



Civil Rights

Your Responsibilities in the School Nutrition Programs

School Year 2026-27

CONNECTICUT
Education

Connecticut State Department of Education
Bureau of Child Nutrition Programs

July 2026

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Disclaimer

- The language in this PowerPoint addresses compliance with the U.S. Department of Agriculture (USDA) civil rights requirements and should not be modified

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Topics

- Civil Rights Overview
- Assurances
- Public Notification
- Data Collection
- Complaint Procedure
- Language Assistance
- Accommodations
- Customer Service
- Conflict Resolution
- Compliance Reviews/Resolution
- Required Training

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Civil Rights Overview

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Civil Rights Legislation

Law	Addresses
Title VI – Civil Rights Act of 1964	Race, color and national origin
Civil Rights Restoration Act of 1987	Clarifies scope of Civil Rights Act of 1964
Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act (ADA) of 1990, and ADA Amendments Act of 2008	Disability
Title IX of the Education Amendments of 1972	Sex (including gender identity and sexual orientation)
Age Discrimination Act of 1975	Age

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Civil Rights Program Requirements

- 28 CFR Part 42: Nondiscrimination in Federally Assisted Programs
- U.S. Department of Agriculture (USDA)
- Executive Order 13166: Addresses/improves access requirements for persons with Limited English Proficiency (LEP)

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Civil Rights Program Requirements, continued

- USDA LEP Policy Guidance (79 Federal Register No. 229. Friday, November 28, 2014)
- 7 CFR Part 16: “Equal Opportunity for Religious Organizations”

- USDA Regulation 4330-2: Prohibits discrimination in programs and activities receiving Federal financial assistance from USDA
- Bostock v. Clayton County, 140 S. Ct. 1731, 590 U.S.__(2020)

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Civil Rights Program Requirements Apply To

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Special Milk Program (SMP)

- Fresh Fruit and Vegetable Program (FFVP)
- Afterschool Snack Program (ASP)
- Seamless Summer Option (SSO) of the NSLP

<https://portal.ct.gov/sde/nutrition/school-nutrition-programs>

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Purpose of Civil Rights

- Equal opportunity to participate in and access benefits and services



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Civil Rights Goals

- Eliminate barriers that prevent or deter people from receiving benefits of a government sponsored/funded program
- Provide equal treatment in the delivery of programs and services to all applicants, participants and beneficiaries of a federal program



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Protected Classes

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Different Federal and State Protected Classes

- USDA classes
- CSDE classes



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CSDE Protected Classes Include All Federal Plus

- Race
- Color
- Religious creed
- Age
- Sex
- Pregnancy
- Sexual orientation
- Workplace hazards to reproductive systems, gender identity or expression
- Marital status
- National origin
- Ancestry

- Retaliation for previously opposed discrimination or coercion
- Intellectual disability
- Genetic information
- Learning disability
- Physical disability (including, but not limited to, blindness)
- Mental disability (past/present history thereof)
- Military or veteran status
- Status as a victim of domestic violence
- Criminal record in state employment

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Definition of Discrimination

The act of distinguishing one person or group of persons from others based on the protected bases

- Intentional, e.g., not accommodating a disabled child with a dietary need is verified by a recognized medical authority
- Neglect or omission
- Effect of actions or lack of actions, e.g., intentionally delaying approval of an eligibility application

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Assurances

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Written Assurance Required

- To qualify for federal financial assistance, all programs need a written assurance that the program or facility will be operated in compliance with the civil rights laws and implementing nondiscrimination regulations



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Agreements Between Local and State Agencies

- A civil rights assurance must be incorporated in **all agreements** between state and local agencies
 - Included in CSDE's Permanent Agreement for Child Nutrition Programs (CNP's)



<https://portal.ct.gov/sde/nutrition/school-nutrition-programs>

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Retailer/Vendor Agreements and Contracts

- Retailer and vendor agreements and contracts must also include an assurance of nondiscrimination

Example

If school food authority (SFA) contracts with food service management company (FSMC) to provide food service to students, SFA is responsible for ensuring that FSMC complies with civil rights requirements

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Contacts, MOU, and MOA

- Prescribed language must be included in all
 - Contracts
 - Memoranda of Understanding (MOU)
 - Memoranda of Agreement (MOA)



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Contacts, MOU, and MOA, continued

- Assurance is binding on program application and its successors, transferees, and assignees as long as they receive assistance or retain possession of any assistance from USDA



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Public Notification

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Public Notification Requirement

- Sponsors must notify the public of their participation in the USDA school nutrition programs
 - Program availability
 - Program rights and responsibilities
 - Policy of nondiscrimination
 - Procedure for filing a complaint
- Inform community of program and details
 - Eligibility
 - Benefits
 - Services
 - Facility location
 - Hours
 - Delivery points

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Examples of Public Notification Methods

