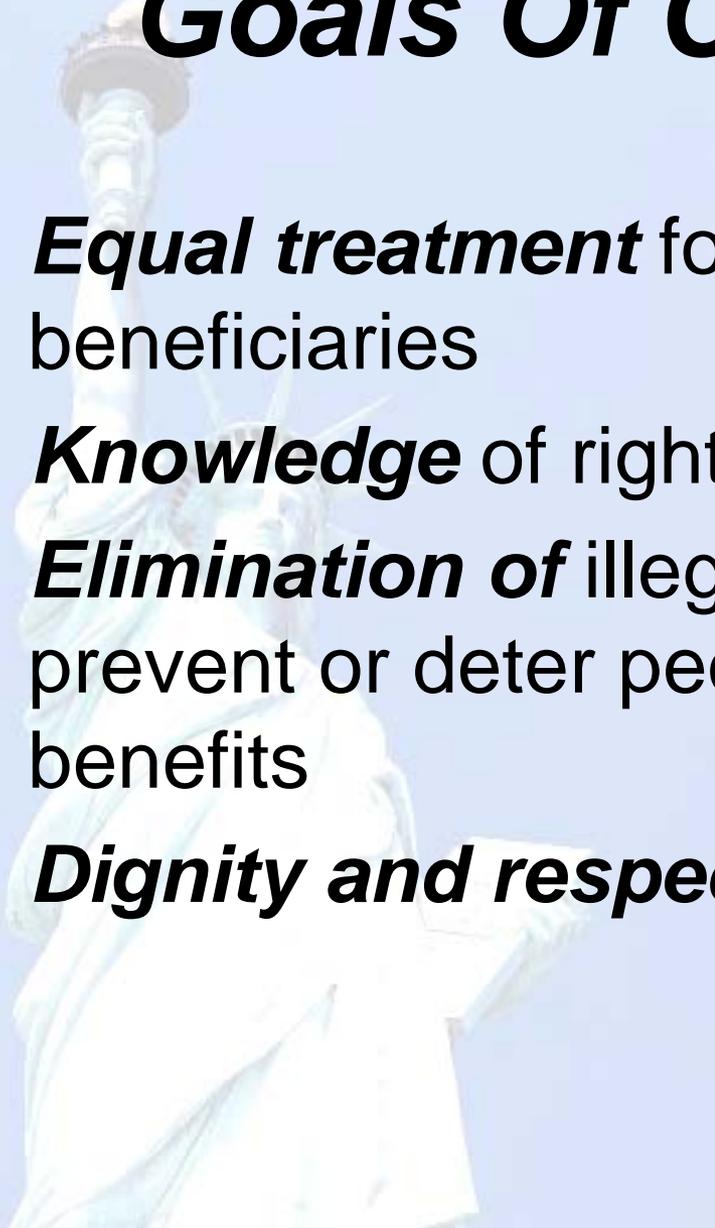


The Statue of Liberty is shown in a light blue, semi-transparent style on the left side of the slide. It is holding a torch in its right hand and a tablet in its left. The background is split vertically into a light blue left half and a white right half.

Civil Rights Requirements

Goals Of Civil Rights



- ◆ ***Equal treatment*** for all applicants and beneficiaries
- ◆ ***Knowledge*** of rights and responsibilities
- ◆ ***Elimination of illegal barriers*** that prevent or deter people from receiving benefits
- ◆ ***Dignity and respect for all***

What is Discrimination?

The act of distinguishing one person or group of persons from another

intentionally,

by neglect, or

*by the effect of actions or lack of actions based on their **protected classes**.*

What Is a Protected Class?

Any person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation, or executive order.



