



CIVIL RIGHTS TRAINING

Idaho State Department of Education
Child Nutrition Programs
Updated January 2016

This institution is an equal opportunity provider.

Thank you for participating in the Idaho State Department of Education Child Nutrition Programs Civil Rights Training. Documenting your participation provides compliance with training regulations required by United States Department of Agriculture (USDA) funded Food and Nutrition Service agencies, sponsors, and volunteers.

Civil Rights Training Overview

- ▣ Purpose
- ▣ Training requirements
- ▣ Discrimination considerations
- ▣ Protected classes
- ▣ Collection and use of data
- ▣ Public notification systems
- ▣ Long and short statements
- ▣ Complaint procedures
- ▣ Compliance review and resolution
- ▣ Requirements for language assistance and requirements for reasonable accommodations for those with disabilities
- ▣ Conflict resolution
- ▣ Customer service
- ▣ Helpful links

The information conveyed in this training is required civil rights training for USDA Child Nutrition Program sponsors, staff, and volunteers. The following civil rights topics will be covered in this presentation:

- Purpose
- Training requirements
- Discrimination considerations
- Protected classes
- Collection and use of data
- Public notification systems
- Long and short non-discrimination statements
- Complaint procedures
- Compliance review and resolution
- Requirements for language assistance and requirements for reasonable accommodations for those with disabilities
- Conflict resolution
- Customer service AND
- Helpful links

Purpose

- ▣ To establish and convey policy and provide guidance and direction to the United States Department of Agriculture, Food and Nutrition Service and its recipients and customers
- ▣ To ensure compliance with and enforcement of the prohibition against discrimination in all Food and Nutrition Service nutrition programs and activities, whether federally funded or not

The purpose of this presentation is to provide annual training for sponsors of USDA funded Child Nutrition Programs.

Civil rights training ensures compliance, enforcement, and prohibition of discrimination in Child Nutrition Programs.

Reason



Ensures that program recipients are being treated without discrimination while participating in Child Nutrition Programs

Civil rights requirements allow the USDA to ensure that programs provide equal access. Civil rights data ensures that all program participants are treated equally based on the six protected classes, which will be covered shortly.

Annual Training Requirements

- ▣ Collection and use of data
- ▣ Effective public notification systems
- ▣ Complaint log and procedures
- ▣ Compliance review techniques
- ▣ Resolution of noncompliance
- ▣ Requirements for reasonable accommodation of persons with disabilities
- ▣ Requirements for language assistance
- ▣ Conflict resolution
- ▣ Customer service



Training is required so that all people involved in the administration of programs that receive Federal financial assistance will understand civil rights related laws, regulations, procedures, and directives. Persons responsible for reviewing civil rights compliance must receive training to assist them in performing their review responsibilities. This training may be carried out as part of ongoing technical assistance.

State agencies are responsible for training Child Nutrition Program sponsors. Sponsors are responsible for training their staff, which includes “frontline staff” and those who supervise “frontline staff”. Frontline staff is all staff that interacts with program applicants or participants.

Civil rights training must occur before the staff assumes their duties in Child Nutrition Programs and then annually thereafter. Civil rights documentation must be kept for three years plus the current year. Sponsors must document the training with an agenda containing the date(s) training occurred and a sign in sheet for all participants. The training agenda must include the following minimum training requirements:

- Collection and use of data
- Effective public notification systems

- Complaint log and procedures
- Compliance review techniques
- Resolution of noncompliance
- Requirements for reasonable accommodation of persons with disabilities
- Requirements for language assistance
- Conflict resolution
- Customer service

Discrimination May Be:



- ❑ **Denial** of benefits or services that others receive
- ❑ **Delay** in receiving benefits or services that others receive
- ❑ **Different** treatment than others, leading to disadvantage

Preventing discrimination is a key component of civil rights training. Discrimination complaints are defined as, “Any complaint filed by persons (non-employee), organizations or companies who, based on being a member of a protected class, allege discrimination in a program or activity conducted or assisted.”

