



MSU Extension Children and Youth Institute Civil Rights Compliance Practices

MSU Extension organizational guidance related to Civil Rights can be found here:

https://www.canr.msu.edu/od/civil_rights_diversity_multiculturalism/. District Directors will provide leadership to management of district civil rights files. This tip sheet provides additional guidance and suggested best practices that are specific to Children and Youth programs. CYI staff should be familiar with how to obtain additional information not housed in district civil rights files if asked. All staff should have understanding of knowledge and procedures as they relate to MSU Extension and Children and Youth Institute.

MSU Extension is subject to periodic reviews of Civil Rights practices by USDA to ensure our program planning, management, and delivery align with legal requirements of being open to all. The Civil Rights review will examine documented efforts of compliance with expectations. It is important to note that this is a review, it is not an audit. While only a portion of staff will be selected to be interviewed in this process, all MSU Extension staff should follow the guidance provided and be able to answer questions about Civil Rights procedures if asked.

Points of Contact

The point of contact for MSU Extension civil rights compliance is Dionardo Pizana. Diane Wisnewski will serve as the point of contact for CYI.

Program Planning, Promotion, Delivery, and Reporting

All programs must be open to all; organizational systems in place to meet the needs of all program participants to ensure nondiscrimination of program participants. The following procedures ensure that your programs are welcoming and inclusive.

Staff may be asked to share examples of promotional efforts. Best Practice: Upload a flyer and/or social media promotional item as an attachment to program activities in PEARS. This will allow you to easily share examples if asked. You may use the comments box within the program activity report to indicate distribution lists where information for the program was shared.

PROMOTIONAL MATERIALS

- Make sure to include nondiscrimination statements and the process for requests for accommodations for all program promotional materials, using the language provided by MSUE. Specifically, use the statement in the section "Meeting Notices, Registration Materials & Accommodations Statement," which

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includes the accommodations for youth with special needs and the process for requesting accommodations.

- Nondiscrimination statements should be on all public facing websites and/or print publications.
- Each county and/or district should maintain a public notification list that includes contact information for all local media sources. Specific attention should be made to ensure media sources relevant to underserved audiences are included on the public notification list. Your district director may ask you to help maintain this list.
- Consider following a marketing plan that ensures broad reach for our programs. Examples include community bulletin boards, public housing, laundromats, grocery stores, media channels for specific demographic markets.
- A copy of each 4-H Newsletter should be uploaded as attachment in PEARS as indirect activity. You can use the comments box to indicate where you distributed copies of the newsletter; especially distribution beyond your enrolled 4-H members.
- A copy of all press releases should be uploaded as attachment in PEARS as indirect activity. You can use the comments box to indicate which media it was shared to, especially if shared beyond the standard public notification list for the county.
- Programs may not discriminate based on gender. All programs and activities implemented in a manner that ensures nondiscrimination. No sex-separate programs, activities, contests, awards, etc. Sexual harassment and complaint process are in place.
 - King/Queen contests are not permissible in Michigan 4-H. See Michigan 4-H Program Planning and Management Guide (PPMG) for more information on Title IX compliance.
 - Partnering with gender-based organizations/groups that are marketed toward a specific gender is acceptable as long as they sign the partner compliance agreement and recognize the need to be inclusive of all.

FINANCIAL ASSISTANCE

- All programs that require a registration fee should include information in the promotional materials about any scholarships or financial assistance available. Scholarship applications, rubrics, and selection procedures should be clearly documented. This includes financial assistance provided through the county 4-H program, advisory groups, or clubs). Selection criteria should include equitable opportunities for eligibility. Best practice: establish a file to store all scholarship applications, requests, and selections. Be prepared to share if requested.
- Some advisory groups also offer educational (college) scholarships. Be certain that you have copies of all related promotional, application, rubrics, and selection materials.

PROGRAM SITES

- “And Justice for All” poster displayed in all program and meeting locations.
- Use of program sites that are barrier free and accessible, not just upon request.
- Sufficient and reasonable accommodations provided when requested.

