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**UNIVERSITY of NEW HAMPSHIRE**  
**COOPERATIVE EXTENSION**

*County Offices*

**Belknap County**  
527- 5475

**Carroll County**  
447-3834

**Cheshire County**  
352-4550

**Coös County**  
788-4961

**Grafton County**  
787-6944

**Hillsborough County**  
641-6060

**Merrimack County**  
796-2151

**Rockingham County**  
679-5616

**Strafford County**  
749-4445

**Sullivan County**  
863-9200

**Family, Home & Garden  
Education Center**  
629-9494 (Office)  
877-398-4769 (Toll Free)

**UNH Cooperative  
Extension State Office**  
862-1520

The University of New  
Hampshire is an equal  
opportunity educator  
and employer. University  
of New Hampshire, U.S.  
Department of Agriculture  
and N.H. counties cooperating.

August 27, 2009

Colien Hefferan  
Administrator, CSREES  
305 A Whitten Building  
12th St., SW and Jefferson Drive  
Washington, DC 20250

Dear Dr. Hefferan,

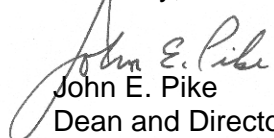
Enclosed is an Action Plan of Civil Rights Corrective Measures in response to recommendations made during a University of New Hampshire Cooperative Extension Compliance Review conducted in August 2008, by Norman E. Pruitt, Program Compliance Review Team leader, Cecilia Johnson, Equal Opportunity specialist, and Ronald Young, Equal Employment Opportunity specialist.

This Action Plan report and strategies are a top priority for UNH Cooperative Extension and will be fully implemented by our Leadership Team and staff.

It is my intent as Dean and Director to ensure that this organization is in full compliance with both the letter and spirit of the law. I am proud that UNH Cooperative Extension staff throughout New Hampshire demonstrate a positive attitude and commitment to Civil Rights, diversity and compliance.

I will personally lead a renewed effort to bring our organization to the highest level of awareness and accomplishments in Civil Rights.

Sincerely,

  
John E. Pike  
Dean and Director

C: Leadership Team

Encs.



**University of New Hampshire Cooperative Extension  
8/27/09 Action Plan in Response to  
Recommendations of 2008 Civil Rights Compliance Review**

**Program Management & Civil Rights Compliance**

Recommendation:

*Reasonable accommodations for qualified disabled clientele are required unless Extension can show that the accommodation would create an undue financial hardship. UNHCE should ensure program announcements produced, at the county level, contain a special needs accommodation statement for disabled to participate in programs. (Page 8 of Report)*

Action taken:

All county offices will conduct a review of ADA requirements. Physical facilities used for Extension programs will be reviewed for ADA compliance, and publication statements announcing programs will carry the following approved accommodations statement. This statement has been shared with all staff through UNHCE’s Civil Rights web page, as a standard message on UNHCE’s on-line eEvents registration system, and in its marketing guide for developing promotional announcements for programs.

The statement reads:

*For any special arrangements including dietary, physical access, or other accommodation requests, including the ability to pay, please contact XXX (name of contact person). Ten working days are needed to facilitate special needs requests.*

Educators should be able to demonstrate that all reasonable accommodations were made for the known eligible disabled clientele to participate in county Extension educational programs. County Administrative Liaisons (CALs) will communicate this to county staff and periodically remind county staff of this procedure to ensure compliance.

Recommendation(s):

*UNHCE should have a clear written statement which sets forth the institution’s legal obligation and policy for services to individuals with Limited English Proficiency. Internal communication of UNHCE’s policy in writing to all Extension personnel is essential to their understanding, cooperation, and compliance.*

*UNHCE should prepare a plan for the guidance of Extension personnel, to improve access to Extension educational programs and activities by LEP customers. (Page 11 of Report)*

Action taken:

Staff will identify volunteers, facilities and student(s)/client(s) in communities where there is Limited English Proficiency to reduce any cultural misunderstandings and improve reading and cultural understandings.

UNHCE's Web site will provide a direct link to eXtension's Web page that provides historical and cultural-specific information as well as resources to support educational programming with these cultural groups. <http://www.extension.org/pages/Audiences>

The following message will be shared with all staff and Advisory Council members:

*UNH Cooperative Extension is committed to providing educational programming to all people, regardless of the primary language they speak. Staff that plan programs for audiences have an obligation to reduce language barriers that might preclude meaningful access by Limited English Proficiency (LEP) persons to the extent reasonably possible.*

## **Extension Boards, Councils, and Committees**

### Recommendation(s):

*UNHCE should review the Guidelines for Expanding Extension Program Development Committees on recruitment and publication notification process to serve on these Extension councils and committees. UNHCE must consider the use of special outreach, including sufficient detail for interested minority persons to understand the assignment and know contact information to volunteer for membership.*

*UNHCE should provide clarification on the process and train all Extension staff on these guidelines to increase the number of minority participants on County Extension Advisory Councils.*

*UNHCE should assist the COA in developing positive action plan with Extension Educators to publicize the recruitment and selection/election process for the county Extension Advisory Council through various media, including minority media, such as newspapers, newsletters, fliers, the Internet, etc., and ensure equal access and opportunities for racial/ethnic minority group members to volunteer to serve on these program decision-making bodies. (Page 12 and 13 of Report)*

### Action taken:

A new position was created in July 2009 for Volunteer Development and Management. One duty of this person is to develop and implement training for staff on the best practices for recruiting and training a diverse County Advisory Council.