Discrimination occurs when participants are **Denied** benefits or services that others receive, when participants are **Delayed** in receiving benefits or services that others receive, or when participants are treated **Differently** than others, resulting in a disadvantage.

Discrimination Examples

- ❑ Refusing enrollment based on disability
- ❑ Failure to provide **reasonable accommodation**
- ❑ Serving meals at a **time, place, or in a manner** that is discriminatory
- ❑ Failing to provide **non-English** materials



A few examples of potential discrimination may be: refusing a person's **enrollment** in a program based on disability, failure to provide **reasonable accommodation** to disabled individuals, serving meals at a **time, place, or in a manner** that is discriminatory, or failing to provide materials that give non-English speaking persons **full and equal opportunity** to receive benefits.

Child Nutrition Programs often take place in low income neighborhoods, where, due to economic disadvantage, children and parents have extraneous circumstances to overcome in regard to their food security. Civil rights are in place to protect children and families from being discriminated against while participating in USDA funded food programs.

Protected Classes

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



The six protected classes recognized in USDA funded Child Nutrition Programs are:

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

Collection and Use of Data

- ❑ Required to obtain data by ethnic and racial category
- ❑ Systems for collecting actual ethnic and racial data may be program specific
- ❑ Annual reporting on the ethnic and racial data



Sponsors are required to report **ethnicity and race** of all program participants **annually**. The preferred method of data collection, according to Food and Nutrition Service, is self identity. For example, a parent checks an ethnicity or race box on their enrollment form. In the case that no self identification is made, a visual identification should be documented.

Please remember you cannot ask a child his or her race or ethnicity.

State agencies require annual reporting on the ethnic and racial data of participants during the annual application process. Each Child Nutrition Program area has data collection procedures specific to their program.

Collection and Use of Data

Ethnic Categories



- ▣ **Not Hispanic or Latino**
- ▣ **Hispanic or Latino**
 - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin - regardless of race

Sponsors may develop a system of data collection specific for their individual organization.

Data documentation must be kept for three years plus the current year. When obtaining data, both ethnicity and race need to be recorded for each participant.

Ethnicity refers to the question: “Is a person **Hispanic or Latino** or **Not Hispanic or Latino?**” Participants can choose from either category.

Collection and Use of Data Racial Categories



- ▣ **Black or African American** - A person having origins in any of the black racial groups of Africa
- ▣ **White** - A person having origins in any of the original peoples of Europe, the Middle East, or North America
- ▣ **Asian** - A person having origins in any of the peoples of the Far East, Southeast Asia, or the Indian subcontinent, including: Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam

Race refers to specific country of origin of the program participant. Racial categories include:

- **Black or African American** – A person having origins in any of the black racial groups of Africa.
- **White** - A person having origins in any of the original peoples of Europe, the Middle East, or North America.
- **Asian** - A person having origins in any of the peoples of the Far East, Southeast Asia, or the Indian subcontinent, including: Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

(racial categories continue on next slide)

Collection and Use of Data Racial Categories



- ▣ **Native Hawaiian or Other Pacific Islander** - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

- ▣ **American Indian or Alaskan Native** - A person having origins in any of the original peoples of North America (including Central America) who maintains tribal affiliation or community attachment

- **Native Hawaiian or Other Pacific Islander** - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **American Indian or Alaskan Native** - A person having origins in any of the original peoples of North America (including Central America) who maintains tribal affiliation or community attachment.

Please make sure that all program participants are documented by both **Ethnicity and Race**. Data is used to help determine areas of potential need and help prevent any discrimination of the participant or a group of participants.

