VISION

To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

MISSION

To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community
Learning Objectives

- SFSP Extension / USDA Waivers
- Monitoring
- Public Notification
- Production Books
- After School Snacks
- Meal Pattern
- OVS
- Meal Distribution Off Campus
- Counting & Claiming

- Staff Training
- Budget
- Civil Rights
- Reporting Requirements
- Open Discussion
SFSP Extension & USDA Waivers
USDA’s Food and Nutrition Service (FNS) extended nationwide waivers for the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO)

- Waivers expire on June 30, 2021
- May end sooner if funding is expended
<table>
<thead>
<tr>
<th>Title</th>
<th>#</th>
<th>Expiration Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nationwide Waiver to Allow <strong>SFSP and SSO Operations Through SY 2020-21</strong> – EXTENSION</td>
<td>59</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to <strong>Allow Reimbursement for Meals Served Prior</strong> to Notification of Approval and Provide <strong>Flexibility for Pre-Approval Visits</strong> in the SFSP - EXTENSION</td>
<td>69</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Allow <strong>OVS</strong> Flexibilities in the SFSP - EXTENSION 2</td>
<td>67</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver of <strong>Meal Service Time Restrictions</strong> in the SFSP and the NSLP SSO - EXTENSION 2</td>
<td>66</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Waive <strong>First Week Site Visits</strong> in the SFSP - EXTENSION 2</td>
<td>65</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Allow <strong>Area Eligibility for Closed Enrolled Sites</strong> in the SFSP and NSLP SSO - EXTENSION 2</td>
<td>64</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Allow <strong>Meal Pattern Flexibility</strong> in the SFSP and the NSLP SSO - EXTENSION 8</td>
<td>63</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Allow <strong>Parents and Guardians to Pick Up Meals</strong> for Children - EXTENSION 5</td>
<td>62</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Allow <strong>Non-Congregate Feeding</strong> in the SFSP and SSO - EXTENSION 5</td>
<td>61</td>
<td>6/30/2021</td>
</tr>
<tr>
<td>Nationwide Waiver to Extend <strong>Area Eligibility Waivers</strong> - EXTENSION 3</td>
<td>60</td>
<td>6/30/2021</td>
</tr>
</tbody>
</table>
The following Waiver Applications MUST be submitted to the SA in order to participate in the Waiver

- **Area Eligibility** *(you will need this if you have sites below 50% F/R)*
- **Parent Pick Up** *(you may have one already approved for NSLP or unanticipated school closure, but you need a new one for Fall 2020 SFSP)*
- **Meal Pattern** *(LIMITED Circumstances)*

REMINDER: You don’t need a waiver in order to implement OVS; but contact your PS if you plan to implement. OVS is not appropriate for all types of distribution models.
Questions
Pre – Operational Visit

• We recognize that many of you were not able to conduct these visits this year
• Typically for new or problematic sites

First Week Visit

• Waived for SY 20/21 by USDA Waiver # 65

2nd Visit (1st – 4th week of operation)

• **Still a requirement! Don’t forget to conduct!**
• Remember, the Program Year started over on 10/1/2020
Site Review – Between 1st & 4th week of Operation

• Obtain copy of the Site Review Form from Monitoring Guidance (Pg. 28)

• 3-page document

• **Good Idea!** – Take this form with you on your monitoring visit. You only have to record this information once for each site. It does not have to be recorded daily.

• **Another Option** – Closed enrolled sites operating during the 20/21 SY could use district collected racial/ethnic data.
Questions
PUBLIC
NOTIFICATION
• Remember, with SFSP, it is important to advertise your program.
• Don’t forget the non-discrimination statement! (Even on Social Media)
• Retain copies of your media releases and advertisements and make a note of when and how they were distributed
For Closed-Enrolled Sites:

• You must notify student households

For Open Sites:

• Information regarding the meal service at open sites must be publicized in the community served.
• There are multiple platforms to promote a program (news release, social media, radio, etc.), although none are prescribed.
• Pick what works for your district. You can do as much promotion or as little as you would like, but you must advertise the program in some manner.
Questions
PRODUCTION BOOKS
Question: To record production, can I use the Red Book or print pages from the SFSP yellow book?

