



CIVIL RIGHTS COMPLIANCE AND ENFORCEMENT TRAINING



Nutrition Department

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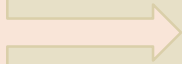
Goals of Civil Rights

- To ensure equal treatment for all applicants and beneficiaries
- To understand rights and responsibilities
- To eliminate illegal barriers that prevent or deter people from receiving benefits
- To ensure dignity and respect for all



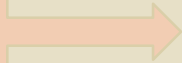
Agenda

Definitions



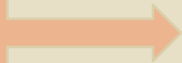
Overview of important terminologies will be defined.

Background



Where did our current laws originate from?

Civil Rights
Components



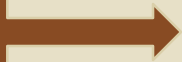
Data collection, public notification, complaint procedures, compliance reviews, resolution of non-compliance, reasonable accommodations, language assistance, conflict resolution & customer service.

Non-
discrimination
Statement



Requirements for when and where the non-discrimination statement must be used.

Scenarios



We will go through some possible scenarios that you could encounter.

What is discrimination?

- The act of distinguishing one person or group of persons from others, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected bases.
- Example: Sites cannot require that parents bring in special formulas or foods.



What are Civil Rights?

A

Non-political rights of a citizen

B

The rights of personal liberty guaranteed to U.S. citizens by the 13th and 14th amendments to the U.S. Constitution and the acts of Congress

C

All of the above

What are Civil Rights?

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The rights of personal liberty guaranteed to U.S. citizens by the 13th and 14th amendments to the U.S. Constitution and the acts of Congress

C

All of the above

Disability

- A physical or mental impairment that substantially limits one or more of an individual's major life activities, having a record of such impairment, or being regarded as having such an impairment.



Types of Disability Discrimination

▶ Discrimination because of the disability

- Denying benefits or opportunity to participate
- Segregating individuals with disabilities
- Aiding, perpetuating or contracting with others that discriminate

▶ Failure to provide a reasonable modification

▶ Ineffective Communication

▶ Inaccessible Facilities



Reasonable Modifications

A change or alteration in policies, practices, and/or procedures to accommodate a disability

- Duty to negotiate over modification. This means simply saying “no” is almost never appropriate.
- Providing appropriate modifications is the primary objective, not ferreting out whether the participant has a disability or abusing the process
- On a case-by-case basis



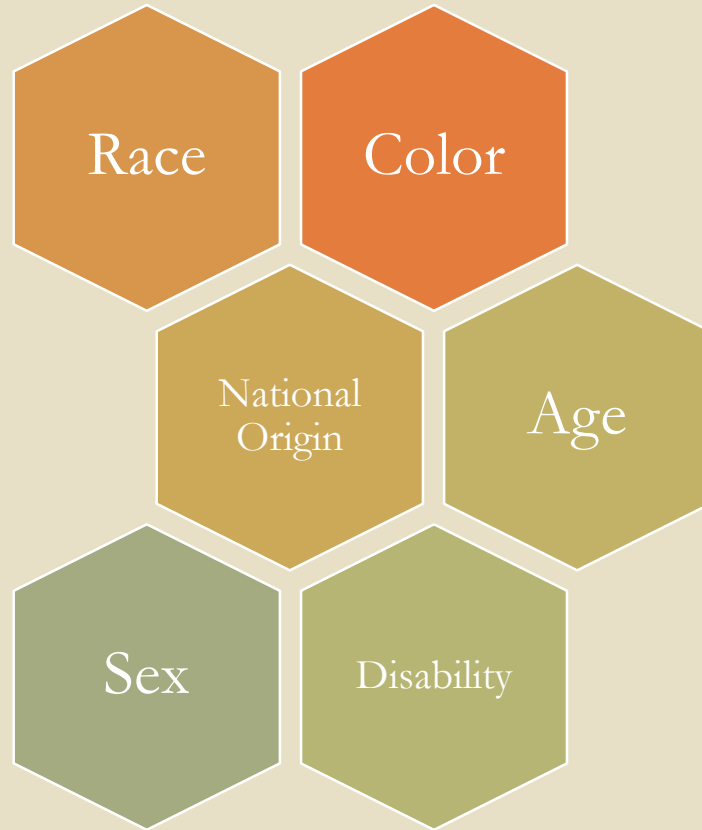
Reasonable Modifications: Key Considerations

- **Consider costs/resources, and the participant's age and ability**
- **“Stereotypes” regarding certain conditions or individuals can never drive decisions. Decisions must be based on facts.**
- **Meal accommodations do not need to mirror the meal or meal item substituted.**
- **“Lifestyle” choices (e.g. vegetarian) are not considered disabilities and need not be accommodated unless related to an underlying disability**

Protected Class

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

Protected Classes for the Child Nutrition Programs Include:



Background: Title VI Civil Rights Act of 1964

- Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall be discriminated against on the grounds of **race, color or national origin**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity.”



Background: The Age Discrimination Act of 1975

- The Age Discrimination Act of 1975 provides that:

No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.



Background: IX of the Education Amendments of 1972

- Title IX of the Education Amendments of 1972 states:

No person in the United States shall, on the basis of sex, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance.