Public Notification Systems

Basic Elements

▣ Program availability

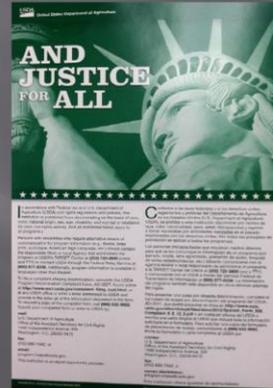
Each agency or other sub-recipient must take action to inform potentially eligible persons of their program rights

▣ Complaint information

Applicants and participants must be advised at the service delivery point of their right to file a complaint and the complaint process

▣ Non-discrimination poster statement

Prominently display the current "And Justice For All" poster, using only the 11 X 17 inch poster



Sponsors are required to make public, via public announcement, their program availability to ensure that qualified participants are aware of the program.

Non-discrimination posters must be displayed in a **prominent public place** such as a lobby, cafeteria, or as a best practice, both. For the National School Lunch Program, posters must be displayed where free and reduced applications are determined and where money is collected.

Please make sure you are displaying the correct non-discrimination poster. The USDA is to release a new edition soon; the old poster is shown here.

Public Notification Systems

Methods



- ❑ Inform potentially eligible applicants about the program (outreach)
- ❑ Provide information in alternative formats available for those with disabilities (e.g., braille)
- ❑ Include the non-discrimination statement on all informational material provided to the public
- ❑ Convey an equal opportunity message in all pictures that are used to provide program information
- ❑ Prominently display the current "And Justice For All" poster

Compliance with public notification systems includes providing information in other formats for those with disabilities. An example of this may be providing large print or braille menus for those who are visually impaired.

Non-discrimination statements must be included on all media mentioning USDA funded Child Nutrition Programs, including menus, flyers, internet pages, and other food related program announcements.

Equal opportunity must be conveyed when using photographs. Include a good representation of various ages, races, genders, etc.

This slide shows an example of a flyer mentioning a sponsor's food program with the non-discrimination statement included at the bottom.

Long Statement in English

Use on all documents longer than one page or one sheet of paper

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992.

Submit your completed form or letter 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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov

USDA Child Nutrition Programs recognize the following protected classes: race, color, national origin, sex, age, and disability.

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The non-discrimination statement is a USDA statement that must be present on all publications and media announcements mentioning USDA Child Nutrition Programs. The *long* non-discrimination statement must be listed on all printed material over one page in length. The *short* non-discrimination statement may be used on printed materials that are only one page or one sheet of paper (including front and back) in length.

This slide shows the long statement.

The first paragraph of the statement includes more protected classes than are recognized by Child Nutrition Programs. The Idaho department of Education, Child Nutrition Programs received approval from USDA to add the sentence near the bottom of the long statement that reads, “**USDA Child Nutrition Programs recognize the following protected classes: race, color, national origin, sex, age, and disability.**”

When you use the long statement, make sure that you get the **entire** statement on your document.

Long Statement in Spanish

De conformidad con la Ley Federal de Derechos Civiles y los reglamentos y políticas de derechos civiles del Departamento de Agricultura de los EE. UU. (USDA, por sus siglas en inglés), se prohíbe que el USDA, sus agencias, oficinas, empleados e instituciones que participan o administran programas del USDA discriminen sobre la base de raza, color, nacionalidad, sexo, discapacidad, edad, o en represalia o venganza por actividades previas de derechos civiles en algún programa o actividad realizados o financiados por el USDA.

Las personas con discapacidades que necesiten medios alternativos para la comunicación de la información del programa (por ejemplo, sistema Braille, letras grandes, cintas de audio, lenguaje de señas americano, etc.), deben ponerse en contacto con la agencia (estatal o local) en la que solicitaron los beneficios. Las personas sordas, con dificultades de audición o discapacidades del habla pueden comunicarse con el USDA por medio del Federal Relay Service [Servicio Federal de Retransmisión] al (800) 877-8339. Además, la información del programa se puede proporcionar en otros idiomas.

