	<b>CHILD NUTRITION &amp; WELLNESS PROGRAM</b> <b>“This institution is an equal opportunity provider”</b>	
		Revised June 2019
		Pomona GC Food

**Goal:**

- To provide children, youth and their families with culturally sensitive, age and developmentally appropriate, strength-based and trauma informed services which can be adapted to meet the needs of Americans with Disabilities Act (ADA), that are designed to ameliorate the effects of trauma in order to increase safety, well-being and permanency with a life-long goal of self-fulfillment. These values are supported throughout all services and programs including the Child Nutrition and Wellness whose goal is stated below.
  - Ettie Lee Homes, Inc. strives to ensure the health and well-being of its youth by promoting good eating habits, physical activity, and positive well-being. In accordance with federal law, it is the expectation of Ettie Lee to provide youth with access to healthy foods and beverages; provide opportunities for developmentally appropriate physical activity; and require that all meals served by the facility meet or exceed the federal nutritional guidelines issued by the U.S. Department of Agriculture.

**Policy:**

- 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, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.
- A Poster for Non-discrimination shall be posted in the kitchen area.

**Regulation:**

- All food shall be safe and of the quality and in the quantity necessary to meet the needs of the clients. Each meal shall meet at least 1/3 of the servings recommended in the USDA Basic Food Group Plan - Daily Food Guide for the age group served.
- All food shall be selected, stored, prepared and served in a safe and healthful manner.
- Make potable (drinking) water readily available at all mealtimes.
- Food and water shall not be withheld at any time as a consequence.

**Contractor Provisions**

- Ettie Lee does not use a vendor to provide nutritional services.
- Ettie Lee does participate in the State School Food Program following minimum serving sizes, minimum food groups and minimum nutrient standards.

**Food Standards:**

- Food shall be safe and of the quality and in the quantity necessary to meet the needs of the clients.
- Each client has available at least three meals per day and two snacks.
- Not more than 15 hours shall elapse between the third meal of one day and first meal of the following day.
- Weekday Breakfast served between 6:00am and 8:00am
- Weekend breakfast served between 8:00am and 10:00am
- Lunch is served between 12pm and 2:00pm
- Snack is served between 3:00pm and 4:00pm and between 7:00pm and 8:00pm
- Weekday dinner is served between 4:30pm and 6:30pm depending on clinical and substance abuse services.
- Weekend dinner is served between 5pm and 6:30pm depending on the outing for the day.
- Sites shall keep on the premises a supply of staple nonperishable foods for a minimum of one week and fresh perishable foods for a minimum of two days.
- Between meal nourishment or snacks shall be available for all clients without asking unless limited by dietary restrictions prescribed by a physician.
  - Each home has a client refrigerator that has available at all times such items as bread, sandwich meat, cheese, fruits, leftovers, milk and condiments.
- There is to be a minimum of one half gallon of milk per child at all times.
- Attached are minimum quantity and quality of daily portions.
- Menus will be written at least one week in advance and copies of the menus as served shall be dated and kept on file for at least 30 day and posted in a prominent place accessible to be view by all.
- Menus will be made available for review by the clients or their authorized representatives and the licensing agency upon request.
- Clients provide monthly input on menu planning during the Client Menu & Recreation Input Group.

**Provision for Special Diets:**

- Meals planned take into consideration the ethnic and diverse background of the youth.
- Special” dietary restrictions, due to religious, philosophical or other reasons on any child placed in the agency are taken into consideration.
- Modified diets prescribed by a client's physician as a medical necessity shall be provided.
  - Ettie Lee will obtain and follow instructions from the physician or dietitian on the preparation of the modified diet.
- Adaptive devices shall be provided for self-help in eating as needed by clients.
- Culture/religious sensitivity to foods will be taken into consideration such as Muslim avoidance of pork and Jewish avoidance of shellfish and alternative foods will be offered.
- Food will be cut, chopped or ground to meet individual needs.

**Food Source:**

- Ettie Lee utilizes the CDE's Buy American Certification and Non-domestic Log for micro purchases that have inconclusive labels or are non-domestic products.
- Commercial foods shall be approved by appropriate federal, state and local authorities. All foods shall be selected, transported, stored, prepared and served so as to be free from contamination and spoilage and shall be fit for human consumption.
- Food in damaged containers shall not be accepted, used or retained.
- Powdered milk shall not be used as a beverage but shall be allowed in cooking and baking. Raw milk, as defined in Division 15 of the California Food and Agricultural Code shall not be used. Milk shall be pasteurized.
- Except upon written approval by the licensing agency, meat, poultry and meat food products shall be inspected by state or federal authorities. Written evidence of such inspection shall be available for all products not obtained from commercial markets.
- All home canned foods shall be processed in accordance with standards of the University of California Agricultural Extension Service.
  - Home canned foods from outside sources shall not be used.
- When food is prepared off the facility premises, the following shall apply:
  - The preparation source shall meet all applicable requirements for commercial food services.
  - Ettie Lee will have the equipment and staff necessary to receive and serve the food and for cleanup.
  - Ettie Lee will maintain the equipment necessary for in-house preparation, or have an alternate source for food preparation, and service of food in emergencies.

