Iowa WIC Program

Civil Rights Training 2021

Purpose

- The purpose of this training is to review the policies and procedures set forth by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) to ensure compliance with and enforcement of the prohibition against discrimination within the WIC program. (Policy 320.20)
- USDA FNS mandates that Civil Rights training be conducted as part of new employee orientation and annually thereafter to inform and update staff of their obligations under Civil Rights laws and regulations. (Policy 320.50)

Civil Rights Training Requirements

- 9 key areas to be addressed:
  - Collection and use of data
  - Effective public notification systems
  - Complaint procedures
  - Compliance review techniques
  - Resolution of noncompliance
  - Requirements for reasonable accommodation of persons with disabilities
  - Requirements for language assistance
  - Conflict resolution
  - Customer service

Follow Up

- Documentation of both the new employee and the annual Civil Rights training will be monitored as part of the local agencies on-site administrative and office reviews. (Policy 320.50)
- The supervisor at the state office will verify training completion by State WIC staff at their annual performance review.

Statement of Policy

- It is the policy of the Iowa Department of Public Health to ensure that no otherwise qualified individual shall solely, by reason of race, color, national origin, age, sex or disability be excluded from the participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving WIC financial assistance. (Policy 320.00)

Title VI of the Civil Rights Act of 1964

- Prohibits discrimination based on race, color and national origin in programs or activities which receive Federal financial assistance.

"Simple justice requires that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial discrimination."

-John F. Kennedy

Title IX of the Education Amendments of 1972

- Prohibits sexual discrimination in education programs or activities that receive any federal financial assistance.
  - Title IX covers the WIC Program because of the required nutrition education component.

Sections 504 and 508 of the Rehabilitation Act of 1973

- Prohibits discrimination on the basis of disability in programs and activities receiving or benefiting from Federal financial assistance.
- The WIC Program must provide services to disabled clients which:
  - Are equal to those provided to non-disabled clients
  - Are held in integrated settings, appropriate to each person's needs
  - Do not limit participation because of the disability
  - Do not deny them the opportunity to serve on a planning or advisory board because of a disability
  - Allow full participation without physical barriers restricting access to the program

Americans with Disabilities Act

- Title II and Title III of the Americans with Disabilities Act of 1990 extended the requirements to all services, programs, and activities of State and local governments and prohibits discrimination based on disability in other public services.
- Senator Harkin authored the bill and was its chief sponsor. He also delivered part of his introduction speech in sign language so his deaf brother could understand.

Americans with Disabilities Act

- Disability is defined by the ADA as:

  "A person who has a physical of mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment."

Clinic Accessibility

- The WIC clinic access survey is a tool for local WIC agencies to use to review all new and renovated clinic sites to determine compliance with the Americans with Disabilities Act. (Policy 300.55)
- Reviews must be completed before the site is used as a clinic and written evaluations must be retained in agency files.
- Following completion of the survey, a transition plan should be completed to address problem areas.
  - Plans should be updated following significant clinic renovations.

Age Discrimination Act of 1975

“ No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Age Discrimination Act of 1975

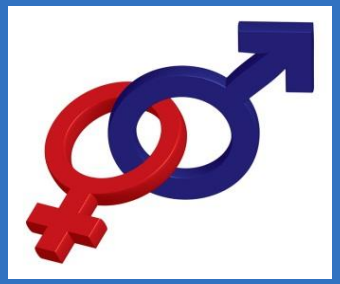
- Whenever congressional legislation specifies or sets restrictions on program eligibility, those provisions take precedence over certain protected bases.
- Since Section 17 of the Child Nutrition Act of 1966, as amended, defines the purpose of the WIC program as provision of benefits specifically to pregnant women, breastfeeding and postpartum women, infants, and children of certain age limitations the eligibility determination according to age in itself is not a violation of civil rights laws.

Age Discrimination Act, 1975

- It would potentially be a violation of civil rights law to deny benefits to a woman strictly based on her age (i.e. eligibility decisions such as denying teenaged applicants for “immorality” or terminating a postpartum woman because she is over a certain age are not allowed).

