

**ADMINISTRATION**

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**1. Civil Rights Assurance—The sponsor has a statement of assurance for Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- A signed copy of the ODE agreement to operate Child Nutrition Program(s) as a sponsor.
- The board of directors, oversight body or sponsor’s authorized representative has accepted responsibility of compliance with Title VI and Title VII of the Civil Rights Act of 1964 and all related rules and regulations, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.

- Copy of the signed ODE-sponsor agreement
- Copy of Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 or a combined assurance document
- Copy of the school board or board of director’s meeting minutes, or a document with the sponsor’s authorized representative’s signature authorizing the agreement

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**2. Public Announcement of USDA Policy of Nondiscrimination—The institution has adopted a policy of nondiscrimination and has met the regulatory requirements for public notification of this policy for Child Nutrition Programs.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- Prior to the beginning of each Program year, the sponsor advises all potential and actual Program participants, employees and the general public that USDA Child Nutrition Program benefits will be offered without discrimination.
- The public announcement includes all required language specified in 7CFR 245.5 for the National School Lunch Program, School Breakfast Program and Special Milk Program; in 7CFR 225.15(e) for the Summer Food Service Program; and in 7CFR 226.23(d) for the Child and Adult Care Food Program.

- Copy of media announcement/notice or news article(s) announcing Child Nutrition Program benefits to potential and actual Program participants, parents and employees in the sponsor’s service area (may be ODE release or sponsor release)
- Copy of any media announcement/notice or news articles printed in languages other than English (may be ODE release or sponsor release)
- Copy of sponsor’s media release provided to local media
- Other public notifications (radio, newspaper, fliers)

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**3. The sponsor has met the regulatory requirements for providing meaningful access to Program benefits to all eligible persons in the service area.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- The sponsor provides written materials and translations of all written materials, and/or translators or interpreter services and/or minority or migrant family advocates, as needed, to convey Program benefits to every potential and actual Program participant and family without regard to race, color, national origin, sex, age or disability.
- For each Limited English Proficient (LEP) language group eligible to be served with less than 100 persons, the sponsor has, at a minimum, provided written notice of the right to receive oral translations of written materials in the primary language of that language group.
- Written Program materials are translated for each eligible LEP language group that constitutes ten percent or 3000, whichever is less, of the population eligible to be served.
- Vital documents are translated for each eligible LEP language group that constitutes five percent or 1000, whichever is less, of the population eligible to be served. (Vital documents include application and enrollment forms; consent forms; letters & notices about reduction, denial, termination of benefits and appeal rights; letters & notices that require a response from the beneficiaries; and notices and information about no-cost language assistance.)
- Applications and notification of Program benefits are effectively distributed to all potential Program participants prior to the start of the Program year.

- Procedure or policy that describes how the sponsor provides Program services and information to all eligible persons in the sponsor's service area without regard to race, color, national origin, sex, age or disability
- Procedure or policy that describes how the sponsor takes reasonable steps to provide Program services and information in appropriate languages other than English
- Description of method for disseminating Program promotional materials, notifications, announcements, applications and letters
- Description of procedure for notifying visually and hearing impaired persons of Program benefits
- Copy of bulletins, application forms, notification letters, promotional materials, fliers, school or Program newsletters describing Program benefits and procedure for participating in the Program(s)
- Description of method the sponsor uses to determine the number of LEP language group persons eligible to participate in the Program(s) in the sponsor's service area relative to the general population of the service area
- Copies of all media announcement(s) published in the Program service area(s) announcing availability of Program benefits and eligibility criteria

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**4. Complaint Policy & Procedures—The sponsor has adopted and disseminated a discrimination complaint policy and procedure for employed personnel, Program participants and potential Program participants that meets the requirements of Title VI, and Title VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- The board of directors or the sponsor’s oversight body has adopted a discrimination complaint policy and procedure.
- The institution has taken steps to notify applicants, participants, potential applicants and participants, parents and employees of the appropriate procedures to follow when filing a discrimination complaint.
- The name, and contact information for the person(s) designated to coordinate civil rights compliance activity for the sponsor is made available to applicants and participants, potential applicants and participants, parents and employees.
- The Child Nutrition Programs “And Justice for All” poster is displayed prominently in all service delivery areas.
- Program staff is trained to understand individuals’ right to file a complaint, the complaint procedure and their specific responsibilities in the procedure, i. e. how to practice what they know.

- Student or participant handbook(s) detailing complaint procedures
- Employee handbook detailing complaint procedures
- Board of Directors policies and/or meeting minutes adopting complaint procedures
- Sponsor’s policies and procedures manual
- Copy of the sponsor’s complaint procedures
- Completed complaint log showing the date complaint is received, the nature of the complaint, and the date the complaint is forwarded to ODE or USDA for investigation and/or resolution
- Copies of Program notices/announcements identifying civil rights compliance coordinator(s)
- Site monitoring documentation showing “And Justice for All” poster requirement was met at all sites
- Dates of Program staff training on Civil Rights, names of attendees, agenda and results of post-tests

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

## ACCESS AND PARTICIPATION

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**5. Program Access—The sponsor provides all Child Nutrition Program meals and supplements in such a manner that does not discriminate on the basis of race, color, national origin, sex, age or disability.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators for Compliance:

- The scheduling and availability of Child Nutrition Program services indicate all children and adult participants have equal opportunity to participate.
- Applications for Child Nutrition Program benefits indicate the number of minorities, males, females and individuals with disabilities are proportionate to the total district enrollment or population of the service area.
- Site selection does not discriminate against any person on the basis of race, color, national origin, sex, age or disability.
- Point of service meal counting procedures are not discriminatory.
- The sponsor has a written policy describing the method used to provide reasonable accommodations to persons with disabilities for all Program services and Program-related meetings.

