

Civil Rights in Child Nutrition Programs



Today we will talk about Civil Rights in Child Nutrition Programs

Purpose of Civil Rights Training

To inform, educate, and support all staff who interact with Child Nutrition Program (CNP) applicants:

- ☐ Staff rights and responsibilities as administrators of CNPs
- ☐ General USDA Civil Rights requirements
- ☐ Resources and information available to assist staff in carrying out their Civil Rights responsibilities



The purpose of civil rights trainings is to inform, educate, and support all staff that interact with Child Nutrition Programs. This training will cover USDA civil rights requirements, staff responsibilities, and resources and information available to assist staff in carrying out their civil rights responsibilities.

What is Discrimination?

Defined as different treatment which makes a distinction of one person or group; either intentionally, by neglect, or by actions or lack of actions based on the protected classes

Protected Classes:

- Race
- Color
- National Origin
- Sex
- Disability
- Age



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Discrimination is defined as different treatment which makes a distinction of one person or group; this can be intentionally, by neglect, or by actions or lack of actions based on the protected classes. Examples of discrimination include:

- Giving one group or type of participants larger or extra helpings of food, such as giving boys more than girls.
- Separating genders
- Failing to provide children with a dietary disability an accommodating meal
- Failing to provide program information to all potential program applicants

Protected classes in the Child Nutrition Program are: race, age, color, sex, national origin, and disability. This means that an alleged discrimination complaint will pertain to one of these areas.

Civil Rights Training

All Staff must be trained **annually** on Civil Rights

- Part-time staff, temporary staff, volunteers, & full time staff
- Central office staff & site staff

Documentation of this training must be maintained

- Sign-in sheets (to show who was in attendance), agenda, date, time of training
- All civil rights training should be tracked on the training tracking tool



Civil Rights training is required annually for all staff; this includes full-time staff, part-time staff, temporary staff, central office and site staff, and volunteers. Documentation for Civil Rights training must be maintained for three years plus the current year. Documentation must include sign-in sheets, agendas, and dates and times of training. All civil rights trainings should be tracked on a training tracking tool, such as USDA's Professional Standards Training Tracker or on Louisiana Fit Kid's version.

Civil Rights Training: Requirements

- Collection & use of data
- Effective public notification systems
- Complaint procedures
- Compliance review techniques
- Resolution of non-compliance
- Requirements for accommodation of persons with disabilities
- Requirements for language assistance
- Conflict Resolution
- Customer Service



Civil rights training subject matter must include the following:

- Collection and use of data
- Effective public notification systems
- Complaint procedures
- Compliance review techniques
- Resolution of non-compliance
- Requirements for accommodations of persons with disabilities
- Requirements for language assistance
- Conflict resolution
- Customer service

Public Notification: Purpose

- To inform surrounding areas that your school agency participates in the CNPs
- To reach as many applicants, participants, and potentially eligible persons as possible
- To ensure program access
- Must include information on:
 - Eligibility
 - Benefits & Services
 - Program Availability
 - Applicant Rights & Responsibilities
 - Procedures for filing a complaint
 - Nondiscrimination Policies
 - Any program changes



All FNS assistance programs must include a public notification system. The purpose of public notification is to inform applicants, participants, and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint. Through public outreach SFAs are trying to ensure program access to as many potential participants as possible. Public notification must include information regarding eligibility, benefits and services, program availability (such as hours and locations), applicant rights and responsibilities, procedures for filing a complaint, nondiscrimination policies, and any program changes.

Public Notification: Methods

1. Public Release:

- Inform the general public that your school participates in CNPs and that free and reduced price meals are offered

2. “And Justice for All” Poster

3. Nondiscrimination Statement

- All notifications must include nondiscrimination statement

Methods of Communication:

- Internet
- Newspaper articles
- Radio & TV announcements
- Letters
- Newsletter / Bulletins



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Schools must notify the public annually of their participation in the program. Notification to applicants and participants must include information regarding program availability, program rights and responsibilities, the procedure for filing a complaint, and the policy of nondiscrimination.

