate in November, 2000.

Recommendation from the Compliance Report: Ensure that all employees are familiar with the University process for filing an employment complaint. (Page 7, #2)

Action to be taken: See action item above relating to the Statement by John Pike, which will include access to the process for filing a grievance. The UNH Cooperative Extension web site will provide ready access to a description of the process.

Responsible party or parties: John Pike (communication) and David Foote (web site)

Timeline: November, 2000

Recommended Reviews

Recommendation from the Compliance Report: Renew and strengthen the affirmative action program to make it more responsible in its employment practices. To the end, it will engage more constructively and aggressively in the elimination of those areas of under-utilization and under-representation of minorities in the State Extension System. (Page 6, #4)

Recommendation from the Compliance Report: Carefully and systematically examine all employment policies currently used by UNHCE to recruit Extension employees to ensure they do not operate to the detriment of any person or group because of their race or sex. Where such an examination reveals barriers to full participation of minorities in the workforce, immediate and specific actions to modify or supplement recruiting policies and procedures should be taken. (Page 9, first #2)

Action to be taken: A review of the UNH Cooperative Extension affirmative action hiring and personnel practices will be made by a representative of the Extension Leadership

Team in conjunction with the University of New Hampshire Personnel Office. While UNH Cooperative Extension must be in compliance with University policies, Extension specific practices will be the target for strengthening.

Responsible party or parties: Robert Edmonds, Program Leader

Timeline: January, 2001

Plan Components

Recommendation from the Compliance Report: Develop an affirmative employment plan (AEP) for UNHCE. The AEP should identify utilization, non-utilization, under representation, and barriers to the Extension workforce. It should address such program elements as recruitment, hiring, promotions, organizations, as well as other relevant employment matters requiring monitoring and evaluation. A copy of the AEP should be submitted within 60 days of this report's release date. (Page 6, #2)

Action to be taken: The Affirmative Employment Plan has been written and is attached to this document as Appendix II.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: Completed

Recommendation from the Compliance Report: Integrate an Affirmative Action Goal Enrichment Program for minorities into the Extension employment process. These employment goals should be established for all occupational levels and have minority group member focus. The goals should be reviewed by all line supervisors and especially discussed with members of all search/screening committees. This should be done on a routine basis with particular emphasis on correcting the impact that employment decisions are having on Blacks and other minority group members which is preventing them from entering the UNHCE workforce. (Page 8, #1)

Action to be taken: UNH Cooperative Extension will require more information and education regarding the development of an Affirmative Action Goal Enrichment Program. A member of Extension's Leadership Team will lead the effort to become informed and to develop a AAGE plan. UNH Personnel and CSREES will be the primary resources. Curt Deville at (202) 720-2700 will be the CSREES contact regarding this.

Responsible party or parties: Robert Edmonds

Timeline: January 2001 for information gathering. June 2001 for the plan completion.

Recommendation from the Compliance Report: Consider ways and means of providing motivational incentives through appropriate recognition and awards to those staff members who make notable contributions to the equal employment and Affirmative Action program. (Page 9, #1)

Action to be taken: It will be necessary for UNH Cooperative Extension to review practices in other Extension units around the country with regard to awards relating to hiring practices. Since civil rights compliance and attitudes extend far beyond hiring within the Extension system, UNH Cooperative Extension will develop appropriate recognition for those who integrate exemplary civil rights practices into their work, no matter if it is hiring, recruiting volunteers, work with underserved audiences, breaking language barriers other positive accomplishments. There should be long-term effects of engaging and rewarding staff with regard to civil rights practices and successes.

Responsible party or parties: Extension Leadership Team

Timeline: Martin Luther King Holiday, 2001

Recommendation from the Compliance Report: Consider implementing an intern program to increase the number of racial ethnic minority potential applicants for UNHCE positions. (Page 10, # 1)

Action to be taken: Program Leaders, specialists and others will work with UNH Student Affairs, UNH Personnel Office and faculty to recruit minority interns to fill needs they have. One target will be to hire an intern to assist with components of this plan.