**Food Safety**

- All persons engaged in food preparation and service shall observe personal hygiene and food services sanitation practices which protect the food from contamination.
  - Hands are to be washed prior to preparing food. Regularly during food preparation and after touching meat sources.
- All foods or beverages capable of supporting rapid and progressive growth of microorganisms which can cause food infections or food intoxications shall be stored in covered containers at 45 degrees F (7.2 degrees C) or less.
- Pesticides and other similar toxic substances shall not be stored in food storerooms, kitchen areas, food preparation areas, or areas where kitchen equipment or utensils are stored.
- Soaps, detergents, cleaning compounds or similar substances shall be stored in areas separate from food supplies.
- All kitchen, food preparation, and storage areas shall be kept clean, free of litter and rubbish, and measures shall be taken to keep all such areas free of rodents, and other vermin.
- Freezers shall be large enough to accommodate required perishables and shall be maintained at a temperature of zero degrees Fahrenheit.
- Refrigerators shall be large enough to accommodate required perishables and shall maintain a maximum temperature of 45 degrees Fahrenheit.
- All refrigerators, freezers and pantry temperatures are to be documented on the Temperature Log two times daily. Once by the overnight staff in the morning and once by the facility manager in the evening.
- Freezers and refrigerators shall be kept clean, and food storage shall permit the air circulation necessary to maintain the temperatures.

- All food shall be protected against contamination. All open food shall be stored in air tight containers such as zip lot bags or Tupperware containers
- Contaminated food shall be discarded immediately.
- All equipment, fixed or mobile, dishes, and utensils shall be kept clean and maintained in safe condition.
- All dishes and utensils used for eating and drinking and in the preparation of food and drinks shall be cleaned and sanitized after each usage.
  - Dishwashing machines shall reach a temperature of 165 degrees F (74 degrees C) during the washing and/or drying cycle to ensure that dishes and utensils are cleaned and sanitized.
  - If Dishwashers do not reach a temperature of 165 degrees a ¼ cup of bleach needs to be added to the wash cycle.
  - Items that are not put in the dishwasher must be cleaned using the 3 sink method.
    - Clients are to scrape their plates in the trash. Staff are to ensure that pots and pans are scraped into the trash.
    - Items are then to be rinsed in the disposal side of the sink.
    - Dishes are then to be washed and sanitized and left to air dry.
- Equipment necessary for the storage, preparation and service of food shall be provided, and shall be well-maintained.
- Tableware and tables, dishes, and utensils shall be provided in the quantity necessary to serve the clients.

To ensure all persons engaged in food preparation and service shall observe personal hygiene and food services sanitation practices, which protect the food from contamination. (Title 22: 80076a13)

- Employees must appear to be in good health.
- Effective hair restraints are to be properly worn.
- Hands must be washed properly, frequently and at appropriate times.
- Burns, wounds, sores, scabs, splints, and waterproof bandages on hands are completely covered by a food service glove while handling food.
- Eating, drinking, chewing gum, smoking, or using tobacco, are prohibited from areas where food is prepared, and stored and ware washing areas.
- Disposable tissues are to be used when coughing or sneezing and followed by immediate hand washing.
- Hand sinks must be unobstructed, operational, clean, and stocked with soap, disposable towels and warm water.
- A hand washing reminder sign must be posted in the kitchen and the bathroom.
- Employee restrooms must remain operational and clean.
- Frozen food is to be thawed under refrigeration or in cold running water. (Food Safety Checklist State Food Program)
- Food is handled with suitable utensils, such as, single use gloves or tongs. (Food Safety Checklist State Food Program)
- Clean reusable towels are used only for sanitizing equipment, surfaces and not for drying hands, utensils etc. (Food Safety Checklist State Food Program)

- All equipment fixed or mobile, dishes, and utensils shall be kept clean and maintained in safe condition. (Title 22: 80076a19)
  - As soon as non-stick pans start to peel they shall be thrown away.
  - Cooking utensils, pots and pans must be free of rust.
  - Chipped and cracked dishes must not be used.
- Water temperature is to be maintained between 105 degrees and 120 degrees.
- All small equipment and utensils including cutting boards and knives are to be cleaned and sanitized between uses. (Food Safety Checklist State Food Program)
- Grease shall not be put down the drains but disposed of properly.

