



United States Department of Agriculture  
Natural Resources Conservation Service



# KANSAS CIVIL RIGHTS COMPLIANCE REVIEW GUIDE



**KANSAS**  
**NRCS Civil Rights Compliance Review Guide**

**SECTION I: INTRODUCTION**

**1. PURPOSE AND SCOPE**

The Natural Resources Conservation Service (NRCS) Civil Rights Compliance Reviews are conducted to: ensure that policy and procedures are being followed for all U.S. Department of Agriculture (USDA) Federally conducted and assisted programs and activities; evaluate employment and program delivery processes, policies, and functions; determine Civil Rights and Equal Opportunity (EO) compliance; and to provide direction, guidance, and technical assistance to NRCS managers and supervisors to correct any Civil Rights and/or Equal Opportunity compliance deficiencies.

**2. POLICY**

It is NRCS policy to ensure that all persons participating in USDA Federally conducted and assisted programs, employees, applicants for employment, or former employees are not subjected to prohibited discrimination based on race, age, disability, marital status, familial status, parental status, sexual orientation, genetic information, or because all or a part of an individual's income is derived from any public assistance program.

- Measuring the effectiveness of compliance in Program Delivery (Title VI) and Equal Employment Opportunity (Title VII) in State Offices and selected Field Offices, NRCS Divisions, and National Technology Centers
- Recognizing commitment, leadership, creative and innovative management of the Civil Rights program
- Ensuring that programs are administered in a fair and equitable manner to all NRCS customers
- Determining the extent that NRCS employees understand their program delivery and equal employment opportunity (EEO) responsibilities
- Identifying program delivery and EO deficiencies
- Providing assistance and guidance to fulfilling NRCS program delivery and EO goals and objectives
- Systematically evaluating whether the extent to which USDA conducts its programs and activities is in a manner consistent with applicable Federal and USDA Civil Rights Requirements

No person shall be subjected to reprisal or harassment because he or she filed a discrimination complaint, participated in or contributed to the identification, investigation, prosecution or resolution of a Civil Rights violation in or by any USDA conducted program or activity; or otherwise aided or supported the enforcement of Federal or USDA Civil Rights laws, rules, regulations or policies. Any person, who believes that he, she, or any specific class of individuals has been subjected to discrimination by any USDA agency, may file a complaint personally or through a designated representative.

**3. AUTHORITIES**

**A. Statutory**

- Title VI of the Civil Rights Act of 1964, as amended, Nondiscrimination in Federally Assisted programs
- Title VII of the Civil Rights Act of 1964 as amended, Equal Employment Opportunity
- Title IX of the Civil Rights Act of 1964, as amended, Intervention and Procedure after Removal in Civil Rights cases; 1972 addition to Title IX "No person in the U.S. shall, on the basis of sex be excluded from participation in, or denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal aid"
- Rehabilitation Act of 1973, as amended; Section 504 and Section 508
- 5 United States Code (USC) 301, Authority to Prescribe Departmental Regulations
- Equal Credit Opportunity Act of 1974, Title VII of the Consumer Protection Act of 1974, as amended, Section 701 of the Equal Credit Opportunity Act of 1974, Public Law 93-49, 15 USC 1691
- Age Discrimination in Employment Act of 1967, as amended

- Equal Pay Act of 1963
- Americans with Disabilities Act of 1990, as amended; Americans with Disabilities Act of 2008
- Architectural Barriers Act of 1968
- Civil Rights Restoration Act of 1987

## **B. Regulatory and Executive Orders**

- 7 Code of Federal Regulations (CFR) 15.15d, Nondiscrimination in Programs or Activities Conducted by the USDA
- 7 CFR 15.15e, Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the USDA
- 12 CFR 202, Equal Credit Opportunity Act (Regulation B)
- 28 CFR 42.401–42.415, Department of Justice Regulation, Subpart F, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs
- 29 CFR 1614, Federal Sector EEO
- Executive Order 12989, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP)
- Executive Order 13160, Nondiscrimination on the Basis of Race, Sex, Color, National Origin, Disability, Religion, Age, Sexual Orientation, and Parental Status in Federally Conducted Education and Training Programs
- Executive Order 13125, Increasing Participation of Asian Americans and Pacific Islanders in Federal Programs
- Executive Order 13087, provides that, as a matter of Federal policy, an individual's sexual orientation should not be the basis for the denial of an employment or promotional opportunity
- Executive Order 13145, prohibits discrimination in Federal employment based on genetic information
- Executive Order 13152, provides for a uniform policy within the Federal Government to prohibit discrimination based on an individual's status as a parent
- Executive Order 12250, Leadership and Coordination of Nondiscrimination Laws
- Executive Order 13175, Consultation and Coordination with Indian Tribal Governments

