



COLORADO STATE UNIVERSITY

CSU EXTENSION

CIVIL RIGHTS AND EQUAL OPPORTUNITY HANDBOOK

FOR VOLUNTEERS AND ADVISORY BOARD MEMBERS



CIVIL RIGHTS AND EQUAL OPPORTUNITY

CONTENTS



A NOTE TO OUR VOLUNTEERS AND ADVISORY BOARD MEMBERS:

Thank you for serving as a volunteer or advisory board member for Colorado State University Extension. Without question, you play one of the most important roles in the delivery of our programs. We are grateful to have you as part of our team. The guidance that follows contains the information and resources needed to ensure that Extension meets the latest federal regulations and university policies. The continued funding of our programs and staff depends on how well each of us work to meet these requirements. More importantly, by fully implementing these measures, we will be able to ensure that CSU Extension is a welcoming place for all Coloradans. You are already proven leaders in your community. Please help us fulfill CSU's land-grant mission by leading in the incorporation of these civil rights, equal opportunity and Diversity, Equity and Inclusion measures across all our offerings.

WHAT YOU'LL FIND:

Page 2: Processes for filing Discrimination and Sexual Harassment Complaints

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Page 8: Strategies for Communicating with Spanish Speaking Communities

Page 9: Title IX and Sex Discrimination and Harassment

Contact your program leaders for more Diversity, Equity and Inclusion (DEI) resources such as:

- OEE's Civil Rights Plan
- DEI Training Plan
- REG Data Collection Template
- Translation/Interpretation Request Form
- Extension's nondiscrimination disclaimer - <https://col.st/II0t3>

IMPORTANT CONTACTS:

As a CSU volunteer or advisory board member, you have numerous county-based and campus-based resources available to you. Please note that you are always welcome to contact your local county-based program staff and faculty (Colorado Master Gardener Coordinator, 4-H specialists, County Director, etc.) and campus-based program leaders (4-H, Family Leadership Training Institute, Colorado Master Gardener, etc.) in addition to the contacts below.

OEE's DEI Specialist:

- Questions regarding Civil Rights, Equal Opportunity, nondiscrimination, reasonable accommodations, and data reporting for USDA-funded programs
- eric.ishiwata@colostate.edu

CSU Office of Title IX Program and Gender Equity:

- Questions regarding Title IX and sex discrimination and harassment
- titleix@colorstate.edu | (970) 491-1715
- <https://col.st/45c3D>

Local County Extension Offices

<https://extension.colostate.edu/contact-us/>

Colorado State 4-H Office

<https://co4h.colostate.edu/> | 970-491-1152

OEE's Language Access/DEI Program Coordinator:

- Questions regarding Language Access
- susana.guarado@colostate.edu with cc to eric.ishiwata@colostate.edu

Office of Equal Opportunity:

- Questions regarding CSU's discrimination complaint process
- oeo@colostate.edu or (970) 491-5836

CIVIL RIGHTS AND EQUAL OPPORTUNITY

RESPONDING TO AND PROCESSING DISCRIMINATION COMPLAINTS



Any faculty, staff, participant or volunteer may report what they believe to be an act of discrimination or harassment based on race/ethnicity, age, creed, color, religion, national origin or ancestry, sex, gender, disability, veteran status, genetic information, sexual orientation, or gender identity or expression, or pregnancy to the CSU Office of Equal Opportunity (OEO) as soon as possible after the alleged incident(s).

Formal Complaints

Formal Complaints seek official determinations as to whether respondents have violated CSU's Non-Discrimination Statement and/or Sexual Harassment Policy. OEO conducts a thorough investigation and concludes with an official report.

Informal Complaints

Informal complaints result in OEO attempting to facilitate mutually acceptable resolutions through conflict resolution techniques. The University does not determine if respondents have violated policies.

Have an Equal Opportunity Complaint?

Complaints must be submitted to the CSU Office of Equal Opportunity

- **(970) 491-5836**
- **oeo@colostate.edu**
- **101 Student Services Building, Fort Collins campus**

A detailed description of the process can be found here: <https://col.st/lb8j2>

Contact (970) 491-5836 for questions.