Para presentar una denuncia de discriminación, complete el [Formulario de Denuncia de Discriminación del Programa del USDA](#), (AD-3027) que está disponible en línea en:

http://www.ocio.usda.gov/sites/default/files/docs/2012/Spanish_Form_508_Compliant_6_8_12_0.pdf, y en cualquier oficina del USDA, o bien escriba una carta dirigida al USDA e incluya en la carta toda la información solicitada en el formulario. Para solicitar una copia del formulario de denuncia, llame al (866) 632-9992. Haga llegar su formulario lleno o carta al USDA por:

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

Los Programas de Nutrición Para Niños (USDA) reconocen los siguientes clases protegidas: raza, color, origen nacional, sexo, edad y discapacidad.

Esta institución es un proveedor que ofrece igualdad de oportunidades.

This slide shows an example of the long non-discrimination statement in Spanish. It is important to use the Spanish version in Spanish speaking communities.

Short Statement

Use on all documents that are only one page or one sheet of paper in length

▣ **English:**

This institution is an equal opportunity provider.

▣ **Spanish:**

Esta institución es un proveedor que ofrece igualdad de oportunidades.



This slide is an example of the non-discrimination short statement in English and Spanish for any document **one page or one sheet of paper** in length (including front and back).

Public Notification Systems Timeline

The timeline for public notification is:

- ❑ Websites must be updated by December 31, 2015;
- ❑ Documents, pamphlets, brochures, etc., using non-discrimination statement (NDS) language prior to 2013 must be updated by December 31, 2015;
- ❑ Documents, pamphlets, brochures, etc., using 2013 NDS language should be updated when supplies are exhausted or by September 30, 2016; and
- ❑ All new printing must use the 2015 NDS.

If you have not updated the long and short statements on your materials, please update them according to the information shown on this slide.

Per Food and Nutrition Services (FNS), the public notification policy is:

- Websites must be updated by December 31, 2015;
- Documents, pamphlets, brochures, etc., using non-discrimination statement (NDS) language prior to 2013 must be updated by December 31, 2015;
- Documents, pamphlets, brochures, etc., using 2013 NDS language should be updated when supplies are exhausted or by September 30, 2016; and
- All new printing must use the 2015 NDS.

Complaint Procedure

▣ Right to File

Any person alleging discrimination based on a protected class has the right to file a complaint within 180 days of the discriminatory action

▣ Acceptance

All complaints, written or verbal, must be forwarded to the State agency within three days. Anonymous complaints will be handled as any other complaints

▣ Verbal

If a person makes a verbal complaint via phone or in person and refuses or is not inclined to place allegations in writing, the person to whom the allegations are made must write up the complaint, making an attempt to collect specific information

The USDA has set a procedure for discrimination complaints based on instructions in FNS113. Sponsors are also required to make civil rights complaint information available upon request. When documenting a civil rights complaint the following information should be included:

- Name, address, and telephone number of the complainant
- Specific location delivering the service
- Nature of the incident that led to the complainant to feel discrimination was a factor
- The basis on which the complainant believes that discrimination exists
- Names and titles, phone numbers, and business or personal addresses of persons who may have knowledge of the discriminatory action
- Date(s) the action occurred

Sponsor Complaint Procedure, Log, and Form

- ▣ Sponsors must keep a **Civil Rights Binder or File** with the required civil rights complaint documents including:
 - Written civil rights complaint procedure
 - Annually dated civil rights complaint log, even when no complaints are received / documented
 - Copies of civil rights complaint forms – Spanish and English (Complaint forms must be available at all Child Nutrition Program sites)

Information in the Civil Rights binder/file must be annually updated and maintained for three years plus the current year

Sponsors must keep a **Civil Rights Binder or File** with the required civil rights complaint documents including the following:

A written **civil rights complaint procedure**. The procedure should state the organization's policy on how to proceed when obtaining a civil rights complaint.

An annually dated civil rights complaint log, even when no complaints are received/documented. Information in the civil rights binder or file must be **annually updated** and maintained for **three years plus the current year** for State agency administrative review.

