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DEPARTMENT OF EDUCATION
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SUMMER FOOD SERVICE PROGRAM PERMANENT AGREEMENT

Sponsor Name:

SAU/RA #:

Mailing Address:

Authorized Representative:

Telephone:

This document constitutes the permanent agreement between the Sponsor and the New Hampshire Department of Education (NHED), Office of Nutrition Programs and Services (ONPS) for the Summer Food Service Program (SFSP).

No monies or other benefits may be paid out under this program unless this agreement is completed, approved, and filed as required by existing regulations (7 CFR Parts 225, 3015, 3016, 3019 and 3052).

GENERAL APPLICABLE TERMS AND CONDITIONS

These general applicable terms and conditions are hereby incorporated into the Agreement between the Sponsor and the NHED. For purposes of this agreement, a public or private nonprofit school food authority, a public or private nonprofit residential summer camp, a unit of local, municipal, county or state government, a public or private nonprofit college or university currently participating in the National Youth Sports Program or a private nonprofit organization that develops a special summer or other school vacation program providing food service similar to that made available to children during the school year under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) and that is approved to participate in the program is referred to as the "Sponsor." A physical location at which a sponsor provides a food service for children and at which children consume meals in a supervised setting is referred to as a "site." Offer vs. Serve (OVS) refers to a particular type of meal service in which children may select components to make up a reimbursable meal rather than taking all components of a unitized meal.

The sponsor has agreed to participate in the SFSP and accepts responsibility for supervision and control over the program and final financial and administrative responsibility for the program.

The Sponsor will:

- A. Operate a nonprofit food service from June through September for children on school vacation; at any time of the year, in the case of Sponsors administering the program under a continuous school calendar system; or during the period October through May, if it serves an area affected by an unanticipated school closure due to a natural disaster, major building repairs, court orders relating to school safety or other issues, labor-management disputes or other similar causes as approved by the NHED.
- B. Submit an agreement to the NHED where sites are located in accordance with the Food and Nutrition Service (FNS) Instruction 794-5, Agreements with Entities Which Operate Interstate Schools and Facilities.
- C. The Sponsor may operate with NHED approval, meal service sites which are not identified as non-profit locations, if the sites meet all of the following criteria:
 - 1. Sites must be operated under the sponsorship of an eligible public or private non-profit service institution;
 - 2. Sites must operate as open sites or restricted open sites;
 - 3. Sites must be located in an area in which at least 50 percent of the children are from households that are eligible for free or reduced-price school meals;
 - 4. Sites must make meals available to all children in the area and must serve meals to children on a first come, first service basis;
 - 5. Sites must serve all meals at no charge;
 - 6. Sites are not for-profit or for-profit camps;
 - 7. Meals must only be distributed by the Sponsor's trained staff and volunteers and sponsor trained site staff serving as volunteers; and
 - 8. The Sponsor must ensure no SFSP funds are provided to the for-profit site.
- D. Serve meals that meet the requirements and provisions during times designated as the meal service periods by the Sponsor and serve the same meals to all children. No permanent changes may be made in the serving time or any meal unless the changes are approved by the NHED.
- E. Serve meals without cost to all children, except that camps may charge for meals served to children who are not eligible for free or reduced-price school meals.
- F. Issue a free meal policy statement in accordance with 7 CFR 225.6(c).
- G. Meet the training requirements for its administrative and site personnel, as required under 7 CFR 225:
 - 1. The Sponsor must attend NHED training annually.
 - 2. The Sponsor must train all administrative staff and site staff before they undertake their responsibilities.
 - 3. The Sponsor shall not allow a site to operate until personnel at the site have attended at least one of the Sponsor's training.
 - 4. The Sponsor must document the attendance at site training and schedule additional sessions for those staff that are absent.
 - 5. The Sponsor must record for each training session offered the training dates, names of attendees and documentation of the topics covered.