Answer: Either! Just be sure staff is aware of the SFSP meal pattern requirements, is fully recording production, and the documentation is organized and “review ready”
In this example, the site was only serving lunch (no breakfast). But they have not served enough fruit/veg!
In this example, the site is serving breakfast and lunch, but they have not clearly indicated which fruit/veg was served at breakfast!
Questions
Marianna Chauvin

Division Director II, School Support
mchauvin@mdek12.org
Which program do I use? How do I get paid?
• USDA has issued guidance which allows you to serve snacks under the NSLP, even if you are serving both breakfast and lunch through the SFSP.

• We were not previously authorized to do this, and several districts have been pursuing CACFP At Risk meals in order to provide snacks.
7. Can the NSLP afterschool snack service operate simultaneously with SFSP/SSO?

Yes. The NSLP afterschool snack service, which operates during the regular school year, may operate simultaneously with the SFSP/SSO during implementation of Nationwide Waiver to Allow Summer Food Service program and Seamless Summer Option Operations through School Year 2020-2021 – EXTENSION, October 9, 2020 [https://www.fns.usda.gov/cn/covid-19-response-59]. As noted in SP 13, CACFP 07, SFSP 06-2020: Child Nutrition Program Nationwide Waivers: Questions and Answers, issued April 11, 2020, [https://www.fns.usda.gov/cn/covid-19/nationwide-waivers-qas]. Program operators may participate in multiple Programs. However, in no circumstances may children receive more than the numbers of reimbursable meals allowed in each Program for which they are eligible. Although schools generally must operate the NSLP in order to operate the NSLP afterschool snack service, FNS recognizes that for the duration of operations under the waiver, schools may be serving breakfasts and lunches through SFSP/SSO.

Similar to the at-risk afterschool meals component of the CACFP, schools that are offering non-congregate meals may meet the requirement to offer an enrichment activity with the NSLP snack service virtually or in other non-congregate ways. See Question 18 of SP 24, CACFP 13, SFSP 13-2020: Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 – #5, issued August 21, 2020, [https://www.fns.usda.gov/disaster/pandemic/covid-19/questions-and-answers-child-nutrition-programs-during-sy-2020-21].
SFSP

MEAL PATTERN

Breakfast and Lunch
For a breakfast to be a reimbursable meal, it must contain:

<table>
<thead>
<tr>
<th>1 cup of Milk (LF or FF)</th>
<th>½ Cup of Fruit/Veg, or 100% Juice</th>
<th>One Serving of Grain</th>
<th>OPTIONAL serving of Meat/Meat Alt may be served</th>
</tr>
</thead>
</table>

No Nutrient Analysis Necessary!
For a lunch to be a reimbursable meal, it must contain:

<table>
<thead>
<tr>
<th>1 cup of Milk (LF or FF)</th>
<th>Two Fruits/Veg to equal ( \frac{3}{4} ) cup</th>
<th>One Serving of Grain</th>
<th>1 Meat/Meat Alt (2 oz)</th>
</tr>
</thead>
</table>

No Nutrient Analysis Necessary!
Unless you are implementing OVS (discussed in the next section), each meal must contain all required elements, including milk!
Be thoughtful about sending multiple meals at one time!

- Some of you are sending multiple meals out at one time.
- USDA has developed a resource to help you stay on meal pattern, with health/safety concerns, etc…

SFSP OVS
OVS in the Time of COVID

• This is new territory for all of us! OVS is not typically allowed in the SFSP.