Copies of the **civil rights complaint form** in Spanish and English.

A sample complaint form can be found on the Idaho State Department of Education website. The procedures, logs, etc., are all available on the Idaho State Department of Education Child Nutrition Programs website.

Sample Complaint Logs

CR COMPLAINT LOG									
Sponsor: <i>A Great Sponsor</i>								FY <i>12/13</i>	
Date complaint received	Name of person who took complaint	Name and address of complainant	Explanation of event - include date of incident (use additional sheets if needed)	Type of Discrimination (circle one)	Date SDE notified	Date instructions or other information rec'd from SDE	Date(s) investigation took place	Who investigated?	Date complaint resolved
<i>No Complaints 6/5/2013</i>				Race/Color National Origin Disability					
				Race/Color National Origin Sex Age Disability					
				Race/Color National Origin					

CR COMPLAINT LOG									
Sponsor: <i>A Great Sponsor</i>								FY <i>13/14</i>	
Date complaint received	Name of person who took complaint	Name and address of complainant	Explanation of event - include date of incident (use additional sheets if needed)	Type of Discrimination (circle one)	Date SDE notified	Date instructions or other information rec'd from SDE	Date(s) investigation took place	Who investigated?	Date complaint resolved
				Race/Color National Origin Sex Age Disability					
				Race/Color National Origin Sex Age Disability					
				Race/Color National Origin Sex Age Disability					

Here are samples of civil rights complaint logs. You must have one report for each school year. At the end of the school year, if the school site has had no complaints, best practice is to note "No Complaints" on the log along with the date. Then begin a fresh log for the new, upcoming school year.

Compliance Review Techniques and Resolution of Non-compliance

- ▣ USDA regional office is responsible for the review of State agencies
- ▣ State agency is responsible for review of local agencies
- ▣ State agency must report any significant finding(s) to the regional USDA office
- ▣ State and local agencies must receive a pre-approval visit for civil rights compliance determination before receiving funds
- ▣ If State agency reports a finding, corrective action will be put in place until noncompliance is resolved
- ▣ All reports must be maintained as part of records for future review

This slide represents the flow of information when a complaint and or procedure for civil rights is being followed up on for compliance. Regional Food and Nutrition Service offices are involved in compliance reviews of State agencies. State agencies are required to ensure compliance within local agencies.

Requirements for Language Assistance

Nombre: _____

Si comes más calorías, aumenta tu actividad física.

Granos	Vegetales	Frutas	Leche	Proteína
4 porciones = 4 onzas	3 porciones = 1 1/2 tazas	2 porciones = 1 taza	2 1/2 porciones = 2 1/2 tazas	3 porciones = 3 onzas
Poner la mitad de granos integrales en tus porciones. Tratar mínimo de comer 2 onzas de granos integrales cada día. 1 onza = 1 taza de cereal 1 rebanada de pan 1/2 taza de arroz blanco	Los vegetales son la fuente principal de la Vitamina A. Variar tus vegetales y no olvides los de hojas verdes y vegetales amarillos, como la espinaca, brócoli y zanahoria.	Las frutas son la fuente principal de la Vitamina C. Los jugos de frutas pueden tener bastante azúcar. Elegir el que tiene 100% de jugo de fruta. Comer variedad de fruta fresca.	La leche da calcio para los dientes y los huesos fuertes. Elegir la leche, yogur y queso bajo en grasa o libre de grasa.	Escoge carnes y pollo bajo en grasa o libre de grasa. Variar la proteína escogiendo más pescado y frijoles. 1 onza = 1 cucharada de mantequilla de maní 1 huevo 1/2 taza de frijoles
Encuentra tu balance entre la comida y las actividades físicas. Haga actividades físicas por lo menos 60 minutos cada día o casi todos los días.		Limitar alimentos con extra grasa y azúcar, ellos añaden más calorías pero no tiene otros nutrientes.		

