The Roadmap to Civil Rights Compliance

2014
What We Will Cover:

- History Civil Rights and USDA programs
- Civil Rights Laws
- Extension Civil Rights Policies
- Program Design & Delivery
  - County Extension Council & Expansion and Review
  - Potential Audiences
  - Recognizing Potential Barriers
  - Public Notification - Reasonable Accommodations
- Program Participation Data and Information Collection
- Outreach Efforts
- Training
- Compliance and Internal Monitoring
- Civil Rights County File Checklist
History

During the history of USDA and its programs, many allegations of discrimination were made and substantiated. Minorities were denied access to many of the USDA programs and services.

Because of this historical discrimination, federal guidelines and laws have been implemented to insure discriminatory practices are not taken place in programs supported or funded by the USDA, including Extension services and programs.
Civil Rights Laws

- Title VI of Civil Rights Act, 1964
- Title VII of Civil Rights Act, 1964
- Title IX of the Educational, Amendments Act, 1972
- Section 501, Rehabilitation Act, 1973
- Americans with Disabilities Act, 1990
- Age Discrimination Act, 1967
- Executive Order 11246
- Executive Order 13166 (LEP)
Extension's Civil Rights Policies

Non-Discrimination Policy

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing positive and discrimination-free working and learning environments where all individuals are treated fairly and with respect. The institution values inclusiveness and diversity and complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance.

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to providing equal opportunity in employment and in educational programs, activities, and services on a non-discriminatory basis and without regard to race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status. Moreover, the institution pledges to detect and eliminate any elements of discrimination which may be found to exist.

Employees will be trained to understand policies, procedures and regulations pertaining to non-discrimination. Administrative and supervisory staff will be held accountable for insuring that all actions within their assigned areas of responsibility are conducted in a non-discriminatory manner.

The University of Arkansas Division of Agriculture Cooperative Extension Service is committed to assuring that programs are accessible to all participants and that alternative means of communication is available to individuals with disabilities and those with limited English proficiency to the extent required to provide meaningful access to programs and services.
Equal Employment & Programmatic Complaint Procedures

Employment Complaint

Programmatic Complaint

- Detailed Procedure
- Timelines
- Deadline for submitting the complaint
- Hearing selection
- Evidence gathering
- Appeal Process

- Detailed Procedure
- Timelines
- Deadline for submitting the complaint
- Hearing selection
- Evidence gathering
- Appeal Process

- Initial Investigation
- Formal Hearing
- Final Decision
- Appeal Process

- Initial Investigation
- Formal Hearing
- Final Decision
- Appeal Process
• Informal Procedure  
  Contact EEO Counselor;  
  Mediate between employee and accused; and  
  If not resolved at this stage, then formal procedure

• Formal Procedure  
  Must be made in writing;  
  Within 180 days of the conduct giving rise to the complaint; and  
  Addressed to the Office of Affirmative Action
Equal Employment & Programmatic Complaint Procedures

Employment Complaint

- Written Procedure
  - Contact supervisor
  - Report any instance of harassment
  - Complete all forms

- Written Procedure
  - Follow up with HR or legal department

Programmatic Complaint

- Program Complaint
  - Must be written in writing
  - Written within 90 days of the event raising issue to the complainant

- Program Complaint
  - Office of the Attorney General
  - U.S. Commission on Civil Rights
• Formal Procedure
  Must be made in writing;
  Within 180 days of the conduct giving rise to the complaint; and can be sent to:

  • County Staff Chair
  • Office of Affirmative Action
  • U.S.D.A, Director, Office of Civil Rights
Diversity

Civil rights laws in the United States came about due to the way that we have reacted to diversity on our population. Diversity is defined as the differences among people with respect to age, socioeconomic status, gender, physical and mental abilities, race, national origin, political beliefs, sexual orientation, spiritual practices, and other human differences.

The idea of diversity is acceptance and respect for these individual differences. It means to understand that each individual is unique and appreciate our individual differences so that we move well beyond simple tolerance to embracing the rich dimensions of diversity.

The principle of inclusion and diversity are core values with respect to Extension’s mission. We must respect and embrace the differences in people so that it will guide the organization in the development and delivery of Extension’s educational programs to meet the needs of all the residents of Arkansas.
Program Design & Delivery

A key initial step in the Extension programming process in meeting our civil rights responsibilities is to include community members who represent specific underrepresented clientele in our advisory system. Vital to recruit and engage a diverse set of members to serve on these committees.

