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# Disclaimer

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS). The content in this training is intended for professionals operating one or more USDA Child Nutrition Programs in Arizona under the direction of ADE. The information in this training is subject to change. Attendees are encouraged to access professional development materials directly from the training library to prevent use of outdated content.



# Intended Audience

**This training is intended for School Food Authorities (SFAs) operating the National School Lunch Program (NSLP). All regulations are specific to operating the NSLP under the direction of ADE.**

# Objectives

**At the end of this training, attendees should be able to:**

- locate the Civil Rights Compliance Form on the Arizona Department of Education (ADE) website;
- understand the program requirements for Civil Rights data collection and reporting;
- know the deadline for the Civil Rights Compliance Form; and
- accurately collect and report racial and ethnic data.

## **TRAINING HOURS**

Information to include when documenting this training for Professional Standards:

**Training Title:** How to Complete the Civil Rights Compliance Form for School Food Authorities

**Key Area:** 3000 – Administration

**Learning Code:** 3420

**Length:** 30 minutes



# Quiz Time



Throughout this guide, there will be comprehension quiz questions to test your knowledge and help you apply what you're learning. Be sure to review these quiz questions and answers available within the guide.

The question mark icon below will indicate a comprehension quiz question.





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The following slides will only cover how-to instructions on compliance with the Civil Rights Compliance Form annual requirement.



# The Civil Rights Compliance Form

## SECTION 1





# The Mission of Civil Rights

Civil Rights Division's mission is to ensure compliance with applicable laws, regulations, and policies for Food and Nutrition Service (FNS) customers and employees regardless of race, color, national origin, gender, religion, age, disability, sexual orientation, marital or family status, political beliefs, parental status, protected genetic information, or because all or part of an individual's income is derived from any public assistance program.

As part of this goal of ensuring compliance with Civil Rights policies, all School Food Authorities (SFAs) who operate a Child Nutrition Program (CNP) are **required** to obtain data by race and ethnic category on potentially eligible populations, applicants, and participants in their program service area to determine how effectively FNS programs are reaching potential eligible persons.




# DATA COLLECTION COMPLIANCE FORM

To ensure compliance with this policy, ADE has provided the Civil Rights Compliance Form that will help SFAs capture and obtain racial and ethnic data of the population they are serving.

This form must be completed each year by December 15th and kept on file for a minimum of five years.

- Please note that you do not need to submit this form to ADE, however, Civil Rights compliance will be assessed during the Administrative Review.



**Civil Rights Compliance for School Food Authorities**

The United States Department of Agriculture (USDA) outlines the responsibility of each School Food Authority (SFA) regarding Civil Rights Compliance. The following form collects information necessary to assess compliance with Civil Rights requirements in accordance with USDA FNS Instruction 113-1. **Please complete this form annually by December 15th and maintain on file for program review purposes.** Please note that the information gathered in this form is confidential and should only be made available to authorized State and Federal personnel.

LEA Name:	CTD Number:	Date of Completion:

	Yes	No	N/A
1. Is the complete nondiscrimination statement included on the parent letter and all other material?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Have any complaints of discrimination (written or verbal) been received this school year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
a. If yes, have they been acted upon according to the SFA's written procedures?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Is the program information made available to major employers contemplating layoffs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Is there a need for program materials to be printed in a language other than English?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
a. If yes, has this been done?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Do admission procedures restrict enrollment by minority persons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Are disabled students (including those with dietary needs) provided program benefits as appropriate?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Using the racial/ethnic information from the household applications for free and reduced-price meals, complete the data charts below. The purpose is to determine how effectively Child Nutrition Programs are reaching potential eligible persons and beneficiaries. Enrollment information may be used for SFAs that are not required to collect household applications.

Total Enrolled:		

ETHNICITY	Number	Percentage
Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origins, regardless of race. The term "Spanish origin" can be used in addition to "Hispanic or Latino."		
Not Hispanic or Latino: A person who does not meet the description above.		
	Total %	
	Should be 100%	

Please note, all students listed in the Ethnicity data chart above must also be included in the Race data chart shown below. For students who reported two or more races, please include their designations in each of the corresponding racial categories.