- Copy of meal/snack scheduling for all Program sites
- Copies of all applications including denied and terminated applications
- Copy of site selection sheet
- Written meal counting and claiming procedures for all sites
- Notices of all Program services and related activities or meetings communicating the availability of special accommodations for persons with disabilities

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**6. Program Recruitment and Outreach—The sponsor uses promotional, recruitment, and operational procedures for Child Nutrition Programs that do not discriminate, exclude or limit opportunities on the basis of race, color, national origin, sex, age or disability.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>▪ All promotional, recruitment and hiring materials portray minorities, males, females and individuals with disabilities in a manner that avoids stereotypes and assures equity.</li> <li>▪ Recruitment and outreach materials contain the notice of equal employment opportunity and nondiscrimination in hiring requirements.</li> <li>▪ Child Nutrition Program materials, resources, and instructional materials reflect multicultural and gender-fair concepts, and do not contain gender-biased language.</li> <li>▪ The institution has a written policy and procedure that ensures equal opportunity in Child Nutrition Program(s) for participants and potential participants with limited English proficiency (LEP).</li> <li>▪ Menus are developed to meet specific cultural, ethnic and age-appropriate preferences.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Copies of promotional/outreach materials (pamphlets, fliers, videos)</li> <li><input type="checkbox"/> Copies of job announcements</li> <li><input type="checkbox"/> Recruitment, hiring and participation criteria</li> <li><input type="checkbox"/> Copies of program training materials</li> <li><input type="checkbox"/> Policies and procedures that address the needs of LEP children, their families and other potential program participants</li> <li><input type="checkbox"/> Policies and procedures that address the needs of hearing-disabled, blind and/or other disabled potential program participants</li> <li><input type="checkbox"/> Copies of menus and recipes</li> <li><input type="checkbox"/> Copies of purchased food specifications</li> </ul> |
|--|--|

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**7. Accessibility of Program Services and Facilities—The institution has made reasonable efforts to make all facilities that serve Child Nutrition Programs accessible to and usable by individuals with disabilities.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

C	NC	NA

Indicators of Compliance:

- Facilities and service areas that offer Child Nutrition Program services are accessible to and usable by individuals with disabilities.
- Alternative methods of delivering Program benefits are implemented when it is not reasonable to alter construction of service delivery areas for individuals with disabilities.
- The sponsor provides a public notice to interested parties regarding the existence and location of services, activities and facilities that are accessible to and usable by individuals with disabilities.

- Copy of sponsor notice to the public of all services, activities, and facilities that are accessible for individuals with disabilities
- Copy of the sponsor’s ADA corrective action/transition plan (if applicable)
- Schedule for additions and renovations, if applicable
- Description of alternative method of delivering Program services and/or making Program benefits equally effective to individuals with disabilities when it is not reasonable to make alterations to buildings with accessibility limitations

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**8. Employment—The personnel policies of the sponsor do not discriminate on the basis of race, color, national origin, sex, age or disability.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

Indicators of Compliance:

C	NC	NA

- Personnel policies, procedures and practices indicate employees and applicants for employment are not subject to discrimination by the sponsor.
- Applications for employment contain the notice of equal employment opportunity and nondiscrimination in hiring requirements.
- Job descriptions for all positions are bias-free when describing duties and responsibilities.
- Recruitment policies and procedures for hiring are nondiscriminatory.
- Policies and procedures for promotions, transfers and granting of tenure are nondiscriminatory.
- Staff demographics by race, gender and disability reflect the general population of the community.
- The salary schedule reflects an objective policy and procedure for compensation of employees.

- Copy of personnel policies/procedures
- Copy of all applications for employment
- Job descriptions
- District salary schedule
- Copy of published job announcements/advertisements

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.



Standard	Status	Suggested Documentation <sup>1</sup>
----------	--------	--------------------------------------

**9. Harassment—The sponsor has adopted and disseminated a policy of nondiscrimination that prohibits all forms of harassment.**

Please check:  
 C = Complied  
 NC = Noncompliance  
 NA = Not Applicable

Indicators for Compliance:

- The sponsor’s board of directors or oversight body has adopted a policy that prohibits all forms of harassment, including any form of harassment between Program participants.
- The sponsor annually notifies the staff and Program participants of its policy against harassment.
- The sponsor has adopted a dissemination plan for its harassment policies.

C	NC	NA

- Copy of the sponsor’s harassment policy
- Copy of the harassment complaint policy, procedures and forms used to document complaints of harassment
- Copy of staff, student, parent or participant handbook(s) describing the harassment policy
- Copy of the dissemination plan
- Evidence that copies of Title VI and Title VII of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972 are available for program staff and participants for reference, as needed
- Evidence of annual policy notification to staff and participants

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm.

---

**OPTIONAL**

Standard	Status	Suggested Documentation
----------	--------	-------------------------

<sup>1</sup> Some of these documents may be required. Refer to specific CNP regulations to confirm