OEE recommends using CSU OEO's Complaint In-Take Form for internal complaints: <https://col.st/hRNzG>

CIVIL RIGHTS AND EQUAL OPPORTUNITY

RESPONDING TO AND PROCESSING DISCRIMINATION COMPLAINTS



INFORMAL AND FORMAL COMPLAINT REQUIREMENTS

Informal and formal complaints must contain:

- Names of the complainant and respondent(s) and the nature of their relationships to the University
- The type of discrimination alleged: discrimination, harassment, retaliation, race/ethnicity, religion, gender, genetic information, age, national origin/ancestry, disability, sexual orientation, color, sex, veteran status, gender identity or expression
- A description of the circumstances of the alleged discrimination, including the date(s) and location(s), witnesses, and supporting documents, if available
- A designation of whether the complaint is informal or formal

REPORTING TO EXTERNAL AGENCIES IS AN OPTION

Persons who believe that they have been subjected to discrimination, harassment, sexual harassment and/or retaliation are able to file a complaint with:

- Colorado Civil Rights Division
- U.S. Equal Employment Opportunity Commission
- U.S. Department of Education's Office for Civil Rights
- Office of Federal Contract Compliance Programs

Information regarding reporting to any of these agencies may be obtained from CSU OEO.

- www.oeo.colostate.edu
- oeo@colostate.edu
- **970-491-5836**



RESPONDING TO AND PROCESSING SEXUAL HARASSMENT COMPLAINTS

CSU's Sexual Harassment Policy prohibits "any unwelcome sexual advance, request for sexual favors, or other conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, education or participation in a university activity
- Submission to or rejection of such conduct by an individual is used as the basis for, or a factor in, decisions affecting that individual's employment, education or participation in a university activity
- Such conduct is sufficiently severe or pervasive to unreasonably interfere with an individual's employment or academic performance or create an intimidating, hostile or offensive environment for that person's employment, education or participation in a university activity

Examples include but are not limited to:

- Unwelcome sexual advances
- Repeated and unwelcome sexually-oriented bullying, teasing, joking or flirting
- Verbal abuse of a sexual nature
- Commentary about an individual's body, sexual prowess or sexual deficiencies
- Leering, touching, pinching or brushing against another's body
- Displaying objects or pictures, including electronic images, which are sexual in nature and which create a hostile or offensive work, education or living environment

Have a Sexual Harassment Complaint?

Complaints should be submitted to the Office of Equal Opportunity:

- **(970) 491-5836**
- **oeo@colostate.edu**
- **101 Student Services Building, Fort Collins campus**

A detailed description of CSU's process can be found here:

<https://oeo.colostate.edu/sexual-harassment/>

Every Extension employee who is not officially designated as a "confidential resource" is required to report every instance of sexual violence, sexual harassment or other conduct prohibited by the policy to OEO.



KEY CSU CONTACTS AND OTHER REPORTING OPTIONS

Office of Equal Opportunity

Provides information on discrimination, harassment and consensual relationships policies; complaint procedures for formal and informal resolution processes related to discrimination, harassment and retaliation; support with disability status designations and reasonable accommodations

- **Contact Katherine Castaneda: oeo@colostate.edu or (970) 491-5836**

Human Resources Employee Relations

Consulting for employees, supervisors and managers regarding rule and policy interpretation, employee-supervisor conflict resolution and workplace behavior

- **Contact Eric Ray: eric.ray@colostate.edu or (970) 491-0538**

Office of Inclusive Excellence (OIE)

A neutral resource for faculty and staff encountering work-related issues and conflicts related to diversity and inclusion; responds to incidents of bias reported through the Bias Reporting System

- **Contact Shannon Archibeque-Engle: shannon.archibeque-engle@colostate.edu or (970) 491-2450**
- **OIE's Bias Reporting System: <https://biasreporting.colostate.edu/>**

CIVIL RIGHTS AND EQUAL OPPORTUNITY

REQUESTING REASONABLE ACCOMMODATIONS



REQUESTING OFFICE OF ENGAGEMENT AND EXTENSION SUPPORT

Participant requests for accommodations can be made verbally or in writing to a local Extension employee. Local staff must provide a written acknowledgement to the requester immediately upon receipt and OEE must respond to requests within 14 business days. Cost cannot be a reason to decline accommodation requests.

For support with reasonable accommodation requests, please reach out to your local county or program faculty or staff who will work with OEE's DEI team.

Information obtained in connection with reasonable accommodation requests must be kept in secured files that are separated from the individual's other files.

