Civil Rights Requirement Checklist

This checklist is designed to assist Child Nutrition Program Sponsors in determining their compliance with Civil Rights expectations for the National School Lunch Program. These areas will be reviewed in periodic administrative reviews conducted by the State Agency.

Assurances in Subrecipient Agreement	Yes (Common Practice)	No (Needs Improvement)
1. Does the Sponsor include the appropriate assurances of nondiscrimination language in its contracts and agreements for the school meal programs?	☒	☐
USDA "And Justice for All" Poster	**Yes (Common Practice)**	**No (Needs Improvement)**
1. Is the "And Justice for All" poster posted in a prominent location that is visible to all students in each school during meal services?	☒	☐
2. Are "And Justice for All" posters displayed in each translation of your identified common languages?	☒	☐
3. Please identify your Sponsor's common languages based on all sites operating underneath your Sponsorship.	*English & Spanish*	

Comments:

Insert Comments Here.

Non-Discrimination Statement	Yes (Common Practice)	No (Needs Improvement)
1. Do all materials that mention USDA programs contain the full, non-discrimination statement? *Examples include* flyers, brochures, pamphlets, parent/student handbooks, newsletters, school websites, enrollment forms, menus, approval/denial letters, verification letters, applications, or any other program materials distributed to the public and on the Sponsor's websites.	☒	☐
2. Do program materials translated into your identified common languages include a translated version of the non-discrimination statement?	☒	☐

	Yes	No
3. Is the exact wording of the USDA provided non-discrimination statement used?	☒	☐
4. Is the font size used no smaller than the text of the material?	☐	☒
5. Does your Sponsorship use the long statement on all required materials unless a legitimate business reason, as discussed with the State Agency, supports the use of the short statement? Note: According to USDA guidance, not enough space on the document is **not** considered a legitimate business reason to use the short statement in place of the long statement.	☒	☐
6. Does the Sponsor provide the nondiscrimination statement in frequently encountered languages and alternative formats to ensure all individuals are given meaningful and equal access?	☒	☐
7. Do graphic materials provided by the Sponsor reflect inclusiveness based on race, color, national origin, age, sex and disability?	☒	☐
8. Are all students allowed equal opportunities to participate in the Child Nutrition Programs regardless of race, color, national origin, sex, age, or disability?	☒	☐
9. Are all students within the same grade group offered the same selection of menu items in the same amounts, regardless of their eligibility, race, color, national origin, sex, age, or disability?	☒	☐

Comments:

Insert Comments Here.

Free/Reduced-Price Application Approval Process	Yes (Common Practice)	No (Needs Improvement)	Not Applicable
1. Denied free/reduced applications submitted to the Sponsor **are not** disproportionately composed of individuals representing a protected class.	☐	☐	Sponsor does not solicit eligibility applications (e.g., CEP, RCCIs, Provision 2, etc.) ☒

	Yes	No	
2. Admission procedures allow for all races/ethnicities to enroll in school and participate in the programs.	☒	☐	
3. No student is required to participate in the Child Nutrition Programs.	☒	☐	

Comments:

Insert Comments Here.

Confidentiality	Yes (Common Practice)	No (Needs Improvement)
1. Is free and reduced-price information used only for the school nutrition programs and other select education purposes?	☒	☐
2. Does the Sponsor obtain written consent from the students' parent/guardian to release application or eligibility information for purposes beyond foodservice?	☒	☐
3. Is overt identification of those eligible for the free/reduced price meals avoided at the point of service (POS)?	☒	☐

Comments:

Insert Comments Here.