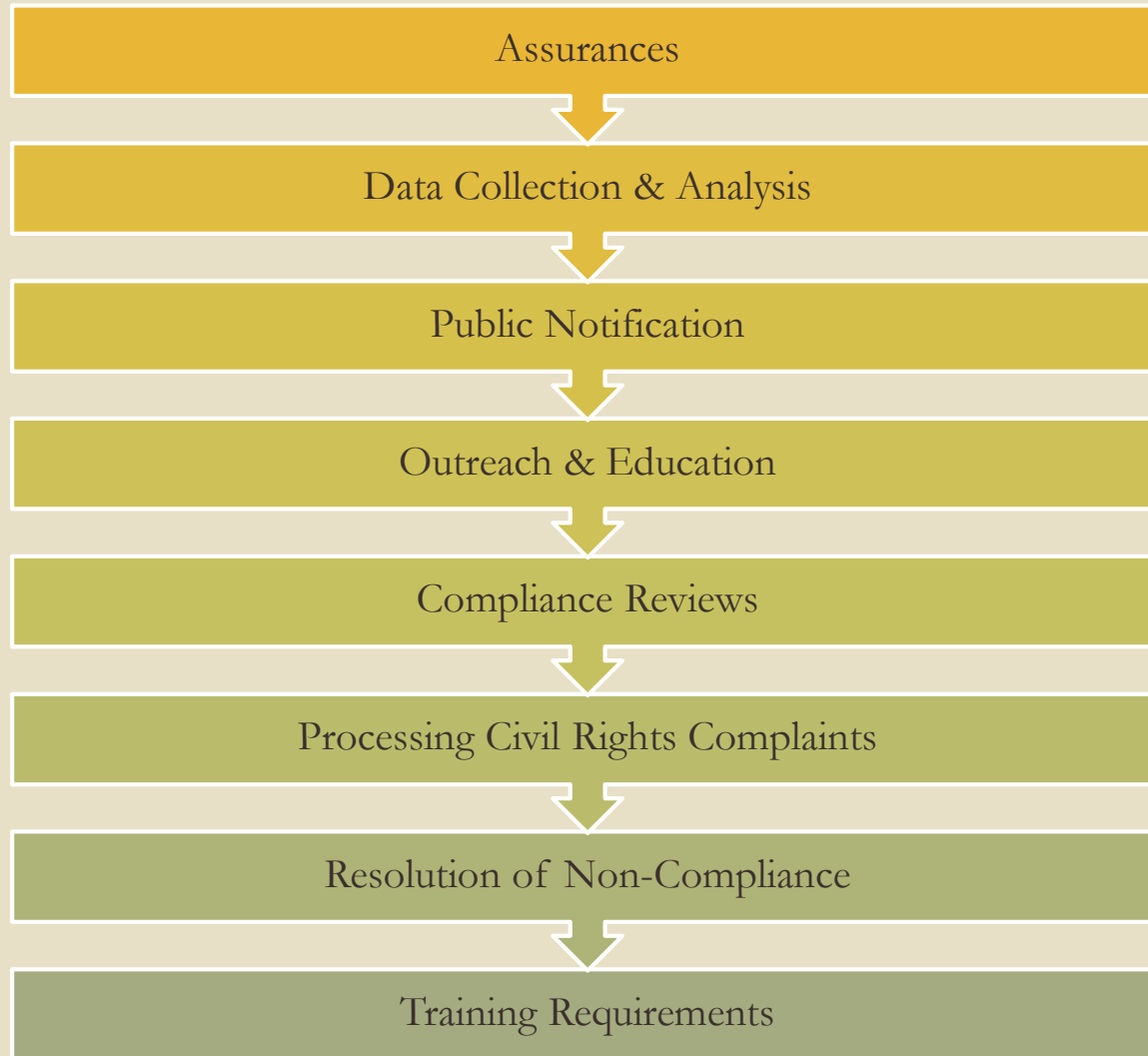


Background: Section 504 of the Rehabilitation Act of 1973 & The Americans with Disabilities Act of 1990



- Both Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 prohibit discrimination based on a disability.
- The Americans with Disabilities Act of 1990 extended the requirements to all services, programs and activities of State and local governments and prohibits discrimination based on a disability in other public services.

Civil Rights Training Components



Assurances

Contractual Agreements in which a state agency, local agency, or the sub recipient legally agrees to administer Food and Nutrition Services (FNS) programs in accordance with all laws, regulations, instructions, policies and guidance related to nondiscrimination.

Your assurance to comply with civil rights requirements is in your **Permanent Agreement** agreed to each year in your application.

- Compliance with these requirements is verified through compiling data, maintaining records and submitting required reports.



Data Collection & Reporting

Sites need to establish a system to collect racial and ethnic data.

- Self-identification is the preferred method for collecting racial & ethnic data.
 - Ex. the household eligibility application requests this information, but is not required to be provided.
- Alternatively – if an applicant/participant does not self-identify then staff can make an observation of race & ethnicity.
 - Rationale: discrimination is often based on perception and others would probably have a similar perception to the person doing the data collection.

Data Collection & Reporting

It is recommended to collect ethnicity first and race second.

Ethnicity Categories:

Hispanic or Latino
Non-Hispanic or Latino

Race Categories:

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

How long do I have to keep the data?

- **Three years plus** the current year.
- Data should be kept **secure and confidential**.

II. Data Collection and Reporting

Site Review Form (ISBE 67-42)

ILLINOIS STATE BOARD OF EDUCATION
Nutrition and Wellness Programs Division
100 North First Street, W-270
Springfield, Illinois 62777-0001

**Summer Food Service Program
MONITORING SITE REVIEW FORM**

INSTRUCTIONS: Complete form in its entirety. A review must be completed at each site at least once during the first four weeks of operation.

NAME OF SITE	DATE	APPROVED MEAL TIMES Begin: _____ End: _____		
SITE ADDRESS	Approved Level of Participation	Meal Type Observed	Review	Follow-Up Review
SITE NUMBER		TIME MONITOR ARRIVED	TIME MONITOR DEPARTED	

RACIAL/ETHNIC IDENTITY: Indicate number of children participating. (Do not use percentages or words such as "all" or "none".)

___ Hispanic or Latino	___ Asian	___ Black or African American	___ Native Hawaiian or Other Pacific Islander
___ Not Hispanic or Latino	___ White	___ American Indian or Alaska Native	___ Other

MEAL SERVICE Answer questions **ONLY** if observed.

NUMBER OF MEALS	NUMBER OF MEALS	NUMBER OF MEALS
1. Ordered/prepared	6. Total available for service (1-5)	11. NOT served as a unit

Data Collection & Reporting

What do I need to do with the information that I collect?

- The information that is collected should be compiled and compared to data that shows the make up of your area of the state.
- We provide you with data from your county on your program application approval letter each year.
- The data that you collect should be compared to this county data annually.