Protected Bases

- No person can be denied benefits based on:
  - Age
  - Color
  - Disability
  - National Origin
  - Race
  - Sex



Title VI of the Civil Rights Act and Limited English Proficiency (LEP)

- State agencies, local agencies or other sub-recipients that fail to provide services to potentially eligible LEP persons may be discriminating on the basis of national origin.
- You are required to take **reasonable** steps to assure meaningful access to the information and services you provide. This is to be provided at no cost to the participant. (Policy 390.40)

What are Reasonable Steps?

- Dependent on the number or proportion of LEP persons served or encountered in the eligible population
  - Greater number = increased need for language services
- Dependent on the frequency with which LEP individuals come in contact with the program
  - More frequent contact with a particular language group = more likely that enhanced services in that language are needed

What are Reasonable Steps?

- Dependent on the nature and importance of the program, activity or service provided
  - More important activities (e.g. communicating eligibility requirements) increase the need for language services
- Dependent on the resources available and their costs
  - Smaller recipients with limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets
  - Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits
  - Technological advances can often help reduce cost and resource issues

Language Assistance Options

- Hiring bilingual staff who are trained and competent in the skill of interpreting
- Contracting with an interpreter service for trained and competent interpreters
- Formally engaging community volunteers who are trained and competent in the skill of interpreting
- Enrolling WIC staff in language classes
- Utilizing a telephonic or web-based interpreter service
- Providing forms, education and audiovisual materials to WIC participants in other languages

Data Collection

- Racial/Ethnic data is collected by the local agencies for each participant in Focus. (Policy 320.30)
- Access to this data is limited to authorized local and state WIC personnel.
- Federal and State governments require this data be used to generate reports which will:
  - Determine how effectively FNS programs are reaching potentially eligible persons and beneficiaries
  - Identify areas where additional outreach is needed
  - Assist in the selection of locations for compliance reviews

Focus Enrollment Screen

- Racial and ethnic data is captured on the Enrollment screen in Focus

Enrollment

Name: Sybil Rights Jr.

Date of Birth: 04/16/2015

Expected DOB __/__/____

*Sex Female

*Hispanic/Latino No

*Mother Mother Not on WIC

*Race
- [x] White
- [x] Black
- [ ] Asian
- [ ] American Indian or Alaskan Native
- [ ] Native Hawaiian or Other Pacific Islander

Link

WIC Status History

Make Foster Child

No Longer Foster Child

Foster Care

Entered Foster Care Date __/__/____

Changed Foster Families Date __/__/____

Close

Asking about Race and Ethnicity

- FNS Instruction 113-1 requires that all program applicants be asked to identify **all** applicable racial categories.
- Self-reporting is the preferred method of obtaining characteristic data.
- If an applicant refuses to self-identify, visual observation shall be used to collect the data.
  - A data collector may not second guess or challenge an applicant's self-declaration unless such declarations are blatantly false.

Asking about Race and Ethnicity

- The following is an example of what may be said when collecting race/ethnicity date from a participant:
  - *"The Federal government collects information on racial and ethnic backgrounds to see if WIC is accessible to all groups of individuals. This information will in no way affect your eligibility for WIC or your participation in WIC."*

What are Race and Ethnicity?

Race

- Refers to people of a shared ancestry.
- Make participants aware they may select more then one.
- FNS requires reporting on the following 5 categories of race:
  - American Indian or Alaskan Native
  - Asian
  - Black or African American
  - Native Hawaiian or Other Pacific Islander
  - White

Ethnicity

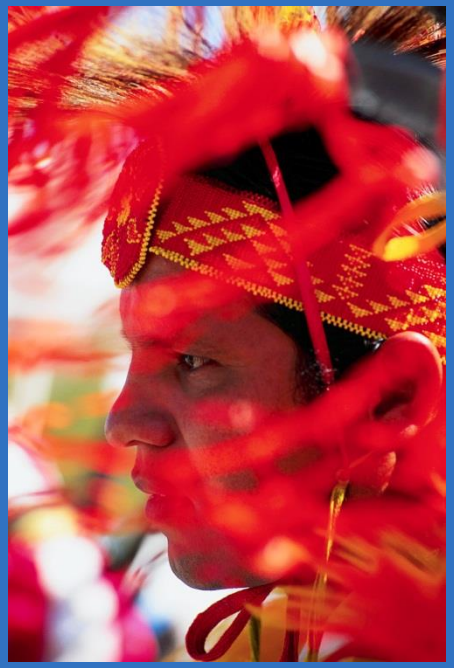
- Refers to an association with a particular racial, national or cultural group, whose customs, beliefs and languages are observed. Also refers to individuals whose identity is distinctive in terms of common cultural traditions or heritage.
- Approved designations for collection are:
  - Hispanic or Latino
  - Not Hispanic or Latino