- County Extension Council
- Expansion & Review Committees
- Volunteer Leader Associations
Program Design & Delivery

Potential Audience

- Agriculture & Natural Resources - Commercial
- Agriculture & Natural Resources - Other
- Family & Consumer Sciences
- 4-H Youth Development
- Community & Economic Development
Table 52. **Black or African American Operators: 2012**

<table>
<thead>
<tr>
<th>Geographic area</th>
<th>Farms</th>
<th>Black or African American operators</th>
<th>Land in farms (acres)</th>
<th>Farms</th>
<th>Land in farms (acres)</th>
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<tr>
<td><strong>State Total</strong></td>
<td>1,087</td>
<td>1,305</td>
<td>157,184</td>
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<td>Forrest</td>
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<td>56</td>
<td>3,424</td>
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<td>3,424</td>
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</table>
Program Design & Delivery

Potential Audience

• Agriculture & Natural Resources - Commercial
• Agriculture & Natural Resources - Other
• Family & Consumer Sciences
• 4-H Youth Development
• Community & Economic Development
Audience comprised of those that would benefit from agriculture and natural resources information, other than commercial activities.

www.census.gov

<table>
<thead>
<tr>
<th>People QuickFacts</th>
<th>Calhoun County</th>
<th>Arkansas</th>
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<tbody>
<tr>
<td>Population, 2013 estimate</td>
<td>5,241</td>
<td>2,959,373</td>
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<td>Population, 2010 (April 1) estimates base</td>
<td>5,966</td>
<td>2,915,916</td>
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<tr>
<td>Population, percent change, April 1, 2010 to July 1, 2013</td>
<td>-2.4%</td>
<td>1.5%</td>
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<tr>
<td>Population, 2010</td>
<td>5,966</td>
<td>2,915,918</td>
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<tr>
<td>Persons under 5 years, percent, 2013</td>
<td>4.7%</td>
<td>6.5%</td>
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<tr>
<td>Persons under 18 years, percent, 2013</td>
<td>17.7%</td>
<td>24.0%</td>
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<tr>
<td>Persons 65 years and over, percent, 2013</td>
<td>19.4%</td>
<td>15.4%</td>
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<td>Female persons, percent, 2013</td>
<td>48.9%</td>
<td>50.9%</td>
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<tr>
<td>White alone, percent, 2013 (a)</td>
<td>76.2%</td>
<td>79.9%</td>
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<tr>
<td>Black or African American alone, percent, 2013 (a)</td>
<td>21.5%</td>
<td>15.6%</td>
</tr>
<tr>
<td>American Indian and Alaska Native alone, percent, 2013 (a)</td>
<td>0.5%</td>
<td>1.0%</td>
</tr>
<tr>
<td>Asian alone, percent, 2013 (a)</td>
<td>0.2%</td>
<td>1.5%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander alone, percent, 2013 (a)</td>
<td>2%</td>
<td>0.3%</td>
</tr>
<tr>
<td>Two or More Races, percent, 2013</td>
<td>1.5%</td>
<td>1.9%</td>
</tr>
<tr>
<td>Hispanic or Latino, percent, 2013 (b)</td>
<td>3.7%</td>
<td>6.9%</td>
</tr>
<tr>
<td>White alone, not Hispanic or Latino, percent, 2013</td>
<td>73.0%</td>
<td>73.7%</td>
</tr>
</tbody>
</table>
Program Design & Delivery

Potential Audience

• Agriculture & Natural Resources - Commercial
• Agriculture & Natural Resources - Other
• Family & Consumer Sciences
• 4-H Youth Development
• Community & Economic Development
Any program or activity that involves youth. Demographic information can be obtained through the Arkansas Department of Education website,

https://adedata.arkansas.gov/statewide/Counties/EnrollmentByRaceGender.aspx
Program Design & Delivery

Recognizing Potential Barriers

- Language Barriers
- Cultural Barriers
- Economic Barriers

Separation of Church & State

Extension faculty, staff, and volunteers may do educational programs for religious groups, but may not carryout programs or projects which advance or impede religion; conduct or incorporate into events any religious service or practice, (for example prayers); or adopt creeds that include sectarian references or language, (e.g. ideals of Christian life.)
Public Notification

- The Arkansas Cooperative Extension Service offers its program to all eligible persons regardless of race, color, sex, gender identity, sexual orientation, national origin, religion, age, disability, marital or veteran status, genetic information, or any other legally protected status, and is an Affirmative Action/Equal Opportunity Employer.