## **C. Departmental Regulations/Manuals**

- Departmental Regulation (DR) 1010-001, Organization, dated July 20, 2006
- DR 4030-001, Section 508 Implementation—Final Guidance, dated July 23, 2003
- DR 4300-003, Equal Opportunity Public Policy, dated January 8, 2001
- DR 4300-005, Agency Civil Rights Programs, dated January 14, 1998
- DR 4300-006, Civil Rights Policy for USDA, dated June 30, 2000
- DR 4300-007, Processing EEO Complaints of Discrimination, dated March 3, 1999
- DR 4300-009, EEO Complaints, dated January 9, 2001
- DR 4330-001, Procedures for Processing Discriminations Complaints and Conducting Civil Rights Compliance Reviews in USDA Conducted Programs and Activities, dated October 18, 2001
- DR 4330-003, Nondiscrimination in Programs and Activities, dated March 3, 1999
- DR 4120-001, Annual Departmental Civil Rights Training, dated September 18, 1998
- DR 4230-002, Special Emphasis Programs, date June 4, 2009
- DR 4360-001, Communicating with Underserved Communities, dated January 14, 1998
- DR 4360-002, Coordination of Request for USDA Support for Outreach Activities, dated August 8, 2001
- DR 5600-002, Environmental Justice, dated December 15, 1997
- Departmental Manual (DM) 4300-001, EEO Complaint Processing Procedure
- DM 4300-002, Reasonable Accommodations Procedures

## **D. NRCS Policy**

- (1) eDirectives—General Manual (GM), Title 230, Equal Opportunity
- (2) Civil Rights Compliance Review Guide

#### 4. NOTICE – (USDA NONDISCRIMINATION STATEMENT)

##### **Non-Discrimination Policy**

The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases apply to all programs and/or employment activities.)

##### **To File an Employment Complaint**

If you wish to file an employment complaint, you must contact your agency's [EEO Counselor](#) within 45 days of the date of the alleged discriminatory act, event, or in the case of a personnel action. Additional information can be found online at [http://www.ascr.usda.gov/complaint\\_filing\\_file.html](http://www.ascr.usda.gov/complaint_filing_file.html).

##### **To File a Program Complaint**

If you wish to file a Civil Rights program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), found online at [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9419, by fax at (202) 690-7442, or email at [program.intake@usda.gov](mailto:program.intake@usda.gov).

##### **Persons with Disabilities**

Individuals who are deaf, hard of hearing or have speech disabilities and you wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).

Persons with disabilities, who wish to file a program complaint, please see information above on how to contact us by mail or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.), please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

##### **Supplemental Nutrition Assistance Program**

For any other information dealing with Supplemental Nutrition Assistance Program (SNAP) issues, persons should either contact the USDA SNAP Hotline Number at (800) 221-5689, which is also in Spanish, or call the [State Information/Hotline Numbers](#).

##### **All Other Inquires**

For any other information not pertaining to civil rights, please refer to the listing of the [USDA Agencies and Offices](#).

#### 5. KANSAS NRCS CIVIL RIGHTS COMPLIANCE PROCEDURES

The annual compliance review schedule is predetermined on a five (5) year rotational basis wherein each management unit is reviewed at least once during the five (5) year period. This Civil Rights compliance review is conducted in accordance with a management and administrative review. The Civil Rights review will be completed on the same day the exit conference is held. This is to ensure that the supervisory district conservationist (SDC) and the district conservationist (DC) are present to provide input to the Civil Rights review guide questionnaire.