Hispanic or Latino

- Ethnicity
- Origins may include Cuba, Mexico, Puerto Rico, South or Central America
- The term “Spanish origin” may be used in addition to “Hispanic or Latino”

American Indian or Alaskan Native

- A person having origins in any of the original peoples of North, Central or South America who maintain 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.
- Includes Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippines, Thailand, and Vietnam.

Black or African American

- A person having origins in any of the black racial groups of Africa.
- The term “Haitian” 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.

Public Notification

- The purpose of the public notification system is to inform applicants, participants, and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint.
- Basic elements of public notification:
  - Program Availability
  - Complaint Information
  - Nondiscrimination Statement

Methods of Public Notification

- Inform potentially eligible persons, applicants, participants, and grassroots organizations of programs or changes in programs. This includes information pertaining to eligibility, benefits, services, the location of local facilities or service delivery points, and hours of service.
- Provide appropriate information, including web-based information, in alternative formats for persons with disabilities and in the appropriate language for persons with Limited English Proficiency.

Methods of Public Notification

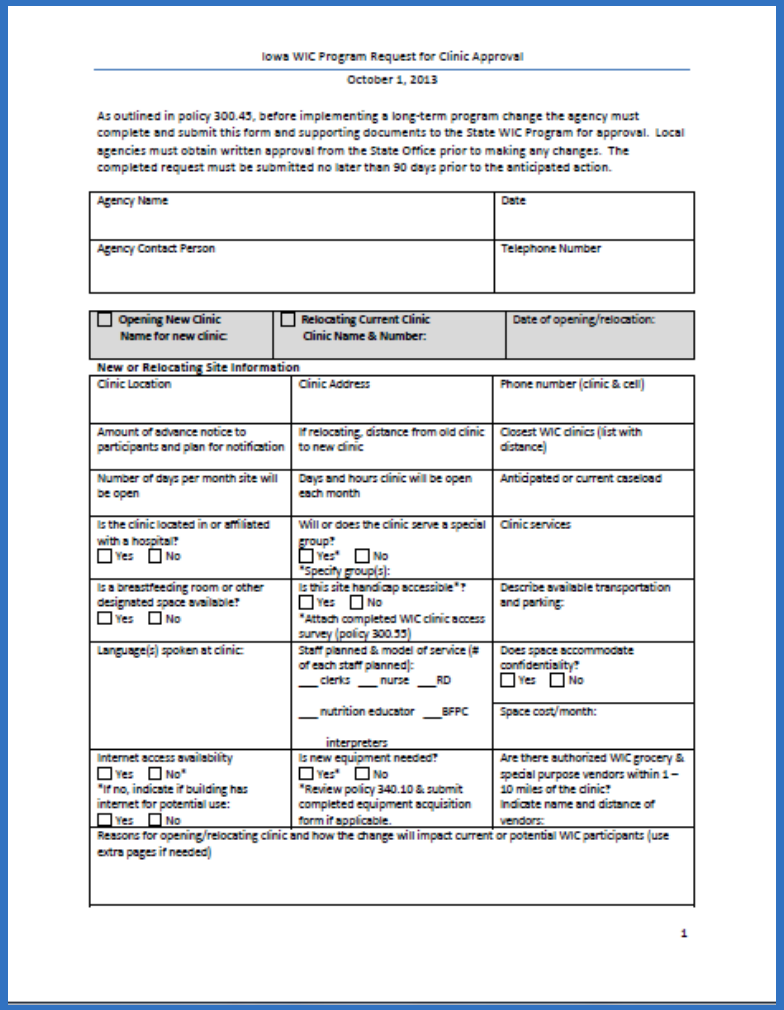
- Include the required nondiscrimination statement on all appropriate FNS and agency publications, web sites, posters and informational materials provided to the public.
  - All documents/flyers that are meant for the general public are considered public notification and thus must contain the nondiscrimination statement.
- Convey the message of equal opportunity in all photos and other graphics that are used to provide program or program-related information.
- Prominently display the USDA nondiscrimination “And Justice for All” poster.