Discrimination = Four D's

Denied benefits or services

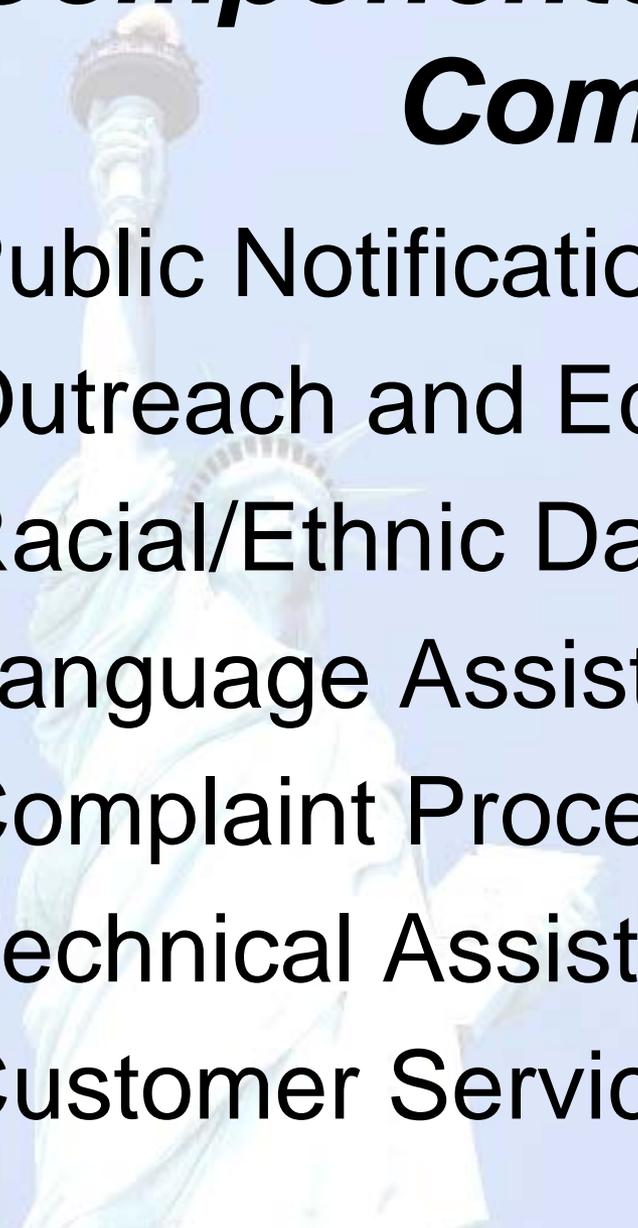
Delayed receiving benefits

Treated **Differently** than others

Given **Disparate** treatment



Components of Civil Rights Compliance



- ◆ Public Notification
- ◆ Outreach and Education
- ◆ Racial/Ethnic Data Collection
- ◆ Language Assistance
- ◆ Complaint Procedures
- ◆ Technical Assistance and Training
- ◆ Customer Service

The Statue of Liberty is shown in a light blue, semi-transparent style on the left side of the slide. It is holding a torch in its right hand and a tablet in its left. The background behind the statue is a light blue gradient.

Public Notification

Public Notification

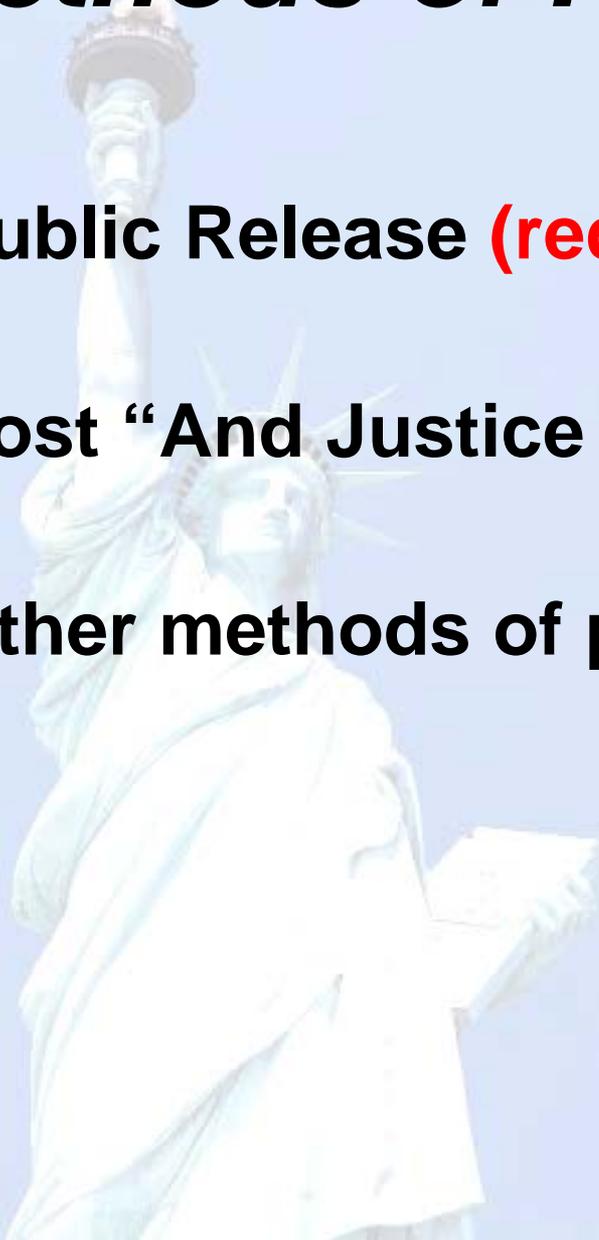


Must include information on:

- Eligibility
- Benefits & Services (i.e. free or reduced price meals)
- Program availability
- Applicant rights and responsibilities
- Procedures for filing a complaint
- Non-discrimination policies
- Any programmatic changes (i.e. changing location of a meal site)

Methods of Public Notification

- **Public Release (required)**
- **Post “And Justice for All” Poster (required)**
- **Other methods of public notification (optional):**



www.azed.gov/health-nutrition/civil-rights

The screenshot displays the Arizona Department of Education website. At the top, the logo for the Arizona Department of Education is on the left, and social media icons for Facebook and Twitter are on the right. Below the logo, the text "Arizona Department of Education" is visible. A search bar with a "SEARCH" button is located on the right side. A navigation menu includes links for HOME, ALL PROGRAMS, STAFF DIRECTORY, CONTACT ADE, FAQ, SCHOOL REPORT CARDS, COMMON LOGON, and ADECONNECT. A large banner reads "HEALTH & NUTRITION SERVICES". Below the banner, a secondary navigation menu lists: Home | Child/Adult Care | School Nutrition Programs | School Health Programs | School Food Programs | Summer Food | Memos | % Free/Reduced. The main content area shows the breadcrumb "You are here: Home / Civil Rights" and the title "Civil Rights". The text states: "In the operation of the Child Nutrition Programs, no individual in the United States shall solely by reason of his or her race, color, national origin, sex, age, or disability, be excluded from the participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Below this text are two links: "Civil Rights Pre-Award Compliance" and "Civil Rights Compliance for NSLP". To the right of the main content is a vertical menu of yellow buttons: "Hot Topics", "Event Registration", "Financial Info", "FAQ", "Civil Rights", and "Contact Us". A red arrow points from a graphic titled "AND JUSTICE FOR ALL" (featuring the Statue of Liberty) to the "Civil Rights" button, which is circled in black.