Responsible party or parties: Extension Leadership Team, Specialists

Timeline: Starting with January 2001 semester

Recommendation from the Compliance Report: Take specific steps that will ensure all Extension supervisors and new employees are made aware of their responsibilities in civil rights and equal employment opportunity. These steps should include features that will ensure that Extension staff members are fully versed in the proper procedures for processing EEO complaints. (Page 11, # 1)

Action to be taken: Civil rights compliance and processes will be included in every new employee orientation meeting, as they have been in the past. New employees will be given an orientation in civil rights compliance by their supervisor within a month of hire. This will include all status employees in the Extension Educator Ranking System, Professional and Technical Employees and Operating Staff employed by UNH Cooperative Extension or working in Extension offices and employed by a county. Civil right policies and practices will be posted on Extension's web site. Training for civil rights will take place at Extension Management Team meetings, at program area staff meetings, and on a scheduled rotation for selected county staff.

Responsible party or parties: Extension Leadership Team and CIT office.

Timeline: Training of new employees by their supervisor will begin immediately. The web site will be reviewed in November 2000. The next new employee orientation is not scheduled and the timing will depend upon the number and timing of new hires.

Recommendation from the Compliance Report: Develop training that will update staff's knowledge relating to CR/AA requirements. Emphasis should be placed on nondiscrimination on the basis of sex, disability, and race, as well as management of Extension employment decisions towards achieving a more equitable balance in program participation and the workforce. (Page 11, # 2)

Action to be taken: Since most Extension staff do not hire or supervise, a training program will be developed targeting current and potential supervisors and those who are likely to hire status or

temporary employees. The UNH Personnel Office will be asked to participate in the training, which will be specific to hiring and supervisory practices.

Responsible party or parties: Leadership Team. Robert Edmonds will be assigned to develop a training program.

Timeline: Implementation of an in-service training by June, 2001.

Recommendation from the Compliance Report: Considering that EEO/CR rules and regulations and the Equal Pay Act require that Extension carefully adheres to the concept of equal pay for equal work, UNHCE should continue to address equity of salary administration for Extension employees who hold the same or equivalent qualifications and time-in-service.

Action to be taken: At least once every three years, UNH Cooperative Extension will have an independent researcher do a comprehensive analysis of equity, including gender equity, among Extension's employees. Salary adjustments will be made as appropriate, based upon the study, giving adequate consideration for performance as a factor in current salaries. UNH Cooperative Extension has an excellent track record in this area and has very well addressed gender equity through salary adjustments.

Responsible party or parties: The Dean and Director will engage a researcher to conduct an equity study.

Timeline: Study to be completed by July 1, 2001.

Recommendation from the Compliance Report: Ensure that all staff have taken advantage of sexual harassment training by or through the university. (Page 12, # 2)

Action to be taken: All status staff will be required to have demonstrated that they have participated in sexual harassment training. This training may be provided by UNH Cooperative Extension at staff meetings, by the University of New Hampshire or some other approved organization.

Responsible party or parties: Bob Edmonds

Timeline: Staff training will begin Jan. 2001. Documentation that all staff have undergone training will be completed by December 31, 2001.

Process Components

Recommendation from the Compliance Report: Although the University's complaint system appears sufficient to protect the rights of employees, the UNHCE needs to reassess internal grievance procedures and ensure that they provide for prompt and equitable resolution of employee complaints alleging any action which would be prohibited by EEO/CR rules and regulations. (Page 6, # 1)

Action to be taken: A Leadership Team member will be assigned to work with the University Personnel Office to develop an Extension specific grievance process that will dovetail effectively with the University system. This may be limited to increasing awareness of how to use the University process by employees.

Responsible party or parties: Robert Edmonds

Timeline: January 2001

Recommendation from the Compliance Report: Carefully and systematically examine all employment policies currently used by UNHCE to recruit Extension employees to ensure they do not operate to the detriment of any person or group because of their race or sex. Where such an examination reveals barriers to full participation of minorities in the workforce, immediate and specific actions to modify or supplement recruiting policies and procedures should be taken.

Action to be taken: The UNH Personnel Office will be engaged to advise UNH Cooperative Extension regarding recruitment practices for status and non-status positions. The review will look at advertisement placement, which may or may not capture targeted audiences, geographical barriers, targeted one-to-one recruitment, recruitment of interns and other practices.