The public notification system must include the following elements:

1. Public Release: schools must take specific actions to inform the public of their program rights and responsibilities and the steps necessary for participation in the program.
2. Display the “And Justice for All” poster: schools must display the “And Justice” poster in the correct size (which is 11”x17”) in a prominent location where it is visible to all participants in the program. The poster provides the USDA address and phone numbers that the public can use to file a complaint if they think their civil rights have been violated. Applicants and participants must be advised of their right to file a discrimination complaint, how to file a complaint, and the complaint procedures.
3. Nondiscrimination statement: all informational materials, including websites used by schools to inform the public about FNS programs, must contain the nondiscrimination statement.

Public notification can include methods such as Internet and computer based applications, Newspaper, Radio/television, Letters/leaflets/brochures, and Bulletins.

Be sure to convey the message of equal opportunity in photos and other graphics that are used to promote program information to applicants or participants.

“And Justice for All” Poster



- ✓ In each school
- ✓ In a location that is easily visible to the students and the public in the food service area
- ✓ Must be 11" x 17" in size

Prominently display the
“And Justice for All”
USDA nondiscrimination poster



All SFAs must Prominently display the USDA nondiscrimination poster “And Justice for All.” As we previously stated, the poster must be 11” x 17” in size.

Posters should be displayed in each school and in a location that is easily visible to the students and the public in the food service area.

Nondiscrimination Statement

The USDA required nondiscrimination statement must be included on ALL forms of communication and program materials; including all materials for public information, education, or distribution that mentions USDA programs.

Long Version: *Use whenever possible.* The long version is required on all documents pertaining to student eligibility even if they are only a page long (prototypes such as letters to households, verification, Direct Certification, State Agency and program web pages (English and Spanish), etc.); or where space permits. The long version must be used on all vital material.

Short Version: required if the material or document is too small to permit the full (long) statement — 9 point font required (such as on menus or one page flyers).

“This institution is an equal opportunity provider.”



The USDA nondiscrimination statement must be included on all forms of communication and program materials. Program materials include all public information and education. The Long version of the nondiscrimination statement is required on all documents pertaining to student eligibility, such as prototypes of letters to the households, verification, and direct certification. The long version of the nondiscrimination should also be used whenever possible or where space permits. The short version of the nondiscrimination statement can be used if the document is too small and there is limited space, such as on menus or nutrition flyers. If using the short version of the nondiscrimination statement a nine point font is required.

Nondiscrimination Statement: Long Version

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity. Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

- (1) **mail:** U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
- (2) **fax:** (833) 256-1665 or (202) 690-7442; or
- (3) **email:** program.intake@usda.gov

This institution is an equal opportunity provider.

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We are aware that a new nondiscrimination statement was posted on the USDA website. However, USDA has said that further guidance is still to come regarding the use of the new nondiscrimination statement.

Nondiscrimination Statement: Printing Requirements

- Wording for either statement must be exact and cannot be changed in any way
- Print size for either statement shall be no smaller than the text of the material
- Shorter version of the nondiscrimination statement *may* be used for broadcast advertisements/public service announcements or other publications not related to student eligibility
- Vital documents about sensitive topics require the full nondiscrimination statement regardless if it is only one page



There are a couple of requirements when printing the nondiscrimination statement: The first printing requirement is that the wording for either statement cannot be changed. The state agency has encountered situations where SFAs have tried to change the word “Sex” to “Gender” in the nondiscrimination statement. USDA is emphatic that no words should be altered, changed, added or removed from the statement.

The second printing requirement is that the print size cannot be smaller than the text of the material.

Also note that in auditory presentations, such as public service announcements, the shortened version may also be used, but the long version is required on any vital documents even if it is only one page long.

Nondiscrimination Statement: Materials

Print Advertisements

- Flyers
- Brochures
- Posters

Agency Publications

- Parent/Student Handbooks
- Employee Handbooks
- Newsletters

Websites

Letters

Broadcast Advertisements / Announcements

- Internet
- Radio
- TV

Enrollment Forms

Menus, if made public



The nondiscrimination statement is required on any materials that mention the programs to the public. These materials may include advertisements, publications, letters, enrollment forms, broadcasts, school websites, etc. Items that do not require the nondiscrimination statement to be printed, are incentive items such as cups, buttons, magnets, pens, etc. due to the impractical size.

Customer Service: Meal Service

All students must be allowed equal opportunities to participate in CNPs regardless of race, color, national origin, sex, age, or disability.