A survey for employees and partners will be sent by the Civil Rights reviewer one month before the scheduled review and should be completed within two weeks. This survey is confidential and will be completed through the use of Survey Monkey. The reviewer will send an email that contains the link to access the survey. The Civil Rights reviewer will check for any glaring issues to discuss and will provide the assistant state conservationist for field operations (ASTC-FO) a summary of responses for follow-up.

The area office assistant will send the SDC the Civil Rights Compliance Review Guide approximately one month prior to the scheduled review.

The ASTC-FO is responsible for providing the Performance Result System (PRS) parity and participant office summary. The ASTC-FO will provide this to the SDC and reviewer prior to review. The reviewer will also look at AgCensus data for the management unit.

The reviewer will check the Outreach SharePoint site to see what activity is being posted for the offices being reviewed. Access the Outreach SharePoint under "Surveys" on the Kansas SharePoint:  
<https://nracs.sc.egov.usda.gov/central/ks/default.aspx>.

The SDC and DCs will need to arrange for a landowner and board member from their office to be interviewed. Times will be arranged once the ASTC-FO arrives in the reviewing office.

- a. The ASTC-FO will interview board members completing Section 7, Partnership Responsibility Requirements.
- b. The ASTC-FO will interview landowners, completing the landowner survey.

The reviewer will go through the Civil Rights Compliance Review guide recording answers given by the SDCs and DCs. All should provide answers specific to their offices.

The reviewer will check the GM Title 230 file (electronic and hard copy version) for the SDC office. DCs from outlying offices can bring their files with them for review.

The area office assistant will check all offices for required posters, if any required Civil Rights posters are missing, the area office assistant will notify the reviewer.

The Civil Rights reviewer will go over the findings of the Civil Rights compliance during the exit interview.

Reviewer will type a completed report and memo noting any commendable, recommended, or agreed-to items. This will be sent to the ASTC-FO for review and concurrence. The area office will send the final reports to the SDC with a copy to the reviewer.

## **SECTION II: Civil Rights Management—Program Delivery (Title VI)**

### **1. CIVIL RIGHTS RESPONSIBILITIES AND RECORDS**

#### **Requirements:**

**7 CFR 15.15d, Nondiscrimination in Programs or Activities Conducted by the USDA; and NRCS GM, Title 120, Part 408, Correspondence and File Management, require agencies to develop plans, procedure, and directives necessary to manage their Civil Rights programs. NRCS offices are required to manage their Civil Rights activities through handbooks, reports, notices and correspondence.**

#### **Document Request:**

A copy of the management unit business plan.

Civil Rights Compliance Questions	Narrative
How do you measure Civil Rights objectives, goals, and action items in your office's business plan?	

Are Civil Rights topics being discussed at management unit staff meetings on a quarterly basis?	
What Civil Rights responsibilities are in your performance work plan?	
Do you comply with the USDA policy of not assisting and/or attending meetings of organizations or groups that exclude minorities, women, and persons with disabilities from membership or participation?	
Findings:	
Recommendations:	
<b>2. PROGRAM DELIVERY TRAINING</b>  <b>Requirements:</b>  <b>DR 4330-3, Nondiscrimination in USDA-Conducted Programs and Activities; and NRCS GM, Title 230, Part 405, Civil Rights in Program Delivery, provide instructions on the responsibilities for providing training on Civil Rights, Laws, and Regulations to all staff members.</b>	
Civil Rights Compliance Questions	Narrative
Have employees received the training Civil Rights Compliance in Program Delivery as required by the core curriculum?	
Are all employees aware of the mentoring program? Do they know how to sign up to become either a mentor or protégé?	
Have district employees received any training (on the topic of Title VI and VII) in the last three years?	
How do you document staff and district employee training?	
How have your employees been made aware of the Employee Assistance Program?	