**Food Safety - Storage:**

- All foods are to be labeled and dated at the time of purchase.
- When buying sandwich meat in double packages, make sure the second package has a label and date on it also. Sometimes the manufacturer labels only one side and if you use only half of the package then the other half is not labeled and dated.
- If you take food from the freezer a second date must be put on the item at that time.
- Food needs to be rotated on a first in first out basis. This means that food dated the oldest is to be in the front of the shelves. New food is to be placed behind the oldest cans/boxes.
- All leftovers shall be stored in covered containers or resealable bags, labeled and dated as to the day the food was prepared.
- Open perishable foods such as leftovers are to be disposed of after 72 hours.
- Food is “inventoried” each time staff goes shopping destroying non-perishable and frozen foods if older than six months from date of purchase.
- Temperature of the dry storage area (Pantry) is to be between 50 degree and 70 degree Fahrenheit. . (Food Safety Checklist State Food Program)
- All food and paper supplies are to be stored 6 to 8 inches off the floor. (Food Safety Checklist State Food Program)
- Heavy items are not to be stored up high. (Cal OSHA)
- There shall be no food stored on top of the refrigerator or freezer at any time.
- Food in damaged containers shall not be accepted, used or retained.

**Meal Pattern Weekly and Daily Minimum Quantities:**

- **Breakfast:**
  - Fruits – One cup per day seven days a week.
    - Fluid juice may not be offered more than three days per week.
    - Frozen juice must be 100% juice without added sugar.
    - ½ cup of dried fruit is equivalent to 1 cup of fruit.
    - For a meal to be reimbursable the client must take the fruit/veggie component.
  - 1 cup of leafy greens count as ½ cup vegetables.
  - Vegetables may be substituted for fruits, but the first two cups per week of any substitution must be from the dark green, red/orange, beans and peas (legumes) or other vegetable subgroups.
  - Whole Grain – A minimum of one serving per day and nine to ten servings per week.
    - All grains must be whole grain-rich.

- 1 oz. of a meat/meat alternative may be substituted after the minimum daily grain requirement is met.
  - Bacon is not considered a food component.
  - Meat/meat alternatives may be offered as extra food items that do not count toward the grain component or as food items for offer verses serve.
  - Fluid Milk – one cup of fluid milk per day seven days a week.
    - All fluid milk must be 1 percent or fat-free.
    - Only fat free milk may be flavored.
  - Minimum and maximum calories for a meal are between 450 and 600 per meal.
  - Saturated fat must be less than 10% of the total calories.
  - Sodium must be less than or equal to 640mg per meal.
  - No trans-fats may be served.
- **Lunch**
- Fruits – One cup per day seven days a week.
    - Canned fruits have to be in their own juice or light syrup.
  - Vegetables – One cup per day seven days a week.
    - ½ cup of dark green vegetables per week.
    - 1 ¼ cup red/orange vegetables per week.
    - ½ cup beans and peas (legumes per week.
    - ½ cup of starchy vegetables per week.
    - ¾ cup of other vegetables per week.
    - 1 ½ additional vegetables
    - Frozen vegetables must be salt free.
    - Canned Vegetables must be reduced salt.
  - Meat – 2 oz. per day minimum and 10-12 oz. per week.
  - Fluid Milk – one cup of fluid milk per day seven days a week.
    - All fluid milk must be 1 percent or fat-free.
    - Only fat free milk may be flavored.
  - Minimum to maximum calories is 750-850 per meal.
  - Saturated fat must be less than 10% of the total calories.
  - Sodium must be less than or equal to 1420 mg per meal.
  - No trans-fats may be served.

### **Standardized Recipes**

- Standardized recipes are to be used when preparing meals in order to ensure compliance to basic nutritional standards.
- Multiply the minimum amount of food needed per serving to meet the School Lunch Standard by the number of people you are serving to come up with the Amount Available on the menu production.
- Remember though to prepare food to double the menu in order to ensure that there is enough food prepared for everyone to have seconds or thirds.
- Remember to include staff when determining amounts for preparing food.

### **Menu Production Record Form – Meal Preparation**

- This form is the legal document by which we prove that we followed the State and Federal Standards for meals and is to be completed at each meal in order for ELYFS to be reimbursed from the state for each meal we serve.