Illinois State Board of Education

Civil Rights Disclosure

The United States Department of Agriculture regulations implementing Title VI of the Civil Rights Act of 1964 requires each school-based Child Nutrition Programs sponsor to determine and have available for review data on the potential eligible beneficiaries by racial/ethnic category for the areas served by the institution.

To assist you in determining the potential beneficiaries, this office is providing the Illinois census estimates of population for your county(s).

If the figures do not accurately reflect the racial/ethnic makeup of the area from which the attendance is drawn for the school-based Child Nutrition Program(s) in which you participate; cross out and insert the information. It is not necessary to submit changes of this information to ISBE but maintain on file for review or audit. All changes must be documented with the source of your information. All records related to school-based Child Nutrition Programs must be maintained for a period of three years plus the current year.

All sponsors should annually review the civil rights brochure available on our website at http://www.isbe.net/nutrition/pdf/civil_rights.pdf. The purpose of the brochure is to notify participants of the school-based Child Nutrition Programs policies regarding civil rights and to provide guidance on nondiscrimination in the administration of the program. A copy of this brochure is available upon request.

County	Percent White	Percent Black	Percent Native American	Percent Asian	Percent Hispanic	Percent Other
Sangamon	87.42	9.65	0.21	1.10	1.06	1.21

Data Collection & Reporting

Why do I have to collect & compare this data?

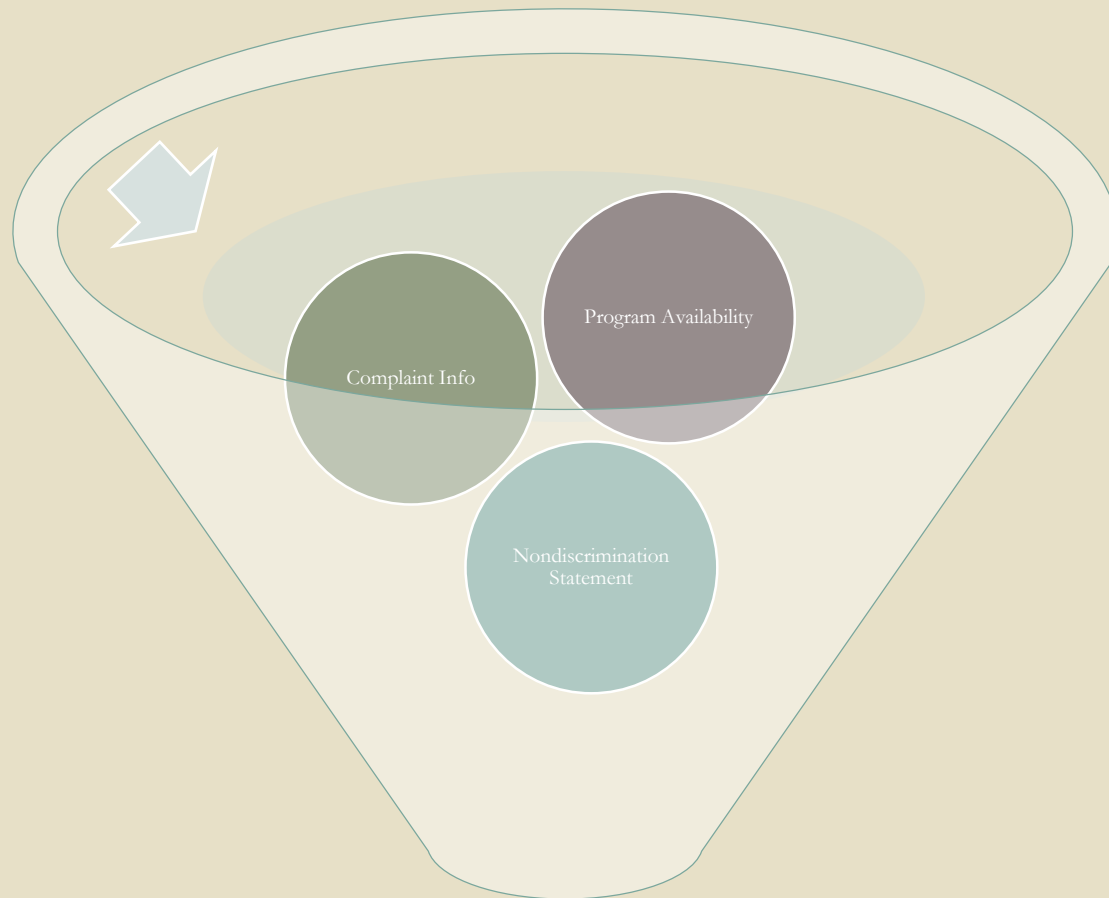
The data is used to determine how effectively your program is reaching potentially eligible children and where outreach may be needed.

For example: if you find that 40% of your county is Asian but only 3% of applicants for the meal programs are Asian than that is an indicator that perhaps more outreach is needed to the Asian population. A solution may be that you need to have the Household Eligibility Application available in different languages in order to meet the needs of your student population.



Public Notification:

Purpose: to inform applicants, participants and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination and the procedure for filing a complaint.



Public Notification System

- All feedings sites must provide information to eligible participants in the appropriate language concerning the availability and nutritional benefits of the Summer meals program (SFSP).
- The public announcement must be provided to the local news media.

Must have info on:

- Program Availability
- Complaint information
- Non-discrimination statement or link
- Location, times



- The Illinois State Board of Education submits a statewide public announcement on behalf of all participating sponsors annually.

Local agencies:

- Brochures/fliers
- Letters
- Internet/website
- Local media

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, 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, 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 <https://www.ascr.usda.gov/how-file-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.