6. The Sponsor will ensure that at least one person who has been trained by the Sponsor be present at each of the Sponsor's sites during the time of the meal service.
7. Training for administrative staff should cover the following topics:
 - a. Purpose of the program
 - b. Site eligibility
 - c. Recordkeeping requirements
 - d. Organized site activity
 - e. Meal requirements
 - f. Nondiscrimination compliance
 - g. How meals will be delivered
 - h. The delivery schedule (if applicable)
 - i. What records are kept and what forms are used
 - j. Monitor's responsibilities
8. Training for monitors should cover the following topics:
 - a. Site for which they will be responsible
 - b. Introduce themselves to site supervisors
 - c. Duties of authority
 - d. Conducting site visit/reviews
 - e. Monitoring schedule
 - f. Reporting/recordkeeping procedures
 - g. Follow-up procedures
 - h. Office procedures
 - i. Local sanitation and health laws
 - j. Civil Rights
 - k. Reporting for ethnic/racial data
 - l. Considerations for personal safety, if necessary
9. Training for site staff should cover the following topics:
 - a. Purpose of the program
 - b. Site eligibility
 - c. Necessity for accurate records
 - d. Importance of organized activities at sites
 - e. For sites obtaining meals from food service management companies/commercial meal vendors, school food authorities, or the Sponsor's central kitchen:
 - i. Meal pattern requirements and types of meal service offered (use planned menus)
 - ii. Delivery schedules (exact times)
 - iii. Adjustments in the delivery amount
 - iv. Facilities available for storing meals
 - v. Who to contact about problems (provide Sponsor's name and telephone number)
 - vi. Approved level of meal service
 - f. For sites where meals are prepared at the site:
 - i. Meal pattern requirements
 - ii. Inventory (use inventory forms)
 - iii. Meal adjustment (use production records)
 - iv. Meal preparation adjustments
 - g. Explain recordkeeping requirements
 - i. Daily recordkeeping requirements
 - ii. Delivery receipts (sample forms)
 - iii. Seconds, leftovers and spoiled meals
 - iv. Daily labor – actual time spent on food service and time and attendance records

- v. Collection of daily record forms
 - vi. Maintain copies of meal service forms
 - h. Civil rights requirements (use Site Supervisor's Guide)
 - i. Explain other miscellaneous policy, such as:
 - i. Problems with inclement weather and alternate service areas
 - ii. Problems with unauthorized adults eating program meals
 - iii. Problems with discipline
 - iv. Review of equipment, facilities and materials available for organized recreational activities
 - v. Review of trash removal system
 - vi. Corrective action
 - vii. Nutrition education
10. The Sponsor will ensure that site personnel and monitors understand the importance of accurate point-of-service meal counts. Meal counts should represent only the number of meals actually served to children. Only complete meals served to children can be claimed for reimbursement. Meals must be counted at the actual point of service.
11. If the Sponsor plans to implement OVS at sites under its Sponsorship, it must follow OVS guidelines as outlined in 7 CFR 225.16(f)(ii). OVS permits children to decline food; a certain number of menu items they do not intend to eat. The Sponsor must ensure that all sites' staff is adequately trained on the guidelines and procedures of OVS and that choosing OVS does not preclude the Sponsor from maintaining a nonprofit operation.
12. Sponsors not implementing the OVS provision will ensure that unitized meals are served to each eligible child at the point of service in order to be claimed for reimbursement.
13. The Sponsor will notify the public through a media release with the dates, locations and serving times for each site serving meals.
14. The Sponsor will notify the local health department with the dates, locations and times of training.
- H. In the storage, preparation and service of food, the Sponsor will maintain proper sanitation and health standards in conformance with all applicable state and local laws and regulations.
- I. The Sponsor will accept and use, in quantities that may be efficiently utilized in the SFSP.
- J. The Sponsor will have access to facilities necessary for storing, preparing and serving food.
- K. The Sponsor will maintain a financial management system as prescribed by the NHED.
- L. The Sponsor will maintain on file documentation of site visits and reviews in accordance with 7 CFR 225.15(d)(2) and (3).
- M. The Sponsor will conduct a preoperational visit for all new and problem sites before they begin operations.
- N. The Sponsor will conduct a site visit at the new sites and any site that experienced operational deficiencies during the previous summer at least once during the first week of operation to ensure that the food service is operating smoothly and that any apparent problems are immediately resolved. In

cases where a site, whether new or returning, will operate for only one week, the site visit must be conducted in that week.