- Internet
- Newspaper articles
- Radio and TV announcements
- Letters
- Bulletins



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Public Notification for Disabilities and LEP

- Provide appropriate information in alternative formats for persons with disabilities
- Provide appropriate information in appropriate languages for LEP persons



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Equal Opportunity in Photos and Graphics

- Convey equal opportunity in photos and other graphics in program-related information



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Include Required Nondiscrimination Statement

- Must be on all appropriate
 - publications
 - websites
 - posters
 - informational materials



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“And Justice for All”
(AJFA) Poster

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AJFA Poster Form AD-475-A

- All entities participating in CNPs must prominently display USDA’s “And Justice for All” (AJFA) poster where participants and potential participants have access
- Updated USDA AJFA posters are in production and will be distributed to all SFAs when available



<https://www.usda.gov/sites/default/files/documents/ad-475a.pdf>

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AJFA Poster for Classroom Meals

- Schools serving all meals in classroom can display posters in prominent locations throughout the school
 - bulletin board in building entrance
 - school office
 - another area frequently visited by parents/guardians and children
- Schools may copy posters and put one in each classroom



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AJFA Poster for School Year 2026-27

- Must prominently display in all facilities and locations that distribute CNP benefits or administer services
- May display AJFA posters dated September 2019 until new posters are received
- If the 2019 AJFA posters are not available for display, paper copies may be substituted as necessary if SFA has not received new posters (issued 2019)



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USDA Nondiscrimination Statement

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Current USDA Nondiscrimination Statement (NDS)

- Visit CSDE’s Nondiscrimination Statements webpage



<https://portal.ct.gov/sde/nutrition/nondiscrimination-statements>

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Where USDA NDS Statement is Required

- The most current nondiscrimination statement must be on
 - application forms
 - notification letters
 - state agency and SFA’s CNP webpages (English and Spanish)
 - information developed for public information



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When Short USDA NDS is Allowed

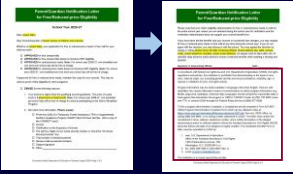
- Short statement can be used only in special circumstances (e.g., menu, one-page flier)
 - “This institution is an equal opportunity provider.”



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USDA NDS is Required for Vital Documents

- Vital documents about sensitive topics require full NDS, even if one page
- Example: CSDE’s sample parent/guardian notification letter for free and reduced-price meals has full USDA NDS on page 2

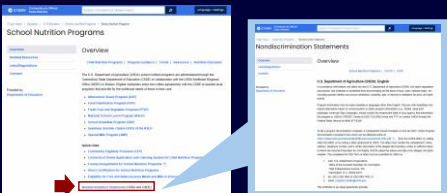


<https://portal.ct.gov/sde/nutrition/eligibility-for-free-and-reduced-price-meals-and-free-milk-in-school-nutrition-programs/parent-and-guardian-notification-letters>

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Sponsor Webpages with Information About CNPs

- Must include full statement or direct link to full statement



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Data Collection

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Data Collection Requirements

- Develop method for data collection on racial/ethnic breakdown of potential participants (free and reduced applications or data collected by school officials)
- Sources include census or public school enrollment



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Maintaining Data

- Any data collected about beneficiaries must be kept secure and confidential
- Maintain all records
 - Current to 3 years prior



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More Information About Records Retention

- Records Retention Requirements for the School Nutrition Programs



https://portal.ct.gov/-/media/sde/nutrition/nsfp/adminrev/records_retention_snp.pdf

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Data Use

- To determine how effectively CNPs are reaching potentially eligible persons and beneficiaries
- Outreach efforts can be targeted
- Information is used for statistical purposes only and has no effect on eligibility criteria
- Verification of citizenship or immigration status should **never** give rise to discrimination

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Complaint Procedures

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Right to File a Complaint

- Any person alleging discrimination based on race, color, sex, age, national origin or disability has a right to file a complaint within 180 days of the alleged discriminatory action



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Written Complaint Procedure Required

- SFA must have a written formal procedure for receiving and processing complaints alleging discrimination within FNS programs (NSLP, SBP, SMP, FFVP, ASP)
- SFAs must use CSDE-issued Civil Rights Complaint Procedures for School Nutrition Programs, dated December 2025
- The procedure as written cannot be edited

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CSDE Resource

Civil Rights Complaint Procedures for School Nutrition Programs



https://portal.ct.gov/-/media/sde/nutrition/civilrights/civil_rights_snp_complaint_procedures.pdf

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Providing Procedures to Complainant

- SFA will provide complainant with information pertaining to filing a program discrimination complaint as a USDA customer
- Nondiscrimination statement provides instructions (English and Spanish)
- SFA will refer complainant to FNS Civil Rights website