Long-Term Program Changes

- Before implementing a long-term program change, such as a new clinic site, change in clinic site, or elimination of a clinic site, the agency must submit a completed Iowa WIC Program Request for Clinic Approval form. (Policy 300.45)
- A completed request form must be submitted to the State WIC office no later than 90 days prior to the anticipated change.
- Participants must be notified at least 60 days in advance of such a change.

Iowa WIC Program Request for Clinic Approval

- Factors impacting approval:
  - Distance to nearest WIC Clinic
  - Availability of site
  - Financial impact on the local agency and availability of funds
  - Clinic staffing
  - Internet accessibility
  - Number of participants and those potentially eligible



Iowa WIC Program Request for Clinic Approval

October 1, 2013

As outlined in policy 300.45, before implementing a long-term program change the agency must complete and submit this form and supporting documents to the State WIC Program for approval. Local agencies must obtain written approval from the State Office prior to making any changes. The completed request must be submitted no later than 90 days prior to the anticipated action.

Agency Name	Date
Agency Contact Person	Telephone Number

☐ Opening New Clinic Name for new clinic:	☐ Relocating Current Clinic Clinic Name & Number:	Date of opening/relocation:

New or Relocating Site Information

Clinic Location	Clinic Address	Phone number (clinic & cell)
Amount of advance notice to participants and plan for notification	If relocating, distance from old clinic to new clinic	Closest WIC clinics (list with distance)
Number of days per month site will be open	Days and hours clinic will be open each month	Anticipated or current caseload
Is the clinic located in or affiliated with a hospital? ☐ Yes ☐ No	Will or does the clinic serve a special group? ☐ Yes* ☐ No *Specify group(s):	Clinic services
Is a breastfeeding room or other designated space available? ☐ Yes ☐ No	Is this site handicap accessible*? ☐ Yes ☐ No *Attach completed WIC clinic access survey (policy 300.55)	Describe available transportation and parking:
Language(s) spoken at clinic:	Staff planned & model of service (# of each staff planned): ___ clerks ___ nurse ___ RD ___ nutrition educator ___ BFPC interpreters	Does space accommodate confidentiality? ☐ Yes ☐ No Space cost/month:
Internet access availability ☐ Yes ☐ No* *If no, indicate if building has internet for potential use: ☐ Yes ☐ No	Is new equipment needed? ☐ Yes* ☐ No *Review policy 340.10 & submit completed equipment acquisition form if applicable.	Are there authorized WIC grocery & special purpose vendors within 1 – 10 miles of the clinic? Indicate name and distance of vendors:

Reasons for opening/relocating clinic and how the change will impact current or potential WIC participants (use extra pages if needed)

1

Nondiscrimination Statement

- A nondiscrimination statement must appear on all materials that identify or describe the WIC Program. (Policy 320.70)
- A nondiscrimination statement is required if the material:
  - Describes the eligibility requirements of the WIC program
  - Identifies the benefits of WIC participation
  - Describes participation requirements for WIC
  - Provides notice of conditions to continue eligibility
  - Provides notice of ineligibility or disqualification
- There are two versions of the nondiscrimination statement.

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, audiotape, 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: http://www.ascr.usda.gov/complaint_filing_cust.html, 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.

This institution is an equal opportunity provider.

