SUBJECT: Clarifications for Administering the "Affirmative Action Plan for Meeting Nondiscriminatory Legal Standards in Employment and the Conduct of All Programs by State Cooperative Extension Services" (Section II, Subsection A)

TO: STATE EXTENSION DIRECTORS

It is essential that there be a clear understanding of the terminology used in the Affirmative Action Plan in order that you can administer effectively the State Plan as accepted by the Department of Agriculture.

Throughout the Plan (Section II, Subsection A) in the Standard and Action Required columns are such phrases as "potential recipients," "citizens of the state," "all persons," "potential clientele groups," "all potential youth of 4-H age," "all youth," "potential Extension home economics program participants," and "youth in each of the local areas."

Obviously, with limited professional and financial resources, it is not possible to serve such total clientele within each State without defining potential recipients, adjusting program content, adjusting educational methods, adjusting organization and committee structure, or combinations of these adjustments.

The term "all reasonable efforts" is used in relation to requirements pertaining to Extension Homemakers groups and 4-H Clubs serving interracial communities or defined geographic areas. All Extension staff members need to know the definition of "all reasonable efforts" and the minimum effort required.

We urge continued initiative and leadership in fulfilling your State Affirmative Action Plan as accepted by the Department. We have an obligation to vigorously pursue the elimination of any discriminatory practices which may be present within the framework of requirements of the law and standards and actions required by the Department. Hopefully, these clarifications will assist you in meeting this obligation.

If you desire to revise your Affirmative Action Plan based on these clarifications, please submit for our consideration your proposed revisions clearly identifying the specific items as listed in your Plan. If your proposed revisions are acceptable to the Department, such revisions will become a part of the total Plan accepted by the Department.

As you continue to implement the Affirmative Action Plan in your State, please let us know of other items which need clarification in order to help you meet the requirements.

EDWIN L. KIRBY
Administrator
Enclosure
Clarifications for Administering the "Affirmative Action Plan for Meeting Nondiscriminatory Legal Standards in Employment and the Conduct of All Programs by State Cooperative Extension Services" (Section II, Subsection A)

1. **Potential Recipients**

**Definition:**

*Recipient* - Any public or private agency, institution, or organization, entity or an individual to which the State Extension Service furnishes services.

**Determination of Potential Recipients:**

State Extension Directors may determine who are appropriate potential recipients of Extension educational assistance. However, such determinations must be made:

1. Irrespective of race, color, or national origin.
2. Consistent with the intent for which Congress has appropriated funds. (Examples: Urban 4-H, Expanded Food and Nutrition.)
3. Consistent with USDA guidelines and requirements for the use of such funds.

State Extension Directors have the flexibility to determine potential recipients within the framework of meeting the above requirements in relation to geographic location (residence) of potential recipients such as metropolitan, suburban, rural nonfarm, and farm population.

II. **Educational Methods (Selection and Intensity)**

State Extension Services may determine that educational methods used will be:

1. Primarily mass media (radio, television, newspaper, circular letters, bulletins) for certain potential recipients.
2. Individual and group contact methods (home and business visitations, meetings, tours, camps, demonstrations, personal letters, office calls) for certain potential recipients.

The selection and utilization of educational methods must be made on a basis which does not involve any discrimination because of the race, color, or national origin of potential recipients.
III. Program Content of Educational Assistance

State Extension Services may determine appropriate program content to be offered through Extension educational assistance to appropriate potential recipients, provided such content areas are:

1. Not based upon race, color, or national origin.
2. Consistent with the intended use of appropriated funds.
3. Consistent with USDA guidelines and requirements for the use of such funds.

Examples of appropriate program content areas include the following:

1. Priorities of content given to programs offered among:
   a. Agriculture and Natural Resources.
   b. Home Economics (Family Living, EFNEP).
   c. 4-H Youth Development.
   d. Community Resource Development.

2. Within each of the major program categories, priorities may be established in areas such as management, marketing, agricultural policy, production, environmental quality, agricultural business, and forestry in Agriculture; nutrition; home management, clothing, family relations, housing, and home furnishings within Home Economics.

IV. Organization and Committee Structure

The purpose of this structure is to assist in the planning and conduct of Extension Educational assistance offered to appropriate potential recipients.

State Extension Services may determine the appropriate organizational and committee structure, including the need for and use of:

1. Extension advisory committees.
2. Program planning committees, and subcommittees.
3. Organized Extension Homemaker groups.
4. Organized 4-H Clubs.
5. All other Extension-sponsored groups.
If such organization and committee structure is used, criteria for membership and operational procedure for such groups must be such that they do not discriminate based upon race, color, or national origin. This includes appropriate representation of minority groups on advisory and program planning committees, and subcommittees.

V. All Reasonable Efforts - Organized Extension Homemaker Groups and 4-H Clubs

The minimum reasonable effort required by County Extension staff members includes all items listed as follows:

1. Use of all available mass media, including radio, newspaper, and television, to inform potential recipients of the program and of opportunity to participate.

2. Personal letters and circulars addressed to defined potential recipients inviting them to participate, including dates and places of meetings or other planned activity.

3. Personal visits by the County Extension staff member(s) to a representative number of defined potential recipients in the geographically defined area to encourage participation.

State Extension Services may require additional steps to be taken such as encouraging volunteers to assist in involving potential recipients of opportunities to participate, but such additional steps are not required by USDA in meeting these requirements.