

### Civil Rights Requirements

**PURPOSE:** To establish the Civil Rights requirements for participants in USDA Child Nutrition Programs.

**SCOPE:** Institutions and facilities participating in the Child and Adult Care Food Program (CACFP).

**DESCRIPTION:** Civil Rights regulations are intended to assure that benefits of the Child and Adult Care Food Program (CACFP) are made available to all eligible persons. This includes:

- Making every effort in recruitment and enrollment procedures to allow equal participation by all eligible participants and potential participants regardless of race, color, national origin, sex, age, or disability.
- Distributing and classifying the Applications for Free and Reduced-Price Meals in a way that is fair to all and does not discriminate based on race, color, national origin, age, sex, or disability.
- Serving meals in a way that allows equal participation regardless of race, color, national origin, age, sex, or disability.

Civil Rights requirements for participants in the Child and Adult Care Food Program include the following:

1. Obligation to offer infant meals in the CACFP
2. Display "and Justice for All" Poster
3. Collect racial and ethnic data
4. Public notification and media release
5. Contact with minority and grass roots organizations
6. Procedures to handle any discrimination complaints
7. Civil Rights training for staff involved with CACFP functions
8. Use of the non-discrimination statement

Detailed information about each of these eight items can be found in *Offering the CACFP in a Non-Discriminatory Manner* (Appendix A).

**Staff Training:** All staff involved with CACFP functions must receive **annual** training on Civil Rights requirements. Documentation of this training shall include the agenda and signed and dated attendance sheets. This information shall be retained in the Civil Rights folder. Appendix B

is a sample *Civil Rights Training for Site Staff* form. Sponsors may use this form or develop one of their own.

Civil Rights Complaints: Sponsors are required to develop and implement a written procedure to handle any discrimination complaint that may be received. The Sponsor's written Civil Rights complaint procedure must describe:

- Where the *Civil Rights Complaint Forms* and *Civil Rights Complaint Log* will be kept at each site and at the administrative offices
- Who is trained on the Sponsor's Civil Rights procedure
- How Civil Rights complaints will be recorded in the *Civil Rights Complaint Log*
- Procedures for receiving and forwarding an alleged civil rights complaint

A Civil Rights Complaint Form (Appendix C) and the Log of Civil Rights Complaints (Appendix D) are attached as part of this policy instruction. Sponsors may use these forms or develop their own.

Compliance with Civil Rights requirements will be included in State Agency reviews of each institution.

This policy is effective December 13, 2004.

SOURCE: Civil Rights Regulations