- The type of food in each food group that is prepared/served and the form that food takes, C-canned, D-dried, F-fresh, or Fz-frozen.
- The amount of food prepared in each food group.
- The number of meals being prepared for staff and youth.
- The amount of food that was left over.
- Any time a change to the menu is made it must be documented on the Menu Production Record.
- This form gets turned in at the end of each month to the Baldwin Park Office.
- The Menu Production Record is audited daily for accuracy by the AM Facility Manager.

### **Serving The Meal**

- Clients must choose and put on their plates at least three items in order for ELYFS to be reimbursed for the meal, even if they don't eat the items they choose.
- When serving each component it must be measured or weighed. For instance if you are preparing a tuna salad sandwich, you must measure out at least 2oz of tuna to put on each sandwich.

### **Menu Production Record Form – Documentation of Reimbursable Meals.**

- This form is the legal document by which we prove that we followed the State and Federal Standards for meals and is to be completed at each meal in order for ELYFS to be reimbursed from the state for each meal.
- Take this form to the table when you are serving your meal.
- As each person fills their plate, check off what components they took. They do not have to eat the component (just take it) in order for you to count it as a component. This is an offer method as opposed to a serve method. In a serve method you would put all components on their plate. This leads to a lot of wasted food.
- In order for a meal to be reimbursed by the state a person must take at least three components for each meal.
- In order for a meal to be reimbursed by the state the person must take a fruit or vegetable at each meal.
- If a client has breakfast or lunch at school we may offer the client food by the meal shall not be reimbursable.
- The Menu Production Record is audited daily for accuracy by the AM Facility Manager. ( Zulema Aquino, Katie Posada, Danielle Gutierrez)
- This form gets turned in at the end of each month to Accounting Assistant Kim Tran at the Baldwin Park Office by the third of the next month along with the budget for audit.


### **Children, Youth and Nonminor Dependent Training**

- Ettie Lee will apply the “Reasonable and Prudent Parent Standard,” as specified in Section 87067, when allowing a child to use kitchen appliances and utensils for food preparation and cooking.
- Ettie Lee will ensure that the child is properly trained to safely use the kitchen appliances and utensils.
- Ettie Lee does not require a child to participate in meal preparation but is voluntary as part of the household chore rotation.

- It is the practice that Ettie Lee Homes, Inc. provides education on health and nutrition three times per year as part of their day treatment program.
- Nonminor dependents are strongly encouraged to participate in food preparation as part of independent living.
- Children, youth and nonminor dependents shall have the opportunity to plan meals, grocery shop, and store and prepare food as part of life skills training.

**Staff Training:**

- The human resource department will monitor all Child Nutrition and Wellness Program training to ensure all training requirements are met.
  - The human resource department will notify supervision on a monthly basis of needed training for each staff.
  - The human resource department will use the USDA Professional Standards Training Tracking Tool to upload all training certifications.
- All Residential Counselors, Facility Managers, STRTP Administrator and Program Managers will receive 5 hours of initial orientation training on all components of the Child Nutrition and Wellness program within ninety days of hire.
- Civil Rights and Complaint procedures will be trained annually each year for all residential counselors, STRTP Administrators and Program Managers.
  - The Civil Rights Coordinator will conduct the Civil Rights and Complaints training.
  - Civil Rights training will be conducted in December.
- All Residential Counselors will receive an additional 4 hours of training annually.
- Facility Managers, STRTP Administrators and Program Manager and Director of Quality Improvement will receive an additional 6 hours annual training.
- Food Administrator will receive an additional 8 hours of annual training.

 <p><b>ETTIE LEE</b> Youth &amp; Family Services Doing Whatever It Takes To Save Lives, Change Lives and Build Hope In Children, Youth and Families</p>	<p><b>CHILD NUTRITION &amp; WELLNESS PROGRAM</b></p> <p><b>WELLNESS GOALS</b></p> <p><b>“This institution is an equal opportunity provider”</b></p>	
		<b>July 2019</b>
		<b>P GH CN&amp; WP</b>

**Nutrition Promotion Goals:**

- Ettie Lee aims to teach, encourage, and support healthy eating by youth. The facility will provide nutrition promotion that promotes healthy foods by:
  - Promoting fruits, vegetables, whole grain products, low-fat and fat-free dairy products, healthy food preparation methods, and health-enhancing nutrition practices.
  - Emphasizing caloric balance between food intake and energy expenditure (physical activity/exercise).
  - Including training for staff and youth on nutrition education.
  - Posting healthy messages throughout the facility that promote physical activity, good eating habits, and positive well-being.

**Nutritional Education:**

- It is the practice that Ettie Lee Homes, Inc. provides education on health and nutrition three times per year as part of their day treatment program.