Basado en 1200 calorías para 4 a 8 años de edad

La cantidad de calorías es solamente un estimado de que lo necesitas. Chequear el peso de tu cuerpo y si lo necesitas regular las calorías que lo consumes. www.nutrition.gov

Esta institución es un proveedor que ofrece igualdad de oportunidades.

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

Civil rights requirements state that provisions must be made for non-English speaking program participants. For example, enrollment forms or menus may need to be translated into Spanish in areas where Spanish is necessary in order for families to comprehend the information. Another example of language assistance would be providing braille or large print for visually impaired program participants.

Requirements for Reasonable Accommodation for Persons with Disabilities



- ▣ Handicap accessibility
- ▣ Life-threatening food allergies
- ▣ Accommodations/Modifications addressed in 504, Individual Education Plan (IEP), Individual Service Family Plan (ISFP)
- ▣ Call State agency for further guidance

Civil rights requirements state that reasonable accommodation must be made for persons with disabilities. For example, to allow food program access, ramps could be available to accommodate those in wheel chairs. Another example of an accommodation would be having food component substitutions available for those with medically documented food allergies.

Disability

- ▣ Under Section 504 of the *Rehabilitation Act of 1973*, and the *Americans with Disabilities Act (ADA) of 1990*, a "person with a disability" means any person who:
 - has a physical or mental impairment which substantially limits one or more major life activities
 - has a record of such an impairment, or
 - is regarded as having such an impairment
- ▣ The term "physical or mental impairment" includes many diseases and conditions



Let's take a closer at the term disability as it relates to civil rights in Child Nutrition Programs. A person with a disability, as defined in the *Americans with Disabilities Act of 1990*, refers to any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. The term "physical or mental impairment" includes many diseases and conditions.

Special Dietary Needs: Medical Statement Form

DISABILITY

- ❑ Sponsors are **required** to make substitutions for children with food allergies deemed as **disabilities**
- ❑ A **disability** may **only** be determined and signed by a **licensed physician (M.D. or D.O.), physician assistant, nurse practitioner, or dentist**
- ❑ Signed form must also indicate appropriate substitutions

INTOLERANCE

- ❑ Sponsors have the **option** to make substitutions for children with **food intolerances** not deemed as a disability by a recognized medical provider
- ❑ **Intolerance** recommendations may be determined and signed by a **Medical Doctor, Doctor of Osteopathy, Nurse Practitioner, Physician Assistant, Registered Nurse, or Registered Dietitian**
- ❑ Signed form must also indicate appropriate substitutions

Special Dietary Needs.

The difference between what is considered a disability and what is a food intolerance or sensitivity is outlined in USDA sponsored Child Nutrition Programs. Per USDA, the determination is ultimately based on documentation by a recognized or licensed medical authority within the state, since only *recognized* medical authorities may determine and sign a medical statement form. In the state of Idaho, a **disability** may **only** be determined and signed by the following recognized medical authorities: **licensed physician (Medical Doctor or Doctor of Osteopathy), physician assistant, nurse practitioner, dentist**. Sponsors are **required** to make substitutions for appropriately documented medical disabilities and must keep all documentation in regards to disabilities, foods to be omitted, and menu substitutions. School food service must never revise or change a written prescription or diet order. Diet orders do not need to be renewed on a yearly basis, however, they should be up to date to reflect the current medical and/or nutritional needs of the participant.

A **food intolerance or food sensitivity** may be documented and signed by a Medical Doctor, Doctor of Osteopathy, physician assistant, nurse practitioner, registered nurse, or registered dietitian. Sponsors have the **option** to substitute for intolerances or sensitivities.

Medical information must be kept confidential. Information should only be shared with staff that *needs* to know to provide for the health, safety, and well-being of the student.