- O. The Sponsor will conduct a site review at all sites at least once during the first four weeks of program operations. The review requires the monitor to observe a complete meal service from beginning to end including delivery or preparation of meals, the meal service and the clean up after meals.
- P. The Sponsor will ensure that if a site operates less than four weeks, the Sponsor must still conduct a review.
- Q. The Sponsor must continue monitoring throughout the duration of the program at a level sufficient to ensure that sites comply with program regulations.
- R. The Sponsor must take prompt action to correct problems at the sites found from previous reviews and inspections by the Health Department and document the corrections taken.
- S. The Sponsor must maintain children on site while meals are consumed.
- T. The Sponsor must retain financial and administrative responsibility for its SFSP.
- U. The Sponsor must submit to the NHED a copy of the letter notifying the local health department of its intention to provide a food service at specific times at planned sites. This must be provided to the NHED before program operation begins.
- V. The Sponsor will meet the civil rights requirements, as required under 7 CFR 225.7(g) and FNS Instruction 113-1:
- W. The Sponsor must inform potential participants of the availability of SFSP.
 - 1. The Sponsor must display in a prominent place at the site and in the Sponsor's office the nondiscrimination poster developed by the United States Department of Agriculture (USDA) or approved by FNS.
 - 2. The Sponsor must make reasonable efforts to provide information in the appropriate translation concerning the availability and nutritional benefits of the program.
 - 3. The Sponsor must include the nondiscrimination statement and instructions for filing a complaint in the public release and in any program information directed to parents of participants and potential participants.
 - 4. The Sponsor must ensure that meals are served to all attending children, regardless of their 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.
 - 5. The Sponsor must ensure that all children have equal access to services and facilities at the site regardless of their 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.
 - 6. Each year, the Sponsor must determine the number of potentially eligible participants by ethnic/racial category for the area served.
 - 7. Each year, the Sponsor must collect ethnic/racial category data for each site under the Sponsor's jurisdiction. Sponsors of residential camps must collect and maintain the information separately for each session of the camp. For all other sites, the Sponsor must count the participating children at least once during the site's operation. The Sponsor may use visual identification to determine a participant's ethnic/racial category.

8. The Sponsor must use separate categories when collecting and reporting ethnicity and race. Ethnicity must be collected first. Respondents must be offered the option of selecting one or more racial designations. The minimum designations for collection are:
 - a. Ethnicity:
 - i. Hispanic or Latino
 - ii. Not Hispanic or Latino
 - b. Race:
 - i. American Indian or Alaskan Native
 - ii. Asian
 - iii. Black or African American
 - iv. Native Hawaiian or Other Pacific Islander
 - v. White
9. To qualify for Federal financial assistance, the program application must be accompanied by a written assurance that the program or facility will be operated in compliance with the CR laws and implementing nondiscrimination regulations.
10. The FNSRO is responsible for obtaining from each State agency a written Statement of Assurance, using Federal-State Agreement, Form FNS-74. By accepting this assurance, the program applicant agrees to compile data, maintain records, and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel during hours of program operation to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, FNS shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the program applicant and its successors, transferees, and assignees, as long as they receive assistance or retain possession of any assistance from USDA.
11. State agencies will incorporate the following CR assurance into all written agreements:

“The Program applicant hereby agrees that it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and all requirements imposed by the regulations of the Department of Agriculture (7 CFR Part 15), DOJ (28) CFR Parts 42 and 50) and FNS directives or regulations issued pursuant to that Act and the regulations, to the effect that, no person in the United States shall, on the ground of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity for which the Program applicant received Federal financial assistance from USDA; and hereby gives assurance that it will immediately take any measures necessary to fulfill this agreement.”

“This assurance is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants, and loans of Federal funds, reimbursable expenditures, grant, or donation of Federal property and interest in property, the detail of Federal personnel, the sale and lease of, and the permission to use Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration that is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Program applicant by USDA. This includes any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of cash assistance for the purchase of food, and cash assistance for purchase or rental of food service equipment or any other financial assistance extended in reliance on the representations and agreements made in this assurance.”

“By accepting this assurance, the Program applicant agrees to compile data, maintain records, and submit reports as required, to permit effective enforcement of nondiscrimination laws and permit

authorized USDA personnel during hours of program operation to review such records, books, and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, the Department of Agriculture, FNS, shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Program applicant, its successors, transferees, and assignees as long as it receives assistance or retains possession of any assistance from USDA. The person or persons whose signatures appear below are authorized to sign this assurance on the behalf of the Program applicant.”