- It is the practice that youth participate in the menu planning each month.
- It is the practice that youth are offered the opportunity and encouraged to participate in the grocery shopping for each facility.
- It is the practice that youth are offered the opportunity and encouraged to participate in the meal preparation.

#### **Nutrition and Exercise:**

- It is the practice that Ettie Lee Homes, Inc. provides education on physical health and exercise three times per year as part of their day treatment program.
- It is the practice that each youth is given the opportunity to engage in physical large motor skills & recreation activities that averages up to 7 hours per week. It is the practice that the youth cannot be restricted from these physical recreation activities as a consequence for behavior.
- It is the practice that there is a scheduled physical recreational outing each month.
- It is the practice that the facility provides recreational equipment for indoor and outdoor use that promotes physical activity. Each home has an outdoor basketball court, 3 of 6 homes have a pool, and each home has access to footballs, basketballs, soccer balls, badminton and volleyballs etc.

#### **Physical and Emotional Well Being:**


- It is the practice that each youth receives a physical exam and dental exam within one month of placement.
- It is the practice that each youth receives individual counseling from a Marriage, Family Child therapist/intern/trainee on a weekly basis.
- It is the practice that each youth has an Individual Mental Health Assessment to assess needs and an Individual Treatment Plan to meet the emotional, social, relationship, physical, educational, medical, and recreational and health related needs of each youth. This plan is updated quarterly.
- It is the practice that each youth's case is reviewed once quarter for evaluation.
- It is the practice that each week there is availability at a weekly consultation meeting for individual needs of youth to be discussed and monthly each youth's case is reviewed formally.
- It is the practice that each youth receives the opportunity as assessed to see a psychiatrist on a monthly basis.
- It is the practice that each youth as assessed receives education and counseling on Drug and Alcohol related issues two times a week for 1½ hours per session.
- It is the practice that each youth as assessed receives education and counseling on Anger Reduction Therapy one time a week for 1½ hours per session.
- It is the practice that each youth in the course receives information on nutrition and wellness at intake and information is posted at each site in a common area.
- It is the practice that all youth are supervised in their current living situation by staff that have received Certification in Community Water Safety, First Aid, CPR, ProAct (De-escalation)
- It is the practice that all youth have access to a credentialed psychiatric technician that is supervised by a clinical therapist and receives guidance from a psychiatrist.
- **FOR COMPLETE DOCUMENT ASK STAFF. CN&WP IS LOCATED IN THE FOOD SAFETY LOG.**

**Public Involvement:**

- Ettie Lee maintains a Wellness committee that includes administrators, department supervisors, mental health professionals, youth and parents (where appropriate) in developing, implementing, monitoring and reviewing the Child Nutrition and Wellness Protocols. The Wellness Committee shall meet quarterly to review and revise the Child Nutrition and Wellness Policies and to develop and monitor an action plan for the coming year as necessary. The Committee shall meet additionally as needed during the school year to discuss implementation activities and address barriers and challenges.
- The Wellness Committee will meet annually, at minimum, or more often as needed to monitor the implementation and impact of the Child Nutrition and Wellness Protocols. Goal attainment will be measured by monitoring the Needs and Services Plans and goals will be revised and updated or newly created. Policy language will be assessed each year and revised as needed.

**Public Notification:**

- Awareness of the Ettie Lee Child Nutrition and Wellness Program shall be made available to staff, youth and families by means of program training manual, client intake information and the ettielee.org website.
- On an annual basis, Ettie Lee will notify staff, youth and families on their website that they offer a Child Nutrition and Wellness Program and about its Civil Rights Policies and Procedures on filing complaints, about the content and updates to the policy and how the public can be involved in the Child Nutrition and Wellness Program.
- Ettie Lee will provide reports of the triennial assessment to the public via their website.

 <p><b>ETTIE LEE</b> Youth &amp; Family Services Doing Whatever It Takes To Save Lives, Change Lives and Build Hope In Children, Youth and Families</p>	<p><b>CHILD NUTRITION &amp; WELLNESS PROGRAM CIVIL RIGHTS AND COMPLAINT PROCEDURES</b></p>	

**Purpose:**

Ettie Lee must ensure that it performs certain duties to both prevent and resolve all complaints related to programs and civil rights.

**Civil Rights Coordinator:**

Karen Turner, Director of Quality Improvement and Staff Development is the Civil Rights Coordinator for the agency: The Civil Rights Coordinator’s duties include:

- Providing the name of the Civil Rights Coordinator,
- Provides mandatory civil rights training to all staff annually.
- Implementing procedures to determine and process civil rights complaints.
- Implementing procedures to determine and process program related complaints.
- Notifying the public, participants, and potential participants, upon request, of information about program requirements and the procedures for filing a complaint in

English and/or in the appropriate language for persons with limited English proficiency.