Medical Statement Form

Awaiting USDA Updating

Checked if participant is disabled

Checked if participant is not disabled

Medical authority signature

Idaho State Department of Education
Child Nutrition Programs

MEDICAL STATEMENT:
Request for Special Meals and/or Accommodations

(1) Name of Participant	(2) Age or DOB	(3) Sponsor	(4) Site
(5) Name of Parent/Guardian, or Auth. Rep.	(6) Telephone (Parent/Guardian, or Auth. Rep.)	(7) Site Telephone Number	

(8) Must check one:

Participant is disabled or has a medical condition and requires a special meal or accommodation. (Refer to definition on reverse side of this form.) Sponsors must comply with requests for special meals and any adaptive equipment. A licensed physician, physician assistant, nurse practitioner, or dentist must sign this form.

Participant is not disabled, but is requesting a special meal or accommodation. An example may include food intolerances, and is not intended to include food preferences. Sponsors are encouraged to accommodate reasonable requests. A licensed physician, physician assistant, nurse practitioner, registered dietitian, or registered nurse must sign this form.

(9) Disability or medical condition requiring a special meal or accommodation: _____

(10) If participant is disabled, provide a brief description of participant's major life activity affected by disability: _____

(11) Diet prescription and/or accommodation: (Please describe in detail to ensure proper implementation) _____

(12) Indicate texture: Regular Chopped Ground Pureed

Foods to be omitted and substitutions: Please list specific foods to be omitted and suggest substitutions. You may use the back of this form to attach a chart with additional information.

(13) Foods to be omitted	(14) Suggested substitutions

(15) Adaptive Equipment: _____

(16) Signature of Preparer*	(17) Printed Name	(18) Telephone	(19) Date
(20) Signature of Medical Authority*	(21) Printed Name	(22) Telephone	(23) Date
(24) Signature of Parent/Guardian	(25) Printed Name	(26) Telephone	(27) Date

*Participants with a disability require a signature from a physician, physician assistant, nurse practitioner, or dentist. For non-disabled participants, a licensed physician, physician assistant, nurse practitioner, registered dietitian or registered nurse must sign the form.
The information on this form should be updated to reflect the current medical and/or nutritional needs of the participant.
USDA is an equal opportunity provider and employer.

The USDA is in the process of updating forms and guidance regarding special meals and/or accommodations, so the CNP standard medical statement form shown here will be updated as guidance becomes available.

Note the arrows pointing to the boxes used to indicate if the participant is disabled or is not disabled; one box must be checked.

Also note the circled areas highlighting the place for the medical authority to list the foods to be omitted (red circle) and suggested substitutions (green circle).

The location for the medical authority's signature is pointed out as well.

Having complete information regarding foods to be omitted, along with suggested substitutions, is required when requesting special meals and/or accommodations.

Conflict Resolution



- ▣ All complaints alleging discrimination on the basis of race, age, color, national origin, sex, or disability, must be:
 - forwarded to the State agency within three days
 - processed by USDA within 90 days

The process for conflict resolution includes making sure all complaints alleging discrimination on the basis of race, age, color, national origin, sex, or disability must be forwarded to the State agency within three days and must be processed by USDA within ninety days.

Customer Service



Customer service involves treating all program participants and their families fairly and equally. Front line servers should be enabled to provide the best customer service possible to families and recipients of Child Nutrition Programs. Awareness of discrimination, and accountability, is a key component to good customer service.

Sponsor Checklist



- Annually train all staff and volunteers on Civil Rights
- Prominently display the current “And Justice For All” poster
- Collect and record race and ethnic data annually
- Offer meals to all
- Maintain an annually dated Civil Rights Complaint Log(s)
- Place non-discrimination statement on all printed materials mentioning Child Nutrition Programs
- Keep all records for three years plus the current year

Let’s summarize the important civil rights sponsor requirements for participation in Child Nutrition Programs.