The Statue of Liberty is shown in a light blue, semi-transparent style against a clear blue sky. It is positioned on the left side of the slide, with its right arm raised holding the torch and its left arm holding the tablet. The title "Outreach and Education" is overlaid on the right side of the image.

Outreach and Education

Outreach and Education

- ◆ You want to reach as many potential children as possible.
- ◆ You want to ensure program access.
- ◆ You need to pay attention to under-represented groups.
- ◆ Include the required nondiscrimination statement on all materials that mention or imply CACFP and/or USDA programs (including web sites, posters, and informational materials).
- ◆ When using graphics, reflect diversity and inclusion.



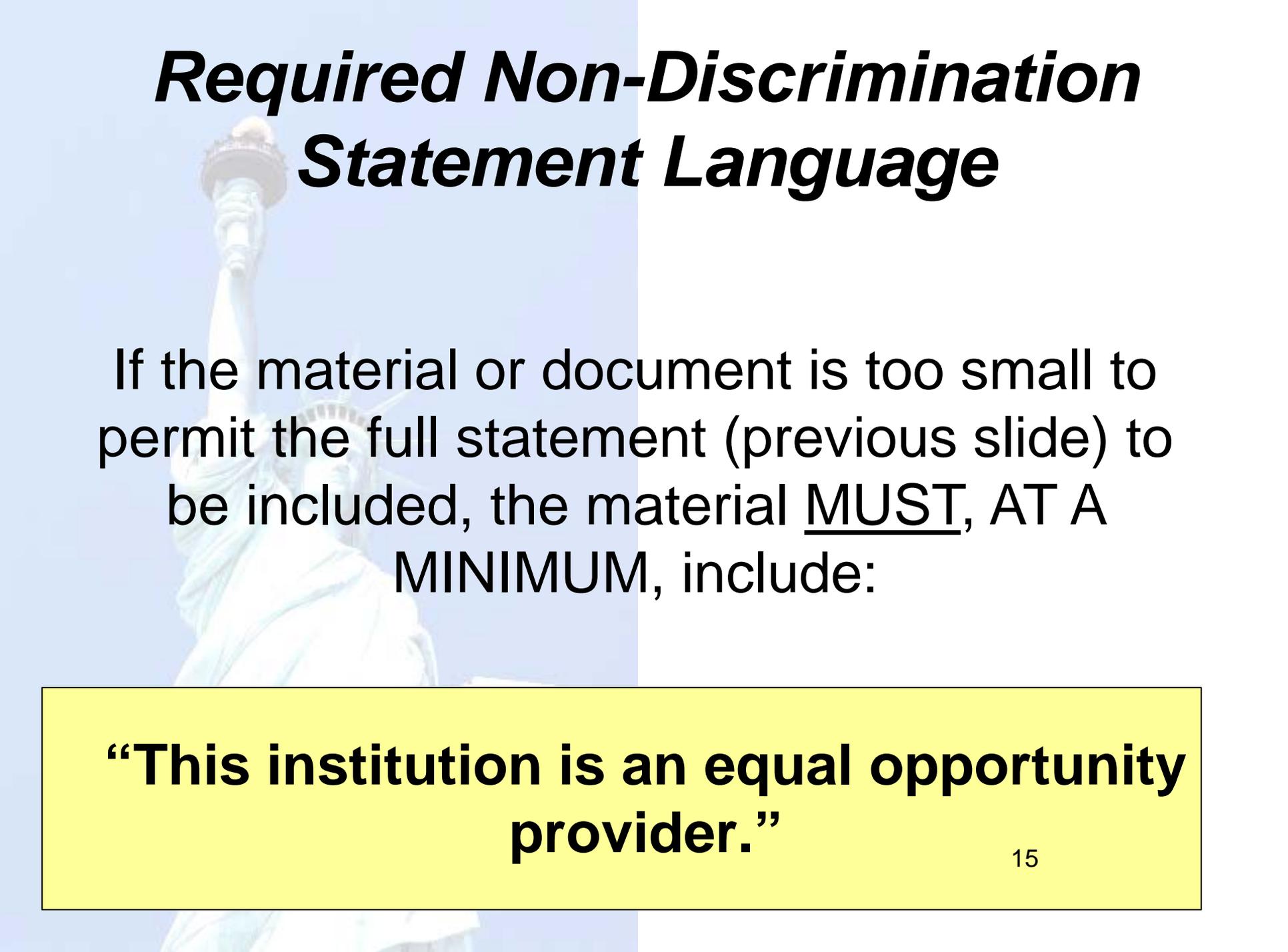
Required Non-Discrimination Statement Language

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, disability, age, 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, audiotope, 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.

This institution is an equal opportunity provider.



Required Non-Discrimination Statement Language

If the material or document is too small to permit the full statement (previous slide) to be included, the material MUST, AT A MINIMUM, include:

“This institution is an equal opportunity provider.”

Racial/Ethnic Data Collection





Why do I have to collect racial and ethnic data?