- X. The Sponsor may request advance payment for total program costs. The Sponsor’s request must be separate for operating costs and administrative costs. Advance requests must be submitted at least 30 days before the payment date of June 1 or by the established NHED deadline. The NHED must receive certification that a Sponsor (except for school Sponsors) has held training sessions on program requirements for site and Sponsor personnel before release of the second month’s operating advance to the sponsor.
- Y. The Sponsor must submit claims for reimbursement on the form and in accordance with procedures provided by NHED.
- Z. The Sponsor must submit claims for reimbursement via the Internet in accordance with procedures established by the NHED. Claims for reimbursement not filed within 60 days following the claiming month for which the claim is made may be disallowed. Any exception to this requirement will be made at the discretion of the USDA, FNS. A one-time exception for late claim submission may be made at the discretion of the NHED. Sponsors on the one-time exception list submitting subsequent late claims within the three year period will not receive reimbursement for the late claim submitted.
- AA. Reimbursements are based on the number of reimbursable meals served multiplied by the sum of the administrative and operational rates. Sponsors must maintain complete records to document all costs and meals they claim for reimbursement. Sponsors are not eligible for reimbursement unless they have a signed agreement with the NHED and there is an approved current year application on file with the NHED.
- BB. Camp reimbursements are based on the number of children served who are eligible for free or reduced-price meals according to the income guidelines for NSLP or SBP. With NHED approval, camps may claim reimbursement for serving up to three meals or two meals and one snack to eligible children each day. Sponsors of camps must maintain the documentation that demonstrates the free or reduced-price eligibility of the children they claim reimbursement for and must make it available for review by NHED. Sponsors of camps may charge non-eligible children a separate fee for meals.
- CC. Sponsors must document funds accruing to the Sponsor’s program. Accruing funds will not be deducted from the Sponsor’s reimbursement. Sources of funds considered program income include:
 - 1. Cash donations specifically identified for use in the program.
 - 2. Any federal, state, or local funds specifically provided to the program.
- DD. Sponsors must use reimbursement or funds that exceed the Sponsor’s expenditures in a way that benefits SFSP services to children. The Sponsor should use funds remaining at the end of the program year as start-up funds or for improving SFSP services in the following year.
- EE. If the Sponsor will not participate in the SFSP the next year, funds may be used towards the Sponsor’s provision of other child nutrition programs. If the Sponsor does not provide any other

program, the excess funds must be remitted to the NHED. Sponsors may not transfer excess funds to non-program operations or to increase salary or fringe benefit costs when the sole purpose of the increase is to reduce the food service program balance.

- FF. Unallowable costs are costs for which program funds may not be used. They include, but are not limited to:
1. The cost for excess meals ordered or prepared but not served to eligible children, i.e., meals in excess of legitimate program adult meals and reimbursement meals, unless specifically approved by the NHED.
 2. Meals served in violation of program requirements, i.e., meals served outside of the approved serving time, meals or components consumed away from the site, and second meals in excess of the two percent tolerance.
 3. Rental costs for periods beyond the close-out date for program operation.
 4. Any other costs incurred that the NHED determined to be in violation of applicable laws or regulations.
 5. The cost to purchase food (including coffee, etc.) for use outside of the SFSP.
 6. The cost of meals served to administrative adult personnel or any other adults who are not part of the food service operation.
 7. The cost of spoiled or damaged meals.
 8. For vended Sponsors, the cost of meals delivered by a food service management company to an unapproved site or for meals not delivered within the agreed-upon delivery time, meals served in excess of the approved capacity, spoiled or unwholesome meals, or meals that do not meet meal requirements or quality standards.
 9. Bad debt, which are any costs arising from non-collectible accounts and other claims and related costs.
 10. Repayment of over-claims and other federal debt.
 11. Contributions or donations including contingency reserves, USDA-donated commodities and other donated food, labor and supplies.
 12. Fines or penalties resulting from violations of or failure to comply with federal, state or local laws and regulations.
 13. Entertainment and fundraising costs.
 14. Interest on loans, bond discounts, costs of financing and refinancing operations and legal and professional fees paid in connection therewith.
 15. Costs resulting from an under-recovery of costs under other grant agreements.
 16. Direct capital expenditures or option to purchase rental costs for acquisition of land or any interest in land; acquisition or construction of buildings or facilities or the alteration of existing buildings or facilities; nonexpendable equipment of any kind; repairs that materially increase the value or useful life of buildings, facilities or nonexpendable equipment; and other capital assets, including vehicles.
- GG. Sponsors, upon request, must make all accounts and records pertaining to the program available to state, federal or other authorized officials for audit or administrative review at a reasonable time and place. The records shall be retained for a period of three years after the end of the fiscal year to which they pertain plus the current year, unless audit or investigative findings have not been resolved, in which case, the records shall be retained until all issues raised by the audit or investigation have been resolved.
1. A review at the Sponsor level should involve a review of how the claim for reimbursement is assembled and a review of the records maintained by the Sponsor. Regardless of the specific administrative review procedures, all Sponsors must make their records available for review by the

NHED and must implement all corrective actions recommended by the NHED. The results of an administrative review may affect the amount of reimbursement a Sponsor will receive.

2. Violations of program requirements may result in withholding or recovery of reimbursement, temporary suspension or termination and exclusion from future program participation.
3. When the NHED finds violations during a site review, it will require the Sponsor to correct the problems found. If the NHED finds a high level of meal service violations at a site, it will immediately require the Sponsor to follow a specific corrective action plan. The NHED will initiate a follow-up system to ensure that Sponsors take the specific action (as outlined in the plan) for correcting site violations.
4. Failure to submit an acceptable corrective action plan may affect the Sponsor's future participation in the program.