Civil Rights Training	Yes (Common Practice)	No (Needs Improvement)	Not Applicable
1. Have all staff members involved in the operation of the Child Nutrition Programs attended the required Civil Rights Training?	☒	☐	
2. When was the Sponsor's most recent Civil Rights training for staff, and their supervisors, who interact with program applicants/participants?	*January 17, 2024*		
3. Have employees who interact with the public received training on the correct procedures to follow when a person with LEP requires an interpreter or translated materials?	☒	☐	

4. Have employees who interact with the public received training on the correct procedures to follow when a person with a disability requests an auxiliary aid or service or a reasonable modification?	☒	☐	
5. Does the Sponsor have documentation on file that verifies the attendance of all staff members?	☒	☐	
6. Does the Sponsor have a copy of the training materials used to conduct the Civil Rights Training on file?	☒	☐	All staff completed State provided training ☒

Comments:

Insert Comments Here.

Civil Rights Complaints	Yes (Common Practice)	No (Needs Improvement)	Not Applicable
1. Does the Sponsor have written policies and procedures outlining how the school/district will handle discrimination complaints?	☒	☐	
	Obtain a copy of the complaints processing policies and procedures.		
2. Have any Civil Rights complaints been received?	Yes	No	
	☐	☒	
3. Have any Civil Rights complaints received been appropriately forwarded to the State Agency?	Yes (Common Practice)	No (Needs Improvement)	Not Applicable (No Complaints Received)
	☐	☐	☒
4. Does the Sponsor keep discrimination complaints separate from program complaints and accessible only to authorized employees?	☒	☐	

Comments:

Insert Comments Here.

Race/Ethnicity Data Collection	Yes (Common Practice)	No (Needs Improvement)
1. Has the Sponsor submitted their annual FANS race/ethnicity data module?	☒	☐
2. Does the Sponsor primarily utilize self-identification as the method of race/ethnicity data collection?	☒	☐
3. Does the program application provide the parents with the appropriate notifications regarding collection of race and ethnicity?	☒	☐

Comments:

Insert Comments Here.

Limited English Proficiency (LEP)	Yes (Common Practice)	No (Needs Improvement)	Not Applicable
1. Does the Sponsor have written policies and procedures describing the services the Sponsor provides to persons with LEP?	☐	☒	
	Obtain a copy of the language access policies and procedures for review and concurrence.		
2. Are food service program materials translated into the Sponsor's identified common languages, giving meaningful access to all participants?	☐	☒	
3. Does the Sponsor provide a notice, in multiple languages, that provides direction on how to request and receive language assistance services, unencumbered?	☐	☒	
4. Has the Sponsor appropriately recorded and tracked requests made of them for interpretation services and translated program materials?	☐	☒	

5. What languages are materials translated in?	*Spanish*		
6. Did the Sponsor publish a public release as required?	☒	☐	Sponsor relies on State Agency issued Public Release ☒
7. Is the public release translated in your commonly used languages, giving meaningful access to all participants?	☐	☒	Sponsor relies on State Agency issued Public Release ☒
8. Does the Sponsor's policies and procedures for accommodating LEP individuals take literacy levels across languages into consideration?	☐	☒	
9. What types of language assistance services does your agency provide? (Select all that apply.)	☒ Qualified Bilingual staff ☐ Qualified In-house interpreters (oral) ☐ Qualified In-house translators (for documents) ☐ Qualified Contracted interpreters ☐ Qualified Contracted translators ☐ Qualified Telephonic interpretation services: Vendor Name:_____	☐ Video interpretation services ☐ Language bank or dedicated pool of qualified interpreters or translators ☐ Qualified volunteer interpreters or translators ☐ Qualified Interpreters or translators borrowed from another agency ☐ Other (Please specify):	

10. How does the Sponsor determine whether the linguists utilized are qualified to interpret or translate for individuals with LEP?	Certification	Professional Standards Verified by Contracts	No Method of Determining Qualifications
	☐	☐	☒

11. How frequently does the Sponsor rely on family and friends of the LEP person to interpret for them?	☐ Seldom	☒ Occasionally	☐ Frequently

12. Is free language assistance services offered prior to using the LEP customer's informal	Yes	No	
	☐	☒	

interpreter for communication purposes?			
13. How frequently does the Sponsor rely on children as interpreters?	☒ Seldom	☐ Occasionally	☐ Frequently

Comments:

We have qualified bi-lingual staff onsite that meet and are available to our families upon request.

