



**POLICY:** The Oregon Health Authority and Office of Community Liaison shall be responsible for the overall civil rights compliance within its jurisdiction.

**PURPOSE:** To ensure local WIC programs comply with the requirements of Title VI of Civil Rights Act of 1964 and other applicable laws and regulations.

**RELEVANT  
REGULATIONS:**

7 CFR 15  
7 CFR 246.6 (b) (9) Agreements with local agencies  
7 CFR 246.8 Nondiscrimination  
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  
Age Discrimination Act of 1975  
Americans with Disabilities Act (ADA) of 1990

**OREGON  
WIC PPM  
REFERENCES:** ♦215—Local Program Monitoring and Review  
♦452—Civil Rights  
♦588—Program Integrity: Complaints

**DEFINITIONS:** *Local WIC Program* County or local community-based facility where applicants/participants apply for and/or receive WIC services and benefits.

*Community –based  
WIC organizations* WIC program based in an agency that is not a health department.

**PROCEDURE:**

***Local WIC  
Program*** 1.0 The Office of Community Liaison within Oregon Health Authority (OHA) works to oversee statewide compliance with Affirmative Action, Section 504, and ADA, and to provide local program-wide training in civil rights and other applicable laws and regulations.

Office of Community Liaison conducts compliance reviews of county health departments, including community-based WIC organizations, every three years. Refer to the Community Liaison website at <http://public.health.oregon.gov/ProviderPartnerResources/LocalHealthDepartmentResources/Pages/lhd-trt.aspx> for the Civil Rights compliance review tool.

**Civil Rights, cont.**

***State WIC responsibilities***

- 2.0 The state WIC program shall make available to local WIC programs the necessary relevant materials and guidelines to ensure effective implementation of the nondiscrimination laws. Materials shall include:
  - 2.1 USDA poster “And Justice for All” for prominent display in the clinic.
  - 2.2 Outreach brochures and posters
    - 2.2.1 “WIC: Nutrition for You and Your Family” (57-400)
    - 2.2.2 WIC outreach poster (57-401)
  - 2.3 Sample civil rights trainings and guidance to local agencies on civil rights training, as well as periodically providing the required training at WIC statewide meetings. Training will include rules and regulations related to:
    - Civil rights;
    - Public notification of non-discrimination requirements;
    - The collection of relevant racial and ethnic data; and
    - Procedures for handling civil rights complaints.

***Local WIC program reviews***

- 3.0 The state WIC program must review local WIC programs every two years, to be coordinated with overall county health department reviews whenever possible (refer to ¶1.0). During local program reviews, state WIC program staff shall review other WIC-specific requirements, including:
  - 3.1 USDA poster, “And Justice for All” displayed in a prominent location frequented by applicants and/or participants;
  - 3.2 All complaints of discrimination filed by or on behalf of a participant forwarded to USDA;
  - 3.3 All participants and potential participants served according to the priority system;
  - 3.4 Availability of non-English materials when 100 or more participants/applicants are non-English speaking;
  - 3.5 Availability of translators or interpreters for non-English speaking participants, and;
  - 3.6 A list of outreach activities conducted during the past year.
- 4.0 Refer to ♦215—Local Program Monitoring and Review for more information.
- 5.0 The state WIC program shall maintain a civil rights file and retain collected racial/ethnic data for three years to determine how effective the programs are at reaching minority groups.

**Civil Rights, cont.**

- 6.0 The state WIC program shall provide guidance to local WIC programs on reporting civil rights complaints. Please refer to ♦452—Civil Rights for local program operation civil rights guidelines and to ♦588—Program Integrity: Complaints for guidelines on reporting civil rights complaints. ★

**If you need this in large print or an alternate format,  
please call 971-673-0040.**

**WIC is an equal opportunity program and employer.**