- Ensuring that the public, participants, and potential participants are notified that a complaint can be filed anonymously or by a third party.
- Developing a method to collect racial and ethnic data.
- Ensuring that the agency makes special meals available to participants with disabilities who have a medical statement on file documenting that their disability restricts their diet.
- Ensuring that participants with disabilities are not excluded from enjoying the benefits or services due to inaccessibility of facilities.
- Must ensure the most current version of the federal nondiscrimination statement is in a prominent location in all public information releases, publications, and on posters concerning nutrition program activities, except menus.
- Must ensure that the **And Justice For All** posters is displayed in areas visible to program recipients, such as the food service area and sponsor's office, except in family day care homes.
- Sending a public release announcing the availability of the CNPs and/or changes in the programs to public media and community/grassroots organizations via the website.
- Providing appropriate translation services when a significant number of persons in the surrounding population have limited English proficiency.
- Establishing admission and enrollment procedures that do not restrict enrollment of minority persons or persons with disabilities. This includes preventing staff from incorrectly denying applications of minority persons and persons with disabilities, and ultimately ensuring that minority persons and participants with disabilities have equal access to all programs.
  - All participants in Ettie Lee are provided free meals.
- Maintaining a complaint log and working with the appropriate people to resolve the complaint. The complaint as well as the complaint log must include, at a minimum, the following information:
  - The name, address, and phone number or other means of contacting the complainant, such as an e-mail address (if not anonymous)
  - The specific location and name of the entity delivering benefits.
  - The nature of the complaint or action that led to the charges being filed.
- If the nature of the complaint alleges discrimination, the NSD recommends that the Civil Rights Coordinator collect the following information and forward to USDA:
  - The basis on which the complainant feels that discrimination occurred. In order to be considered a discrimination complaint, the complainant must feel discriminated against based on one or more of the protected classes
  - The names, titles, and if known, addresses of persons who may have knowledge of the discriminatory action or situation
  - The date(s) that the alleged discrimination occurred, or the duration of such action
  - Forward all allegations of discrimination to the USDA National Office in Washington, D.C., at the address provided on page 8 of this document

## **Nondiscrimination Statement:**

- Ettie Lee includes the most current version of the federal nondiscrimination statement in a prominent location in all public information releases, publications, and on posters concerning nutrition program activities, except menus.
- The following statement “**This institution is an equal opportunity provider.**” must be on all flyers, brochures, etc. where the Child Nutrition and Wellness Program is mentioned.
  - The statement must not be any smaller than the font used in the printed document.
- All large documents must contain the full Nondiscrimination Statement:
  - 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, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.
  - Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 800-877-8339. Additionally, program information may be made available in languages other than English.
- The USDA prohibits discrimination in all its programs and activities. However, CNP regulations **do not** cover all types of discrimination. The **only** protected classes covered under the CNPs are race, color, national origin, sex, age, or disability.

## **Children with Disabilities**

- The Americans with Disabilities Act (ADA) Amendments Act has simplified what determines a disability and it should no longer require extensive analysis. SFAs and local educational agencies (LEA) should not be involved in analyzing documentation to determine whether a particular physical or mental impairment is severe enough to qualify as a disability. The ADA Amendments Act amended the definition of disability, broadening it to cover most physical and mental impairments, and the goal is to ensure equal opportunity to participate in or benefit from the SNPs.
- Section 504, the ADA, and 7 *CFR*, Section 15b, define a person with a disability as any 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 activities are broadly defined and include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. Major life activities also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. A physical or mental impairment does not need to result in a severe, life-threatening reaction to be

considered a disability. It is sufficient that the impairment limits a major life activity. For instance:

- Digestion is an example of a bodily function that is a major life activity. A child whose digestion is impaired by a lactose intolerance may have a disability regardless of whether or not consuming milk causes the child severe distress. A modification in this case is appropriate.
- An allergic reaction that is controlled by taking medication should not be considered in determining whether the allergy is a disability. A modification in this case is appropriate.
- Dietary preference that a child eat a gluten-free diet because a parent believes it is better for the child, does not constitute a disability and does not require accommodation.
- A physical or mental impairment that constitutes a disability must be on a case-by-case basis. The determination must be made without regard to whether mitigating measures may reduce the impact of the impairment.