Meal Modifications for Students with Disabilities	Yes (Common Practice)	No (Needs Improvement)
1. Does the Sponsor have written procedures for parents/guardians to request a Meal Modification for a child with disabilities?	☒	☐
2. Does the Sponsor have procedural safeguards included as a component of their written Meal Modification request process?	☒	☐
3. Where are your written procedures for requesting Meal Modifications made available for participants?	*Meal Modifications are submitted to our School Operations Manager and provided to our FSMC to accommodate*	
4. In which languages and alternative formats are these procedures made available for parents/guardians and participants with LEP or with disabilities?	*Spanish and are provided in-person, via email, and google form.*	
5. Have Child Nutrition Program staff received training related to Meal Modifications for Children with Disabilities?	☒	☐
6. Does the Sponsor have an assigned ADA or Section 504 Plan Coordinator who is responsible for receiving Meal Modification Statements?	☒	☐

Comments:

Insert Comments Here.

Accommodating Students with Disabilities	Yes (Common Practice)	No (Needs Improvement)
1. What policies and procedures are in place to provide reasonable modifications and auxiliary aids and services to ensure equal opportunity participation and equally effective communication for individuals with disabilities when accessing the Sponsor's programs and activities?	*Our Building was built ADA compliant and provides a clear and comprehensive national mandate that eliminates discrimination against all individuals with disabilities.*	
2. Has the Sponsor conducted a self-assessment of the disability access needs in the service area? If so, which auxiliary aids and services are available to serve individuals with communication disabilities?	☐	☒
3. Does the Sponsor provide a notice in multiple languages and in alternate formats that provides direction on how to request and receive auxiliary aids and services and reasonable modifications unencumbered?	☐	☒
4. Provide the name and contact information for the Sponsor's Section 504 and/or ADA Coordinator?	*Julio Giron – jgiron@kippmiami.org*	
5. What type of auxiliary aids and services do local agency staff utilize when communicating with individuals with disabilities? (Select all that apply)	☐ Qualified Sign Language Interpreter (In -person) ☐ Video Remote Interpreting Service ☐ Notetakers ☒ Large Print Materials ☒ Brailed Materials	☐ Screen Readers ☐ Assistive Listening Devices ☐ Closed Captioned Decoders ☐ Audio Recordings ☐ Other (Please specify):
6. Does the Sponsor contract with or employ qualified interpreter services so that interpreters and other aids and	☒	☒

services will be available on short notice?		
7. What are the <mark>Sponsor's</mark> policies and practices regarding the use of family, friends, and children as interpreters for individuals with disabilities?	*We never use family, friends, and children as interpreters, we have qualified staff members on-site to assist our families.*	
8. What is the local agency's policy on access for individuals with disabilities that rely on a service animal or miniature horse that is trained to assist with a physical or mental disability?	*N/A*	
9. How does the <mark>Sponsor</mark> ensure its websites are accessible to individuals with disabilities?	*We ensure that all websites and links are functional and accessible to all individuals.*	
10. How does the <mark>Sponsor</mark> record and track communication assistance or other reasonable modifications provided to individuals with disabilities?	*All staff and parent communications are recorded on our student data platform Deans List.*	
11. Describe the local agency's policies and procedures for handling instances where provision of an auxiliary aid and service or reasonable modification would result in a fundamental alteration to the program or activity or an undue financial burden.	*We provide our families with the opportunity to provide reasonable modification with proper documentation.*	
12. What is the local agency's policy regarding access for individuals with disabilities that rely on wheelchairs, mobility aids, or other power-driven mobility devices for assistance?	*Our Building was built ADA compliant and provides a clear and comprehensive national mandate that eliminates discrimination against all individuals with disabilities.*	

13. Is the local agency's facility accessible to individuals with physical disabilities?	☒	☐

Comments:

Insert Comments Here.