



Civil Rights Training
TEFAP CSFP (5-4-2026)
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AND JUSTICE FOR ALL



Every USDA agency **AND**
their staff/volunteers must
participate in this annual
training to ensure they are
aware of civil rights issues
associated with a food
program.

Civil Rights Training

Civil Rights Training Topics

Specific subject matter required, but not limited to:

- Discrimination definition
- Protected classes
- Compliance
- Assurances
- Public notification
- Race/ethnicity data
- Complaints of discrimination
- Compliance reviews
- Civil Rights training requirements
- Customer service
- Disability access
- Language access
- Legal authorities

Protected Classes and Discrimination

Protected class is a legal term that describes characteristics or factors which cannot be targeted for discrimination or harassment.

Race

Color

National
Origin

Disability

Sex

Age

What is discrimination?

Different treatment which makes a distinction of one person or a group of persons from others; either intentionally, by neglect, or by the actions or lack of actions based on a protected class.

Areas of Compliance

- Civil Rights Assurances
- Public Notification, Outreach, and Engagement
- Race and Ethnicity Data Collection and Reporting
- Complaints of Discrimination
- Compliance Reviews
- Resolution of Noncompliance
- Civil Rights Training
- Disability Access
- Language Access

Civil Rights Assurances

To qualify for federal financial assistance, an application must be accompanied by a written assurance that the entity to receive financial assistance will operate in compliance with all nondiscrimination laws and regulations.

Civil Rights Assurances- Agreements

A Civil Rights assurance statement must be incorporated in all agreements between:



Federal agencies and state agencies



State agencies and their local agencies or subrecipients



Local agencies and their subrecipients (if applicable)

Public Notification, Outreach, and Engagement

FNS assistance programs must include a public notification system that informs applicants, participants, and potentially-eligible persons of:



Program
Availability



Policy of
Nondiscrimination



Procedure for Filing
a Complaint

And Justice for All Poster

- The current version of AD-475 is dated **March 2025**.
- USDA FNS will be providing new AJFA posters.



Public Notification— Nondiscrimination Statement

At a minimum, the full program-appropriate Nondiscrimination Statement (NDS) must be on:



Application Form(s)



Eligibility or Ineligibility
Notifications



Adverse Action
Notifications



Program Webpage



Program Public
Information

Nondiscrimination Statement (4-2-2026)

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

Please note:

The following pages (14-18) that discuss collecting race and ethnicity data is only for the CSFP Program. It is not a requirement for the Eligibility Criteria Form that is used by food pantry programs to track TEFAP and Food Bank product.

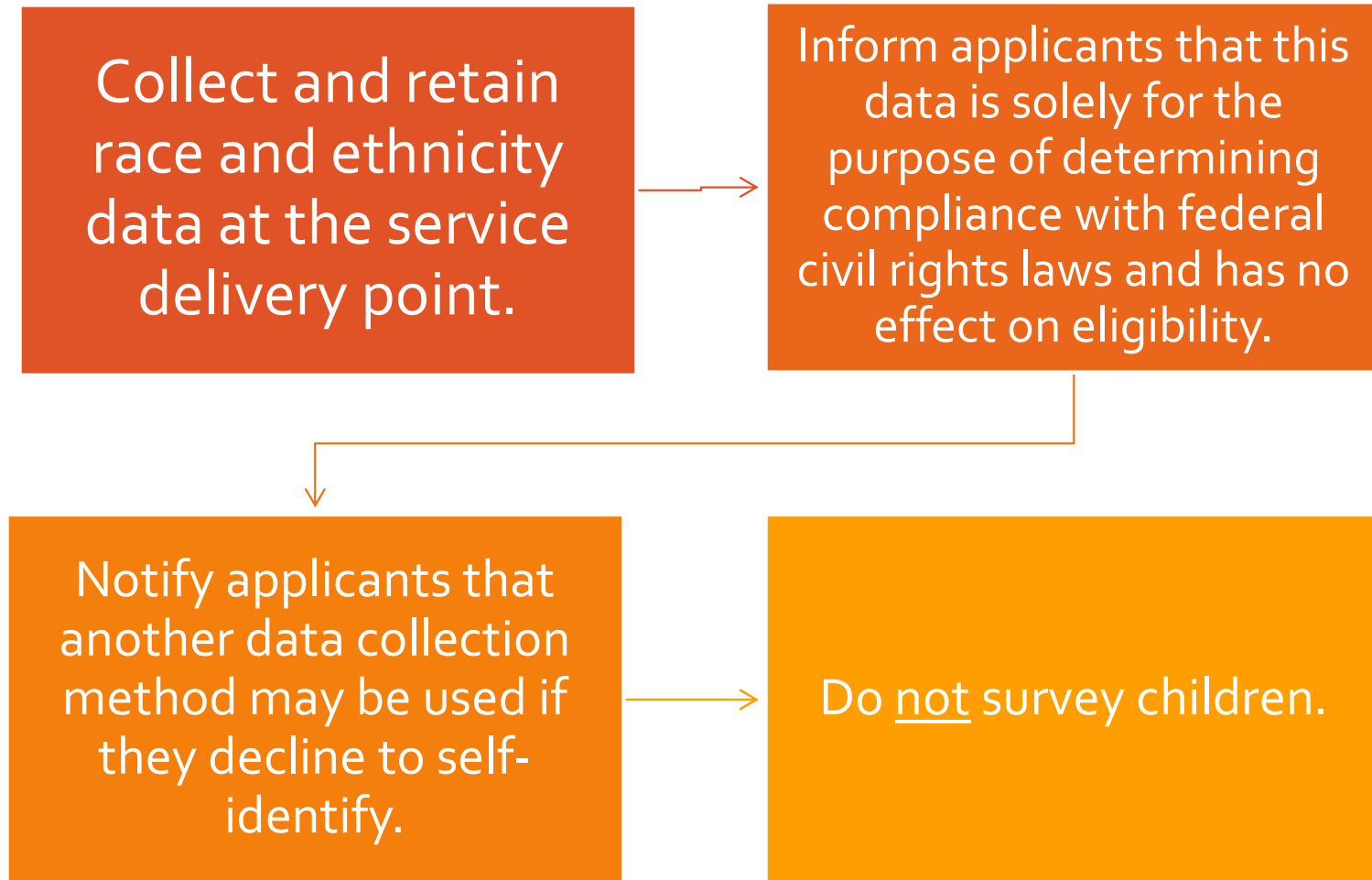
Race and Ethnicity Data Collection—Point of Service