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

Collecting and Recording Participation Data



- Establish a system
- Program applicants
 - Data collectors

Data Collecting and Reporting

Collect ethnic data first, then racial data

1. Ethnicity categories:

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

2. Racial categories (instructions should specify “mark one or more”)

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

Obtain racial/ethnic data through:

**Voluntary self-identification or self-reporting
(*preferred method*)**

OR

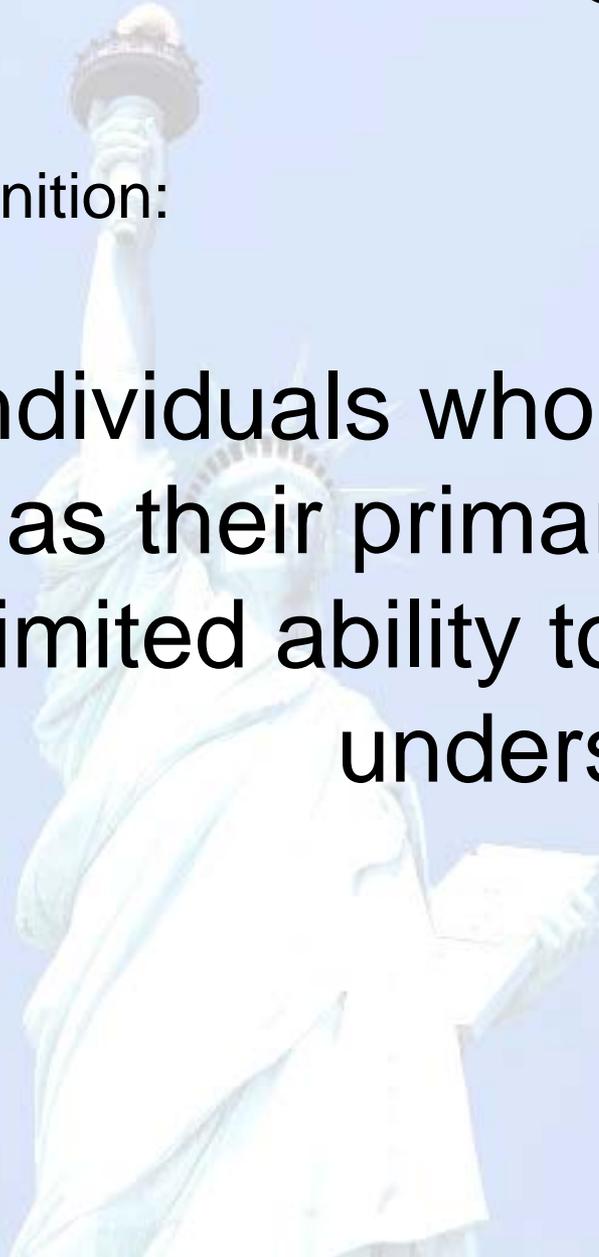
**If a household chooses not to provide
racial/ethnic information:**

- Visual identification
- Personal knowledge, records or other documentation

The Statue of Liberty is shown in a light blue, semi-transparent style on the left side of the slide. It is holding a torch in its right hand and a tablet in its left. The background is a light blue gradient.

Language Assistance

Limited English Proficiency (LEP)



Definition:

Individuals who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

Limited English Proficiency (LEP)



- ◆ Interpreters:
 - ◆ Children should not be used
 - ◆ Volunteers may be used, but make sure they understand interpreter ethics – particularly confidentiality!
- ◆ Resources:
 - ◆ Share resources to save money
 - ◆ Language line phone services

Complaint Procedures





Handling Civil Rights Complaints

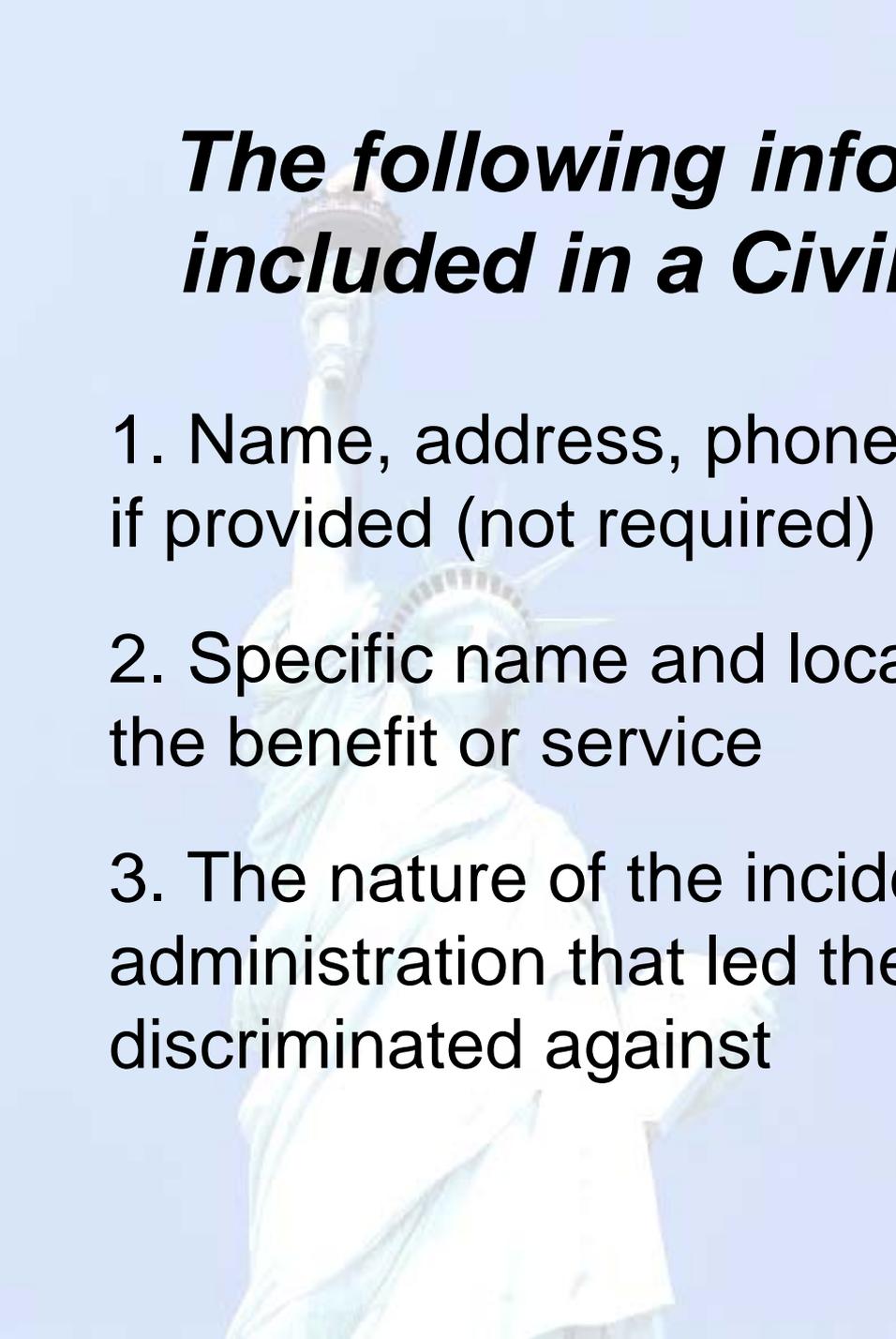
Sponsors are required to develop and implement a written procedure to handle any discrimination complaint that may be received