Findings:

Recommendations:

### 3. PUBLIC NOTIFICATION

#### Requirements:

**7 CFR 15.15d, Nondiscrimination in Programs or Activities Conducted by the USDA; DR 4300-3, Equal Opportunity Public Policy; and NRCS GM, Title 230, Part 405, Civil Rights Compliance in Program Delivery, require NRCS offices to establish programs to ensure that all persons know about the availability and use of NRCS program services and are encouraged to participate.**

Civil Rights Compliance Questions	Narrative
How do you inform potential and non-traditional program beneficiaries about NRCS programs and activities?	
What news articles have you written?	
Do you send news articles to your local newspaper for publishing?	
Do the conservation districts in your management unit publish a district newsletter?	
Do you and your staff hold and participate in public meetings discussing USDA programs?	
Do you and your staff work with communities through grassroots organizations?	
Is the most current nondiscrimination statement used when you disseminate program information?	
Where can your customers find the nondiscrimination statement in the district newsletter, fact sheets, and publications?	
Are public meetings materials available in alternative means of communication? Do meeting fliers contain accessibility statement?	

Over the past 12 months, how many NRCS Civil Rights success stories have you published in your local news outlet?	
Do you work with media outlets catering to females, minorities, or persons with disabilities?	
<p>Are the following posters displayed in the correct locations?  <a href="http://www.ks.nrcs.usda.gov/intranet/posted_materials.html">http://www.ks.nrcs.usda.gov/intranet/posted_materials.html</a></p> <ul style="list-style-type: none"> <li>• USDA Secretary's Civil Rights Policy Statement</li> <li>• NRCS Civil Rights Policy Statement</li> <li>• NRCS Anti-Harassment Policy</li> <li>• And Justice for All</li> <li>• USDA EEO is the Law</li> <li>• USDA Sexual Harassment is Illegal</li> <li>• NRCS EEO Counseling Program</li> <li>• Kansas Civil Rights Committee</li> </ul>	
<p>Findings:</p>  <p>Recommendations:</p>	
<p><b>4. PROGRAM OUTREACH</b></p> <p><b>Requirements:</b></p> <p><b>7 CFR 15.15d, Nondiscrimination in Programs or Activities Conducted by the USDA; DR 4360-001, Communicating with Underserved Communities; DR 4360-002, Coordination of Request for USDA Support for Outreach Activities; and NRCS GM, Title 230, Part 406, National Outreach Policy require the establishment of outreach programs at the local level to ensure that all persons know about the availability of NRCS program services effectively and are encouraged to participate. Executive Order 13166 requires federal agencies to provide Limited English Proficiency (LEP) persons with meaningful opportunity to participate in programs and activities conducted by USDA.</b></p>	
<b>Civil Rights Compliance Questions</b>	<b>Narrative</b>
What methods are used by NRCS with grassroots organizations in reaching non-traditional and under-served customers within your management unit?	
Talk about your outreach activities for minorities, women, and persons with disabilities.	
Is there a need in your management unit for materials for participants with disabilities or those with Limited English Proficiency (LEP)?	

<p>Have you been provided materials from your area or state office to assist with the above needs?</p>	
<p>What items in your management unit business plan address program outreach action items?</p>	
<p>What forms of notification do you utilize? Examples include: newsletters, publications, news releases, meetings, posters, personal contacts, electronic media, fact sheets, videos, and grassroots organizations.</p>	
<p>Findings:</p>  <p>Recommendations:</p>	
<p><b>5. PROGRAM COMPLAINTS OF DISCRIMINATION</b></p> <p><b>Requirements:</b></p> <p><b>28 CFR 42.408, Complaint Procedures; 7 CFR 15.15.6, Complaints; NRCS GM, Title 230, Part 405, Civil Rights Compliance in Program Delivery, and the “And Justice for All” poster provide instructions for customers filing complaints of discrimination in program and/or service delivery. These regulations should be on file and the poster displayed in a prominent location.</b></p>	
<p>Civil Rights Compliance Questions</p>	<p>Narrative</p>
<p>Can you explain the program complaint procedure?</p>	
<p>When was the last time the program complaint procedure was reviewed with your staff?</p>	
<p>Can all employees explain how to process a Civil Rights discrimination complaint or do they know where to find the instructions?</p>	
<p>Can all employees explain the difference between a program delivery complaint (Title VI) and an EEO complaint (Title VII)?</p>	
<p>Do employees know how to contact an EEO counselor?</p>	

Findings:

Recommendations:

