

Civil Rights Requirements For School-Based Child Nutrition Programs

This information notifies participants of the Federal School-Based Child Nutrition Programs of program policies regarding civil rights and provide guidance on nondiscrimination in the administration of these programs.

This information outlines specific responsibilities, requirements, and procedures for federally assisted programs to ensure federal, state, and local compliance with the provision of Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973.

After each specific responsibility/requirement is identified, suggested ways to meet the responsibility/requirement are listed.

Any questions regarding the civil rights requirement of the National School Lunch, School Breakfast, and Special Milk Programs should be directed to the Illinois State Board of Education, Nutrition Programs, 100 North First Street (W-270), Springfield, Illinois 62777-0001, 800/545-7892.

School Food Authority Responsibilities

Data Collection

- Collect and maintain data regarding the target population by racial/ ethnic category. Examples include fall housing report, census data, and demographic maps. This information is available each year by county on your approval letter.
- Collect and maintain racial/ethnic participation documentation. Methods include staff observation or voluntary self-identification by applicants on the free and reduced-price application forms.
- Maintain all program information for three years plus the current year. Safeguards should be exercised to ensure the data is available only to authorized personnel.

Program Operations

- Denied free and reduced-price applicants should not be disproportionately composed of minority groups.
- Admission procedures should not restrict enrollment of minority persons.
- Program operations should not discriminate against participants based on race, color, national origin, sex, age, or disability. Examples include seating arrangements, serving lines, services and facilities, assignment of eating period, and selection of applications for verification.

Training

- Must provide civil rights training to their subrecipients, including *front-line staff*, on an annual basis.
- *Frontline staff* is defined as those who interact with program applicants or participants and those persons who supervise *frontline staff*.
- Specific subject matter for training must include: collection and use of data, effective public notification systems, complaint procedures, compliance review techniques, resolution of noncompliance, requirements for reasonable accommodation of persons

with disabilities, requirements for language assistance, conflict resolution, and customer service.

- There is a PowerPoint presentation available on our website at www.isbe.net/nutrition that can be used for training.

Public Notification

- Display in a prominent place a USDA poster containing the nondiscrimination statement and the federal procedure for filing a complaint. Posters may be obtained by contacting Nutrition Programs, Illinois State Board of Education at 800/545-7892.
- All printed school nutrition program informational materials, such as free and reduced-price meal notification letters and public releases, must include the following nondiscrimination statement and complaint procedures.

In accordance with Federal law and United States Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish). USDA is an equal opportunity provider and employer.

- If the material is too small to permit the full statement above, the material, at a minimum, must include the following statement in font size no smaller than the text of the material.

This institution is an equal opportunity provider.

- Provide information in the appropriate translation concerning the availability and nutritional benefits of the school nutrition program, as needed. This requirement can be met through the use of bilingual staff members, volunteers, and/or informational materials in appropriate languages.
- Provide school nutrition program information to the parents and local minority and grassroots organizations upon request; examples include letters, brochures, and public releases.
- Develop and implement a procedure to process civil rights complaints. A civil rights complaint procedure may be developed by the SFA. Persons who believe they have been discriminated against in any USDA-related activity may be advised to write: USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (800) 795-3272 or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.