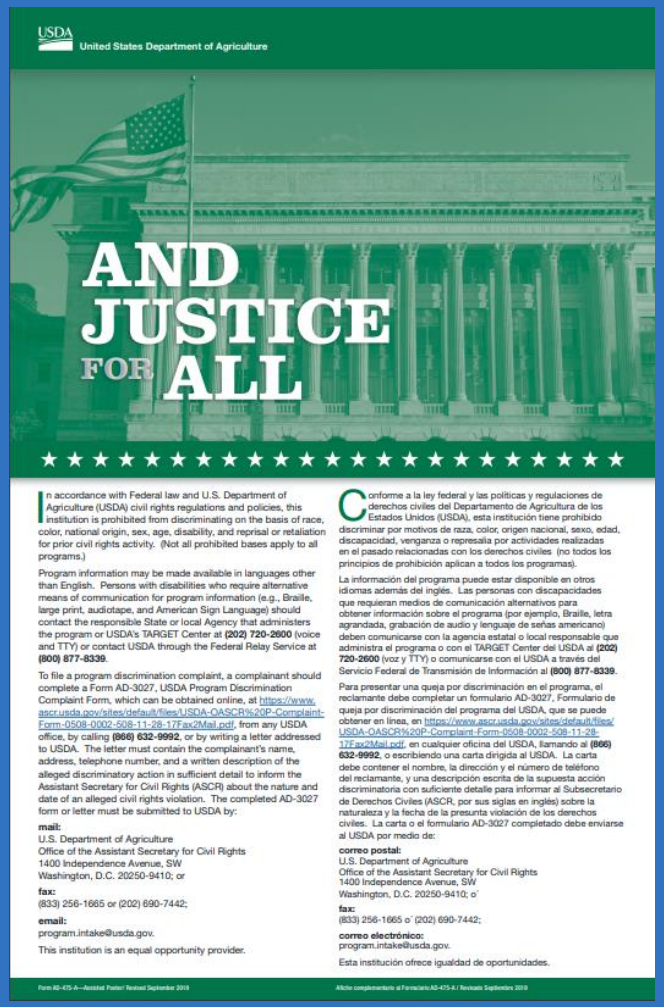
Minimum Nondiscrimination Statement

"This institution is an equal opportunity provider"

- This statement should be used as the exception, not the rule!
- Acceptable to use when materials are too small to permit the full statement. (Policy 320.70)
- Statement must appear in print size no smaller than the text of the document.
- Use this statement for broadcast materials (i.e. radio and television public service announcements).

And Justice For All Poster

- Must be prominently displayed in all WIC clinics to remind participants of the procedure for filing a complaint. (Policy 320.40)
- This poster is a federally mandated requirement and is the most highly recognized form of public notification of the nondiscrimination policy.
- And Justice for All Posters are available through the State Office.
- Translations of the poster are available in multiple languages and can be accessed at: https://www.fns.usda.gov/cr/and-justice-all-posters-guidance-and-translations
  - *Translations can be printed and hung next to the original poster*



USDA United States Department of Agriculture

AND JUSTICE FOR ALL

In accordance with Federal 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, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and 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.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.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:

mail:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

fax:
(833) 256-1665 or (202) 690-7442;

email:
program.intake@usda.gov.

This institution is an equal opportunity provider.

Conforme a la ley federal y las políticas y regulaciones de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta institución tiene prohibido discriminar por motivos de raza, color, origen nacional, sexo, edad, discapacidad, venganza o represalia por actividades realizadas en el pasado relacionadas con los derechos civiles (no todos los principios de prohibición aplican a todos los programas).

La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra agrandada, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al **(202) 720-2600** (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al **(800) 877-8339**.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf, en cualquier oficina del USDA, llamando al **(866) 632-9992**, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; o

fax:
(833) 256-1665 o (202) 690-7442;

correo electrónico:
program.intake@usda.gov.

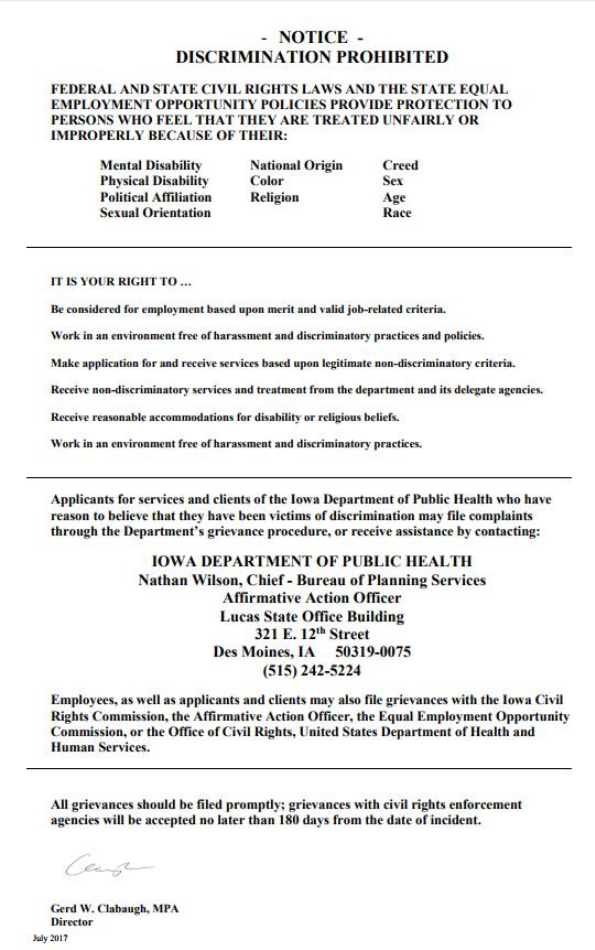
Esta institución ofrece igualdad de oportunidades.