El Servicio de Extensión Cooperativa de Arkansas ofrece su programa a todas las personas elegibles independientemente de su raza, color, sexo, identidad de género, orientación sexual, nacionalidad, religión, edad, discapacidad, estado civil o condición de veterano, información genética, o cualquier otro estatus protegido por la ley, y es un empleador de acción afirmativa/igualdad de oportunidades.

- The Arkansas Cooperative Extension Service is an equal opportunity/equal access/affirmative action institution. If you require a reasonable accommodation to participate or need materials in another format, please contact your County Extension office as soon as possible. Dial 711 for Arkansas Relay.

El Servicio de Extensión Cooperativa de Arkansas es una institución de acción afirmativa/igualdad de oportunidades/igualdad de acceso. Si requiere acomodación razonable para participar o necesita material en otro formato, por favor póngase en contacto con su oficina de extensión tan pronto como sea posible. Dial 711 para Arkansas.

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There is no clear definition of reasonable accommodation, but it does include providing sign language interpreters for the hearing impaired, and providing materials in large print or audio as examples. In order that arrangements can be made to provide "reasonable accommodation", Extension is entitled to establish a time limit for special requests.

The office delivering the program is expected to bear the cost of any special needs that are requested. However, if this cost may difficult for a county to bear; therefore, the Division’s Office of Affirmation Action should be contacted to assist with the accommodations.
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Program Participation Data Collection

The Arkansas Cooperative Extension Service is committed to reaching all of the residents of the State of Arkansas with its programs and activities and recognizes the importance of diversity and inclusion. As such, collection of participation data is a tool to evaluate participation by various clientele groups in Extension educational programs and activities.

**Direct Contact:** a face-to-face interaction with clientele where there is an exchange of educational information; an educational experience. Direct contact occurs in the office, field, home consultations, workshops, seminars, meetings, and similar activities.

**Indirect Contacts:** are those other ways besides face-to-face contacts made by Extension staff members engaging clients in Extension programming; such as e-mail, circular letters; newsletters.

**Collecting Guidelines**
Pursuant to federal guidelines for the collection of demographic information for direct contacts, Extension Services are authorized to utilize two methods.

**Participant Self-Reporting Method**
This method is the self-identification by the clientele. This is the most preferred method for collecting demographic information as it is the most accurate since the clientele are disclosing their racial-ethnic and gender information. This self-reporting format is accomplished by utilizing attendance/sign-in-sheet records participants complete.

**Observer-Collected Method**
The second method for collection of direct contacts is called the Observer-Collected Method. Using this method, an Extension staff member collects the demographic data using direct observation of the clientele.
# Attendance Record/Sign-In Sheets

**Name of Activity/Event:**

**Date:**

**Location:**

**Conducted by:**

<table>
<thead>
<tr>
<th>Location</th>
<th><em>Ethnicity (Please Check One)</em></th>
<th><em>Race (Please Check One)</em></th>
<th><em>Gender</em></th>
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</tbody>
</table>

*This information is requested solely for the purpose of determining compliance with federal civil rights law, and your response will not affect your eligibility to participate in Extension programs. By providing this information, you will assist us in assuring that this program is administered in a nondiscriminatory manner.*

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Program Participation Data Collection

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**Collecting Guidelines**
Pursuant to federal guidelines for the collection of demographic information for direct contacts, Extension Services are authorized to utilize two methods.

**Participant Self-Reporting Method**
This method is the self-identification by the clientele. This is the most preferred method for collecting demographic information as it is the most accurate since the clientele are disclosing their racial-ethnic and gender information. This self-reporting format is accomplished by utilizing attendance/sign-in-sheets that participants complete.

**Observer-Collected Method**
The second method for collection of direct contacts is called the Observer-Collected Method. Using this method, an Extension staff member collects the demographic data using direct observation of the clientele.
**Observer-Collected Contacts Log**

This form is to document demographic information of program participants when circumstances do not allow for self-reporting by clientele.

<table>
<thead>
<tr>
<th>Program Event:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location:</td>
<td>Conducted by:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Race or Ethnicity</th>
<th>Gender</th>
<th>American Indian/Alaskan Native</th>
<th>Asian</th>
<th>Black/African American</th>
<th>Hispanic or Latino</th>
<th>Native Hawaiian/Pacific Islander</th>
<th>White</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Female</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td></td>
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</tr>
</tbody>
</table>

**American Indian or Alaskan Native:** A person having origins in any of the original peoples of North America, and maintains cultural identification through tribal affiliations or community recognition.

**Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**Black or African American:** A person having origins in any of the black racial groups of Africa.

**Hispanic or Latino:** A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

**Native Hawaiian:** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**White:** A person having origins in any of the original peoples of Europe, North Africa, or the Middle East.
Outreach Efforts

Balanced Participation
The overall goal for Extension programs is to meet parity. An Extension program is in parity when the participation of individuals of minority groups reflects the proportionate representation in the population of potential recipients. For example, if there is 20% minorities in a county, and an Extension program has an overall participation rate of 20% minorities, then the Extension program is in parity.

“ALL REASONABLE EFFORTS” consist of a series of approaches that are required of Extension staff to solicit participation of the underrepresented group in an Extension program. These are documented efforts to target and solicit the particular underrepresented group that is not participating in the program. These are also known as affirmative action steps and are required when programs do not meet balanced participation requirements. A sincere effort must be made to encourage participation by minorities or the underrepresented. It is not enough to simply announce the program is open to all. Below are some of the situations that would require “all reasonable efforts” by Extension staff:

• an Extension sponsored group that does not have a balanced membership rate and is in a mixed racial/ethnic membership area;

• advisory groups that do not reflect the composition of the potential audience; and/or

• program participation in which certain groups are consistently underrepresented.
Outreach Efforts

"ALL REASONABLE EFFORTS" Steps includes and must be repeated and documented until the goal of balanced participation is met and maintained.

- Use of media outlets that target the underrepresented group to announce programs and events, i.e. radio stations, newspapers and television.

- Development diverse flyers, brochures, posters, announcements to be placed in locations frequented by the underrepresented group;

- Write personal letters to and contact members of the underrepresented group to encourage participation;

- Make personal contact with leaders from the underrepresented group to seek their assistance in reaching this audience;

- Seek assistance from other community groups to encourage participation. i.e. grassroots organizations (NAACP, Minority Health Coalitions, Better Community Developers, Faith-Based Organizations; Minority Churches, local food bank organizations; civic, fraternal and social organizations whose memberships reflects diversity), volunteers.
Outreach Efforts

**Balanced Participation - 4-H and EH Clubs**
To be in compliance, a club must have a “balanced membership.” Balanced membership is achieved when the number of members of the underrepresented race reaches 75% of the number of the non-majority members the club would have if its racial composition were exactly proportional to that of the membership area. For example, a club with 20 members in a membership area where blacks comprise 20 percent of the population would be exactly proportional (in parity) if it had 4 black members. This club would be considered to have "balanced membership," however, if it had 3 black members (75 percent of the ideal goal).

**“ALL REASONABLE EFFORTS”** must be conducted for 4-H and EH clubs if the clubs do not have a balanced membership. The AFFACT-343 must be completed each year for the clubs, along with maintaining “all reasonable efforts” documentation. Location of all 4-H and EH clubs must be maintained in the county civil rights file.
# List of all 4-H and EH Clubs and Certification of All Reasonable Efforts

<table>
<thead>
<tr>
<th>(1) Club or Unit Name (List all Clubs in the County)</th>
<th>(2) Type</th>
<th>(3) Racial/Ethnic Composition Club/Unit</th>
<th>(4) Racial/Ethnic Composition of Membership Area</th>
<th>(5) % of Minorities In Area</th>
<th>(6) # of Contacts Required</th>
<th>(7) Personal Contacts</th>
<th>(8) Direct Mail Contacts</th>
<th>(9) Mass Media Releases</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Total # Members # Minority/Underepresented White Black Other</td>
<td>White Black Other Total</td>
<td></td>
<td></td>
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The above list is an accurate summary of the clubs and members of each club in the county. I hereby certify that if "all reasonable efforts" were needed to achieve balanced membership in any club, such efforts have been made and are documented in the county's civil rights files.

County Staff Chair: ____________________________ Date: __________________
All 4-H Clubs are County-Wide (Membership area = 1200 Whites, 230 Blacks, 100 Others)

1. Hickory 4-H Club = 10 White, 2 Black, 1 Other
2. Mesquite 4-H Club = 5 White
3. Applewood 4-H Club = 6, White, 1 Black
4. 4-H Shooting Sports = 16 White
5. 4-H Lighthouse Club = 12 White, 4 Black
6. 4-H Livestock Club = 15, White, 3 Black, 2 Other

2014 4-H Club Map
Training and Compliance Monitoring

**Training**
- Online training modules, along with assessments.
- Staff is required to complete the modules and assessments every 3 years.
- New employees will be required to complete within the first thirty (30) days of employment.
- Documentation of the completion of such training will be maintained with the Division’s Affirmative Action Office.