Right to file

Registering a complaint

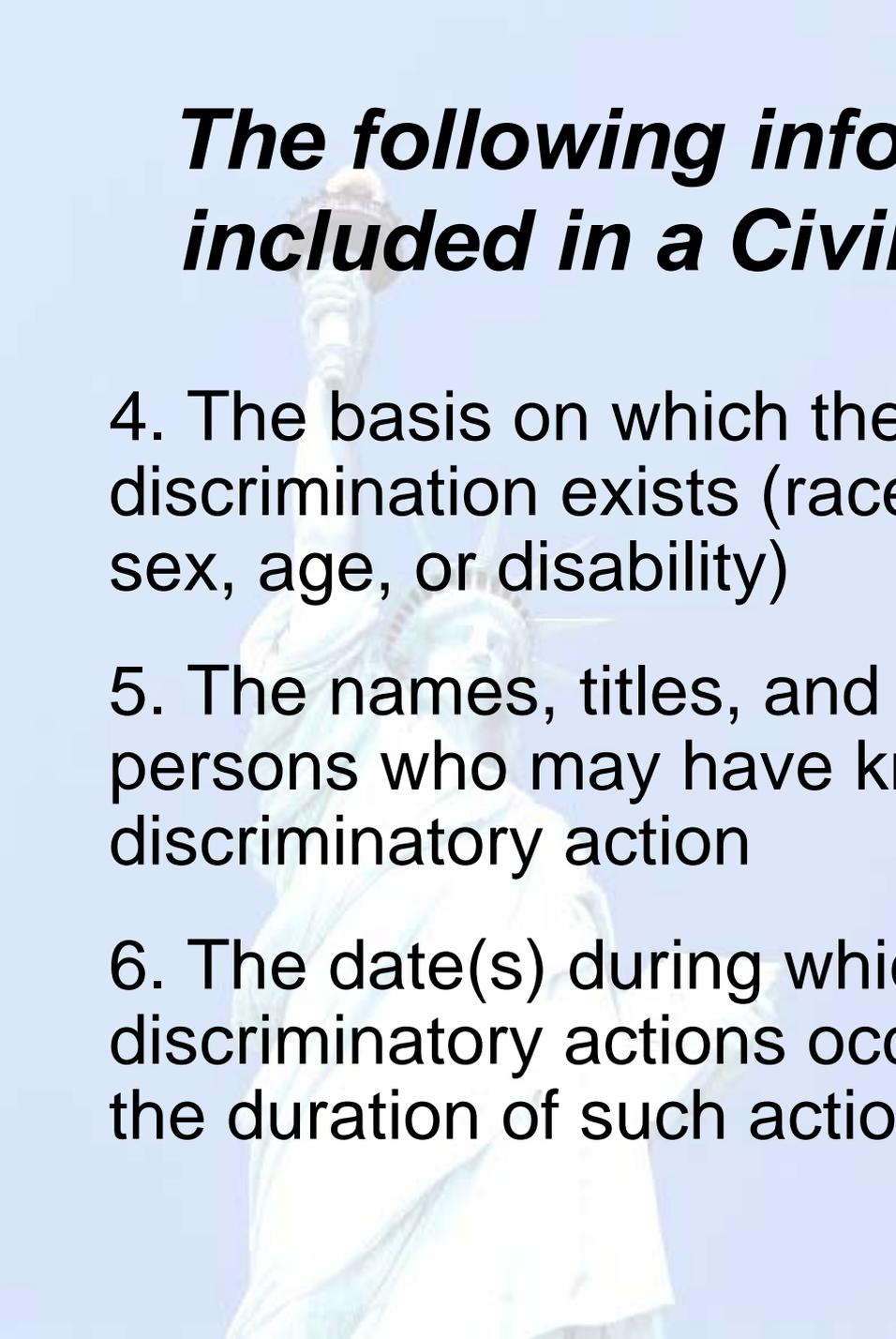
Handling Civil Rights Complaints

- ◆ Complaints can be written or verbal
- ◆ Anonymous complaints should be handled as any other complaint
- ◆ All verbal or written complaints must be forwarded to the ADE or Civil Rights Division of USDA Food and Nutrition Service.
- ◆ Document all potential complaints in a *Civil Rights Complaint Log*
- ◆ Have a central location where the *Civil Rights Complaint Forms* and *Civil Rights Complaint Log* will be kept