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Where to Submit Complaints

- All civil rights complaints shall be accepted and forwarded to USDA Office of the Assistant Secretary for Civil Rights (OASCR)
 - mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; or
 - email: program.intake@usda.gov

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Filing Complaints

- Individuals must file a complaint within 180 days from the act of discrimination
- Complaints may be written or verbal
- Never discourage groups or individuals from filing complaints or from voicing allegations of discrimination
- Notify CSDE that a complaint has been or may be filed

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Filing Complaints, continued

▪ Maintain tracking log of complaints received and forwarded to OSCAR

▪ Procedures for receiving a complaint should not prevent a complaint from being accepted

▪ SFA must not attempt to resolve the complaint themselves

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Verbal Complaints

▪ If complainant will not put the complaint in writing, SFA must do so

▪ Use USDA Discrimination Complaint Form to ensure all required information is captured

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USDA Discrimination Complaint Form: English

Form AD-3027

U.S. Department of Agriculture USDA Program Discrimination Complaint Form



<https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>

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USDA Discrimination Complaint Form: Spanish

Form AD-3027S

Departamento de Agricultura de Estados Unidos Formulario de quejas por discriminación en los programas del USDA



<https://www.usda.gov/sites/default/files/documents/ad-3027s.pdf>

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Language Assistance

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Limited English Proficiency (LEP)

▪ LEP individuals

- Do not speak English as their primary language
- Have limited ability to read, speak, write, or understand English

▪ SFAs must take “reasonable steps” to ensure meaningful access to their programs and activities by a LEP person

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Reasonable Steps to Ensure Meaningful Access

- Providing documents in a variety of languages (translation)
- Providing interpretation services to those that need help in completing applications

- Providing verbal information for individuals who are unable to read the written information provided

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What Constitutes “Reasonable Steps” Depends On

1. Number or proportion of LEP persons eligible to be served or likely to be encountered within the area serviced by the recipient

2. Frequency with which LEP individuals come in contact with the program

3. Nature and importance of the program, activity, or service provided by the program

4. Resources available and their costs

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Meaningful Access

- Accomplished by providing reasonable, competent/qualified, accurate, and effective language services to individuals with LEP when accessing recipient programs and activities



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Providing Language Assistance

- USDA provides application forms in many foreign languages (refer to link below)
- Foreign language teachers and community organizations may have resources to help with translations (written and verbal)

- May use volunteers but make sure they are competent/qualified, understand interpreter ethics, and maintain participant confidentiality
- Cannot use children as interpreters

<https://www.fns.usda.gov/schoolmeals/model-application/translations>

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Provide Documents/Services in Predominant Languages

- SFAs must identify their district’s predominant languages and provide documents or services to participants and their families in those languages

Documents or Services

- Free and reduced-price applications
- Notification letters
- Interpretive services for parent questions

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LEP Taglines

- A phrase in different languages that guides a person to where they can obtain language assistance services

Hello iHola! Bonjour
Olá Привет こんにちは
你好 مرحباً Hallo
Xin chào Hej Merhaba
Γεια σου Dzień dobry מֶלֶךְ
Habari Dia duit ஸ்டீ
ਸਤ ਸ੍ਰੀ ਅਕਾਲ வணக்கம் ഹലോ

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Top Six Languages Spoken in Connecticut Schools

Spanish

Portuguese

Arabic

Chinese Mandarin

Polish

Haitian-Creole

October 2023 Public School Information System (PSIS) Data Collection

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Sample Taglines

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Taglines and Providing Meaningful Access to the Child Nutrition Programs

https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/freered/taglines_providing_meaningful_access_cnps.pdf

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LEP Accessibility for District Websites

Does the website have the ability to provide information in another language?

Would an LEP individual be able to find out how to access the webpage in another language?

Work with your IT department to make the district website more accessible to LEP persons

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Website LEP Examples

If Spanish was your native language and you could not read English, which format would be the most helpful to indicate the website was available in other languages?

Example 1

Example 2

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Website LEP Examples: Answer

If Spanish was your native language and you could not read English, which format would be the most helpful to indicate the website was available in other languages?

Example 2

Shows language options recognizable to LEP individual

Work with district/school website designer to see if website has capability to offer language assistance in this way

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English Learner/Multilingual Learner (EL/ML) Website

English Learners and Bilingual Education Statues

Connecticut English Language Proficiency (CELP) Standards

English Learners Data Bulletin

<https://portal.ct.gov/sde/english-learners/english-learner-multilingual-learner>

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Accommodations

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Laws Prohibit Disability Discrimination

- Sections 504 and 508 of the Rehabilitation Act of 1973 and 7CFR Part 15b, prohibit discrimination based on disability in programs or activities receiving Federal financial assistance
- The ADA, 28 CFR Part 35, Title II, Subtitle A, prohibits discrimination on the basis of disability in all services, programs and activities provided to the public by State and local government