**6. EVALUATION OF PROGRAM DELIVERY**

**Requirements:**

**28 CFR 42.406, Data and Information Collection, requires federal agencies to collect data from applicants of recipients of federal assistance to enforce Title VI; Executive Order 12250, Leadership and Coordination of Nondiscrimination Laws; 28 CFR 42.408, Complaint Procedures; 7 CFR 15.15d, Nondiscrimination in Programs or Activities Conducted by the USDA; DR 4330-2, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA; and NRCS GM, Title 230, Part 405, Civil Rights in Program Delivery, require: the monitoring and evaluation of programs in order to ensure that they are administered in a nondiscriminatory manner and the collection and evaluation of race, sex, national origin, and disability (RSNOD) participation and eligibility data for programs. Data is necessary to determine both quantitatively and qualitatively how effectively agency programs are reaching all potential beneficiaries. Executive Order 13166 requires federal agencies to provide Limited English Proficiency (LEP) persons with meaningful opportunity to participate in programs and activities conducted by USDA.**

Civil Rights Compliance Questions	Narrative
How do you determine the number of potential program beneficiaries and on-farm/off-farm customer groups?	
What are the demographics you serve?	
Does the program participation data reflect participation by women, minorities, and persons with disabilities?	
How do you utilize program participation data to determine potential eligible program beneficiaries? (AgCensus, ProTracts, SCIMS)	
In findings of disparities, what actions have you taken to correct them?	

Findings:

Recommendations:

**7. PARTNERSHIP RESPONSIBILITIES**

**Requirements:**

**7 CFR 15.5, Compliance; DR 4330-2, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA; and NRCS GM, Title 230, Part 405, Civil Rights in Program Delivery, set forth the recipients responsibilities in program delivery, i.e., increase the diversity of representation on partnership boards and councils; adhere to Agency rules and regulations with respect to Equal Opportunity; develop plans, procedures, and directives necessary to manage Civil Rights programs; ensure that all offices be accessible to persons with disabilities; and establish, maintain, and carry out an effective EEO Program.**

Civil Rights Compliance Questions	Narrative
What are the qualifications for membership on the board?	
What methods are used to inform the public about board membership?	
Does the current board's makeup reflect the community's makeup?	
What methods are used by the Board members to recruit and/or appoint females, or persons with disabilities to serve on the board?	
What methods are used to encourage minority and female participation in the electoral process and as Directors or Officers on the board?	
Are the following discussed with the board on an annual basis: <ul style="list-style-type: none"> <li>• Prevention of Sexual Harassment</li> <li>• Civil Rights Policy and training</li> <li>• "And Justice for All" poster</li> </ul>	

Findings:

Recommendations:

**8. ACCESS TO ALL NRCS FACILITIES BY PERSONS WITH DISABILITIES**

**Requirements:**

**The Architectural Barriers Act of 1968 (P.L. 90-480) requires that all buildings and facilities be accessible to people with disabilities if, since 1968, they were designed, built, or altered with certain Federal funds, or if they are leased for occupancy by Federal agencies. The Uniform Federal Accessibility Standards (UFAS) provide the guidelines for architectural compliance with the Act. If a lease is renewed after May 2008, buildings must comply with the Architectural Barriers Act Accessibility Standards (ABAAS).**

**Section 504 and 508 of the Rehabilitation Act of 1973, as amended; 7 CFR 15.15e, Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities conducted by the USDA; and NRCS GM-230 Part 405, Civil Rights in Program Delivery, require that all offices and electronic communications are accessible to persons with disabilities.**

In Kansas, this section is completed at a separate time by the intra-agency Accessibility Review Team (ART). The schedule for that is sent by Farm Services Agency based on when leases are ready for renewal.

