

# CIVIL RIGHTS REQUIREMENTS



## Requirements

### Notification to the Community

The Summer Food Service Program (SFSP) regulations allow the State Agency to announce the availability of free meals on the behalf of SFSP sponsors. Therefore, sponsors will no longer be required to issue a media release specifically for the SFSP. Sponsors that have open and restricted open sites should continue to make the community aware of the meal sites, dates of operation and times of meal services. Sponsors of camps and enrolled sites, must notify participants or enrolled children of the availability of free meals. This information can be provided in the regular distribution of your program materials. When mentioning the SFSP, be sure to include the non-discrimination statement - full or shortened version, depending on size of handout, etc. For a list of promotional materials available and marketing information, visit the [SFSP Outreach Materials](#) page.

### And Justice for All Posters

Display the full size “And Justice for All” poster developed by USDA in a prominent place at each site so that participants can see it. Also display it in the sponsor’s administrative office. Many times, the posters are displayed near the serving line. For mobile sites, the poster may be displayed on the transportation vehicle (inside door that is opened at the site during service), displayed on a cooler or on a display board that has other information, such as the menu. The posters can be ordered from DPI by completing the SFSP Resource Order Form. When the full-size poster is not available, it is acceptable to post a copy obtained from the [USDA Civil Rights](#) website.



### Other Requirements

- Make Program information available to the public upon request.
- Take reasonable steps to ensure meaningful access to services for limited English proficient persons by providing information in the frequently encountered, non-English languages of individuals eligible to be served or likely to be affected by the program.
- Ensure that translations are accurate concerning the availability and nutritional benefits of the Program.
- Make reasonable modifications in policies and procedures to ensure individuals with disabilities have equal access and effective communication when accessing the Program.
- Include the nondiscrimination statement, and instructions for filing a complaint, in any Program information directed to parents of participants and potential participants. The shortened version may be used only if the print material is a page or less and there isn't enough room for the full version. "This institution is an equal opportunity provider."
- Ensure that meals are served to all attending children, regardless of their race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.
- Ensure that all children have equal access to services and facilities at the site regardless of their race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

# Race and Ethnicity Data

## Requirements and Purpose

- Non-camp sponsors must collect race and ethnicity data of actual participants each year for each site operating.
- Sponsors of camp sites must collect race and ethnicity data of actual participants separately for each session of camp.

The purpose of this requirement is to determine how effectively Child Nutrition Programs are reaching potential eligible persons and beneficiaries. The data may be used to identify areas where additional outreach is needed, determine any barriers to access, and assess the institutions and sponsor's compliance. This data is also used to analyze the impact of policy changes (during the Civil Rights Impact Analysis process) on participants and for investigating program discrimination complaints.

## Collection Process

Sponsors are to use methods that are based on self-identification and self-reporting; visual observation *cannot* be used to collect data. A best practice for this would be obtaining the information from parents, or guardians or adult participants. Therefore, if the sponsor has collected this data for other purposes for program participants, that data already available may be used to complete the form. If not available for the specific children participating, the data may be collected from parents/guardians using the Sample Race and Ethnicity Data Collection form, provided by DPI. If unable to obtain data from parents/guardians because they do not come to the site(s), etc., aggregate data may be used. Aggregate data must be specific to the service area of the meal service site. Aggregate data may be obtained from school databases, the [Census' American Community Survey \(ACS\)10](#), which provides racial and ethnic data by multiple types of geographic areas, including by census tract and census block group, and/or the [National Center for Education Statistics Common Core of Data](#) database, which provides data by school. Once collected, complete the [Race and Ethnicity Data Form](#) for each site. Keep all records pertaining to the collection of the data on file along with the completed Race and Ethnicity Data Form for 3 years, plus the current year.

# Civil Rights Compliance Training

All staff who work with the USDA Child Nutrition Programs must receive training on all aspects of civil rights compliance annually. If staff have been trained as part of a different Child Nutrition Program, such as the National School Lunch Program or Child and Adult Care Food Program, those staff do not need to receive a separate SFSP civil rights training.

Civil Rights Training Topics Include: collection and use of data, effective public notification systems, complaint procedures, requirements for language assistance, conflict resolution, customer service, requirements for reasonable accommodation of persons with disabilities.

The Institute of Child Nutrition (ICN) provides a free online [Civil Rights in Child Nutrition Programs course](#), that can be used to complete the annual civil rights training requirement for all staff. Participants must register with ICN and then enroll in the course. Once completed the participant will receive a certificate of completion. Sponsors may also utilize the Civil Rights Training posted on the [Materials & Resources page](#), under the Civil Rights tab and on the [SFSP Training](#) page.

[Non-discrimination Statement](#)  
[Translated Non-discrimination Statements](#)