### **Substitutions and other Reasonable Modifications**

- In many cases, reasonable dietary modifications for a child with a disability are managed within the meal pattern requirements when a well-planned variety of nutritious foods are available. However, the needs of a child with a disability may involve requests for accommodations that do not meet the meal pattern requirements.

### **Requiring a Medical Statement**

- SFAs are required to make substitutions to meals for children with a disability that restricts the child's diet on a case-by-case basis and only when supported by a written medical statement from a state licensed healthcare professional. **The CDE only permits the following state licensed healthcare professionals to complete and sign a written medical statement for a disability: licensed physicians, physician assistants, or nurse practitioners.**
- California does not recognize other medical authorities as authorized to sign a written medical statement to determine a child's diet. Physician assistants and nurse practitioners both work under the direction of a licensed physician. This will safeguard program integrity while allowing appropriate flexibility for those families who do not have access to a licensed physician.
- California allows electronic signatures. A written medical statement that is e-signed by the designated state licensed healthcare professional can also be considered an acceptable signature. Medical statements must:
  - Describe the physical or mental impairment sufficiently in order for the SFA to understand how it restricts a child's diet
  - Explain what must be done to accommodate a child's disability
  - Identify food or foods to be omitted from a child's diet
  - Recommend food or choice of foods that must be substituted in a child's meals
  - If a written medical statement is unclear or lacks sufficient detail, the SFA must obtain appropriate clarification to ensure a proper and safe meal is provided to the child. SFAs may consider the services of a registered dietitian, when available, to assist in implementing meal modifications. SFAs may also contact the CDE for guidance.

### **Serving Meals in an Integrated Setting:**

- Ettie Lee shall provide all meal services in the most integrated setting appropriate to meet the needs of the child. Exclusion of any child from the environment is not considered an appropriate or reasonable modification. For instance, a child may not be excluded from the dining table and required to sit in the hallway during the service of breakfast. A separate table available for children to control exposure to a severe food allergy may be an appropriate safeguard, yet it cannot simultaneously be used to segregate children as punishment for misconduct.

### **Reimbursement:**

- Regardless of the meal accommodation, reimbursement for modified meals served to children with disabilities that restrict their diet is at the appropriate rate based on the child's eligibility for free, reduced-price, or paid meals for the applicable program. These meal modifications do not have to meet the program meal pattern requirements in order to be claimed for reimbursement if they are supported by a signed written medical statement. However, SFAs should ensure that the meal modifications meet the nutritional needs of the child.

### **Accessibility:**

- Ettie Lee is responsible for the accessibility of food service areas and for ensuring the provision of food service aides, where needed, to assist in preparing and serving meal accommodations

### **Public Notification and Grassroots Efforts:**

- Ettie Lee has a public notification system or grassroots effort. The purpose of this system is to inform applicants, participants, and potentially eligible persons of program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint.
  - At intake all participants are made aware of the Child Nutrition and Wellness Program and Civil Rights and Complaint Procedures.
    - This overview is documented in the client file.

### **Protected Racial and Ethnic Categories in the CNPs**

- Ettie Lee collects ethnicity first, and then offers respondents the option of selecting one or more racial designations. Respondents are encouraged to use multiple responses for race should include one of the following: Mark One or More, or Select One or More, to encourage accurate information
- Ettie Lee collects this demographic information to ensure that it makes efforts to outreach to those underserved populations that are able to participate in the Child Nutrition and Wellness Program.
- The minimum designations for ethnic and racial data collection are as follows:
  - **Ethnicity**
    - **Hispanic or Latino**—A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term Spanish origin can be used in addition to Hispanic or Latino
    - **Not Hispanic or Latino**
  - **Race**
    - **American Indian or Alaskan Native**—A person having origins in any of the original peoples of North and South America, including Central America, who maintains tribal affiliation or community attachment

- **Asian**—A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
- **Black or African American**—A person having origins in any of the black racial groups of Africa. Terms such as Haitian or Negro can be used in addition to Black or African American
- **Native Hawaiian or Other Pacific Islander**—A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands
- **White**—A person having origins in any of the original peoples of Europe, the Middle East, or North Africa

### **Discriminatory Behavior**

- The following are general examples of prohibited discriminatory behavior
  - Denying an individual or household the opportunity to apply for FNS program benefits or services on the basis of race, color, national origin, sex, age, or disability.
    - Ettie Lee provides all its clients free meals.
  - Providing program services or benefits in a different manner on the basis of race, color, national origin, sex, age, or disability, unless the difference is necessary to comply with nondiscrimination requirements, such as disability accommodations (this includes providing disability accommodations which includes dietary accommodation or physical assistance).
  - Selecting members for planning and advisory bodies in such a way as to exclude persons from membership on the basis of race, color, national origin, sex, age, or disability
- Selecting FNS program sites or facilities in a manner that denies an individual access to FNS program benefits, assistance, or services on the basis of race, color, national origin, sex, age, or disability. Ettie Lee also prohibits discrimination on the basis of religion and political beliefs.