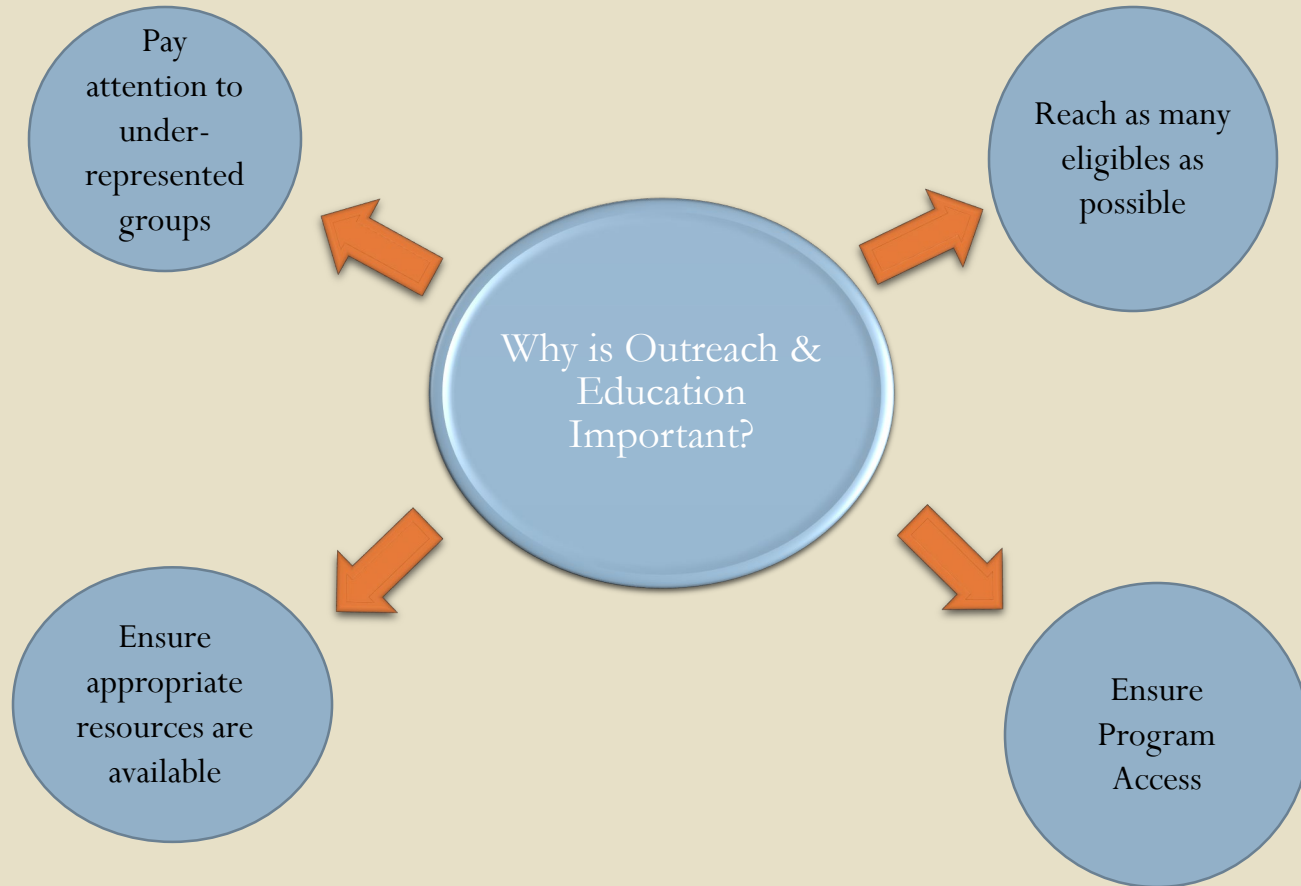
This institution is an equal opportunity provider.

Outreach & Education

The non-discrimination statement must be included on all materials that mention the USDA programs (including websites). However, you do not need to include the statement on your menus.

There is a shortened statement that can be used in rare cases. This shortened version can not be used just because it will not fit on the document, you must determine who the audience is and if the full statement is needed.

