

## Civil Rights Training

### Policy

#### **USDA Federal Regulations:**

(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.

#### **FNS Instruction 113-1:**

XI Civil Rights Training - Training is required so that people involved in all levels of administration of programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures, and directives. Persons responsible for reviewing CR compliance must receive training to assist them in performing their review responsibilities. The training may be carried out as part of ongoing technical assistance.

The FNS Regional OCR and State agencies will be responsible for training State agency staffs. State agencies are responsible for training local agencies. Local agencies are responsible for training their subrecipients, including “frontline staff”. “Frontline staff” who interact with program applicants or participants, and those persons who supervise “frontline staff”, must be provided civil rights training on an annual basis. Specific subject matter must include, but not be limited to:

- A Collection and use of data,
- B Effective public notification systems,
- C Complaint procedures
- D Compliance review techniques,
- E Resolution of noncompliance
- F Requirements for reasonable accommodation of persons with disabilities,
- G Requirements for language assistance,

H Conflict resolution, and  
I Customer service

## Authority

**USDA Federal Regulations:** 7 CFR Part 246.8 (a)  
**FNS Instruction 113-1:** Section XI Civil Rights Training

## Procedures

WIC contract agencies and the state WIC office have specific roles in civil rights training.

In addition to complying with the requirements listed in 7 CFR Part 246.8 (a) as listed in the “Policy” section above, the State and local agencies shall also comply with the requirements of Title II and Title III of the Americans with Disabilities Act (ADA) of 1990 as amended by the ADA Amendment Act of 2008, Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”, and FNS instructions, directives, and guidelines.

### State WIC Office 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.

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 or training (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/regs2010/titleII\\_2010/title\\_ii\\_primer.html](https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html).