RACE	Number
American Indian or Alaskan Native: A person having origins in the original peoples of North, Central, or South America, and who maintains cultural identification through tribal affiliation or community recognition.	
Asian: A person having origins in any of the original peoples of the Far East, Southeast Asian, or the Indian subcontinent. This area includes, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	
Black or African American: A person having origin in any of the black racial groups of Africa. Terms such as Haitian can be used in addition to Black or African American.	
Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	
White: A person having origins in any of the original peoples of Europe, North Africa, or Middle East.	
Unknown	

November 2024 | Health and Nutrition Services | Arizona Department of Education | This institution is an equal opportunity provider.

## CIVIL RIGHTS COMPLIANCE FORM FOR SCHOOL FOOD AUTHORITIES



# Quiz Time

Fill in the blank: The Civil Rights Compliance Form must be completed by December 15th \_\_\_\_\_.

- A** once every five years
- B** once every four years
- C** each year
- D** each year the SFA is up for an Administrative Review





# Quiz Time

Fill in the blank: The Civil Rights Compliance Form must be completed by December 15th \_\_\_\_\_.

**A** once every five years

**B** once every four years

**C** each year

**D** each year the SFA is up for an Administrative Review

The Civil Rights Compliance Form must be completed annually no later than December 15th. It is important to keep this form on file for a minimum of five years. All SFAs should be prepared to provide this form at the time of the Administrative Review.





# Quiz Time

True or False: You must submit the Civil Rights Compliance Form to ADE by December 15th each year.

**A** True

**B** False





# Quiz Time

True or False: You must submit the Civil Rights Compliance Form to ADE by December 15th each year.

**A** True

**B** False

**SFAs are not required to submit the Civil Rights Compliance Form to ADE but are required to have it completed and kept on file by the deadline.**





# Data Collection and Reporting



SECTION 2



# Completing the Civil Rights Compliance Form

## FINDING THE FORM

All items related to Civil Rights requirements for CNP operators and program recipients are located on HNS' Civil Rights webpage - [azed.gov/hns/civilrights](https://azed.gov/hns/civilrights).

To locate the [Civil Rights Compliance Form for SFAs](#), navigate to the [Civil Rights webpage](#). The form can be found under Forms and Resources for Operators.



Arizona Department of Education

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### Civil Rights

State agencies and child nutrition sponsoring agencies shall comply with the requirements of Title VI of the Civil Rights Act of 1964; Americans with Disabilities Act (ADA); Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; and the Age Discrimination Act of 1975.

Additionally, recipients are required to notify applicants with disabilities and limited English proficiency (LEP) persons of their right to free language assistance and accommodations and to provide these services upon request. Notification of this must be clearly stated on recipient websites.

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 (including gender identity and sexual orientation), 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.

#### Forms and Resources for Operators

- [Civil Rights Pre-Award Compliance Form \(NSLP\)](#)
- [Civil Rights Compliance Form NSLP](#)
- [Civil Rights Pre-Award Compliance Form \(CACFP\)](#)
- [Civil Rights Data Collection \(SFSP\)](#)

Administrators and School Leaders

Parents and Families

Child Nutrition Program Operators

Peer to Peer Support for Child Nutrition Professionals

Free and Reduced-Price Percentage Report

HNS/USDA Memos

Civil Rights

Submit Data Request

The remainder of this training will provide you with instruction on how to locate and properly complete the Civil Rights Compliance Form.

# Complete the Heading

Complete the heading by filling out the LEA name, CTD number, and date the Civil Rights Compliance Form is being completed.

- The “Date of Completion” needs to show that the LEA completed the Civil Rights Compliance Form no later than **December 15th**.

## EXAMPLE 1: COMPLIANT



### Civil Rights Compliance for School Food Authorities

The United States Department of Agriculture (USDA) outlines the responsibility of each School Food Authority (SFA) regarding Civil Rights Compliance. The following form collects information necessary to assess compliance with Civil Rights requirements in accordance with USDA FNS Instruction 113-1. **Please complete this form annually by December 15th and maintain on file for program review purposes.** Please note that the information gathered in this form is confidential and should only be made available to authorized State and Federal personnel.

LEA Name:	CTD Number:	Date of Completion:
HNS Unified District	12-34-56	11/18/24

## EXAMPLE 2: NOT COMPLIANT



### Civil Rights Compliance for School Food Authorities

The United States Department of Agriculture (USDA) outlines the responsibility of each School Food Authority (SFA) regarding Civil Rights Compliance. The following form collects information necessary to assess compliance with Civil Rights requirements in accordance with USDA FNS Instruction 113-1. **Please complete this form annually by December 15th and maintain on file for program review purposes.** Please note that the information gathered in this form is confidential and should only be made available to authorized State and Federal personnel.