The following information should be included in a Civil Rights Complaint

1. Name, address, phone number of complainant, if provided (not required)
2. Specific name and location of entity delivering the benefit or service
3. The nature of the incident, action, or method of administration that led the complainant to feel discriminated against



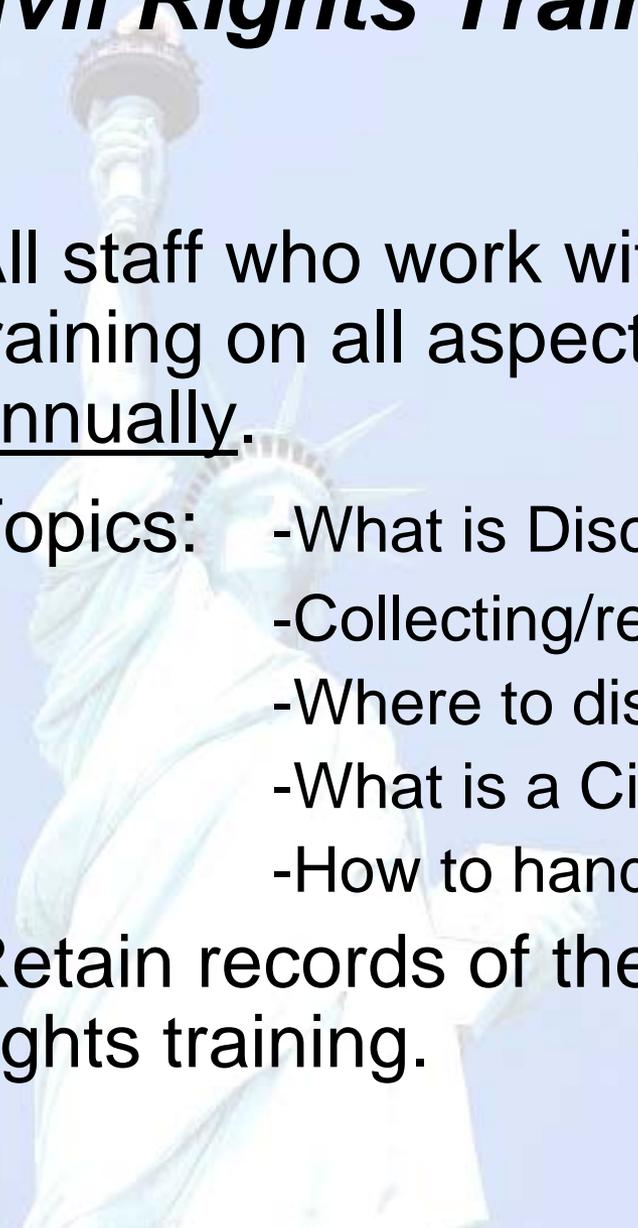
The following information should be included in a Civil Rights Complaint

4. The basis on which the complainant feels discrimination exists (race, color, national origin, sex, age, or disability)
5. The names, titles, and business addresses of persons who may have knowledge of the discriminatory action
6. The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions

A faded, light blue-tinted image of the Statue of Liberty is positioned on the left side of the slide. The statue is shown from the waist up, holding the torch in her right hand and the tablet in her left. The background behind the statue is a light blue gradient.