• However, due to USDA waiver #67, you may be able to implement OVS with the SFSP meal pattern in certain situations!
OVS is not intended to be a way to circumvent meal pattern requirements or eliminate specific components!!!
Talking Specifically About Milk Here!!!!
You CANNOT pre-package all other components and allow the child to refuse just the milk and call that OVS!
OVS is unlikely to work in the following situations:

- Grab&Go Scenarios in which food is pre-packaged and picked up outside the cafeteria
- Curbside Pickup
- Bus delivery
- Meals delivered to the Classroom

If you have a plan to implement OVS in these scenarios, PLEASE contact your Program Specialist to discuss your plan.
OVS is most likely to be successful in the following situations:

- Food is picked up in the cafeteria – students have the ability to pick which components go on their tray or in their bag
- Some type of meal ordering system in which students are given specific instructions on how to order a reimbursable meal

REMINDER: Simply allowing students to refuse milk is NOT OVS
Breakfast - OVS

Allowable for SFSP during the 20/21 SY
Four (4) food items must be **offered** on the menu:

- One (1) serving of fruit/vegetable
- One (1) serving bread/bread alternate,
- One (1) serving of fluid milk, and
- One (1) additional serving of fruit/vegetable, bread/bread alternate **or** a serving of a meat/meat alternate
<table>
<thead>
<tr>
<th>Items that must be offered</th>
<th>Minimum Amount</th>
<th>Required to offer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruit or Vegetable*</td>
<td>½ cup</td>
<td>✓</td>
</tr>
<tr>
<td>Bread or Bread Alternate</td>
<td>1 Serving</td>
<td>✓</td>
</tr>
<tr>
<td>Milk</td>
<td>1 cup</td>
<td>✓</td>
</tr>
<tr>
<td>One additional serving of either:</td>
<td>1 serving</td>
<td>✓</td>
</tr>
<tr>
<td>fruit/veg/bread/meat/meat alternative</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Fruit or vegetable juice must be full-strength.
• All food items offered must be different from each other.

• A child must take at least three (3) of any of the four (4) food items offered and may choose to take all four items.

• Two servings of the same item is not permissible under OVS in SFSP.
Does this MENU meet SFSP OVS requirement?

- Banana
- 2 Servings of Toast
- Milk

Menu Acceptable? NO
Does this menu meet SFSP OVS requirement?

- Banana
- Toast
- Yogurt
- Milk

Menu Acceptable? Yes
This is what the student selected from the menu. Is this meal reimbursable?

Reimbursable Meal? NO
Lunch - OVS

Allowable for SFSP during the 20/21 SY
Four (4) food components must be offered through at least five (5) different food items:

- One (1) serving of meat/meat alternate
- Two (2) serving of fruit and/or vegetables (two different food items)
- One (1) serving of bread/bread alternate
- One (1) serving of fluid milk

All Food items offered must be different from each other

A child must take at least 3 food **components** (but may choose to take all five items)
**Meal Pattern Requirements: Lunch**

<table>
<thead>
<tr>
<th>Item Quantity</th>
<th>4 Components (5 different food items)</th>
<th>Minimum Amount</th>
<th>Required to offer</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Fruit or Vegetable*</td>
<td>3/4 cup</td>
<td>✓</td>
</tr>
<tr>
<td>1</td>
<td>Bread or Bread Alternate</td>
<td>1 Serving</td>
<td>✓</td>
</tr>
<tr>
<td>1</td>
<td>Milk</td>
<td>8 ounces</td>
<td>✓</td>
</tr>
<tr>
<td>1</td>
<td>Meat/Meat Alternate</td>
<td>2 ounces</td>
<td>✓</td>
</tr>
</tbody>
</table>

*Fruit or vegetable juice must be full-strength. Full strength vegetable or fruit juice may be counted to meet not more than one-half of this requirement.*
Does this menu meet SFSP OVS requirement?

**Total Components: 4**
1. Meat
2. Fruit/Veg
3. Milk
4. Grain

**Total Items: 5**
1. Meat
2. Fruit
3. Veg
4. Milk
5. Grain

Menu Acceptable?  Yes
Student Selection - Lunch OVS

Total Components: 2
1. Meat:
2. Fruit/Veg

Total Items: 3
1. Meat
2. Fruit
3. Veg

Reimbursable Meal? NO
Student Selection – Lunch OVS

**Total Components: 3**
1. Fruit/Veg
2. Grain
3. Meat/MA

**Total Items: 4**
1. Meat/MA
2. Fruit
3. Veg
4. Grain

Reimbursable Meal? YES!
DELIVERING MEALS
OFF CAMPUS

Non-School Sites, Bus Deliveries,
Community Distribution Sites
Many schools are delivering meals into their communities to ensure virtual enrolled students, and even non-enrolled children in the community have access to meals.