Collect and retain race and ethnicity data at the service delivery point.

Inform applicants that this data is solely for the purpose of determining compliance with federal civil rights laws and has no effect on eligibility.

Notify applicants that another data collection method may be used if they decline to self-identify.

Do not survey children.



Race and Ethnicity Data Collection —Purpose



To determine how effectively FNS programs are reaching potentially eligible persons and participants



To identify areas where additional outreach or services are needed



To assist in the selection of locations for compliance reviews

Race and Ethnicity Data Collection—Point of Service

The ALSDE must ensure local agencies and subrecipients collect and retain race and ethnicity data at the service delivery point.

Race and Ethnicity Data Collection—Data Management

Ensure

Ensure that access to data is limited to authorized personnel.

Complete

Complete reports, as required.

Retain

Retain data for current year plus three (3) fiscal years.

Racial and Ethnic Data: Updated Categories

New Single Question Format

- American Indian or Alaskan Native
- Asian
- Black or African American
- **Hispanic or Latino**
- **Middle Eastern or North African**
- Native Hawaiian or Pacific Islander
- White

Old Two-Question Format

- 1. Ethnicity Data**
 - Hispanic
 - Not Hispanic
- 2. Racial Data**
 - White
 - Black or African American
 - American Indian and Native Alaskan
 - Asian
 - Native Hawaiian or Pacific Islander

Complaints of Discrimination

NEW Hyperlink!

[How to File a Program Discrimination Complaint | USDA](#)

- Program Discrimination Complaint Portal (requires registration and authentication)
- New Forms (available in English and Spanish)
- Email

Complaints of Discrimination

- Notify participants of the option to file a complaint directly with the USDA.
- Confidentiality is extremely important and must be maintained.
- Applicants and participants must file within 180 days of the alleged act of discrimination.
- Develop complaint forms (optional), but the use of such forms cannot be a prerequisite for acceptance.
- Maintain civil rights complaints in a log separate from other program complaints.

Complaints of Discrimination— Elements

Name, address, and
telephone number of
the complainant

The location and
name of the
organization or office

The nature of the
incident or action

The names, titles,
and business
addresses of persons
who may have
knowledge of the
discriminatory action

The date(s) during
which the alleged
discriminatory
actions occurred

The basis for the
alleged
discrimination

Complaints of Discrimination— Requirements

Accept

Accept civil rights complaints in written, verbal, or anonymous formats.

Five Calendar Days

Forward complaints based on race, color, national origin, sex, and disability to CRD within five (5) calendar days of receipt.

Five Business Days

Forward complaints based on age (or a combination of age and other bases) to CRD within five (5) business days of receipt.

Compliance Reviews: Overview

- Examine the activities of state agencies, local agencies, subrecipients, and local sites to determine Civil Rights compliance.
 - FNS Civil Rights and FNS Program staff review the ALSDE.
 - FNS staff and the ALSDE review local agencies.
 - Local agencies review their subrecipients.
- Significant findings must be provided in writing to the reviewed entity and FNS.

