**August 2011**

**Justification for Change**

**0596-0215**

The Forest Service,  Civil Rights Staff, Equal Opportunity Program is responsible for providing advice and counsel to the agency regarding compliance with Federal equal opportunity nondiscrimination laws, statues, executive orders and U.S. Department of Agriculture policies and regulations.  The FS 1700-6 (2976) is a critical tool used by employees to record their monitoring efforts of agency partners.   The submission of the revisions of the form is a result feedback from program managers after 3 years of use and their suggestions for improvements in text for better understanding and implementation.   The below list of modifications to the FS 1700-6 form are mostly for increased recognition and clarification, streamlining the questions, and grammar improvements.

We are also making this form available as a fillable e-Form that can be saved, attached and printed.

|  |  |  |  |
| --- | --- | --- | --- |
| **Page #** | **Current** | **Change to** | **Reason for Change** |
| 1 | Name Change Title: Equal Opportunity Program Delivery Compliance Review Record | **Civil Rights Compliance Review Record - Federally Assisted Programs** | Will improve understanding of form use. |
| 1 | 3. Special Uses Code:\_\_\_\_\_\_\_\_\_\_ 4.Grant Number/Case Code:\_\_\_\_\_\_\_\_\_\_\_ | 3. Special Uses Code:\_\_\_\_\_\_\_ **Or** **Grant Number**:\_\_\_\_\_\_\_  | Streamlines information collected. Better flow. |
| 1 | 5. Business Organization Name:\_\_\_\_\_\_6. Applicant Recipient Name:\_\_\_\_\_\_\_Phone Number:\_\_\_\_\_\_\_\_ | 4. Business/Organization Name **& Phone**\_\_\_\_\_\_\_\_ **OR** Applicant/Recipient Name **& Phone**\_\_\_\_\_\_\_\_ | Streamlines information collected. Better flow. |
| 1 | 8. Last Review Date:\_\_\_\_\_\_\_\_\_ | 6. **Previous** review date:\_\_\_\_\_\_\_\_\_ | Clarifies data collected. |
| 2 | 1. Has the Forest Service explained the civil rights responsibilities for nondiscrimination in program delivery | 1. Has the Forest Service explained the civil rights responsibilities for nondiscrimination in **federally assisted** program delivery | Clarifies this is for Federally assisted programs. Better flow. |
| 2 | 2. Does the recipient’s permit, agreement, or grant contain the appropriate clause **certifying**….. | 2. Does the recipient’s permit, agreement, or grant contain the appropriate clause **assuring……** | Clarifies for better flow. |
| 2 | 3. Do your applicable publications, informational materials (including computer—based) and signs contain a statement of affiliation with the FS? | 3. **Will/Do** your applicable publications, informational materials (including computer—based) and signs contain a statement of affiliation with the FS? | Grammar improvement to capture both tenses that apply to pre and post review use.  |
| 2 | 4. Do the publications (e.g., brochures, advertisements) and other informational materials you use contain the USDA nondiscrimination statement? | 4. **Will/Do** the publications (e.g., brochures, advertisements) and other informational materials you use contain the USDA nondiscrimination statement? | Grammar improvement to capture both tenses that apply to pre and post review use.  |
| 2 | 5. Do you communicate to customers how to file a complaint with USDA? (Describe in Part IV-Additional information, below) | 5. **Will/Do** you communicate to customers how to file a complaint with USDA? (Describe in Part IV-Additional information, below) | Grammar improvement to capture both tenses that apply to pre and post review use.  |
| 2 | 6. Do promotional illustrations depict individuals representing diversity, i. e. *ethnicity*, race, color, national origin, sex, age, persons with disabilities? | 6. **Will/Do** promotional illustrations depict individuals representing diversity**, i. e., race, color, national origin, sex, age, persons with disabilities?** | Grammar improvement to capture both tenses that apply to pre and post review use. Also correction of basis list. |
| 2 | 7. Is the And *Justice for All* Poster (Form AD-475C) in a visible location for program participants/customers and employees? | 7. **Will/Is** the And *Justice for All* Poster (Form AD-475C) **(be)** in a visible location for program participants/customers and employees? | Grammar improvement to capture both tenses that apply to pre and post review use.  |
| 2 | 10.1. Before conducting outreach activities for your program or project, do you refer to census data or other information to identify the population (by race, national origin, sex, age and disability) eligible to be served?
 | 10.a. Before conducting outreach activities for your program or project, do you refer to census data or other information to identify the population (by race, **color,** national origin, sex, age and disability) eligible to be served? | Basis was left out of prior form. Needed for consistency. |
| 2 | 12. Have you explained the civil rights and nondiscrimination responsibilities to your employees?Have you explained the above expectations to your sub-recipients? | 12. Have you explained the civil rights and nondiscrimination responsibilities to your employees?Have you explained the above **responsibilities** to your sub-recipients? | Clarification improvement. |
| 2 | 13. Are your program(s) and facilities fully accessible to persons with disabilities? | 13. Is (**Are) your program(s) fully accessible** to persons with disabilities? | Streamlining questions so not to duplicate. |
| 4 | **ADDITIONAL INFORMATION**Use this section to describe or explain in more detail your answers to specific questions in Part I and Part II above | **ADDITIONAL INFORMATION**Use this section to describe or explain in more detail your answers to specific questions in **Part II** and **Part III** above | Correction of prior form. |
| 5 | 8. Do you provide qualified sign-language interpreter services, if such services are requested? Are audio-visual presentations and videos (closed) captioned? Are computer-based products accessible? | 8a. Do you provide qualified sign-language interpreter services, if such services are requested?8.b Are audio visual presentations and **multimedia captioned**? Are computer -based products**, produced as a result of this project/partnership, accessible**? | Clarification and improvement of text and updating terminology. |
| 6 | **Instructions****Part I- FS and Recipient Information**Questions8. Provide the date the program or activity was last reviewed by the Forest Service | **Instructions****Part I- FS and Recipient Information**Questions8.  **If the Forest Service previously reviewed the program or activity, provide the date.**  | Clarification and improvement of text. |
| 6 | **Instructions Part V****Answer question 1**Removed criteria **(only 15 or more employees)** | **Ask the recipient if they have conducted the self-evaluation (Section 504 of the Rehabilitation Act of 1973), which certifies the completion of a self-evaluation of their policies and practices for accessibility to persons with disabilities, within one year after receiving a permit, cooperative agreement or domestic grant. 7CFR15b.8(C ) Verify the date and describe in Section IV Additional Information.** | Clarification and improvement of text. |
| 6 | **Part V add instruction for question 8** | **8a. Verify if partners are aware of and will use qualified American Sign Language Interpreter Services if requested****8b. If the recipient is developing multimedia and computer based products (websites, databases) as a result of the project/partnership, require accessibility (captioning) and compliance with the Rehabilitation Act of 1973, as amended.** | Clarification and improvement of text. Added instructions for question. |