Form AD-475-A—Assisted Poster/ Revised September 2019

Afiche complementario al Formulario AD-475-A / Revisado Septiembre 2019

IDPH Nondiscrimination Poster

- The Department nondiscrimination poster gives instructions on what to do if someone feels they have been discriminated against.
- Must be displayed prominently with the And Justice for All poster.



- NOTICE -
DISCRIMINATION PROHIBITED

FEDERAL AND STATE CIVIL RIGHTS LAWS AND THE STATE EQUAL EMPLOYMENT OPPORTUNITY POLICIES PROVIDE PROTECTION TO PERSONS WHO FEEL THAT THEY ARE TREATED UNFAIRLY OR IMPROPERLY BECAUSE OF THEIR:

Mental Disability	National Origin	Creed
Physical Disability	Color	Sex
Political Affiliation	Religion	Age
Sexual Orientation		Race

IT IS YOUR RIGHT TO ...

Be considered for employment based upon merit and valid job-related criteria.

Work in an environment free of harassment and discriminatory practices and policies.

Make application for and receive services based upon legitimate non-discriminatory criteria.

Receive non-discriminatory services and treatment from the department and its delegate agencies.

Receive reasonable accommodations for disability or religious beliefs.

Work in an environment free of harassment and discriminatory practices.

Applicants for services and clients of the Iowa Department of Public Health who have reason to believe that they have been victims of discrimination may file complaints through the Department's grievance procedure, or receive assistance by contacting:

IOWA DEPARTMENT OF PUBLIC HEALTH
Nathan Wilson, Chief - Bureau of Planning Services
Affirmative Action Officer
Lucas State Office Building
321 E. 12th Street
Des Moines, IA 50319-0075
(515) 242-5224

Employees, as well as applicants and clients may also file grievances with the Iowa Civil Rights Commission, the Affirmative Action Officer, the Equal Employment Opportunity Commission, or the Office of Civil Rights, United States Department of Health and Human Services.

All grievances should be filed promptly; grievances with civil rights enforcement agencies will be accepted no later than 180 days from the date of incident.

Gerd W. Clabaugh, MPA
Director
July 2017

Right to File a Complaint

ALL CIVIL RIGHTS COMPLAINTS WILL BE ACCEPTED

Written ● Oral ● Anonymous

- In the event a complainant makes a verbal allegation and refuses or is not inclined to put such allegation in writing, the person to whom the allegations are made will write up the elements of the complaint for the complainant.
- Only the USDA may reject a complaint on the basis of lack of merit.
- The complainant and the entity that the complaint is filed against will be encouraged to resolve the issue at the lowest possible level and as expeditiously as possible.

Civil Rights Complaint Folder

- All WIC clinics are required to create and maintain a Civil Rights Complaint Folder that contains:
  - Instructions on how to file complaints
  - Copies of complaint forms
- This folder must be available at all times and all staff should know how to access this folder.

What to Do When There is a Complaint

- Provide appropriate forms for written complaints OR take detailed notes of oral complaints.
- Notify your Local Agency WIC Coordinator and State Nutrition Consultant immediately.
- Discrimination complaints must be forwarded to the USDA within 5 calendar days of receipt.
- If the Affirmative Action Officer of the Iowa Department of Public Health receives notice of a discrimination complaint related to a federally protected basis, notification is sent to the Regional Office of FNS.
- All complaints shall be processed and closed within 90 days of receipt.
- The WIC Coordinator will track and record the closure of Civil Rights complaints.
- The Nutrition Consultant will track and record the closure of the complaint on the State's Civil Rights complaint log.