These strategies are allowable for the SFSP during the 20/21 SY:

- Door-to-Door Bus Delivery
- Dropping meals at designated distribution sites in the community
- Non-School Sites
Door-to-Door Delivery on Buses

- Make sure you have notified the SA.
- Must provide the number of buses and an estimated number of households reached.
- You do NOT have to provide the SA with addresses of each house or bus stop, as long as the bus is following the same route it would follow during the regular school year.
In order to operate a Non-School Site (and have it listed as a site in MARS), you must meet one of the following criteria:

- The site must have operated previously under SFSP, or
- Have a current health permit from MSDH
• If you have a site in the community that does not meet the afore-mentioned criteria for a non-school site, you still have an option to deliver meals to this site via bus.

• You would simply park the bus in the location for a designated and advertised amount of time, allowing children/families to approach the bus to collect a meal.

• You MUST notify the SA if you are using this approach. You MUST provide addresses and distribution times.
Delivery Receipts and Meal Counts

- All external (off campus) distribution methods **must** utilize and retain delivery receipts **in addition** to the meal count forms.
- Even if food is picked up rather than delivered, the delivery receipt still required.
- You can use the SA template or produce your own.
Comparison of Meal Count Sheets and Delivery Receipts

Sample Daily Meal Count Form

SUMMER FOOD SERVICE PROGRAM

Managing the Meal Service

Central Kitchen Name: __________________ Date of Delivery: __________
Site name: __________________ Meal Type (please circle one): B L S Snack

To be completed by the Central Kitchen Representative:

Individual

Serving Size

Quantity Sent

Temperature at Central Kitchen

Time the Food left the Central Kitchen

Signature of Central Kitchen Representative: __________________ Date: __________

To be completed by the Site representative:

Signature of Site Supervisor: __________________ Date: __________
• You are not required to complete a delivery receipt for each house on the route.

• However, we suggest you complete one delivery receipt for each bus that is running (meals sent, meals distributed, leftover or returned, etc)

• Record the temperature of the food at the beginning and the end of the route to ensure food safety.
Mary Burks

Director, School Support
mburks@mdek12.org
MEAL COUNTING
Question: Must I use the SFSP meal count sheet for counting?

Answer: No. Meals must be accurately counted, but a variety of methods may be used. This is one of the few times the “no number free” option can be used on an automated POS. Clickers can be used and results recorded.

SFSAs should also review counts for irregularities.
Accurate Meal Counting

• Sponsors receive reimbursement based on the number of meals served to children. Therefore, keeping an accurate meal count is an essential component of making sure the claims are accurate.

• Sponsors must ensure that meals served are reimbursable, especially if implementing OVS
Acceptable Counting Methods

- P.O.S. by the Cashier
- Clicker Counter Method
- Check-off Tally Sheets
- Token or Popsicle Stick Method
Unacceptable Meal Counting Methods

- Meal counts based on the number trays or plates available.
- Meal counts based on the number of children in attendance.
- Meal counts based on previous meal counts.
Claim Consolidation

- Weekly Meal Count Forms are used to consolidate daily meal count information.
- Extremely helpful when submitting claims for reimbursement.
- Weekly meal count forms are not required.
- DAILY MEAL COUNT SHEETS (manual or computerized) ARE REQUIRED!
Sponsors are Responsible for Counts / Claims!

- Sponsors assume responsibility for all the information submitted on the claims.
- The claim must reflect only meals that meet SFSP requirements and are actually served to eligible children.
- Second Party Check strongly encouraged! Have another staff member review the daily and weekly meal counts and compare totals.
Non-Reimbursable Meals

Sponsors may claim reimbursement only for those meals that meet SFSP requirements.