**SECTION III: Equal Employment Opportunity MANAGEMENT—(TITLE VII)**

**1. EMPLOYEE AWARENESS AND EQUAL EMPLOYMENT OPPORTUNITY TRAINING**

**Requirements:**

**29 CFR 1614.102, Agency Program, holds Agencies responsible for communicating Equal Employment Opportunity policies, programs, and employment needs to all employees; and DR 4120-001, Annual Civil Rights Training.**

Civil Rights Compliance Questions	Narrative
Have employees completed the following courses (either formal or awareness training): <ul style="list-style-type: none"> <li>• Equal Employment Opportunity (EEO)</li> <li>• Prevention of Sexual Harassment</li> <li>• EEO Counseling, Mediation, and Complaints</li> </ul>	
How often do you discuss the following at your management unit staff meetings? (discussion should be documented in minutes or noted on agenda and filed) <ul style="list-style-type: none"> <li>• EEO Policy</li> <li>• Prevention of Sexual Harassment</li> <li>• Civil Rights Policy</li> </ul>	

Findings:

Recommendations:

**2. AWARDS AND RECOGNITION**

**Requirements:**

**29 CFR 1614.102a.5.10.13, Agency Program, requires agencies to:**

**Review, evaluate, and control managerial and supervisory performance in such a manner to ensure a continuing affirmative application and vigorous enforcement of the policy of equal opportunity; provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in EEO; and inform its employees and recognized employee organizations of the Affirmative EEO policy and program, and enlist their cooperation.**

Civil Rights Compliance Questions	Narrative
Have you received an award or recognition in EEO or Civil Rights activities?	
Have you recognized anyone for outstanding achievements in EEO or Civil Rights activities?	
What activities would constitute an "Exceeds" on a performance work plan or that you would consider a significant achievement?	
What is the process to nominate someone for a Civil Rights award?	
<p>Findings:</p> <p>Recommendations:</p>	
<p><b>3. CIVIL RIGHTS ADVISORY COMMITTEE/SPECIAL EMPHASIS PROGRAMS</b></p> <p><b>Requirements:</b></p> <p><b>NRCS GM, Title 230, Parts 403, Special Emphasis Programs, and 404, Civil Rights Advisory Committee, require the establishment of Special Emphasis Program Managers and Civil Rights Advisory Committees to assist and enhance opportunities for designated groups that may be under represented in employment, recruitment, and/or personal advancement and development.</b></p>	
Civil Rights Compliance Questions	Narrative
Can you list the special emphasis programs (SEP) that are administered in Kansas?	
Do you see special emphasis program information from program managers?	
How are you notified about special emphasis/Civil Rights program activities?	
What does your office do to promote special emphasis program (SEP) activities?	
Do you and your employees know the process to apply for a Civil Rights committee position or Special Emphasis Program Manager position?	

Findings:

Recommendations:

## CIVIL RIGHTS QUESTIONNAIRE FOR EMPLOYEES AND PARTNERS

\*\*Answers are confidential\*\*

This questionnaire will take 12 to 18 minutes to complete

**1. Select the extent of your agreement/disagreement with the statement: “Management officials demonstrate OVERALL support for the Civil Rights Program.”**

Strongly Agree   
  Agree   
  Disagree   
  Strongly Disagree

**Comments:**

**2. Select the extent of your agreement/disagreement with management’s support for Civil Rights in the following areas:**

	Strongly Agree	Agree	Disagree	Strongly Disagree
Training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Program Development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outreach Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**3. Select the extent of your agreement/disagreement with the following statement: “My immediate supervisor treats subordinate employees. . . ”**

	Strongly Agree	Agree	Disagree	Strongly Disagree
Fairly	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
With dignity and respect	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**4. Select the extent of your agreement/disagreement with the following statement:  
“Management’s decisions on the following are based on merit.”**

	Strongly Agree	Agree	Disagree	Strongly Disagree
Assignments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Details	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**5. How often are the following topics discussed at management unit staff meetings?**

	Always	Regularly	Occasionally	Never
Civil Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equal Employment Opportunity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**6. Have you seen the following posters, notices, or statements at your worksite?**

	Yes	No	Don't Know
Secretary of Agriculture Civil Rights Policy Statement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NRCS Civil Rights Policy Statement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
“And Justice for All” Poster	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
USDA “Prevention of Sexual Harassment” Poster	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NRCS Anti-Harassment Policy Statement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kansas Civil Rights Advisory Committee Poster	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**7. How familiar are you with the following:**