AUDITS

AUDIT REQUIREMENTS. The NHED provides federal financial assistance to a variety of entities that must comply with all federal and state audit requirements including: the Single Audit Act of 1984, as amended, (31 U.S.C. 7501 et. Seq.); Office of Management and Budget (OMB) Super Circular 2 CFR 200; Catalog of Federal Domestic Assistance (CFDA); Audits of State, Local Governmental Units, and Non-Profit Organizations, as amended; and any other applicable law or regulations and any amendment to such other applicable law or regulation that may be enacted or promulgated by the federal government. If the Sponsor is a local government or nonprofit organization and expends total federal awards of \$500,000 or more during its fiscal year, received either directly from the federal government or indirectly from a recipient of federal funds, the Sponsor shall have an audit made in accordance with the provisions of OMB Super Circular 2 CFR 200.

If the nonprofit Sponsor expends less than \$500,000 of federal financial assistance during its fiscal year, the Sponsor is exempt from these audit requirements but is required to maintain records of federal financial assistance and to provide access to such records by federal and state agencies or their designees.

If the Sponsor is a nonprofit institution not subject to the provision of the OMB Super Circular 2 CFR 200, or is a for-profit organization, the Sponsor shall be subject to the audit requirements of the laws and regulations governing the program(s) in which it participates.

PERIOD SUBJECT TO AUDIT AND AUDIT FREQUENCY. A single audit or program-specific audit made in accordance with OMB Super Circular 2 CFR 200 shall encompass the fiscal period of the Sponsor and shall be performed on an annual basis.

SUBMISSION OF AUDIT REPORT TO THE STATE. If a single audit, organization-wide, or a program-specific audit is made in accordance with the provisions of OMB Super Circular 2 CFR 200, the Sponsor must submit the audit report within 30 days after the audit has been issued. The audit shall be completed and the report submitted no later than nine months after the end of the Sponsor's fiscal year. The Sponsor shall submit three copies of the audit report to:

NH Department of Education
Audit Department
25 Hall Street
Concord NH 03301-3860

All auditees shall submit a copy of the audit report to the Federal Auditing Clearinghouse in accordance with OMB Super Circular 2 CFR 200.512(b)(1). The address for the currently designated clearinghouse is:

Financial Standards and Reporting Branch
 Office of Federal Financial Management
 Office of Management and Budget
 Washington DC 20503
 Phone (202) 345-3993

GENERAL AUDIT PROVISIONS. The Sponsor is responsible for obtaining the necessary audit in accordance with audit requirements of OMB Super Circular 2 CFR 200, Subpart F – Audit Requirements.

The NHED reserves the right for federal and state agencies or their authorized representatives to perform additional audits of a financial or performance nature, if deemed necessary by the NHED or federal agencies. Any such additional audit work will rely on work already performed by the Sponsor’s auditor and the costs for any additional expense to the federal agency or NHED will be borne by those agencies at no additional expense to the Sponsor. Audit working papers and audit reports shall be retained by the Sponsor’s auditor for a minimum of three years from the date of the audit report, unless the Sponsor’s auditor is notified in writing by the NHED or the appropriate federal agency to extend the retention period. Audit working papers shall be made available upon request to authorized representatives of the NHED, the federal agency or the General Accounting Office.

CFDA reporting numbers are as follows:

Program	Federal Code	Federal Regulation	CFDA
SFSP	NSLA (42 USC 1751-69h)	7 CFR 225	10.559

SIGNATURE ON BEHALF OF SPONSOR:

I certify that the information submitted on these forms is true and correct and that the sponsor is aware that deliberate misrepresentation or withholding of information may result in prosecution under applicable State and Federal statutes.

SIGNATURE OF CHIEF ADMINISTRATOR

DATE

PRINT NAME

NAME OF SPONSORING AGENCY/SPONSOR

DATE

For agreement inquiries, contact:

Administrator
 Office of Nutrition Programs and Services
 25 Hall Street
 Concord, NH 03301-3860
 Phone: (603) 271- 3862

FOR NHED USE ONLY:

The Summer Food Service Program Permanent Agreement between the above Sponsor and NHED will become final upon the approval of the Sponsor's application to participate in the SFSP.

SIGNATURE OF NHED REPRESENTATIVE

CFDA# 10.559

[USDA Nondiscrimination Statement | Food and Nutrition Service](#)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
Program.Intake@usda.gov

This institution is an equal opportunity provider.