Outreach & Education

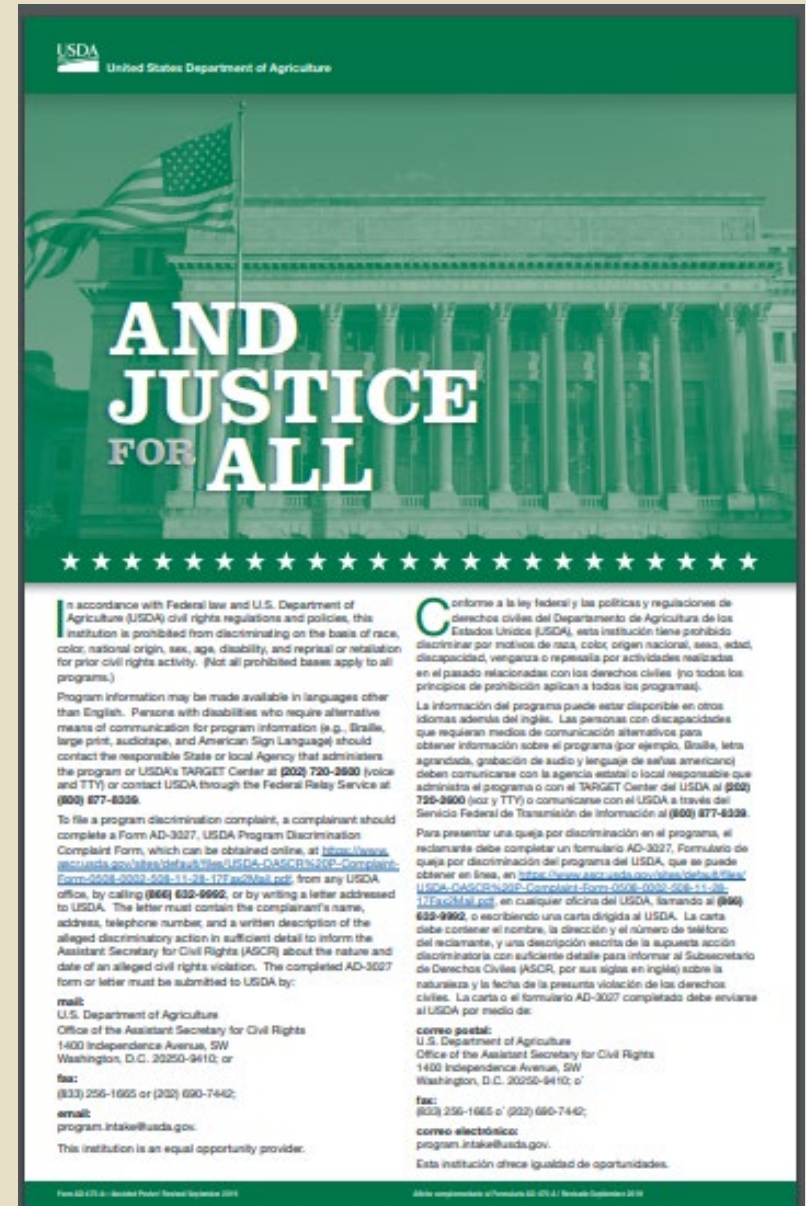


Outreach & Education And Justice for All Poster

This poster must be prominently displayed and visible to program applicants & participants. They must be posted in all administrative offices and eating areas.

Posters are available free of charge from the Illinois State Board of Education Nutrition & Wellness Programs Division upon request.

Send all requests to cnp@isbe.net and include the name of the sponsor requesting the poster, the address to mail it to and the number of requested posters.

The poster features a green background with a white American flag on the left and a classical building facade on the right. The text 'AND JUSTICE FOR ALL' is prominently displayed in white. Below the title, there are two columns of text in English and Spanish, providing information on how to file a complaint and contact details for the USDA. The poster also includes a row of white stars at the bottom of the green section.

USDA
United States Department of Agriculture

AND JUSTICE FOR ALL

In accordance with Federal 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, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and 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 <http://www.ams.usda.gov/info/submit/USDA-DASCR%20-Complaint-Form-2008-2009-2010-11-29-17280208.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:

mail:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

fax:
(833) 256-1665 or (202) 690-7442;

email:
program.intake@usda.gov.

This institution is an equal opportunity provider.

Conforme a la ley federal y las políticas y regulaciones de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta institución tiene prohibido discriminar por motivos de raza, color, origen nacional, sexo, edad, discapacidad, venganza o represalia por actividades realizadas en el pasado relacionadas con los derechos civiles (no todos los principios de prohibición aplican a todos los programas).

La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieren medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra agrandada, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <http://www.ams.usda.gov/info/submit/USDA-DASCR%20-Complaint-Form-2008-2009-2010-11-29-17280208.pdf>, en cualquier oficina del USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; o

fax:
(833) 256-1665 o (202) 690-7442;

correo electrónico:
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.

Form AD 3027-A - Revised Poster Format September 2011

Limited English Proficiency (LEP)

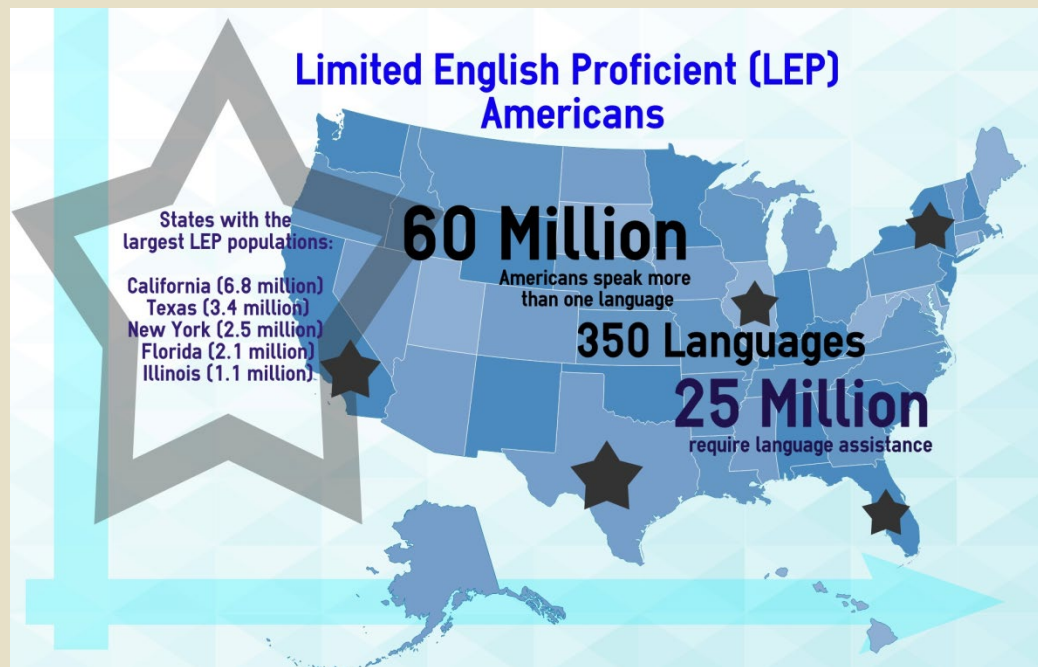
- Definition:

- Individuals who do not speak English as their primary language and have a limited ability to read, speak, write or understand English.
- Recipients of Federal financial assistance have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by persons with LEP.

Limited English Proficiency (LEP)

Reasonable Steps

- Number or proportion of LEP persons in the eligible service population.
 - --*The greater the number, the higher the need*
- Frequency of contact in the programs.
 - --*Opportunities for outreach*
- Importance of the service provided by the programs
- Resources available to the recipient/costs



Limited English Proficiency (LEP)

Resources

School Nutrition Programs, such as CACFP and SFSP, have English & Spanish Household Eligibility Applications (HEA) available on their websites along with a link to the HEA in additional languages on the USDA webpage.

Further information on LEP is available at www.LEP.gov

Albanian	Farsi	Italian	Nepali	Spanish
Amharic	French	Iu Mien	Polish	Tagalog
Arabic	French Creole	Jamaican Creole	Portuguese	Thai
Armenian	Greek	Japanese	Punjabi	Tigrinya
Bengali	Gujarati	Karen	Romanian	Ukranian
Bosnian	Haitian Creole	Khmer	Russian	Urdu
Burmese	Hindi	Korean	Samoan	Vietnamese
Chinese (Simplified)	Hmong	Kru	Serbian	Yiddish
Chinese (Traditional)	Igbo	Kurdish	Somali	Yoruba
Croatian	Ilokano	Laotian	Sudanese	

Compliance Reviews

Compliance reviews are used to determine that the applicant or recipient of federal financial assistance is in compliance with civil rights requirements.