Compliance Reviews—Types

Pre-award

Routine (post-award)

Special compliance reviews

Compliance Reviews-- Routine/Post- Award Review Sample Questions

Do printed materials and websites contain the nondiscrimination statement?

How are applicants and participants advised of their right to file a civil rights complaint of discrimination?

Is the current *And Justice for All* poster prominently displayed?

Are reasonable modifications, including auxiliary aids and services, appropriately made for people with disabilities?

Are steps taken to ensure meaningful access for persons with limited English proficiency?

Civil Rights Training Requirements

- State agencies are responsible for training:
 - Staff and subrecipient agencies on an annual basis.
 - New employees before participating in program activities.
 - Volunteers, as appropriate to their roles and responsibilities.
- Subrecipient agencies are responsible for training local sites, including “frontline staff” who interact with participants and those who supervise frontline staff.

Civil Rights Training—Required Topics

- Assurances
- Public notification
- Complaints of discrimination
- Civil rights training
- Race & ethnicity data collection
- Language access for people with limited English proficiency
- Ensuring access for people with disabilities
- Compliance reviews & resolution of noncompliance
- Conflict resolution
- Customer service

Customer Service Training Ideas

Communication Skills

- Active listening
- Positive language
- Nonverbal communication

Empathy

- Understanding customer emotions
- Building rapport

Problem-Solving Skills

- Analyzing issues
- Finding solutions

Miscellaneous

- Collaboration

Examples of Conflict Resolution Training

- Active Listening
- Communication Skills
- De-escalation Techniques
- Mediation
- Conflict Analysis
- Emotional Self-Management

Disability Access—Definition of Disability

- A person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.
- Major life activity means functions such as caring for oneself, performing manual tasks, walking, seeing, eating, hearing, speaking, breathing, learning, reading and working.
- Functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, immune, respiratory, circulatory, cardiovascular, endocrine, and reproductive functions.

(ADAAA of 2008)

Disability Access—Equally Effective Communication

State agencies, local agencies, and subrecipients are required to:

Ensure

Ensure communication with people with hearing, visual, or speech disabilities is as effective as communication with others.

Notify

Notify people with disabilities about the availability of auxiliary aids and services and how to request these service in a format and language that they can understand.

Provide

Provide requested auxiliary aids and communication services, e.g., qualified sign language interpreters, large print, Braille, or audio tapes.

Disability Access—Reasonable Modifications

- Confirm physical accessibility for buildings and facilities, particularly to persons in wheelchairs and other power-driven mobility devices.
- Ensure websites and digital services are accessible, e.g., ensuring screen reader compatibility.
- Provide the most integrated setting that allows individuals with disabilities an opportunity to fully interact with individuals without disabilities.
- Permit access for service animals (dogs and horses).

Language Access

Who are people with LEP?

- Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Recipients of federal financial assistance have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency (LEP) **at no cost** to the individual.

- Failure to provide meaningful access to a person with LEP could be discrimination on the bases of national origin (Title VI of the Civil Rights Act of 1964).

Language Access—Meaningful Access Defined

Language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP.

For individuals with LEP, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to individuals proficient in English. (*See DOJ Language Access Plan.*)

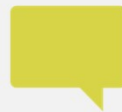
Alabama Results of Language Needs Assessment



"I Speak" document



Taglines on ALSDE websites



Language Line: **334-694-4656**

Language Access—Services

Language services:

- Applicants and participants cannot be asked to bring their own interpreters.
- Children should **not** be used as interpreters except in exigent circumstances when no qualified interpreter is available.

Examples of language services:

- Qualified bilingual staff
- Qualified telephonic interpreter services
- Qualified contract in-person interpretation services
- Qualified written language services (translation)

ALSDE Language Line

Call main CNP telephone number:

334-694-4656



Legal Authorities—Civil Rights Statutes

Title VI of the Civil Rights Act of 1964

- Race, Color, and National Origin

Civil Rights Restoration Act of 1987

- Clarifies the scope of the 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

Age Discrimination Act of 1975

- Age

CFR Title 7, Agriculture

7 CFR 15(a)(b)(c)

- USDA implementing regulation for Federally assisted programs

7 CFR 16, "Equal Opportunity for Religious Organizations"

- Gives equal footing to religiously affiliated organizations

CFR Title 28, Chapter 1

Department of Justice

28 CFR 35

- Covers nondiscrimination on the bases of disability in State and local government services (public entities)

28 CFR 36

- Covers nondiscrimination on the basis of disability in public accommodation services

28 CFR 42

- Covers nondiscrimination in federally assisted programs