	Totally Familiar	Familiar	Unfamiliar	Totally Unfamiliar
Management Directive 715 (Formerly Affirmative Employment Plan)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Special Emphasis Programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NRCS Reasonable Accommodation Policy and Procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**8. How often does Management promote or encourage the following:**

	Always	Regularly	Occasionally	Never
Special Emphasis Program Observances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Special Emphasis Program Participation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Comments:**

**9. Please select your response to the following statements:**

	Yes	No
I have open communication with my supervisor.	<input type="radio"/>	<input type="radio"/>
If my supervisor was not treating me in a fair manner, I would discuss the issue(s) with him/her.	<input type="radio"/>	<input type="radio"/>
I have experienced discrimination in the workplace in the last three years.	<input type="radio"/>	<input type="radio"/>
I have experienced harassment in the workplace in the last three years.	<input type="radio"/>	<input type="radio"/>
If I was discriminated against, I would file an EEO complaint.	<input type="radio"/>	<input type="radio"/>
Fear of "reprisal" would be a factor in my decision.	<input type="radio"/>	<input type="radio"/>
I would consider using Alternative Dispute Resolution to address a workplace discrimination allegation.	<input type="radio"/>	<input type="radio"/>

**Comments:**

**10. Please select your response to the following statements:**

Yes	No
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*An Equal Opportunity Provider and Employer*

I know the difference between a Program Delivery complaint (Title VI) and an Equal Employment Opportunity complaint (Title VII).

I know how to file an EEO complaint.

I know how to contact an EEO Counselor.

I am aware of the Alternative Dispute Resolution process.

I have an individual development plan.

I am familiar with the Employee Assistance Program.

I have received training in the prevention of sexual harassment within the last three years.

**Comments:**

**LANDOWNER QUESTIONNAIRE**

*Interviewed by the Assistant State Conservationist for Field Operations*

LANDOWNER NAME: \_\_\_\_\_

FIELD OFFICE: \_\_\_\_\_

\*\*OPTIONAL Gender: Male \_\_\_\_\_ Female \_\_\_\_\_ Race/National Origin \_\_\_\_\_

1. How long have you been a Landowner?

2. Identify type of farming operation:

3. Are you familiar with USDA Programs? Yes No  
Are you participating in USDA programs or have participated in USDA programs?

List Programs:

4. Have you been denied participation in any USDA programs? If yes, please explain.

5. Do you feel that you have been treated fair by NRCS field staff? Please explain.

6. How often do you visit the NRCS field office?

7. Have you received any newsletters or literature from NRCS regarding USDA Programs?

8. Would you file a program complaint if you believe that you were discriminated against by NRCS staff?

9. Do you know how and where to file a program discrimination complaint? Are you familiar with the "And Justice for All" poster and its significance?

10. Are you satisfied with the field office staff work ethics, performance, services, and helpfulness? Please explain.

**CONSERVATION DISTRICT BOARD MEMBER QUESTIONNAIRE**  
*Interviewed by the Assistant State Conservationist for Field Operations*

Name: \_\_\_\_\_

Conservation District: \_\_\_\_\_

Field Office: \_\_\_\_\_

Gender (optional): Male \_\_\_\_\_ Female \_\_\_\_\_ Race/National Origin \_\_\_\_\_

1. How long have you been a conservation district board member?

How did you become a member (elected or appointed)?

2. How did you learn about the conservation district board?

3. What is the make-up of the conservation district board?

4. In what manner does the makeup of the board reflect the community's makeup (race, sex, occupations, landowners, etc)?

5. What are the qualifications for membership?

6. How does the board develop outreach activities to encourage women, minorities, and persons with disabilities to serve as board members?

7. Have you encouraged the board members to recruit and/or appoint minorities, women, or persons with disabilities to serve on the board? How are prospective members recruited?

8. Does the board participate in locally-led conservation initiatives?

9. What do you think of the board's partnership and working relationship with NRCS?
  
10. Are you satisfied with the helpfulness and work ethics of the staff?
  
11. Are you kept aware of NRCS program changes and availability by NRCS staff? How?
  
12. Are you invited to NRCS Civil Rights training or any other NRCS-sponsored training?
  
13. Does the district have a Local Operational Agreement (LOA) with NRCS? Is the LOA reviewed annually at a board meeting?
  