◦ Pre-Award Reviews:

- Take place before the sponsor is approved for operation. This would be for new applicants to our programs.

◦ Post-Award Reviews:

- Take place after a sponsor is approved for operation. An example would be during an Administrative Review.

◦ Special Reviews:

- Take place after a site has been approved due to a complaint, data collection or as follow-up to previous non-compliance.

Where Can Civil Rights Complaints be Given?

Complainants may choose to:

- Contact USDA directly or
- Contact the State Agency directly, or
- Notify the SFA or Institution of their complaint

SFAs and Institutions must forward all discrimination complaints received regarding Child Nutrition Programs to their State Agency within 5 working days

Who would I refer someone to at the USDA if they wish to file a complaint:

- The And Justice for All poster provides the following information on where Civil Rights Complaints can be sent:

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form PDF Document, (AD-3027) found online at <https://www.ascr.usda.gov/how-file-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 Submit your completed form or letter to USDA by:

Mail: U.S. Department of Agriculture
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Washington, D.C. 20250-9410;

Fax: (202) 690-7442; or

Email: program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

Complaints to the State Agency or School

All complaints alleging discrimination on the basis of race, color, national origin, age, sex, or disability, either written or verbal, must be processed within the time frames established by Departmental regulations and agreements.

Remember any complaint filed with the school must be forwarded to the State Agency within 5 working days!

- If a school receives a civil rights complaint - All complaints written or verbal must be forwarded to the appropriate regional or Office of Civil Rights Director.
- Contact the state agency and we will be happy to assist you.
- Phone: 800/545-7892
- Email: cnp@isbe.net

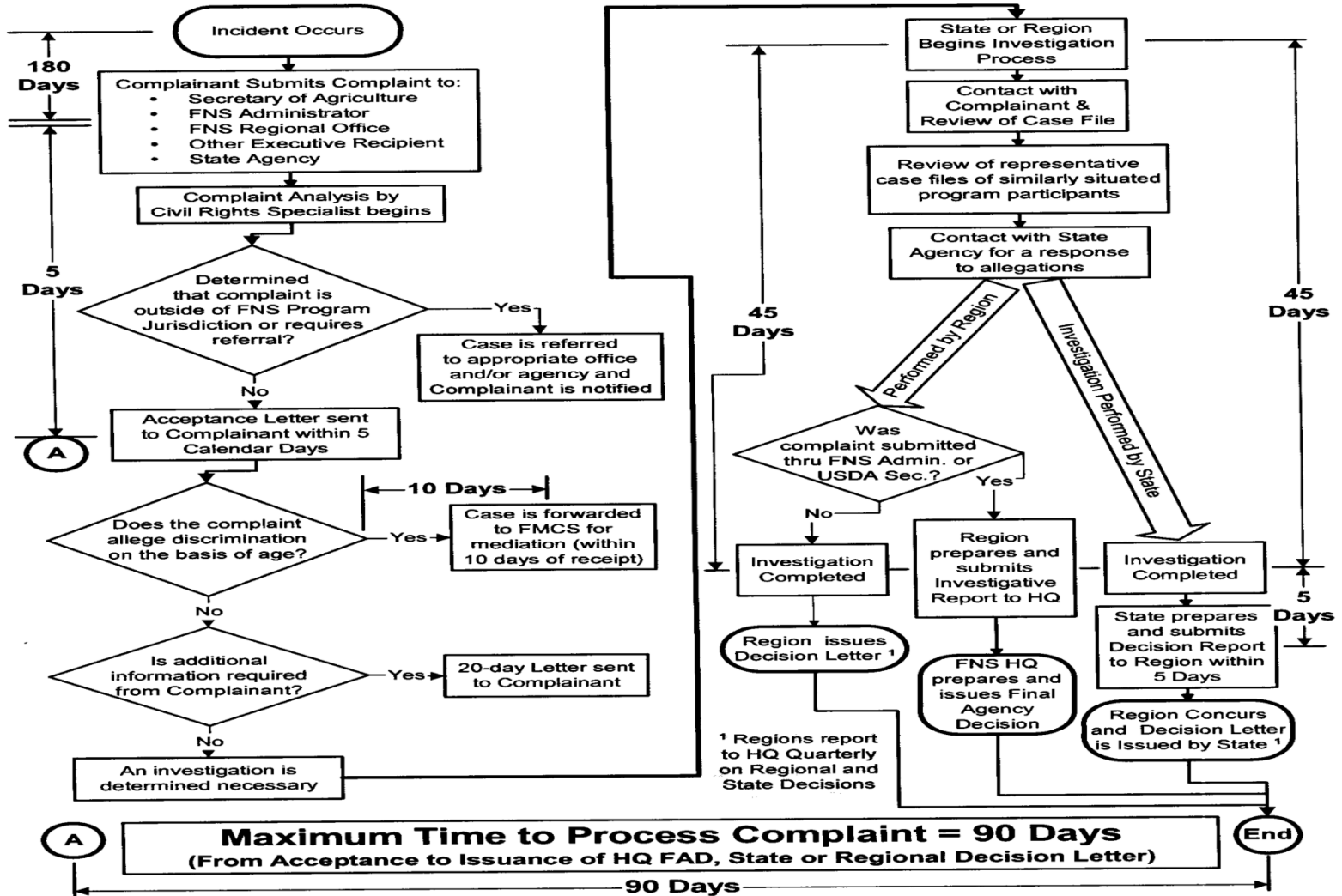
A sample complaint form is available on the ISBE Civil Rights webpage at:
http://www.isbe.net/nutrition/htmls/civil_rights.htm

Complaint Process

- Develop a reporting method and train site staff on the importance of processing civil rights complaints in a timely manner.
- Have a “go to” person who knows the process
- Complaints can be written on a form or presented verbally to site staff.
- Site staff should put in writing all verbal complaints and details surrounding the event as quickly as possible.
- Complaints **MUST** be filed within 180 days of incident
- Best to file as soon as possible after incident.
- Once complaint at USDA, letter issued within five days.