Technical Assistance and **Training**

Civil Rights Training for Agency Staff

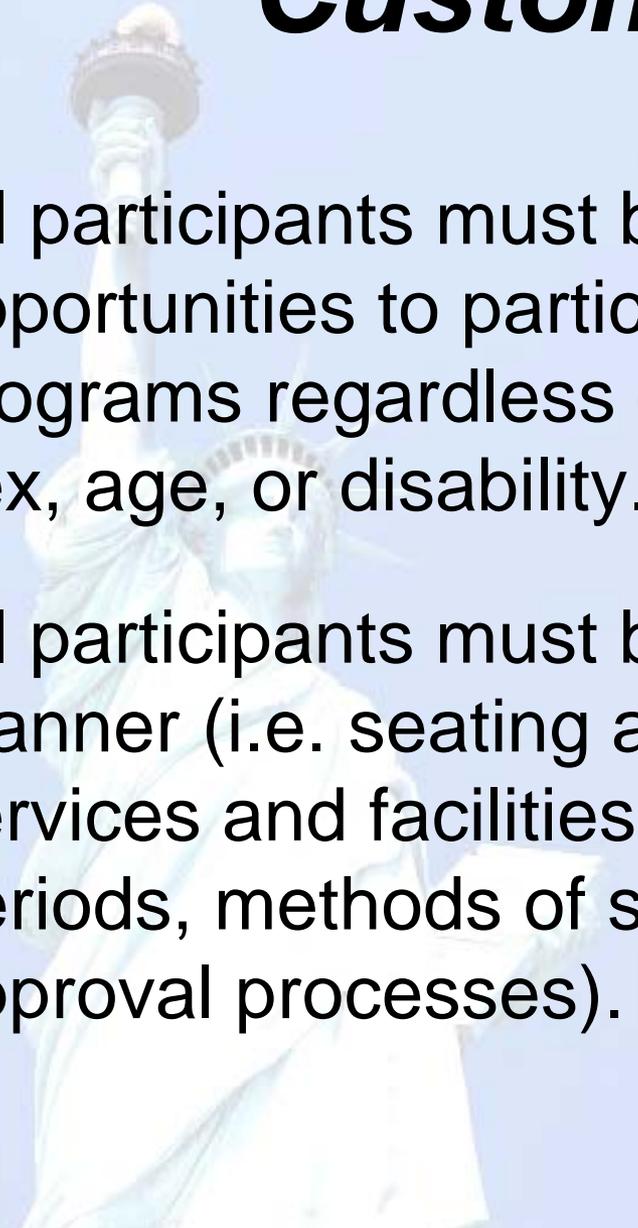


- ◆ All staff who work with the CACFP must receive training on all aspects of civil rights compliance annually.
- ◆ Topics:
 - What is Discrimination?
 - Collecting/recording racial/ethnic data
 - Where to display posters
 - What is a Civil Rights complaint
 - How to handle a Civil Rights complaint
- ◆ Retain records of the people who received civil rights training.

The Statue of Liberty is shown in a light blue, semi-transparent style on the left side of the slide. She is holding a torch in her right hand and a tablet in her left. The background behind her is a solid light blue color.

Customer Service

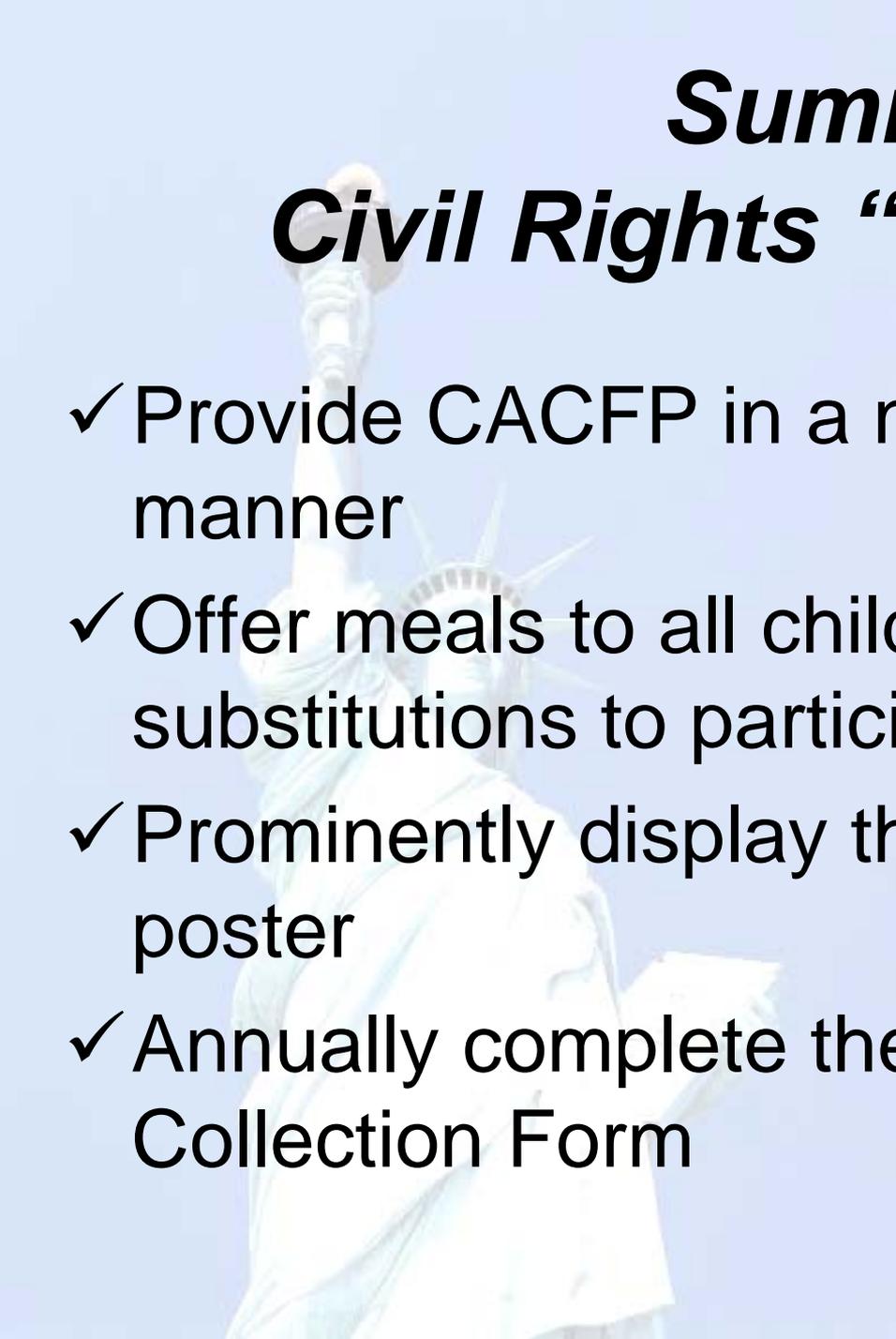
Customer Service



- All participants must be allowed equal opportunities to participate in Child Nutrition programs regardless of race, color, national origin, sex, age, or disability.
- All participants must be treated in the same manner (i.e. seating arrangements, serving lines, services and facilities, assignment of eating periods, methods of selection for application approval processes).

