

Food Service Staff 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 listed subject listed below within the accompanying PowerPoint. Please acknowledge your annual training with your printed name and signature.

USDA FNS Federally-Protected Bases:

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

Vermont Agency of Education-Protected Bases:

- Includes all federal bases and:
 - Religion
 - Sexual Orientation
 - Gender Identity
 - 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

- Inform parents/guardians how to apply for the program, e.g., through newsletter/website.
- Provide Child Nutrition program forms, such as the free and reduced-price meal application.
- 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 “And Justice for All” non-discrimination poster in all required areas.

2. Data Collection and Use

- Enter racial and ethnic data annually into the Organization Application section of the Application Packet. This information should be obtained from the registrar. The system contains the link to the county-level information.
- This information is only for statistical purposes and has no impact on eligibility.
- Never discuss race and ethnicity with children.
- Keep data for three years, plus the current year.

3. Requirements of 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. Reasonable modifications to accommodate persons with 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 expanded 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 licensed medical 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 go to USDA address in nondiscrimination form, using the CR complaint form.
- If related to state-protected bases, refer to Vermont Agency of Education legal team.
- However, accept CR 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, 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 CR requirement is not followed by a School Food Authority or Child Nutrition Program sponsor.