LEA Name:	CTD Number:	Date of Completion:
HNS Unified District	12-34-56	12/16/24




# Civil Rights Questions

Once you have completed the heading, move down to questions 1-7. It is important to answer these questions honestly and accurately per your own operation. If the question does not apply to your SFA, simply check the box showing “N/A.”



This visual is only an example and each SFA should complete their own Civil Rights Compliance Form to reflect current practices within their operation.



**Civil Rights Compliance for School Food Authorities**

The United States Department of Agriculture (USDA) outlines the responsibility of each School Food Authority (SFA) regarding Civil Rights Compliance. The following form collects information necessary to assess compliance with Civil Rights requirements in accordance with USDA FNS Instruction 113-1. **Please complete this form annually by December 15th and maintain on file for program review purposes.** Please note that the information gathered in this form is confidential and should only be made available to authorized State and Federal personnel.

LEA Name:	CTD Number:	Date of Completion:
HNS Unified District	12-34-56	11/18/24

	Yes	No	N/A
1. Is the complete nondiscrimination statement included on the parent letter and all other material?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Have any complaints of discrimination (written or verbal) been received this school year?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
a. If yes, have they been acted upon according to the SFA's written procedures?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
3. Is the program information made available to major employers contemplating layoffs?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Is there a need for program materials to be printed in a language other than English?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
a. If yes, has this been done?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Do admission procedures restrict enrollment by minority persons?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
6. Are disabled students (including those with dietary needs) provided program benefits as appropriate?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

# Total Enrolled & Ethnicity Data

Next, input the total number of enrolled students in the box titled "**Total Enrolled Students**." If this field is not complete, the percentages will not auto-fill. Additionally, an error message will appear if the total number of students in the chart exceeds the Total Enrolled.

The data chart should be filled using information from Household Applications for Free and Reduced-Price Meals for **all enrolled students**.

All enrolled students should be included in the Ethnicity data chart to get a true picture of the ethnicities within the population of the SFA.

- If a household did not indicate ethnic or racial data on their application, the SFA may make a visual determination of the student or may use the practice stated above.
- If an SFA **does not collect household applications** or does not feel that the racial/ethnic data from the household applications represents the population of the SFA, work with the SFA’s enrollment or registrar’s office to obtain an accurate representation of the served population.

	Total Enrolled:	245
ETHNICITY	Number	Percentage
Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origins, regardless of race. The term "Spanish origin" can be used in addition to "Hispanic or Latino."	167	68.16%
Not Hispanic or Latino: A person who does not meet the description above.	78	31.84%
	Total % <i>Should be 100%</i>	100.00%



The data reported, including total enrollment, should be reflective of the day the SFA completes the form.



# Quiz Time

True or False: SFAs should be reporting ethnicity based on the total student enrollment, not only on the students who submitted household applications and completed the fields regarding ethnic identities.

**A** True

**B** False





# Quiz Time

True or False: SFAs should be reporting ethnicity based on the total student enrollment, not only on the students who submitted household applications and completed the fields regarding ethnic identities.

**A** True

**B** False

**It is important to capture ethnic data based on the population of the SFA, not only students who have submitted this data through their household applications. SFAs should use self-reported data to their advantage when completing the Civil Rights Compliance Form but should use other LEA resources if needed.**





# Racial Data

The last section to complete is the Race data chart. The Race data chart will include all students in the Ethnicity data chart and will group these students into their racial categories.

- All enrolled students must be included in the Race data chart.

If a household selected more than one race or ethnicity on the household application, report the student(s) designations in each of the corresponding racial categories.

- This could mean that the number of students reported (both Hispanic or Latino AND Not Hispanic or Latino) may not match the number of students reported in the race categories.

RACE	Number
American Indian or Alaskan Native: A person having origins in the original peoples of North, Central, or South America, and who maintains cultural identification through tribal affiliation or community recognition.	2
Asian: A person having origins in any of the original peoples of the Far East, Southeast Asian, or the Indian subcontinent. This area includes, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	14
Black or African American: A person having origin in any of the black racial groups of Africa. Terms such as Haitian can be used in addition to Black or African American.	31
Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	1
White: A person having origins in any of the original peoples of Europe, North Africa, or Middle East.	47
Unknown	7

ADE understands that it may be challenging to obtain this data for all enrolled students within the SFA, but it is expected to exhaust all efforts in collecting this data as accurately as possible for all students.