The Volunteer Development and Management Specialist is also responsible for providing training materials and resources to help counties recruit and support diverse Advisory Councils. In addition, the Volunteer Development and Management Specialist will ensure representation from diverse audiences, including underserved and underrepresented clientele and ensure compliance with civil rights, affirmative action, and equal opportunity policies. These recruitment efforts for Advisory Councils will include data on member gender, ethnic background, geographic location, economic situation and other societal components. No names should be disclosed.

For election of new Advisory Council members with a more diverse background, the chair will appoint a nominating committee of three other members of the council. This committee will then solicit nominations through other council members, the UNH Cooperative Extension professional staff, county Extension newsletters where applicable, or other forms of mass media. Within a two-month period or less, a slate of potential candidates will be developed and an election held.

County Administrative Liaisons (CALs), working with County Office Administrators and county staff, will conduct an annual review of the composition of advisory boards. Benchmarks will be established and reviewed to determine if changes of participation by underrepresented populations are needed.

## **Extension Program Participation Data**

### Recommendation(s):

*UNHCE should engage all Extension staff in a management directive that provides a review of the appropriateness, necessity and reasonableness, and valid functions served by the collection of program participation data by race and gender. The directive should provide illustrations of actual uses of the data.*

*UNHCE should develop procedures which require county Extension staff members to demonstrate ongoing valid use of the program participation data. (Page 15 of Report)*

### Action taken:

Staff training for Civil Rights and Affirmative Action/EEO, and workshops for staff regarding the reporting system, will include a segment on the use of reports with special emphasis on how to look for historical trends in participant race/ethnicity and to compare the participant data with the *potential* audience for programs.

Each county and administrative program area is provided with an annual report of participants, which is shared through an electronic reporting system as a saved report. An internal audit will take place every two years.

## **Program Implementation**

### Recommendation(s):

*UNHCE should issue procedures for Community Resource and Agricultural Resources Business Institute programs to incorporate specific program targets for the delivery of Extension educational benefits and services to minority and women in business.*

*UNHCE should promote special outreach efforts to increase the number of minority volunteers to participate in the County Extension Master Gardener program.*

*UNHCE should review documentation of all reasonable efforts, where Extension staff document outreach efforts to serve minority clientele. These plans should consistently apply for all Extension staff to help increase the number of minorities in programs. (Page 24 of Report)*

### Action taken:

One of the goals in the current UNHCE's current Strategic Plan is to become more recognized and valued by New Hampshire citizens. One action under this goal is to, "*Expand marketing efforts to reach a variety of audiences, including underserved and diverse audiences.*" Currently a marketing and public relations team is being formed to develop specific strategies for all staff and volunteers to use when marketing UNHCE programs.

Locations for workshops such as the Natural Resources Business Institute that are only held once or twice each year are rotated so citizens from all parts of the state are provided the opportunity to attend.

Targets for women and minority participation will change from location to location but the goal is to hold these workshops regularly in areas of the state where larger populations of women and minority business managers live, such as Manchester and Nashua.

Recommendation(s):

*Extension staff should review the outreach and recruitment efforts for 4-H programs and adult volunteer participation to ensure that all reasonable efforts to recruit minorities are documented by county Extension staff. (Page 28 of Report)*

*UNHCE 4-H officials should require Extension educators to document all reasonable efforts to conduct outreach activities to increase the number of minority participants in 4-H community clubs that are not integrated but, located in racially/ethnically mixed communities.*

*The 4-H Extension Educators should take specific steps to decrease the number of single race clubs in racially/ethnically mixed communities and increase minority representation in District and State 4-H events. (Page 29 of Report)*

Action taken:

Processes for outreach and recruitment efforts for 4-H members and volunteers will be discussed annually at statewide 4-H Youth Development staff meetings. Systems for documentation of outreach efforts will be established. Increased use of the UNHCE 4-H Web site will be explored.

UNHCE's 4-H Youth Development program will review the definition process of identifying communities within counties as racially mixed or not. With this clarification it will be easier to target communities that are racially mixed. All club leaders will continue to document their member and volunteer recruitment efforts on the annual club report turned in each November to the state 4-H office.