Iowa WIC Program Discrimination Complaint Form

- A copy of the Iowa WIC Program Discrimination Complaint Form can be found on page 4 of Policy 320.40.

DISCRIMINATION COMPLAINT FORM
Iowa WIC Program
1-800-532-1579

The complaint must be filed within 180 days of the alleged discriminatory action.

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, audiotape, 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: http://www.ascr.usda.gov/complaint_filing_cust.html, 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.

This institution is an equal opportunity provider.

Name: _____ Address: _____ Telephone: _____

NAME, ADDRESS AND TELEPHONE NUMBER OF THE OFFICE DELIVERING THE SERVICE OR BENEFIT:

_____

_____

Page 4

Completing the Complaint Form

- Information Needed:
  - Complainant's Name, Address, Telephone number
  - Location where the discrimination occurred
  - Nature of the incident
  - Basis for the Claim (i.e. race, age, etc.)
  - Names and contact information of witnesses
  - Dates when the action(s) occurred
    - Complaint must be filed within 180 days of the alleged discriminatory action

Noncompliance Finding

Noncompliance: A factual finding that any civil rights requirement, as provided by law, regulation, policy, instruction, or guidelines, is not being adhered to by a Sate agency, local agency or other sub-recipient.

Resolution of Noncompliance

- The State Agency must provide immediate written notice to the local agency indicating the areas of noncompliance and the action required to correct the situation.
- Corrective action must be taken to immediately.
  - The local office must submit a letter to the State for approval, describing the steps it will take to achieve compliance.
  - If not achieved within 60 days, the case must be referred on to the Regional Administrator.

Compliance Reviews

- Examine agency activities to determine Civil Rights compliance.
- FNS is responsible for reviewing State agencies. State agencies are responsible for reviewing local agencies.
- The office performing compliance reviews must advise the reviewed entity in writing of the findings and recommendations. If any of the findings are significant they must be forwarded on to the FNS Regional Office of Civil Rights or the FNS Headquarters Civil Rights Division.