# Racial Data Chart

## EXAMPLE

In this example, the Race data chart has been completed.

Here, the number of students recorded in the Race data chart exceeds the total number of enrolled students in the Ethnicity chart. This discrepancy occurs because some students may identify with two or more races.

		Total Enrolled:	90
ETHNICITY		Number	Percentage
<b>Hispanic or Latino:</b> A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origins, regardless of race. The term “Spanish origin” can be used in addition to “Hispanic or Latino.”			
		27	30.00%
<b>Not Hispanic or Latino:</b> A person who does not meet the description above.		63	70.00%
		<b>Total %</b> <i>Should be 100%</i>	100.00%

27 + 63 = 90

Please note, all students listed in the Ethnicity data chart above must also be included in the Race data chart shown below. For students who reported two or more races, please include their designations in each of the corresponding racial categories.	
RACE	Number
<b>American Indian or Alaskan Native:</b> A person having origins in the original peoples of North, Central, or South America, and who maintains cultural identification through tribal affiliation or community recognition.	2
<b>Asian:</b> A person having origins in any of the original peoples of the Far East, Southeast Asian, or the Indian subcontinent. This area includes, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	14
<b>Black or African American:</b> A person having origin in any of the black racial groups of Africa. Terms such as Haitian can be used in addition to Black or African American.	31
<b>Native Hawaiian or Other Pacific Islander:</b> A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	1
<b>White:</b> A person having origins in any of the original peoples of Europe, North Africa, or Middle East.	47
<b>Unknown</b>	7

2+14+31+1+47+7=102



# Quiz Time

Multiple Choice: When completing the Race data chart on the Civil Rights Compliance Form, what should SFAs use to properly obtain and report this data?

- A** Household applications
- B** SFA data
- C** Visual determinations (if necessary)
- D** All of the above



# Quiz Time

Multiple Choice: When completing the Race data chart on the Civil Rights Compliance Form, what should SFAs use to properly obtain and report this data?




- A** Household applications
- B** SFA data
- C** Visual determinations (if necessary)
- D** All of the above

**SFAs should be reporting data on the Civil Rights Compliance Form as accurately as possible and reflective of the entire population of the LEA. Please note that SFAs should be using all possible avenues of collection for this student data.**





# Civil Rights Compliance Form Checklist

-  **THE CIVIL RIGHTS COMPLIANCE FORM MUST BE COMPLETED BY DECEMBER 15TH EACH YEAR.**
-  **THE CIVIL RIGHTS COMPLIANCE FORM SHOULD NOT BE SHARED WITH UNAUTHORIZED PERSONNEL.**
-  **KEEP THE CIVIL RIGHTS COMPLIANCE FORM ON FILE FOR A MINIMUM OF FIVE YEARS.**
-  **ALL STUDENTS ENROLLED IN THE SFA SHOULD BE TAKEN INTO ACCOUNT WHEN COMPLETING THE CIVIL RIGHTS COMPLIANCE FORM.**



# TECHNICAL ASSISTANCE

If you have a question or require additional assistance, please contact your assigned specialist or contact HNS.



602-542-8700



ContactHNS@azed.gov



[www.azed.gov/hns](http://www.azed.gov/hns)







# Congratulations

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**You have completed the Online Course:  
How to Complete the Civil Rights Compliance  
Form**

Information to include when documenting this  
training for Professional Standards:

**Training Title:**  
**How to Complete the  
Civil Rights Compliance  
Form**

**Key Area: 3000 – Administration**  
**Learning Code: 3420**  
**Length: 30 minutes**

Please note, attendees must document the amount of training hours  
indicated on the training despite the amount of time it takes to complete it.



# Certificate

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## Requesting a training certificate

Please click the button to complete a brief survey about this online training. Once the survey is complete, you will be able to print your certificate of completion from Survey Monkey.



Information to include when documenting this training for Professional Standards:

<b>Training Title:</b>	<b>Key Area: 3000 – Administration</b>
<b>Step-by-Step Instruction:</b>	<b>Learning Code: 3420</b>
<b>How to Complete the Civil Rights Compliance Form</b>	<b>Length: 30 minutes</b>

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Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.







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To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) 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](mailto:program.intake@usda.gov).

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