Civil Rights Training

Policy

USDA Federal Regulations:
246.8 (a) *Civil rights requirements.* The State agency shall comply with the requirements of title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Department of Agriculture Regulations on nondiscrimination (7 CFR parts 15, 15a and 15b) and FNS instructions to ensure that no person shall, on the grounds of race, color, national origin, age, sex or handicap, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under the Program. Compliance with title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and regulations and instructions issued thereunder shall include, but not be limited to:

(1) Notification to the public of the nondiscrimination policy and complaint rights of participants and potentially other person:
(2) Review and monitoring activity to ensure Program compliance with the nondiscrimination laws and regulations;
(3) Collection and reporting of racial and ethnic participation data as required by Title VI of the Civil Rights Act of 1964, which prohibits discrimination in federally assisted programs on the basis of race, color, or national origin; and
(4) Establishment of grievance procedures for handling complaints based on sex and handicap.

Authority

USDA Federal Regulations: 7 CFR Part 246.8 (a)
USDA Federal Regulations: 7 CFR 15
USDA Federal Regulations: 7 CFR 16
USDA Departmental Regulations
FNA Program Regulations
Judicial Administration Federal Regulations: 28 CFR 35
Judicial Administration Federal Regulations: 28 CFR 36
Judicial Administration Federal Regulations: 28 CFR 42
Title VI of the Civil Rights Act of 1964
Title IX of the Education Amendments of 1972
Section 504 of the Rehabilitation Act of 1973
Americans with Disabilities Act (ADA) of 1990
ADA Amendments Act of 2008
Age Discrimination Act of 1975
Civil Rights Restoration Act of 1987

Procedures

WIC contract agencies and the WIC State Agency have specific roles in civil rights training.

WIC State Agency Role
The State WIC agency is responsible for:

- Developing/updating the Civil Rights Training
- Training state agency staff
- Monitoring agency compliance with training requirements as part of its administrative and agency office reviews

Local Agency Role
Local WIC agencies are required to provide civil rights training as part of their orientation program for new employees and annually thereafter. The training must include a review of:

- Public notification and outreach
- Data collection
- Compliance reviews
- Procedures for handling complaints

Specific subject matter must include, but not be limited to:

- Collection and use of data;
- Effective public notification systems;
- Complaint procedures;
- Compliance review techniques;
- Resolution of noncompliance;
- Requirements for reasonable accommodations of persons with disabilities;
- Requirements for language assistance;
- Conflict resolution; and
- Customer service

All employees who are involved with the administration of the WIC Program or who interact with WIC participants in administering the program, including staff who are paid indirectly by WIC, must complete the Civil Rights training.

Additional training must be provided whenever new legislation or regulations are implemented. See Policy titled "Local Agency Personnel Training" for more information about this and other training requirements.

The Section 504/Americans with Disabilities Coordinator as well as staff in charge of hiring (e.g. WIC Coordinators and Human Resource personnel) must complete ADA training within the first month of hire.

Civil Rights Training
The local and state agency must use the Civil Rights Training that can be found on the Iowa WIC Web Portal.

ADA Training
The "ADA Update: A Primer for State and Local Governments" should be reviewed for those in need of ADA training. The document can be found at the following location: https://www.ada.gov/resources/title-ii-primer/.