Requirements include:

- **Train all staff** on civil rights topics covered today. Document training with an agenda, dates, and signatures and have documentation available for the State agency to review.
- **Prominently display** the current “And Justice For All” poster in a public place. Best practice is to place the poster both in a public entry as well as in the food service area. For NSLP, posters must be displayed where free and reduced applications are determined and where money is collected.
- **Collect and record race and ethnic data** for all participants annually. Remember data collection can be specific to your program.
- Offer **meals to all infants** and children in care, without discrimination.
- Place the **non-discrimination statement on all printed materials mentioning Child Nutrition Programs**, including menus, enrollment forms, and electronic announcements mentioning the USDA funded food programs.
- Keep all civil rights **records** for **three years plus the current year**, this includes

maintaining an **annually updated civil rights complaint binder** containing a complaint procedure, an annually updated complaint log, and complaint forms.

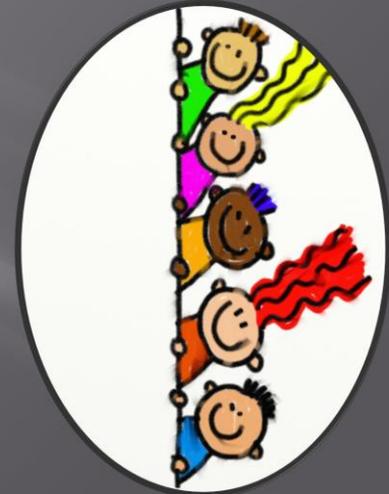
Helpful Civil Rights Links

<http://www.fns.usda.gov/civil-rights>

http://www.fns.usda.gov/sites/default/files/FNS_and_CNPP_Civil_Rights_Policy.pdf

Spanish translator

<http://www.nass.usda.gov/Help/Translate/index.php>



This slide contains helpful civil rights links to the United States Department of Agriculture website, the Food and Nutrition Service site, and a Spanish translation website link. A link to the Idaho State Department of Education website will be published as it becomes available; the SDE website is currently undergoing a remodeling.

The first Food and Nutrition Service link directs you to the civil rights webpage where you can access civil rights Laws, Regulations, Executive Orders, and related Other Guidance (FNS 113-revision 1). The second Food and Nutrition Service link directs you to a PDF of the Civil Rights Policy.

Professional Standards

- ▣ <http://professionalstandards.nal.usda.gov/>
 - Key Area: Administration 3000
 - Key Topic: Policies and Procedures 3420

- ▣ Documentation
 - FNS online tracking tool: <http://www.fns.usda.gov/school-meals/professional-standards>
 - MyIdahoCNP > Download Forms > Professional Standards:
 - Professional Standards Training Log (Word doc)
 - Professional Standards Training Tracker (Excel file)



Here are the key area and key topic learning codes pertinent to this webinar to meet the Professional Standards training and recording requirements (the learning codes are found at the first site listed). Please count the time spent viewing this webinar toward annual Professional Standards training requirements and remember to track training for foodservice employees.

It is required that some form of documentation be kept on file to show Professional Standards compliance; options include the FNS online tracking tool at the site shown, and two Professional Standards tracking resources available in MyIdahoCNP under Download Forms, in the Professional Standards section. You can also find information on Professional Standards and a host of other NSLP-related topics in the Idaho School Nutrition Reference Guide.

Non-discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992.

Submit your completed form or letter 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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov

USDA Child Nutrition Programs recognize the following protected classes: race, color, national origin, sex, age, and disability.

This institution is an equal opportunity provider.

This slide contains the required USDA Child Nutrition Programs non-discrimination statement for this presentation.

THANK YOU!



Child Nutrition Programs
208-332-6820



On behalf of kids, parents, and our staff here at the Idaho State Department of Education Child Nutrition Programs - THANK YOU for viewing the annual Civil Rights Training presentation and THANK YOU for doing your part to provide healthy meals to Idaho's youth.

This concludes the presentation. Please contact Child Nutrition Programs at 208-332-6820 if you need further information.