### **Complaint Procedures:**

- The Civil Rights Coordinator is responsible for the development and implementation and monitoring and the review of the Child Nutrition and Wellness Program Complaint Procedures.
- Complaint Procedures are reviewed with the clients at intake and documented in the client file.
- Complaint Procedures are trained to staff within ninety days of hire and annually thereafter.
- Complaint Procedures are posted in a prominent place in the kitchen area of the facility and in administrative building where families and the public can view.
- Complaint Forms are available in a prominent place without having to ask for them.
- Staff must provide assistance in writing and processing complaints if the client asks for help.
- The STRTP Administrator is responsible to ensure that the Civil Rights Coordinator is made aware that there is a discrimination complaint or grievance.
- Discrimination complaints are to be reported directly to the below agency.

- Discrimination complaints are to be reported to the Civil Rights Coordinator.
- The Civil Rights Coordinator is to log the discrimination complaint on Complaint Log.
- The Civil Rights Coordinator is responsible to provide a Resolution to Non-Compliance of the agency procedures by reviewing and revising procedures as necessary and ensuring that staff are trained on the new procedures.
- The Civil Rights Coordinator is responsible providing a log of all complaints and grievances and their resolution on a quarterly basis to the agency Board of Directors.
- The Civil Rights Coordinator is responsible to mail the complaint to the correct contact and address.


### **Non-Discrimination Statement**

- **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, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.**
- **Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotope, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 800-877-8339. Additionally, program information may be made available in languages other than English.**
- **To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at the Filing a Program Discrimination Complaint as a USDA Customer pageExternal link opens in new window or tab. , 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**
  - **Washington, D.C. 20250-9410;**
  - 
  - **(2) fax: 202-690-7442; or**
  - 
  - **(3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov)**
  - 
  - **This institution is an equal opportunity provider.**



**Note: The USDA will investigate and process complaints alleging discrimination.**

- All program complaints filed with the NSD are resolved at the state level. The NSD Complaint Coordinator logs the complaint, refers it first to the district for handling and if not resolved, then to the appropriate program or Field Services Unit, and tracks it through resolution. The NSD reserves the right to conduct unannounced site visits to determine the validity of all allegations.

 <p><b>ETTIE LEE</b> Youth &amp; Family Services Doing Whatever It Takes To Save Lives, Change Lives and Build Hope In Children, Youth and Families</p>	<p><b>CHILD NUTRITION &amp; WELLNESS PROGRAM AUDITING SCHEDULE</b></p>	

**Program Assessment and Evaluation:**

- The site facility manager is responsible for monitoring the daily implementation of the Child Nutrition and Wellness Program.
- The program manager is responsible for calling the committee to meet for any concerns or changes.
- Two times a year Site Monitoring and Observation of meal preparation and food service for both breakfast and lunch will be conducted at each site.
  - Karen Turner, Director of Quality Improvement and Staff Development and/or Kathy Stannard Director of Administration and/or Alva Stewart, Program Manager are responsible to conduct the annual site monitoring.
- Annually - The facility manager, site administrator, program manager, Director of Residential Treatment, Director of Quality Improvement will meet each year to monitor and evaluate compliance including training expectations.
  - Review cyclic menus, production records, temperature charts, special diet documentation, and reimbursement procedures.
  - Confirm staff and residents are receiving nutrition education and physical activity as prescribed.

**Triennial Assessment:**

- At least once every three years, Ettie Lee will conduct a triennial assessment to measure compliance with the Child Nutrition and Wellness Protocols, to the extent this policy compares with model policies (such as score from Well SAT at <http://wellsat.org>) , and a description of the progress attaining the goals of the policy using a tool such as School Health Index [https://schools.healthiergeneration.org/help/introduction\\_to\\_the\\_school\\_health\\_index/](https://schools.healthiergeneration.org/help/introduction_to_the_school_health_index/) or <http://www.actionforhealthykids.org/tools-for-schools>)
- Ettie Lee will conduct its Triennial Assessment of the Child Nutrition and Wellness Program in **June 30, 2020**.

**Child Nutrition and Wellness Committee –**

Program is developed by Director of Quality Improvement and Staff development with input from clients, food service staff, group home administrators and community members.

Name	Title	Signature	Date