

## Child Nutrition Programs Annual Civil Rights Training Agenda and Documentation

All personnel involved in the Child Nutrition Programs must receive annual (based on a calendar year) Child Nutrition-specific Civil Rights training. This form lists the minimum annual civil rights training requirements, and it can be used as an agenda and attendance sheet. Review each subject listed below, within the accompanying PowerPoint. Please acknowledge your annual training with your printed name and signature.

### USDA Food and Nutrition Services (FNS) Federally-Protected Bases:

- Race
- Color
- National Origin
- Sex (including gender identity and sexual orientation)
- Age
- Disability

### Vermont Agency of Education-Protected Bases:

- Includes all federal bases and:
  - Religion
  - Marital/Civil Union Status

### Specific subject matter required, but not limited to:

1. Public Notification System
2. Collection and Use of Data
3. Requirements for Language Assistance
4. Requirements for Reasonable Modifications to Accommodate Disabilities
5. Complaint Procedures
6. Civil Rights Reviews
7. Resolution of Noncompliance
8. Customer Service
9. Conflict Resolution



## **1. Public Notification System**

- Inform parents/guardians how to apply for the program, e.g., through newsletter/website.
- Provide Child Nutrition program forms, such as the Application for Free and Reduced Price Meals.
- Use the USDA Nondiscrimination Statement on all appropriate materials, publications, and websites.
- Applicants and participants must be advised of their right to file a complaint, and how to do so.
- Prominently display the “And Justice for All” non-discrimination poster in all required areas.

## **2. Collection and Use of Data**

- Enter race and ethnicity data annually into the Site Application(s) of the Application Packet. The Organization Application contains the link to the county-level information.
- This information is only for statistical purposes and has no impact on eligibility.
- Children must not be asked to identify their race or ethnicity.
- Keep data for three years, plus the current year.

## **3. Requirements for Language Assistance**

- Take reasonable steps to ensure “meaningful” access to the child nutrition programs for Limited English Proficiency (LEP) individuals.
- “Meaningful access” based on LEP population proportion, contact frequency, costs, etc.
- Schools/Districts may need to provide written and verbal interpretative services.
- Provide translated household meal applications, calendar menus, and other critical information
- Children should not be used to translate program requirements, unless it is an emergency.

## **4. Requirements for Reasonable Modifications to Accommodate Disabilities**

- Ensure that procedures are in place to accommodate children with a disability. Work together with the parent/guardian, administration, and nurse’s office.
- Understand clarified definition of disability under ADA Amendments Act of 2008.
- Ensure physical accessibility. Are wheelchair ramps available? Is there an elevator in the building?
- Provide meal modifications in accordance with statements provided by State licensed healthcare professionals.

## **5. Complaint Procedures**

- Each SFA/Sponsor must have a written procedure for handling complaints of discrimination.
- Keep a log to document any complaints of discrimination.
- Report complaints to USDA address in nondiscrimination form, using the civil rights complaint form.
- If related to state-protected bases, refer to Vermont Agency of Education legal team.
- Accept civil rights complaints given to you, whether written, verbal or anonymous. Then, immediately forward to USDA or to the Vermont Agency of Education (if related to state-specific protected bases).

## **6. Civil Rights Reviews**

- Pre-Award Civil Rights Questionnaire for new programs.
- Routine Civil Rights Reviews conducted as Administrative Reviews. Is the correct and current “And Justice for All” non-discrimination prominently displayed? Have all involved personnel received training? Is the non-discrimination statement on the website? Is the short non-discrimination statement on the calendar menu? Does the SFA/Sponsor have a written procedure for handling complaints of discrimination?
- Special Civil Rights Reviews may be conducted if the need arises.

## **7. Resolution of Noncompliance**

- Noncompliance is a finding that any civil rights requirement is not followed by a School Food Authority or Child Nutrition Program sponsor.
- Significant findings reported to USDA.
- All findings require corrective action, as detailed in written notice from state reviewers.
- Correction action must occur to be in compliance.

## **8. Customer Service**

- Good customer service will help reduce or eliminate complaints of discrimination.
- Be courteous and thoughtful.
- All participants must be treated in the same manner.
- No separation by protected bases in seating arrangements, serving lines, facilities, or eating periods.
- Effective communication is essential to good customer service.
- Know and be able to explain any requirements that must be followed.

## **9. Conflict Resolution**

- Remain calm, ask questions, and listen. Aim to minimize tension.
- This helps reduce the perception of discrimination among upset individuals.

## Attendance Sheet

School Food Authority (SFA) or Sponsor: \_\_\_\_\_

School or Site Name: \_\_\_\_\_

Presenter/Trainer: \_\_\_\_\_

State Agency Webinar Used:

In-person Training:  Other:

<b>Print Name</b>	<b>Signature</b>	<b>Job Title</b>	<b>Date of Training</b>

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/ad-3027.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](mailto:Program.Intake@usda.gov)

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