All efforts will be made to include a representative audience of New Hampshire 4-H club membership in district and state events. It is important to note that most activities beyond the county are for those 12 and older, so the representation needs to reflect that age demographic, not the total 4-H enrollment.

All the above action items will be discussed by the State 4-H Advisory Committee to ensure understanding and support of the need for increased efforts to be inclusive and document those efforts.

## **Recommendations of 2008 Civil Rights Compliance Review For Equal Employment Opportunity**

### Recommendation:

*UNHCE officials, given the availability of qualified minorities, should take specific steps to eliminate absence of minority employees in both of the Counties Extension workforce. UNHCE should search/recruit in areas previously unexplored. Setting timetables and taking related action should be detailed in a recruitment plan.*

*Positive deliberate action should be taken by UNHCE officials to actively recruit qualified eligible minority persons for county Extension Educator positions as actively as they have recruited for White candidates. An expanded search network, as determined necessary, should include not only traditional avenues, but potentially fruitful channels through which promising minority candidates can be located. This related action should be detailed in a recruitment plan. (Page 5 of Report)*

*It is recommended that UNHCE make all reasonable efforts to hire minorities when job opportunities occur. (Page 35 of Report)*

### Action taken:

UNHCE's obligation is to meet all USDA regulations and will incorporate UNH's inclusive recruitment, hiring and retention strategies into county hiring processes. See UNH Diversity and its Strategic Plan: <http://www.unh.edu/diversity/> and <http://www.unh.edu/diversity/pdf/Diversity%20Strategic%20Plan%202004-09.pdf>

UNHCE will enhance recruitment and retention of a widely diverse faculty (which includes Extension Educators,) through partnering and retention programs, with a particular emphasis in the next three to five years on racial and ethnic minorities, as well as on women in traditionally under-represented fields. UNHCE uses the University of New Hampshire's (UNH) Human Resources online employment system, which encourages application by members of all underrepresented groups. <https://www.unhjobs.com/applicants/jsp/shared/frameset/Frameset.jsp?time=1250538725604>

It is important to note that of the two counties reviewed by USDA, Geoffrey Njue does hold the position of County Office Administrator (COA) in Strafford County, but the position of COA transitions on a regular basis. It was noted that in some Extension areas, it appears minorities are frequently recruited only for positions thought to be for minorities, such as in the FCS programs. Geoffrey Njue is, first and foremost, an Extension Educator in Agricultural Resources, in Strafford County.

UNHCE will continue to work with the University's office of Human Resources, in support of the University's mission to recruit and retain a diverse workforce and promote inclusion and equity. This includes the already implemented:

- Incorporation of a diversity module in the curriculum for *the Managing and Supervising at UNH* Professional Development Program (which Extension Educators participate in,) in an effort to inform managers and supervisors of the University's commitment to diversity, the importance of valuing differences, creating a welcoming climate and the role of supporting that commitment in a discussion of the Diversity Plan.

- Development of the *Getting Started at UNH* Orientation Program which includes a review and highlight of available resources such as affinity groups and organizations as well as an overview of the Diversity Initiatives and Multicultural Affairs Web pages. This orientation program helps members of under-represented groups make a smooth transition into the University community.

Through the Office of the Provost and Executive Vice President, the Faculty Mentoring and Professional Development Program assists junior faculty, which includes Extension Educators, in their academic career development through the guidance and support of experienced University faculty members who serve as role models, advisors and mentors. The Program also offers knowledge-based, skill-enhancing and leadership development seminars to department chairs and senior faculty on issues facing pre-tenured faculty, higher education and academia.

UNHCE views equal opportunity in employment and education programming an essential priority and one to which it is deeply committed. UNHCE will continue to ensure that recruitment activities are designed to attract and employ candidates for all positions from minority as well as majority group members.

Recommendation:

*It is recommended that UNHCE conduct a civil rights analysis to determine the reason that female Assistant/Associate Extension Educators were 71.4 percent of the not nominated and not promoted to the next promotion level. (See Page 36 of Report)*

Action taken:

An analysis was conducted by each Program Leader responsible for promotion nominations of all Extension educators within UNHCE. Those eligible for nomination each received individual counseling, resulting in an appropriate plan of action for future promotion.

Recommendation:

*It is recommended that UNHCE conduct a civil rights analysis to determine the reason female employees are over 80 percent of the overall separations and 100 percent of the involuntary separations during this period. (See Page 37 of Report)*

Action taken:

UNHCE has conducted an analysis and review and met with all supervisors. Following these efforts, UNHCE found that with the involuntary separation of 9 Extension Program Associates (female,) due to loss of a contract with the State of New Hampshire, female separations were at 58 percent, actually lower than the total UNH workforce of female separations, at 67 percent.

(UNHCE received a 90-day notice from the state of New Hampshire terminating the contract in 2006.)