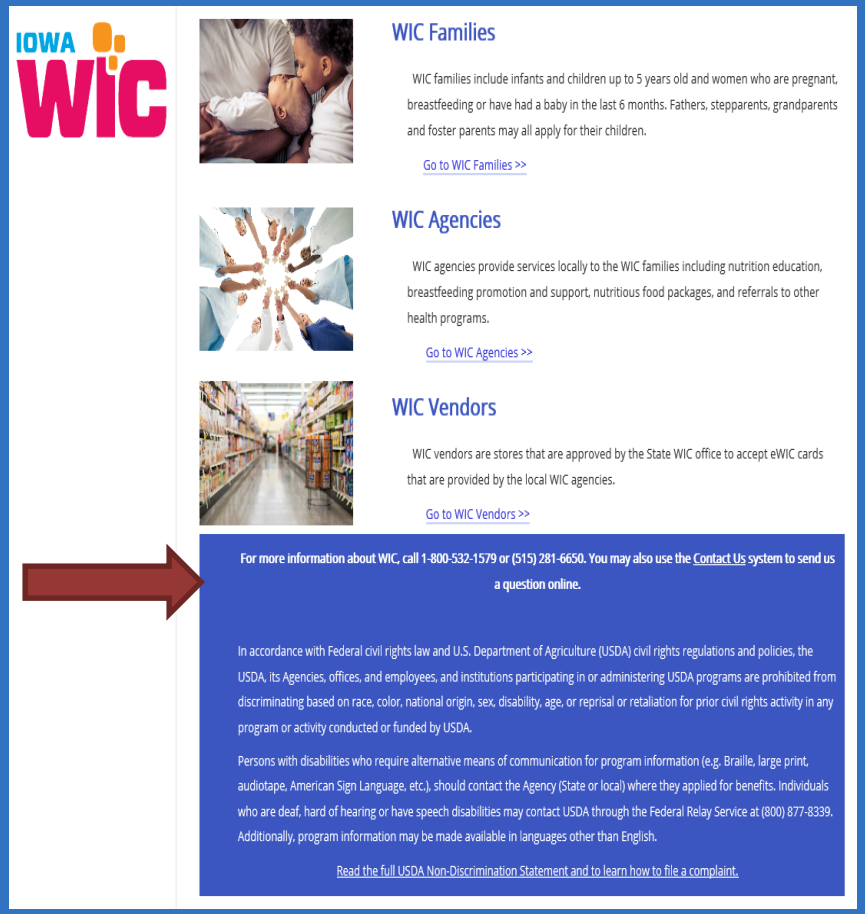
Non-Civil Rights Complaints

- Each Agency should develop a plan for handling non-civil rights complaints. In general, complaints should be handled as quickly as possible and by following the chain of command in order to provide the best possible customer service.
- Program complaints can be forwarded to the State office.

Non-Civil Rights Complaints

- You can also encourage participants to email us via the “Contact Us” link on the IDPH WIC website.

- https://idph.iowa.gov/WIC



IOWA WIC

WIC Families

WIC families include infants and children up to 5 years old and women who are pregnant, breastfeeding or have had a baby in the last 6 months. Fathers, stepparents, grandparents and foster parents may all apply for their children.

Go to WIC Families >>

WIC Agencies

WIC agencies provide services locally to the WIC families including nutrition education, breastfeeding promotion and support, nutritious food packages, and referrals to other health programs.

Go to WIC Agencies >>

WIC Vendors

WIC vendors are stores that are approved by the State WIC office to accept eWIC cards that are provided by the local WIC agencies.

Go to WIC Vendors >>

For more information about WIC, call 1-800-532-1579 or (515) 281-6650. You may also use the Contact Us system to send us a question online.

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, audiotape, 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.

Read the full USDA Non-Discrimination Statement and to learn how to file a complaint.

Non-Civil Rights Complaints

- For Vendor complaints, you can provide a Comment Card or direct individuals to the IDPH WIC website to obtain a copy of this card.

- https://idph.iowa.gov/wic/vendors

VENDOR COMMENT FORM

The WIC State Office is very interested in knowing about specific problems you have with WIC participants and/or with eWIC cards or if you have a general comment or suggestion. Please fill out as much information as you can below, then attach this document and any additional documentation in an email to IowaWIC@idph.iowa.gov

Store Name:

Store Address:

Store Contact Person:

Check one or more boxes and provide details below:

- ☐ Participant tried to buy unauthorized items with eWIC card.
- ☐ Participant requested cash or additional foods for eWIC card.
- ☐ Participant tried to return items purchased with eWIC card for cash or credit.
- ☐ Participant was verbally or physically abusive to employees.
- ☐ Suggestion/question/comment

If possible, please include a copy of the receipt in your email

Date of incident: Time of incident:

Last four (4) of the participant's card number:

Name of the participant (if known):

Details of problem or suggestion:

For assistance, call the Bureau of Nutrition at: 515-281-6650 or In-State 1-800-532-1579

IOWA WIC WIC is an equal opportunity provider. IDPH

Customer **Service**

- **S**ervice is
- **E**ffectively communicating with customers,
- **R**esponding to their needs,
- **V**aluing their worth and
- **I**nstilling excellence through
- **C**ourtesy, confidence and
- **E**nthusiasm!

Customer Service and Non-Civil Rights Complaints

- Demonstrate good customer service by treating all people with dignity and respect.
- Listen, so that participants feel they are being heard.
- Remember that our customers have various needs and often few resources.
- You may talk with dozens of participants each day, the image of your agency depends on you!

The Golden Rule of Customer Service

"Do unto others as you would have done unto you."

- Don't interrupt. Be patient and give customers a chance to explain the issue.
- Be understanding. Angry customers require the most empathy.
- Avoid being judgmental.
- Apologize for their inconvenience, even if the problem is not the fault of you or your agency.

The Golden Rule of Customer Service

- Talk calmly and slowly.
- Identify the problem based on all the information the customer has given you. Determining a solution may involve contacting the customer again.
- Personally follow up to make sure the participant has been satisfied and the issue has been resolved.

Please make sure to record that you have completed this annual training in Focus.

Thanks!

Policy 300.10a