All participants must be treated equitably

- o Seating arrangements, serving lines, assignment of eating periods, methods of selection for application approval and verification processes

Guidance on Prohibition of Separation by Gender during Child Nutrition Program Meal Service: [USDA Memo SP 31-2015](#)



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Customer service is defined as effectively communicating with customers, responding to the customer's needs, valuing the customer's worth, and instilling excellence through courtesy, confidence, and enthusiasm. Treating customers with respect and dignity through excellent customer service saves you time and minimizes opportunities for complaints and angry customers. All students must be allowed equal opportunities to participate in the Child Nutrition Programs regardless of race, color, national origin, sex, age, or disability. All participants of the child nutrition program must be treated equitably. In order to reduce the risk of a civil rights discrimination complaint ask yourself the following questions each time a participant comes to your program for services:

1. Am I treating this person in the same manner I treat others?
2. Have I given this person the opportunity to ask questions?
3. Have I provided the person with the information he or she needs to make necessary decisions?

Customer Service: Denial of Meals

USDA policy prohibits the denial of meals as a disciplinary action against any student who is enrolled in a school that participates in the CNPs, including:

- Disciplinary actions that directly result in loss or denial of meals
- Requiring a child to work for their meal



USDA policy prohibits the denial of meals as a disciplinary action against any student who is enrolled in a school that participates in a Child Nutrition Program. It also prohibits requiring a child to work for or earn their meal.

Customer Service: Overt Identification

- Identifying information must not be used for any purpose other than determining and verifying eligibility for free or reduced meals
- Overt identification of any child is prohibited
 - This includes the sale of competitive foods
- No overt identification may be used when ordering meals for special functions



Identifying information must not be used for any purpose other than determining and verifying eligibility for free or reduced meals. Overt identification should be considered in different situations beyond the application process. This includes at the point of service where other students may see eligibility statuses on the cashier computer screen. Or for example, when special functions take place that require alternate meal service types such as field trips and class parties; in these instances, no overt identification of meal status should occur.

Conflict Resolution

Skills can help staff provide good customer service and avoid potential civil rights complaints.

5 Goals:

- ☐ Avoid the desire to blame
- ☐ Improve the situation
- ☐ Communicate your feelings directly
- ☐ Improve relationships and increase communication
- ☐ Avoid repeating the situation



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In no way is a SFA to impede with a customer's right to file a civil rights complaint. However, most conflicts are easily resolved by using appropriate tools. Conflict resolution consists of useful skills to assist with the solution of complaints. These skills include:

Using a win/win approach: change the conflict from an attack and defense to cooperation and avoid the desire to blame.

Use a creative response: turn problems into possibilities to improve the situation.

Demonstrate empathy: help others feel that they are understood by being an active listener.

Appropriate assertiveness: state your case without arousing the defenses of another person. Remember to use "I" statements to communicate your feelings directly.

Manage emotions: stick strictly to the facts of the complaint and communicate your feelings directly.

Have a willingness to resolve: identify barriers to a resolution and overcome those barriers. Avoid repeating the situation.

If the complainant persists with their complaint, direct them to file their complaint with USDA's Office of Civil Rights

LEP Language Assistance

Responsibility to take “reasonable steps” to ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP)

Reasonable Steps, consider...

- Number or proportion of LEP people eligible to be served or likely to be encountered by the program
- Frequency with which LEP individuals come in contact with the program
- Nature & importance of program, activity, or service
- Resources available to the recipient



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Limited English Proficiency (LEP) are those individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. SFAs must take reasonable steps to assure “meaningful” access to the information and services they provide to individuals with LEP.

Reasonable steps would include an evaluation of the following factors:

- The number or proportion of LEP people eligible to be served or likely to be encountered by the program
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program, activity, or service provided by the program to people’s lives
- The resources that are available and the costs to provide these services

A shortage of resources or anticipated costs to provide these services to individuals with LEP does not eliminate the requirement to do so. SFAs must explore the most cost-effective means of delivering services and information to people with LEP.

Language Translations

Make CNP information available to all participants and their families in the necessary language

- Enrollment forms
- Menus
- Informational brochures
- Letters and notifications to families



All Child Nutrition Program Information should be provided in the necessary language for all participants and their families.

For example, enrollment forms, menus, brochures, and letters should be provided in the necessary language for all participants and their families.

Language Interpreters

- Children should not be used as interpreters
- Volunteers may be used, but should understand ethics for using interpreters
 - Example: Spanish teacher could assist a household in completing an application but would need to be trained on the importance of keeping all information received confidential.