Reimbursement *may not* be claimed for:

- Meals that do not meet meal pattern requirements
- Meal types not approved by the State Agency
- Meals served before or after the approved dates of operation (*retro-active approval is ok in some situations for SY 20/21*)
- Meals not served as a complete unit, except offer versus serve
- Meals not served
- Meals served to anyone other than eligible children
Questions
STAFF TRAINING
You must provide annual training to all SFSP program staff
Per 225.15 (d), Training of site personnel shall, at a minimum, include:

- the purpose of the Program
- site eligibility
- recordkeeping
- site operations
- meal pattern requirements
- the duties of a monitor
- Civil Rights (*FNS 113-1 (XI)) MUST INCLUDE ALL REQUIRED CR TOPICS
Training Records

• Date(s) of training for site and administrative personnel
• Attendees’ signature
• Topics covered at each training session
Questions
BUDGET
• You are required to keep a separate ledger with SFSP debits and credits

• Typically, the SA will tell you exactly which budget codes to use
During the 20/21 SY, you have the option of using any of the following:

- Transfer money from 2110 (NSLP/SBP) into 2130 (SFSP Program Year ending 9/30/20) and/or 2131 (SFSP Program Year ending 9/30/21)

- 2121 - use this code for all food related expenses during the school year.
• Many schools transitioned from NSLP to SFSP in mid-September 2020

• Some schools made the decision to seek retro-active SFSP payments for meals served in August/September

• IF you are a PRICING school that got retro-active SFSP payments, you **MUST retain clear accounting of all refunds or account credits** given back to students/families for meals they may have purchased during that time.

• **Claiming a meal under SFSP and charging the student for that meal would be considered “double dipping”**
How is your budget derived in MARS?

• Questions L8 and B8 on your site applications

• Your budget should be the LAST thing you do when you complete your MARS application, because it is pulling numbers from other places. If you do it first, your budget won’t make sense!
Your ADP is going to pull into your budget in the form of a projected reimbursement.
Example of a Budget in MARS

### 2020 - 2021 SFSP Budget Detail

**Status:** Active  
**DBA:**  
**Type of Agency:** Educational Institution  
**Type of SFSP Organization:** School Food Authority

**Budget Version:** Original

#### Operating Reimbursement

<table>
<thead>
<tr>
<th>Meal</th>
<th>Sites</th>
<th>Total Meals</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breakfast</td>
<td>4</td>
<td>121,248</td>
<td>$261,895.68</td>
</tr>
<tr>
<td>Lunch</td>
<td>4</td>
<td>121,248</td>
<td>$455,892.48</td>
</tr>
<tr>
<td>Snack</td>
<td>0</td>
<td>0</td>
<td>$0.00</td>
</tr>
<tr>
<td>Supper</td>
<td>0</td>
<td>0</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

**Sub Total** $717,788.16

#### Administrative Reimbursement

<table>
<thead>
<tr>
<th>Meal</th>
<th>Sites</th>
<th>Total Meals</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breakfast</td>
<td>4</td>
<td>121,248</td>
<td>$26,068.32</td>
</tr>
<tr>
<td>Lunch</td>
<td>4</td>
<td>121,248</td>
<td>$47,589.84</td>
</tr>
<tr>
<td>Snack</td>
<td>0</td>
<td>0</td>
<td>$0.00</td>
</tr>
<tr>
<td>Supper</td>
<td>0</td>
<td>0</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

**Sub Total** $73,658.16
Example of a Budget in MARS (cont)

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total SFSP Costs</td>
<td>$1,097,480.00</td>
</tr>
<tr>
<td>Total SFSP Reimbursement</td>
<td>$791,446.32</td>
</tr>
<tr>
<td>Excess SFSP revenue amount from the prior program year or previous</td>
<td>$19.61</td>
</tr>
<tr>
<td>participation in SFSP</td>
<td></td>
</tr>
<tr>
<td>Amount from other funding resources (e.g. grant, donations)</td>
<td>$311,510.22</td>
</tr>
<tr>
<td>Other funding resources</td>
<td></td>
</tr>
<tr>
<td>Extra Federal Funding District Maintenance Fund</td>
<td></td>
</tr>
<tr>
<td><strong>Balance</strong></td>
<td><strong>$5,496.15</strong></td>
</tr>
</tbody>
</table>
Questions
Charles Crawford