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DATA COLLECTION

- Appropriate processes and documents should be in place to collect demographic data from program participants. Information must be stored safely, accessible, and without connection to any individual or group. Opportunities available for program participants to self-identify demographic information or choose not to provide. Minimal amounts of missing or misplaced data.
- Sensitive data (birthdates, demographic data, addresses, etc.) can be collected in Events Management, 4-H Online, PEARS (demographic data collection survey). Google Forms is not an acceptable alternative to collect sensitive data. Sensitive data should not be shared via email; if necessary to share data with another staff member, please use MSU File Depot. You should also not store sensitive data on your computer; once your program and reporting is completed, be sure to delete files with sensitive data from your computer. If youth are attending an overnight event or are involved in a program for more than 3 hours, they should be individually enrolled in 4-H Online.
- CYI staff should know how to pull demographic data reports from 4-H Online and PEARS.
- If collecting demographic data during an event through a physical form, it must be completed by adults (participants 18+ or parents) and should not be attached to an individual name and should not be collected on the same form as a program evaluation. Once the data is entered into PEARS, the hard copy file can be destroyed.
- Keep track of attendance for advisory group meetings through minutes and/or sign in sheets. Use sign-in sheets for in-person programs/meetings and attach them to the program activity in PEARS as an attachment. Sign-in sheets serve many functions for risk management more than civil rights compliance purposes. Sign-in sheets should NOT be used to collect demographic information.

REPORTING

- Efforts to reach diverse external and underserved audiences should be documented in PEARS in the quarterly effort report under custom data tab in the “Diversity and civil rights efforts this quarter” box. You will find a list of prompts that will guide your response to this question here: <https://d2l.msu.edu/d2l/le/lessons/952802/topics/8649807>. It is not expected that you answer all these questions every quarter, but you should represent the efforts you have made.
- Through the Action Plan process, CYI staff should calculate parity of county demographics and compare actual program reach of both 4-H Online enrollment and PEARS program activities. Identify areas for improvement and include steps in Action Plan to meet civil rights and diversity goals. Data should be reviewed and compared at least semi-annually. Progress can be recorded in PEARS quarterly effort report.

4-H Clubs

- Civil Rights Compliance Statements for each 4-H club and affiliate organization should be signed by volunteers and uploaded annually in 4-H Online under the corresponding club/group’s “Public Relations Efforts”.
- Review with 4-H leaders/volunteers annually the expectations for civil rights and diversity efforts.
- Annually collect club meeting location information to help volunteers think through any potential accessibility challenges.

Advisory Boards and Committees

Most county 4-H programs have advisory boards who help support the county 4-H program. Staff should be prepared to share a list of current advisory councils/boards and their members. Each advisory group should have a clearly documented process for how they recruit and select members to serve on their board. The recruitment and selection process should include a nondiscrimination policy (often captured within bylaws).

All 4-H Advisory Groups (affiliates) must be chartered and listed in 4-H Online as an “Administrative Organizational Unit.” Upload the following documents in 4-H Online to document these efforts:



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- Bylaws (which should outline selection process, elections, term rotation, and include non-discrimination statements) under “Bylaws”
- Signed Constitution (affiliated agreement) under “Constitution”
- Signed Civil Rights Compliance Statements under “Public Relations Efforts”
- Volunteers and youth elected to serve on 4-H Advisory Groups should also be enrolled in 4-H Online and enrolled in the appropriate affiliate organization (in order to pull R/E/G demographic data).
- Optionally, can include a Roster of officers or elected members under “Roster”

Staff should know how to pull a roster of group members and a demographic report for a club from 4-H Online. Advisory group support team has templates for bylaws that can be used; these templates include language for rotation and selection: https://www.canr.msu.edu/resources/michigan_4_h_advisory_groups_bylaws_template.

Maintain a file (hardcopy file, notebook, or electronic within the county SharePoint folder) in the office for each advisory group. The file should include subfolders for meeting minutes (including attendance records) and sign-in sheets for all meetings. If groups provide scholarships, it is important to include how scholarships are promoted, criteria for awarding, selection committees, list of who received them (including race, ethnicity, and gender of recipients).

While it is not an expectation that each county establish/maintain an Expansion and Review Committee, if your county 4-H program utilizes this non-chartered advisory group, you should report their efforts in PEARS as a coalition including meeting dates, committee roster, committee recruitment, selection, and rotation. If your county does not utilize an Expansion and Review Committee, you should be able to share all other ways you seek out stakeholder feedback and input to local programming that meets the various needs of your community (e.g. local needs assessments, focus groups, surveys, etc.). This process should demonstrate consideration of needs of diverse and underrepresented populations in your community. Document efforts for stakeholder input in PEARS quarterly effort civil rights box.

District Civil Rights Files

Your district director will provide leadership for the management of district civil rights files. CYI staff will be asked to contribute:

- Public Notification List maintained
- List of ADA compliant meeting facilities
- Partner Compliance Letters for partners involved in co-hosting or co-presenting programs in conjunction with MSUE staff uploaded in District Civil Rights Folder
- Local resources for interpreter and accommodation services
- Appropriate equal opportunity employment human resources procedures followed for all postings including permanent, student, temporary, and on-call

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