**Compliance Monitoring.** USDA expects each Cooperative Extension Service to have an internal civil rights compliance review in process that assures a routine review. There are three different levels of civil rights reviews.

- **Annual Compliance Review - Civil Rights Yearly Assessment (AFFACT-01)**
  - Assure following through on commitment to carry out civil rights goals, documentation is in civil rights files.
  - This report will also note the accomplishments by staff in achieving the civil rights goals.
  - Must submit to the Districts Offices no later than November 15th of each year.

- **Internal Review is one that is conducted on-site at the county office.**
  - Formal review conducted in each county every five (5) years on a rotating basis.
  - Prepare for an internal review, county staff should utilize the Civil Rights Review Checklist, AFFACT – 347.
  - Will identify areas that need improvement
  - Review civil rights files
  - A written assessment of the internal review will be completed by the Civil Rights Compliance Officer or the District Director following the completion of the review.

- **Federal Review**
Civil Rights County File Checklist

County faculty and staff are expected to document the efforts and activities used to reach out and expand access with underrepresented groups. The following information should be contained in the county's civil rights files.

- 2014 University of Arkansas Cooperative Extension County Civil Rights Compliance Plan
  - Summaries of Civil Rights Laws
  - University of Arkansas Non-Discrimination Policies

- County Demographic Information
  - County Demographic Information - current
  - Potential Audience Demographic Information- Each Program Area (AFFACT-05) - current

- Civil Rights Yearly Assessment Reports (AFFACT-01) – last three (3) years

- Annual AIMS Civil Rights Contact Date Reports for Each Program Area

- Mailing Lists (Current Year) containing demographic information

- County Extension Council Membership List (All Committees/Advisory Groups) – (AFFACT-04)
  - Attendance Records – last three (3) years
  - Committee Minutes (Including 4-H and EHC Expansion and Review Committees) (AFFACT-04) - last three (3) years

- Internal Civil Rights Review and Findings (AFFACT-346) – most current

- Accessibility for the Disabled
  - ADA Self-Evaluation and Compliance (AFFACT-345)
  - Listing of all reasonable accommodations requested and provided (AFFACT – 345.1)
Civil Rights County File Checklist

☐ 4-H and EH Clubs
  • Location of 4-H Clubs identified on county map – current
  • Annual summary of 4-H overnight/ day camp participants (AFFACT – 13) – last three (3) years
  • Annual summary of 4-H Scholarships Awarded (AFFACT – 14)
  • Annual summary of 4-H Awards, Competitive Events Participants (AFFACT – 15)
  • Location of EH Clubs identified on county map - current

☐ “All Reasonable Efforts” File
  • Contains documentation of all good faith efforts, including notes, invitation letters, interview records, list of grassroots organizations, copies of flyers, newspapers articles, records of personnel visits; minority media lists
  • A separate file for “All Reasonable Efforts” for EH and 4-H Clubs should be maintained with all outreach documentation, along with the AFFACT-343
  • List of materials and/or copies of information disseminated to the public in other languages
  • Maintain these records for three (3) years

☐ Attendance Records
  • Separate file for each program area, (Ag, Comm., Ag- Other, FCS, 4-H, EFNEP) (AFFACT-0.8, 08.1, 08.2)
  • Maintain these records for three (3) years

☐ Public Notification
  • Copies of printed materials disseminated to the public announcing programs/events that contain the non-discrimination statement and/or ADA statement
  • Maintain these records for three (3) years

☐ Office Conference Minutes
  • Must include discussions/strategies to increase underrepresented clientele
  • Maintain these records for three (3) years

☐ Non-Discrimination Assurances
  • Annual Certification of Non-Discrimination for each EH and 4-H Club (AFFACT - 513, AFFACT – 662, AFFACT – 663)
  • Annual Notification Letters to Organizations and Groups
  • Determination of Non-Discrimination Status (AFFACT – 03)
  • Maintain these records for three (3) years

☐ Volunteers
  • Certification of Child Maltreatment Training (Always Keep)
  • Annual Summary of Master Gardener Volunteers and 4-H Volunteers – (AFFACT – 16) – Maintain these records for three (3) years