REQUESTING TRANSLATION & INTERPRETATION SUPPORT

CSU Extension, as a recipient of NIFA funding, is required to take reasonable steps to ensure persons with limited English proficiencies (LEP) have meaningful access to programs and activities.

In areas where a significant proportion of the populations eligible to be served need services or information in languages other than English, OEE is required to take reasonable steps to provide information in those languages at no cost to participants. CSU Extension's education-based programs cannot turn-away prospective participants/volunteers due to their limited English proficiencies, nor can we ask participants/volunteers to provide their own interpreters.

Office of Engagement & Extension has resources to support Extension's language access needs.

- **Contact your county or campus program leader with any translation and interpretation requests who will submit a request to OEE's Language Access/DEI Program Coordinator, Susana Guardado.**
- **Please allow a minimum of 14 business days prior to your deadline for translation and interpretation requests.**

CIVIL RIGHTS AND EQUAL OPPORTUNITY

COMMUNICATING WITH SPANISH-SPEAKING COMMUNITIES



Strategies for Communicating with Spanish-speaking Communities

Trusted Messengers: Word-of-Mouth

For Colorado's Spanish-speaking communities, word-of-mouth from "trusted messengers" remains the most effective means of recruitment.

Trusted Messengers: Text/Instant Messages

A somewhat distant second would be invitations sent via texts/GroupMe/WhatsApp, again from trusted messengers. Please note: effective electronic communication includes texts and instant messages, not email, social media, or websites.

Who are “Trusted Messengers”?

Examples of trusted messengers include: community-serving nonprofit organizations, the school district's family liaisons, Spanish-speaking health care providers or “promotores” (health promoters), grassroots/neighborhood leaders, Spanish-speaking public educators, faith leaders and trusted business leaders.

Trusted messengers do not necessarily carry titles. They could be anyone with influence in the community. Think of trusted messengers as gatekeepers.

It goes without saying, it is always easier to recruit participants when you have already-established relationships that are built on trust, which can only be cultivated over time.

Radio

Among Colorado's Spanish-speaking communities, radio is heavily used for entertainment, news and sharing information. Communicate via Spanish language radio stations in order to reach a broad audience. When speaking on Spanish language radio, you can speak in Spanish or English, most stations will interpret for you. You can either contact the radio station ahead of time and schedule a guest spot or simply call in to make an announcement.

Univision

Local Univision stations are another powerful tool for reaching Spanish-speaking communities.



Strategies for Communicating with Spanish-speaking Communities (continued)

Ineffective Outreach Strategies

Outreach strategies that proved to be ineffective include flyers or webpages translated into Spanish, text-heavy emails and social media accounts not already part of residents' established feeds.

Building Trust Takes Time

Instead of attempting to establish new methods of communication (ex: new social channels or translating websites to Spanish), rely on established messengers within the community.

Consider existing relationships within the community and actively work to strengthen and expand those relationships, while also establishing new relationships. Building trust takes time but, once established, can be a powerful tool for effective outreach and communication.

Additional Tips

- When printing or publishing a document that feature Spanish-speaking participants' work and accomplishments, it is critical to have reputable translation for the document and not rely upon auto-translate services. Please refer to page 6 to request translation services.
- When possible, publish bilingual documents with both Spanish and English on the same page. This is more inclusive than Spanish-only and English-only documents.
- When web communication is used (remember that this is not a preferred method of communication and should only be used when strictly necessary), note that any graphics with text in them do not translate if a user is looking at the page with a web-translator extension.
 - For example, a graphic created for social media that has text on the image will not translate if the user is utilizing the Google Translate browser extension (or similar software).
 - If you must use graphics, include both English and Spanish versions on the webpage.
- Use vivid colors, big bold lettering and break up block text with images and visuals.

CIVIL RIGHTS AND EQUAL OPPORTUNITY

TITLE IX AND SEX DISCRIMINATION AND HARASSMENT



Title IX and Sex Discrimination and Harassment focuses on gender equity. For issues related to sexual harassment, please report to CSU Office of Equal Opportunity (OEO). To report gender discrimination, in terms of access to education-based program or activities, please report to CSU Office of Title IX Programs and Gender Equity (see contact info below).