Language interpreters can be helpful when dealing with someone with limited English proficiency (LEP). Volunteers may be used, but they should understand the ethics required when using an interpreter. For example, a Spanish teacher could assist a household in completing an application, but would need to be trained on the importance of keeping all information confidential. Also, children should not be used as interpreters.

Racial/Ethnic Data

Racial/ethnic data is used to determine how effectively your program is reaching potentially eligible children and where outreach may be needed.

Data must be collected annually

- Usually collected at the time of enrollment
- Free/Reduced Price meal applications

Records must be kept for 3 yrs + current year



All schools that participate in a USDA Child Nutrition Program must have a system to collect the racial and ethnic data of program participants. This data is used to determine the state's compliance with Federal Civil Rights laws. USDA regulations state that "respect for individual dignity should guide the process and methods for collecting data on race and ethnicity". Therefore, self-identification or self-reporting is the preferred method of obtaining characteristic data. The collection of this information is strictly for statistical reporting requirements and has no effect on the determination of their eligibility to receive program benefits. This data must be maintained in a confidential file for 3 years plus the current year and this information should be restricted to authorized school personnel and other authorized state and federal personnel, when requested.

Racial and ethnic data is used to determine how effectively your program is reaching potentially eligible children and where outreach may be needed.

Ethnicity and Race Categories

Ethnicity Categories:

- Hispanic or Latino
- Non-Hispanic or Non-Latino

Race Categories (may mark one or more):

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or other Pacific Islander
- White



Ethnicity is broken down into two categories: Hispanic or Latino and Non-Hispanic or Non-Latino. The racial categories includes American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or other Pacific Islander, and white. A person may identify as belonging to multiple racial categories, but will only belong to one Ethnicity.

Accommodating Persons With Disabilities

What is the school's responsibility?

- Provide accessible facilities: accessible parking lots, entrances & exits, halls, elevators, restrooms
- Provide appropriate information in alternative formats: Braille program materials, sign language interpreters
- Provide food substitutions for students with disabilities when documented in writing by a licensed medical provider (MD, NP, PA) or when included in a child's IEP or 504 plan at no charge



Next, let's discuss Accommodating Persons with Disabilities. Reasonable accommodations refer to ensuring that participants with a disability have physical access to programs and services; such as easily accessible entrances, restrooms, etc.

A school is required to provide food substitutions or modifications for a student with a dietary disability. A written medical statement, completed and signed by a licensed physician, advanced practice nurse with prescriptive authority, or physician assistant is required to be on file when the request falls outside the meal pattern.

Accommodating Persons With Disabilities: Meal Modifications

- Modifications within the Meal Pattern **DO NOT** require a medical statement
- Modifications outside of the Meal Pattern **DO** require a medical statement

Must include:

- Food to be avoided
- Recommended substitute
- Brief explanation of how the exposure will affect the child

If the statement does not fully explain the modification needed, the SFA needs to contact the guardian for additional information

**Receipt of the clarification should NOT delay the SFA from providing the modification*



Meal pattern modifications within the meal pattern do not require a medical statement. Meal pattern modification outside of the meal pattern do require a medical statement provided by a licensed medical provider. A licensed medical provider includes a medical doctor, physician assistant, or a nurse practitioner. The medical statement must include information about the child's impairment and how it restricts the diet, an explanation of what must be done to accommodate the disability, and the foods to be omitted and the recommended alternatives. If the medical statement does not fully explain the modification needed, the SFS should contact the guardian for additional information. As a reminder, receipt of clarification should not delay the modified diet.

Right to File a Complaint

Any person who believes they or someone they knows has been discriminated against based on Federal protected classes has a right to file a complaint within **180 days** of the alleged discriminatory action.

To file a complaint:

- Mail: US Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW Washington, DC 20250-9410
- Call: 202.260.1026
- Fax: 833.256.1665 or 202.690.7442
- Email: Program.Intake@usda.gov



Applicants and participants must be advised of their right to file a complaint, of how to file a complaint, and of complaint procedures. The LDOE recently underwent a civil rights management evaluation by USDA. From that, several changes resulted in the processes the State agency and SFAs will use to adhere to these standards. The first, is a new prototype form, entitled "Civil Rights Complaint Procedures for Child Nutrition Programs;" the second is a new "USDA Discrimination Complaint form." SFS Memos 21-120 and 20-121 discuss each of these forms in more detail. When filled out, the Civil Rights Complaint procedures will provide the SFA with the procedures for handling any civil rights complaint that may arise. The form must be completed and kept on file by the SFA—but the SA does not need to receive a copy.