Division Director II, School Support
ccrawford@mdek12.org
The purpose of FNS Instruction 113-1 is to:

- Establish and convey policy;
- Provide guidance and direction
- Ensure compliance with and enforcement of the prohibition against discrimination.
Civil Rights Training

- Training is required so that people involved at all levels of administration of programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures and directives.
- State agencies are responsible for training local child nutrition administrators on an annual basis.
- Local agencies are responsible for training their managers and staff who interact with applicants or participants on an annual basis.
The annual training *must* include, but not be limited to, the following training topics in the FNS Instruction 113 – 1:

1. Collection and Use of Data
2. Effective public notification systems
3. Complaint procedures
4. Compliance review techniques
5. Resolution of noncompliance

6. Requirements for reasonable modifications for persons with disabilities

7. Requirements for language assistance

8. Conflict resolution

9. Customer service
Protected Base

Defined as:

Any person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation, or executive order.

What are the protected bases?
Child Nutrition protected bases are:

1. Race
2. Color
3. National Origin
4. Age
5. Disability
6. Sex
7. Reprisal or Retaliation
Child Nutrition protected bases are:

1. Race
2. Color
3. National Origin
4. Age
5. Disability
6. Sex
And Justice for All

- Display where benefits are issued/received.
- Reproductions must be at equal size (11x17)
- If copied as black & white, use Form AD-475

-A Rev Dec 2015
Full Non-Discrimination Statement

Accessible on the OCN Home Page

https://mdek12.org/OCN

Direct Link

This institution is an equal opportunity provider.
CORRECT VERSION:

This institution is an equal opportunity provider.

INCORRECT VERSIONS!

• This institution is an equal opportunity employer.
• Yoknapatawpha County Schools is an equal opportunity provider.
• USDA is an equal opportunity provider.
Collection and Use of Data

1. State and Local agencies are required to obtain data by race and ethnicity.

2. Self identification or self-reporting is preferred method of obtaining data.

3. Applicants/participants may not be required to furnish information on their race or ethnicity.

4. Where an applicant/participant does not provide this information, the collector shall through visual observation secure and record the data.
The purpose of the public notification system is to inform applicants, participants, and potentially eligible persons of:

- Program Availability
- Complaint Information
- Non-discrimination statement

Provide appropriate information in alternative formats for persons with disabilities and in the appropriate language(s) for LEP persons.
Complaint Procedures

- **Right to File** – anyone alleging discrimination has the right to file a complaint within 180 days of the alleged discriminatory action. (The Secretary of Agriculture or his designee may waive the 180 filing deadline for good cause. The reason justifying the waiver must be documented in writing in the complaint file.)

- **Acceptance** – complaints, written or verbal, must be forwarded to the appropriate FNS Regional Civil Rights Director within 5 working days. Anonymous complaints will be handled as any other to the extent feasible based on available information.

- **Forms** – any OCR may develop complaint forms, but the use of such forms must not be a prerequisite for acceptance of a complaint.
Verbal Complaints – the person to whom the allegations are made must write up the elements of the complaint for the complainant. Every effort should be made to have the complainant provide the following information:

- Complainant Name, address & phone (email or other contacting means)
- Specific location and name of agency delivering the service or benefit
- Nature of the incident or action that led the complainant to feel discriminated
Complaint Procedures cont’d…

- What protected base (prohibited basis or protected class) the complainant feels discriminated against
- Names, phone numbers, titles, addresses of persons who may have knowledge of the discriminatory action
- The date(s) which the alleged discriminatory actions occurred or duration of such actions
SEE ATTACHMENT (FLOW CHART)

Last page of this document: https://fns-prod.azureedge.net/sites/default/files/113-1.pdf
Compliance Reviews

- Must advise the reviewed entity in writing of findings and recommendations
- Federal or State reviewer must secure information as necessary to make the determination of compliance
- Routine reviews conducted as required by program regulations. Selection criteria; unusual fluctuations of racial / ethnic groups in service area, number of discrimination complaints filed against the agency, unresolved findings from previous reviews, information from grassroots orgs., State officials, etc…
Resolution of Noncompliance

- **Noncompliance** - factual finding that a Civil Rights requirement is not being adhered to.