- **Sex, according to the USDA, refers to the “biological determination as female, male and other.”**
- **Gender refers to “one’s concept of self as a man, woman, a blend of both or neither, such as genderfluid, transgender and/or nonbinary.”**
- **Both sex and gender are covered by CSU’s Nondiscrimination Statement, therefore, CSU Extension programs and workplaces are required to be open to all, regardless of how they identify in terms of sex, gender, sexual orientation and gender expression.**

There are three policies related to Title IX:

1. Title IX of the Educational Amendments of 1972

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.”

2. CSU’s Sexual Harassment Policy, which prohibits:

“...any unwelcome sexual advance, request for sexual favors or other conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, education or participation in a university activity;
- Submission to or rejection of such conduct by an individual is used as the basis for, or a factor in, decisions affecting that individual’s employment, education or participation in a university activity; or
- Such conduct is sufficiently severe or pervasive to unreasonably interfere with an individual’s employment or academic performance or create an intimidating, hostile or offensive environment for that person’s employment, education or participation in a university activity.
- Examples include but are not limited to: unwelcome sexual advances; repeated and unwelcome sexually-oriented bullying, teasing, joking, or flirting; verbal abuse of a sexual nature; commentary about an individual’s body, sexual prowess, or sexual deficiencies; leering, touching, pinching, or brushing against another’s body; or displaying objects or pictures, including electronic images, which are sexual in nature and which create a hostile or offensive work, education, or living environment.”

3. CSU’s policy on “Responsible Employees,” which states:

“...any CSU employee who is not identified as a confidential resource is required to report sexual violence, sexual harassment or other conduct prohibited by the policy to CSU’s Office of Title IX Programs and Gender Equity.”

When in doubt, it is wiser to send the details to OEO and let them make the judgement call. The only exceptions for mandatory reporting would be if you are officially designated as a “confidential resource,” someone like a mental health counselor or OEO officer.

CIVIL RIGHTS AND EQUAL OPPORTUNITY

TITLE IX AND SEX DISCRIMINATION AND HARASSMENT



Who Can File a Complaint and How?

CSU's complaint process for Title IX-based discrimination cases is open to all staff, program participants, committee members and community partners. Examples of grounds for an investigation include girls or women-identified participants not being afforded the same opportunities to participate in Extension's education-based programming or office funds being allocated in ways that deny girls or women-identified participants full participation in Extension programming. Discussions will be kept confidential to the full extent permitted by the law. CSU's Office of Title IX Programs and Gender Equity need to be notified of incidents as soon as possible.

Likewise, CSU's complaint process for sexual harassment is open to all staff, program participants and community partners. Reports must be sent to OEO no later than 180 days after the last incident considered to be sexual harassment. A detailed description of the filing process can be found here:

<https://o eo.colostate.edu/sexual-harassment/>. You also have the option to file an external complaint to the USDA in the form of a letter or you can request an official intake form from the USDA via email.

Contact information, for all options, is posted on the OEE intranet's DEI portal.

If you need additional guidance or resources, contact Eric Ishiwata (eric.ishiwata@colostate.edu). Do not, however, share any case-specific, confidential information with Ishiwata or OEE HR. If the issue is related to discrimination, take it directly to OEO. If it relates to Title IX and Sexual Discrimination and Harassment, take it directly to CSU's Office of Title IX Programs and Gender Equity.

CSU's Office of Equal Opportunity (OEO): oeo@colostate.edu or (970) 491-5836

CSU's Office of Title IX Programs and Gender Equity: titleix@colostate.edu or (970) 491-1715

Building Title IX Requirements into Programs

All programs and activities must be offered in a manner that ensures non-discrimination on the basis of sex/gender identity, marital/parental status and/or pregnancy, childbirth or related condition.

No program, activity, club, or group name may contain sex-stereotyped names or illustrations. This includes marketing materials, presentations and other digital media related to the program, activity, club or group. There can be no sex-separate programs, activities or awards. All offices and programs are required to conduct thorough reviews of their programming and materials to ensure Extension is in 100% compliance with these guidelines by the end of October 2022.

EXCEPTIONS for prohibition on gender-based programs are made for programs specifically designed to address historical imbalances in participant representation on the basis of gender and/or gender identity (i.e., Annie's project, Youth STEM programming for girls or FCS support for teen parents, etc.).

All program staff, participants, committee members and volunteers must have access to CSU Extension's sexual harassment and Title IX policies and have an understanding of the complaints process.