FNS 113 Complaint Processing Procedures & Timelines



Non-Compliance



- A factual finding that any Civil Rights requirement, as provided by law, regulation, policy, instruction, or guidelines is not being adhered to.
- There are no “minor” or “major” categories of noncompliance. All instances of non-compliance are considered equally.

Resolution of Non-Compliance

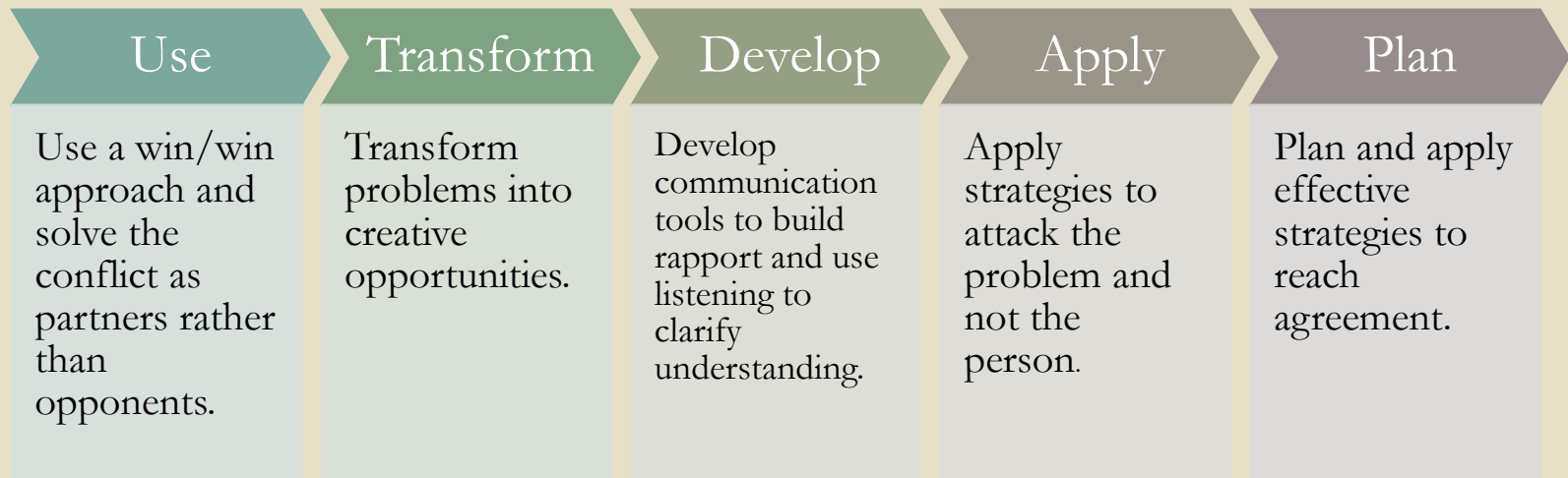
- **Non-compliance:** a finding of noncompliance may be the result of a routine review, a special review or an investigation. Noncompliance is a factual finding that any CR requirement, as provided by law, regulation, policy, instruction or guidelines, is not being adhered to.
- **Achieving Voluntary Compliance:** once noncompliance is determined, steps must be taken immediately to obtain voluntary compliance.
- **Termination or Suspension of Assistance:** as a last resort, if voluntary compliance is not completed within the allotted time period termination or suspension of assistance may result.

Conflict Resolution

USDA encourages the resolution of complaints at the lowest possible level and as quickly as possible.

Create a written code of conduct and post it with your policy for dealing with unacceptable behavior and conflict.

Use alternative dispute resolution (ADR) techniques.



Conflict Resolution Skills

Customer Service

- All participants must be treated in the same manner:
- ✓ seating arrangements
- ✓ serving lines
- ✓ services and facilities
- ✓ assignment of eating periods
- ✓ methods of selection for application approval processes