14. Are you familiar with the "And Justice for All" poster; and its significance?

Kansas Civil Rights Compliance Review Guide  
General Manual, Title 230--Equal Opportunity Files Checklist

All offices are required to establish and maintain files containing records which document and support equal opportunity. Records must be kept in accordance with the requirement in the General Manual, Title 120, Part 408. This includes files described under 230-15-11, Community Outreach or 230-15-12, Delivery of Services. One file under 230-15, Civil Rights is acceptable. Files may be electronic.

	Copies of the last two Civil Rights Reviews conducted in the office and the required response.
	All letters/memos pertaining to training in Civil Rights and program delivery must show who received the training, when, and the subjects covered. File retention: 3 years.
	Staff meeting minutes where Civil Rights was a topic, including specifics of discussions. File retention: 3 years.
	Copy of the field office business or outreach plan. File retention: 3 years.
	Copy of the most recent Form AD 2056, Building/Site Accessibility Compliance Checklist.
	Copies of conservation district (CD) board meeting minutes documenting that the board's responsibilities in Civil Rights and program delivery were discussed. File retention: 3 years.
	Documentation of actions taken by staff to increase participation of and provide assistance to underserved groups as identified on the "And Justice for All" poster. File retention: 3 years.
	Outreach refers to program delivery and services. Keep a copy (five years) of the outreach events reported in the Outreach SharePoint Survey. A few examples are: information on outreach events attended; partnered with, or organized; presentation summaries made at outreach events; articles written and provided to media sources pertaining to outreach activities; documentation of media interviews.
	Copies of news releases and/or articles, publicizing the Natural Resources Conservation Service (NRCS) and/or its programs, sent to county newspapers of record and others; include list of recipients, such as partners, radio stations, and others. File retention: 3 years.
	Copies of public notices by the NRCS containing Equal Employment Opportunity (EEO)/Equal Opportunity (EO) policies (includes every newspaper advertisement with the nondiscrimination statement "USDA is an Equal Opportunity Provider" as a part of the notice and paid ads or public service notices at no cost). File retention: 3 years.
	News stories of accomplishments with protected groups and individuals. File retention: 3 years.
	Examples of alternative communications used (Braille, large print, foreign language, etc.) [should include date, time, parties involved, and topics covered]. File retention: 3 years.

Sample memo to submit after review is completed:

**SUBJECT:** EOP—Civil Rights Review  
Name of Management Unit

**DATE:**

**TO:** \_\_\_\_\_, Supervisory District Conservationist  
NRCS, Name of Town, Kansas

**FILE CODE:** 230-15-5

Participants: \_\_\_\_\_, Assistant State Conservationist, \_\_\_\_\_ Area Office  
\_\_\_\_\_, Civil Rights Person, Name of Town, KS  
\_\_\_\_\_, Supervisory District Conservationist, Name of Town, KS

Attached is the report on the Civil Rights Review of the \_\_\_\_\_ Management Unit completed on \_\_\_\_\_ . There are two recommended items and one agreed-to item.

**IT IS RECOMMENDED** that the supervisory district conservationist review the complaint procedure with staff at a management unit staff meeting. Be sure to document this in the staff meeting minutes.

**IT IS RECOMMENDED** that the district conservationist in \_\_\_\_\_ County visit with the Conservation District Board regarding the importance of increasing the diversity of board members.

**IT IS AGREED** that the district conservationist in \_\_\_\_\_ present Civil Rights Responsibilities to the \_\_\_\_\_ County Conservation District Board. The district conservationist will review this with the board by \_\_\_\_\_ (date).

Kansas does have an active civil rights committee made up of a cross section of employees across the state. The next time there is a solicitation for committee members, I would encourage you and your staff to consider applying. This would be a great opportunity for you to learn more about the civil rights program.

If you have any questions in regard to the review, please contact me.

NAME  
Assistant State Conservationist

Attachment

ec:  
Eric B. Banks, State Conservationist, NRCS, Salina, Kansas  
Loren L. Graff, State Administrative Officer, NRCS, Salina, Kansas  
Civil Rights Person, Title, NRCS, \_\_\_\_\_, Kansas