Responsible party or parties: Robert L. Edmonds, Program Leader, Forestry & Wildlife

Timeline: July 1, 2001

Recommendation from the Compliance Report: Establish a system of records to document equal opportunity efforts. Race and sex data should be consistently collected in all job applications including resumes/applications for specialist and agent positions. This system should encompass specific documentation related to decisions surrounding the applicants for an Extension vacancy, as well as information and data relative to pools of applicants identified for interviews, and technical reasons for rejection of minority applicants. (Page 10, # 2)

Action to be taken: The University System of New Hampshire has in place a system for collecting information and documenting the progress of minority applicants. Using a survey similar to the one used by the University for selected positions, an assessment will be made of the applicant pools.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: Some components are currently in place. Research on the feasibility of a survey of racial composition of employment pools will be conducted during the coming year with an anticipated implementation date of January 2, 2001.

Recommendation from the Compliance Report: Before a hiring decision is signed, managers should be made aware of the extent to which minority and female candidates have been generated in the search process. This awareness could greatly assist managers in deciding if an adequate search was conducted. (Page 10, # 3)

Action to be taken: This system is in place and is reviewed by the University Personnel Office as well as by Leadership Team members related to the position hiring process.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: January 2001

Recommendation from the Compliance Report: Once a Diversity Plan is in place for each position, utilize applicant flow data as a monitoring device to insure that diversity goals are being followed. (Page10, # 4)

Action to be taken: UNH Cooperative Extension will gain more information from CSREES about the form and content of diversity plans so that it may develop plans appropriately. There is an applicant flow process in place at UNH Cooperative Extension that is used throughout the university.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: January 2001

Evaluation

Recommendation from the Compliance Report: Ensure performance evaluation procedures for evaluating Extension Staff members are used in a non-discriminatory manner. The procedures should encompass an indicator that provides for fair and impartial allocation of merit pay and salary increases. (Page 9, #2)

Action to be taken: UNH Cooperative Extension has in place one of the most comprehensive performance evaluation procedures within the University System of New Hampshire. The process has rules set which ensure that all in the Extension Educator ranking system are treated equally. The process includes a self-evaluation and a mechanism for peer input. For county staff, advisory council input is part of the evaluation process. Standardized forms are used for all Extension Educator performance evaluations. A standardized performance evaluation summary is used for documenting performance

evaluation in each individual's personnel file. This summary is signed by the supervisor and by the employee.

Operating staff have a standardized form provided by the University System of New Hampshire.

Professional and technical staff do not have a standardized system provided by the University System. Within employment types, the evaluation process is handled similarly for every employee.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: January 2001

Recommendation from the Compliance Report: UNHCE should consider the feasibility of developing and implementing an evaluation system to gauge the effectiveness of the overall EEO/AA Program activities. The system should include:

Problem solving strategies to identify EEO problems, barriers, and employment patterns,

forming or existing within the UNHCE System;

- a) A vehicle to provide periodic reports to the management officials on EEO/AA progress and for evaluating and implementing employee recommendations for realizing EEO objectives; and
- b) A follow-up mechanism to ensure implementation of EEO/AA goals and objectives as identified by management and employees as outlined in the UNH Affirmative Employment Plan. (Page 7, # 1)

Action to be taken: The following actions will be implemented:

1. Program leaders will work with their staffs, individually and collectively within each program area to identify audiences which are underserved because of EEO problems, barriers or employment patterns within the UNHCE system. The barriers and other factors will be identified and strategies to overcome the obstacles will be developed and implemented as appropriate.

2. Progress on EEO/AA compliance will be tracked. Employee input will be accumulated, evaluated and implemented as appropriate. An evaluation of the progress and implementation of employee suggestions will be summarized in a report by the Leadership Team annually. This will be used as a guidepost for future EEO/AA strategies.

Responsible party or parties: UNH Cooperative Extension Leadership Team

Timeline: Annually in January in conjunction with the Martin Luther King Holiday

Appendix I **Compliance Review Report**

Appendix II **Affirmative Employment Plan for Employment of Minorities**

And Women in UNH Cooperative Extension

Appendix III

Related University System of New Hampshire Policies