Any person who believes they have been discriminated against based on protected classes (national origin, race, sex, color, age, or disability) has a right to file a complaint within 180 days of the alleged discriminatory action.

U.S. Department of Agriculture
USDA Program Discrimination Complaint Form

Complainant Information		
First Name	Middle Initial	Last Name
Mailing Address (include Full City, State and Zip Code)		
Primary Phone Number	Alternate Phone Number	Email
Best way to reach you: ☐ Mail ☐ Phone ☐ Email ☐ Other		
If you have difficulty understanding the English language, you may request language assistance services by calling 866-632-9992. Assistance will be available for individuals who are not proficient in English. Persons with disabilities who require alternative means of communication (e.g., braille, large print, American Sign Language) should contact the responsible State or local Agency that administers the program or contact the United States Department of Agriculture (USDA) through the Federal Telecommunications Relay Service at 711 (voice TTY).		
Representative Information		
Do you have a representative? ☐ Yes ☐ No		
Do you have written authorization from representative? ☐ Yes ☐ No		
If so, please attach:		
First Name	Last Name	
Mailing address (include Full City, State and Zip Code)		
Phone	Email	
Complaint Information		
(attach additional pages and supporting documentation as needed)		
1. Provide the name of the program you applied for (if know/applicable)		
2. Select the USDA agency that conducts the program or provides Federal financial assistance for the program.		
☐ Agricultural Marketing Service, AMS ☐ Foreign Agricultural Service, FAS/Trade and Foreign Agricultural Affairs, TFAA ☐ Food and Nutrition Service, FNS ☐ Forest Service, FS ☐ Farm Service Agency, FSA ☐ National Institute of Food and Agriculture, NIFA ☐ Natural Resources Conservation Service, NRCS ☐ Rural Development, RD ☐ Other ☐ Unknown		
3. Date of recent alleged discrimination (mm/dd/yyyy)	4. Location and/or address of the office where discrimination occurred	
5. Who do you believe discriminated against you? Include the name(s) of person(s) involved in the alleged discrimination (if known).		

Civil Rights Complaint Form

- All staff must be trained on Civil Rights
- The complaint form must be available at all sites
- Staff should allow individuals to file their own complaint with as little involvement as possible



This is the discrimination complaint form. It can be found on the CNP website. This USDA Program Discrimination complaint form must be available at all sites participating in the child nutrition program. When an individual wants to report a discrimination complaint, child nutrition staff should have as little involvement as possible with the complaint process. All staff must be trained on civil rights and this civil rights complaint form.

Forms of Civil Rights Complaints

May be written, verbal, or observed

- If receiving a verbal complaint, listen politely
- Complaints can be made via phone, letter, email, fax or any other form of communication

May be anonymous

- Anonymous complaints should be handled as any other complaint
- Can be related to any area of CNP operation
- Program administration, food service, employment



Complaints may be written, verbal, or observed. A complaint may also be anonymous; anonymous complaints should be handled the same as any other complaint. If the complaint is verbal and the person alleging discrimination is not inclined to put the allegation in writing, the person to whom the complaint was made must write up the complaint on behalf of the complainant.

Civil Rights Complaints: Step #1

1) Document the Complaint

- Name, address, & phone number of complainant
- Specific name & location of entity delivering the benefit or service
- The nature of the incident, action, or method of administration that led the complainant to feel discriminated against
- The basis on which the complainant feels discrimination exists (race, color, national origin, sex, etc.)
- The names, titles, business addresses, and phone numbers of persons who may have knowledge of the discriminatory action
- The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions



The first step is to document the complaint and make an effort to obtain the following information:

- Name, address, & phone number of complainant
- Specific name & location of entity delivering the benefit or service
- The nature of the incident, action, or method of administration that led the complainant to feel discriminated against
- The basis on which the complainant feels discrimination exists (race, color, national origin, sex, etc.)
- The names, titles, business addresses, and phone numbers of persons who may have knowledge of the discriminatory action
- The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions

All complaints should then be forwarded directly to USDA

Civil Rights Complaints: Step #2

2) Contact USDA

All verbal or written complaints must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service *within three days* of receiving a complaint.