- **Achieving Voluntary Compliance** – if found noncompliant, immediate steps to become compliant must be taken.

- **Termination / Suspension of Assistance** – any action must be limited to the agency found noncompliant and limited to the particular program which noncompliance was found.
This is a requirement!

The Americans with Disabilities Act (ADA) of 1990 and the ADA Amendments Act of 2008 prohibit discrimination and ensure equal opportunity for persons with disabilities in employment, State and local government services (Title II), public accommodations, commercial facilities, and transportation (Title III). Section 504 of the Rehabilitation Act of 1973 also prohibits discrimination on the basis of handicap in programs or activities receiving federal financial assistance.
Title VI of the Civil Rights Act of 1964 and its regulations require recipients of federal financial assistance, i.e. SAs, local agencies, or other sub-recipients, to take reasonable steps to ensure “meaningful” access to information and services they provide for individuals with limited English proficiency (LEP). What factors should be considered to determine what constitutes reasonable steps?

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;

2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people’s lives; and

4. The resources available to the grantee/recipient and costs.

Meaningful access is accomplished by providing reasonable, timely, appropriate, competent/qualified, accurate and effective language services to individuals with LEP when accessing recipient programs and activities.
USDA LEP Policy Guidance can be found at:

https://www.fns.usda.gov/cr/limited-English-proficiency-lep

Federal regulations also prohibit discrimination of LEP persons on the ground of national origin (7 CFR Part 15).
• **Conflict** - when one or both parties are not able to secure what they need or want and are actively seeking their own goals.
Causes of Conflict:

- Misunderstanding
- Personality clashes
- Competition for resources
- Authority Issues
- Lack of cooperation
- Differences over methods of style
- Low performance
- Value or goal differences
Destructive conflict . . .

- Diverts energy from more important issues and tasks.
- Deepens differences in values.
- Polarizes groups so that cooperation is reduced.
- Destroys the morale of people or reinforces poor self-concepts.
Conflict Resolution cont’d…

**Constructive** conflict . . .

- Reveals issues of importance, resulting in issue clarification.
- Builds cohesiveness as people learn more about each other.
- Causes reassessment by allowing for examination of procedures or actions.
- Increases individual involvement.
Conflict resolution refers to resolving the dispute to the approval of one or both parties.

- Remain calm and approachable.
- Enter the process with an open mind.
- Don’t prejudge others.
- Don’t over-react.
- Attack the problem, not the person and listen to understand their concerns!
Alternate Dispute Resolution (ADR)

Use of a neutral 3rd party to resolve informally a complaint of discrimination through the use of various techniques (e.g. fact finding, mediation, facilitating etc.)
Customer Service

- Be professional
- Be courteous
- Listen intently and take notes if needed
- Repeat back what you have been told to insure correctness
- Follow up with corrective action if required
- Remember . . You are providing a service!
Things you should be focused on right now. Things you need to keep on file.
CHECKLIST FOR SUCCESS

- Extend SFSP Contract in MARS through end of SY
- (If applicable) apply for After School Snack Program
- Conduct your (1-4th week) Monitoring Visits
- Train your staff (make sure everyone is on the same page about meal counting, OVS, etc)
- Retain copies of your Media/Public Release
- Collect and retain Racial/Ethnic Data
- (If applicable) issue and track meal refunds if you are a pricing school and you are seeking retro-active SFSP payments
- Review your menu! (are you serving milk? Enough fruits and veg?)
Record Keeping Requirements

- Full and accurate records – maintained for 3 years
- Daily Meal Counts
- Program operating costs, including food and other cost
- Program admin. cost, including labor and supplies
- Records of Funds accruing to the program
- Training records (including Civil Rights Training)
- Monitoring Reviews
- Ethnic and Racial data
Checklist of Records
Do you have any innovative ideas you would like to share?
Non Discrimination Statement

This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:

Don’t forget to send your certification form that you attended this training to April Catchings.