These civil rights laws protect persons with disabilities if they are potential applicants or participants in any FNS funded programs

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Definition of Person with a Disability

- Has a physical or mental impairment which substantially limits one or more major life activity, has a record of such an impairment, or is regarded as having and impairment

Source: Section 504 of the Rehabilitation Act of 1973 and the American with Disabilities Act (ADA) of 1990, and the ADA Amendments Act of 2008 (P.L. 110-325)



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SFAs Must Ensure Accessibility: Websites

- Imperative that SFA websites and online application systems are readily accessible to and useable by persons with visual impairments and other disabilities



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SFAs Must Ensure Accessibility: Buildings and Facilities

- Programs must ensure physical accessibility for buildings and facilities, particularly to persons in wheelchairs and with mobility disabilities



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SFAs Must Ensure Accessibility: Different/Special Treatment

- In some cases, different or special treatment may be necessary to ensure effective aids, benefits and services are reasonable



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Examples of Accommodations

- Access for persons in wheelchairs and other mobility limitations
- Access for those with limited vision
- Using American Sign Language (ASL) and interpreters

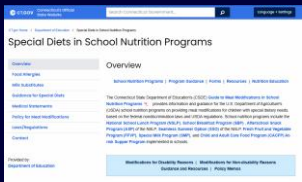
- Substitutions for participants whose disability restricts their diet (meal modifications)

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CSDE Webpage

Special Diets in School Nutrition Programs

- Guide to Meal Modifications in School Nutrition Programs
- Summary Chart: Overview of USDA Requirements
- Medical Statement
- Guidance and Instructions for Medical Statement
- Allowable Milk Substitutes
- Training links
- Additional Resources



<https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs>

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Customer Service

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Importance of Customer Service

- Good customer service reduces chances of discrimination complaints



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Tips for Customer Service

- Be courteous and thoughtful
- Be patient and listen carefully
- Treat all students equally
 - No seating arrangements, serving lines, services and facilities, or eating periods separated by protected class



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Conflict Resolution

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Conflict Resolution Requirements

- Must be covered in SFA's Civil Rights procedures
- Include how SFA will process a complaint with the goal of providing a solution with assistance of state agency and USDA, as needed



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Required Training



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USDA Requires Annual Civil Rights Training

- For all staff who work with program applicants or participants
 - Food service staff
 - Front line staff
 - Supervisors
 - Determining officials, verifying officials, and hearing officials



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Required Training Topics

- Data collection and use
- Effective public notification
- Complaint procedure
- Compliance review techniques
- Resolution of noncompliance
- Reasonable accommodations for disabilities
- Language assistance
- Conflict resolution
- Customer service

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CSDE Training Resource

- This PowerPoint presentation is available for SFAs to provide staff training
- "Presentation" section of CSDE's Civil Rights for School Nutrition Programs webpage



<https://portal.ct.gov/sde/nutrition/civil-rights-for-child-nutrition-programs/civil-rights-for-school-nutrition-programs#Presentation>

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Document Staff Training

- Document training for each staff member as part of USDA's Professional Standards training requirements



<https://portal.ct.gov/sde/nutrition/professional-standards-for-school-nutrition-professionals>

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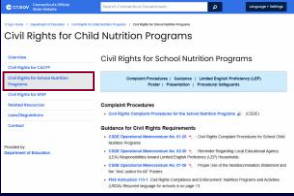


Resources

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CSDE Webpage: Civil Rights for Child Nutrition Programs

- Civil Rights for School Nutrition Programs section



<https://portal.ct.gov/sde/nutrition/civil-rights-for-child-nutrition-programs/civil-rights-for-school-nutrition-programs>

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CSDE School Nutrition Programs Staff

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Contact Information for CSDE Staff

- CSDE Resource: County Assignments for School Nutrition Programs



<https://portal.ct.gov/-/media/sde/nutrition/cnstaff/countyassign.pdf>

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Questions

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USDA NDS

In accordance with federal civil rights 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 (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2500 (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: <https://www.usda.gov/sites/default/files/documents/ad-3027.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:

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: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov.

This institution is an equal opportunity provider.

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CSDE NDS

The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of race; color; religious creed; age; sex; pregnancy; sexual orientation; workplace hazards to reproductive systems, gender identity or expression; marital status; national origin; ancestry; retaliation for previously opposed discrimination or coercion, intellectual disability; genetic information; learning disability; physical disability (including, but not limited to, blindness); mental disability (past/present history thereof); military or veteran status; status as a victim of domestic violence; or criminal record in state employment, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes. Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Attorney Louis Todisco, Connecticut State Department of Education, by mail 450 Columbus Boulevard, Hartford, CT 06103-1841; or by telephone 860-713-6594; or by email louis.todisco@ct.gov.

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