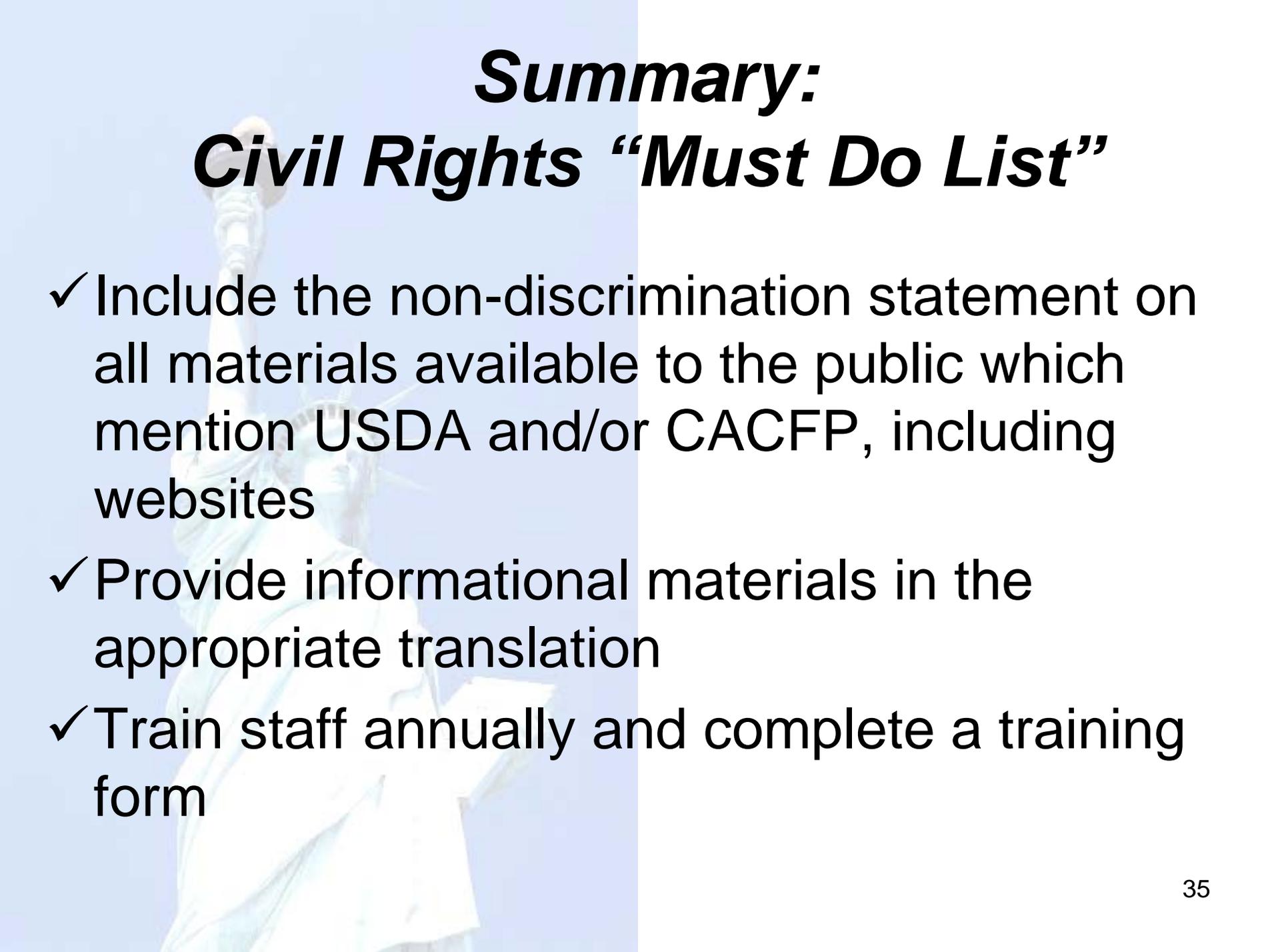
The Statue of Liberty is shown in a light blue, semi-transparent overlay on the left side of the slide. She is holding a torch in her right hand and a tablet in her left. The background behind her is a solid light blue color.

Civil Rights Summary



Summary: ***Civil Rights “Must Do List”***

- ✓ Provide CACFP in a nondiscriminatory manner
- ✓ Offer meals to all children and meal substitutions to participants with disabilities
- ✓ Prominently display the “*And Justice for All*” poster
- ✓ Annually complete the Civil Rights Data Collection Form



Summary:

Civil Rights “Must Do List”

- ✓ Include the non-discrimination statement on all materials available to the public which mention USDA and/or CACFP, including websites
- ✓ Provide informational materials in the appropriate translation
- ✓ Train staff annually and complete a training form



Summary:

Civil Rights “Must Do List”

- ✓ Develop & fully implement your Civil Rights Complaint Procedure
- ✓ Make forms available to all staff: Civil Rights complaint forms, Civil Rights log and Civil Rights complaint procedure
- ✓ Refer all Civil Rights complaints to ADE or USDA

Questions?

Contact:

Veronica Cramer

602-364-1965