The second step for civil rights complaints is to contact USDA. All verbal or written complaints must be forwarded to the Civil Rights Division of USDA Food and Nutrition Services within three days of receiving a complaint.

Civil Rights Complaints: Step #3

3) Maintain Records

Have a central location where copies of Civil Rights complaints will be documented and kept.

Agencies may provide complaint form to:

- Any individual wishing to make a complaint
- Person receiving verbal or phone complaint



The third step in civil rights complaints is to maintain documentation. All civil rights documentation should be kept at a central location and should be maintained for three years plus the current year.

Civil Rights Reminders

- USDA regional office is responsible for the review of State Agencies
- State agency (SA) is responsible for review of LEAs
 - SAs must report any significant findings to USDA
 - LEAs must receive a pre-approval visit to ensure compliance with Civil Rights before receiving federal funds
 - Compliance is assessed through the Administrative Review
 - Access to complaint information shall be limited/controlled to assure confidentiality



A few civil right reminders include:

1. USDA regional office is responsible for the review of the state agencies
2. The state agencies are responsible for the review of the School Food Service Authorities;

- State agencies must report any significant findings to USDA
- SFAs must receive a pre-approval visit to ensure compliance with Civil Rights before receiving federal funds.
- Compliance is assessed through the Administrative Review
- Access to complaint information shall be limited/controlled to assure confidentiality

Resolution of Non-Compliance

- ☐ If non-compliance is indicated, a corrective action plan must be implemented to achieve voluntary compliance within 60 days.
- ☐ Corrective Action Plan: plan describing the agency's actions to be taken to resolve non-compliance with civil rights requirements.
- ☐ Suspension of assistance or termination may result if non-compliance is not resolved.



If non-compliance is indicated, a corrective action plan must be implemented to achieve voluntary compliance within 60 days. The corrective action plan should describe the agency's actions to be taken to resolve the non-compliance determined. If the corrective action is not achieved within 60 days, suspension of assistance or termination may result.

Civil Rights Compliance: Checklist

- ✓ Civil Rights written policy and compliant log should be kept
- ✓ Train all staff and volunteers annually
- ✓ All staff should know CNP Civil Rights Policy
- ✓ Prominently display “And Justice for All” poster
- ✓ Collect & record racial/ethnic data
- ✓ Keep all records for 3 years plus the current year
- ✓ Maintain Civil Rights complaint procedures & forms
- ✓ Place nondiscrimination statement on all printed materials mentioning Child Nutrition Programs

*District policies regarding civil rights complaints should specify how civil rights compliance is handled for CNP separate from other programs



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Here is your checklist for Civil Rights Compliance:

- Civil Rights written policy and compliant log should be kept
- Train all staff and volunteers annually
- All staff should know CNP Civil Rights Policy
- Prominently display “And Justice for All” poster
- Collect & record racial/ethnic data
- Keep All records for 3 years plus the current year
- Maintain Civil Rights complaint procedures & forms
- Place nondiscrimination statement on all printed materials mentioning Child Nutrition Programs

As a reminder, District policies regarding civil rights complaints should specify how civil rights compliance is handled for CNP separate from other programs. This is where the completion and use of the Civil Rights Complaint Procedures for CNPs is documented and utilized.

Resources

- ☐ LDOE Resource Library: <https://cnp.doe.louisiana.gov/Nutrition/Resources>
 - [Civil Rights Complaint Procedures for Child Nutrition Programs](#)
 - [USDA Program Discrimination Complaint Form](#)
 - [Medical Statement for Meal Modifications](#)
- ☐ USDA: Civil Rights <https://www.fns.usda.gov/civil-rights>
- ☐ Accommodating Children with Disabilities in the School Meal Programs: <https://www.fns.usda.gov/cn/2017-edition-accommodating-children-disabilities-school-meal-programs>
- ☐ USDA LEP Policy Guidance: <https://www.federalregister.gov/documents/2014/11/28/2014-27960/guidance-to-federal-financial-assistance-recipients-regarding-the-title-vi-prohibition-against>
- ☐ Modifications to Accommodate Disabilities in the School Meal Programs: <https://www.fns.usda.gov/cn/2016-modification-to-accommodate-disabilities-in-school-meals>