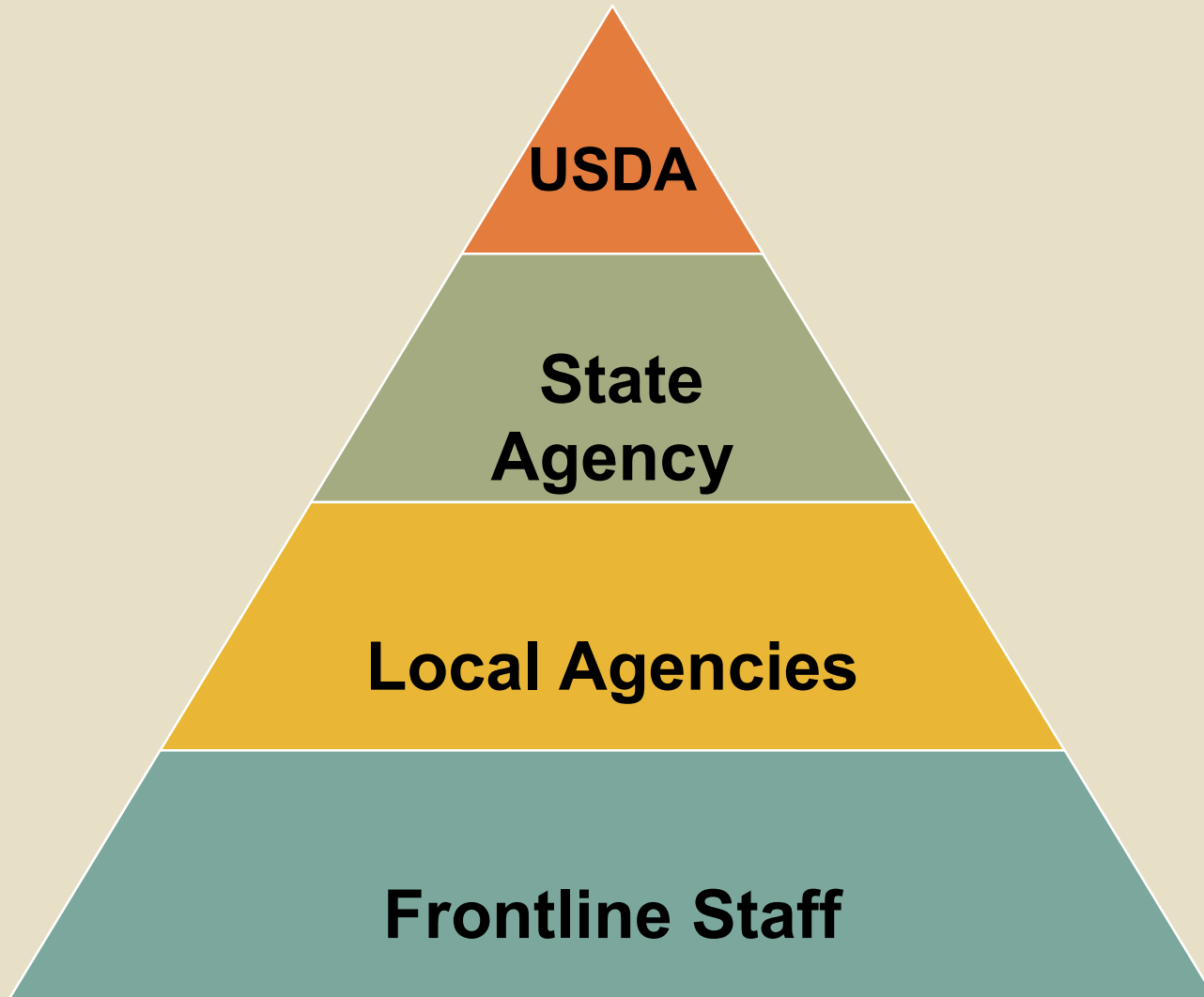
Treat people the way you want to be treated.

Civil Rights Training Requirements

- Annual training is required for all “frontline staff”.
- Frontline Staff include those who interact with program applicants or participants and those who supervise frontline staff.
- This training module can be used to meet this annual training requirement.



Civil Rights Training



Civil Rights Training

- Training of Frontline Staff is required on an annual basis.
- Resources that are available to help you meet that requirement:
 - This slideshow presentation
 - Civil Rights brochure
 - Review of the USDA's Instruction 113-1 (Civil Rights Compliance & Enforcement)

*** Ensure that you document the date, what resources were utilized and who completed the annual training. Sample documentation forms are available under our Civil Rights Requirements link on our SFSP resource page.

QUIZ

1. What are the six federally protected classes under USDA Requirements?



1) What are the six federally protected classes under USDA Requirements?

Race

Color

National
Origin

Age

Sex

Disability

1) A sponsor scheduled and held its annual Civil Rights training for frontline staff on May 13th. On June 15th a new site worker named Tina begins working at a feeding site.

When should Tina receive her first training on Civil Rights?

A

Next year at their annual civil rights training

B

Whenever someone has time to train her

C

It should be a part of her new staff member orientation

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It should be a part of her new staff member orientation

2) Scenario #1

Through your data collection procedures, you recognized that even though the community is composed of a large Hispanic population (40 percent), only 2 percent of Hispanics are receiving meal benefits.

What outreach efforts could you take to increase Hispanic program participation?

- A** Educational information or materials may be needed in other languages.
- B** Provide outreach to other programs in the area which serves the Hispanic population.
- C** Such as partnering with social service agencies and working with neighborhood groups.
- D** Any and all the above.

2) Scenario #1

Through your data collection procedures, you recognized that even though the community is composed of a large Hispanic population (40 percent), only 2 percent of Hispanics are receiving meal benefits.

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- C** Such as partnering with social service agencies and working with neighborhood groups.
- D** Any and all the above.

2) On occasion, you will have leftovers at the close of lunch and will offer them to the older boys in the group.

Is this practice discriminatory and if so on what basis?

- A Race
- B Age
- C Sex
- D Both B & C

2) On occasion, you will have leftovers at the close of lunch and will offer them to the older boys in the group.

Is this practice discriminatory and if so on what basis?

- A Race
- B Age
- C Sex
- D Both B & C

3) Which of the following staff would be required to receive annual civil rights training?

A Just Summer Sponsors

B Just Site Supervisors

C Cook/server

D Children who receive a meal

3) Which of the following staff would be required to receive annual civil rights training?

- A Just Summer Sponsors
- B Just Site Supervisors
- C Cook/server
- D Children who receive a meal

4) Who can someone file a civil rights complaint with?

A The School

B The State Agency

C The USDA

D All the Above

4) Who can someone file a civil rights complaint with?

A

The school

B

The State Agency

C

The USDA

5) Can a site seat all children that speak the same language at the same table? For ex. have all children that speak Russian sit together at the same table and all students that speak Vietnamese at a different table.

A

Yes

B

No

5) Can a site seat all children that speak the same language at the same table? For ex. have all students that speak Russian sit together at the same table and all students that speak Vietnamese at a different table.

A

Yes

B

No. Segregating or separating children who share particular characteristics into groups would be considered a civil rights issue and discrimination based on the protected class of national origin.

NOTE: Be careful of implied segregation, such as seating all boys or girls at separate tables. This is a questionable practice unless it is done for disciplinary or other legitimate reasons.

6) A family does not want to identify their race or ethnic background on the Household Eligibility Application. What should the staff do?

A

The application is incomplete – return it to the household to complete that section of the application.

B

Leave that section of the application blank – you don't need that information.

C

Have staff complete that section based on a visual observation.

6) A family does not want to identify their race or ethnic background on the Household Eligibility Application. What should the staff do?

A

The application is incomplete – return it to the household to complete that section of the application.

B

Leave that section of the application blank – you don't need that information.

C

Have staff complete that section based on a visual observation.



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