

“It’s Your Job. Protecting the Civil Rights of Our Participants”

Training Section

Bureau of Clinical and Nutrition Services

Texas Department of State Health Services

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Welcome!

About this Module:

Welcome to the world of self-paced learning. This is a way of learning that allows you, the learner, to move at your own pace. This means that any time you wish to go back to review a section, you may.

Each section of this lesson contains information about civil rights topics. At the end of each section there is a “*Stop* *Go to...*” notice telling you to refer to the separate **SELF-CHECK WORKBOOK** for a learning activity to help you to review the information you have just read. The questions that appear in each of the seven *Self-Checks* may be answered in an “open book” fashion. Feel free to go back and reread any section or look at any notes you may have made.

You may also keep this manual as an on-the-job reference later.

Introduction

So! As part of your new job, you have to go through civil rights training.

Well... what we hope to show is that learning about civil rights in the WIC Program is not a boring exercise, but, rather, an exciting challenge to your job. No doubt your supervisor has already talked with you about her expectations for you in this position and her confidence that you will meet and probably exceed those expectations.

The purpose of this manual is to give you the tools needed to begin your job as an informed employee and help you understand your legal requirements relating to

protecting the civil rights of your customers.

Objectives of this Module

At the completion of this module, you will be able to:

1. Cite one civil rights policy and state how your own Local Agency complies with that policy.
2. Describe in your own words how to handle a civil rights complaint.

As you progress through the module, there may be some words or terms with which you are not yet familiar:

- When we use the term **State Agency**, we are referring to the main agency at the Texas Department of State Health Services in Austin, Texas, which runs the WIC Program for the State of Texas.
- The **Local Agency** is that local organization (usually a city or county health department, community action agency or hospital) that runs the WIC program. The Local Agency is where you work.
- A person who may qualify for WIC services, but is not yet on the program, is known as being **potentially eligible**.
- The person who receives WIC benefits and services is known as the **participant**.
- A person who applies for WIC benefits is known as an **applicant**.

I. It's the Law

Civil rights laws in the United States have been around for over 200 years. They began when the original 13 states ratified the Constitution's first 10 amendments, known as the Bill of Rights.

A person's "civil rights" in the United States include, but are not limited to, the right to practice a religion freely, the right to be free from discrimination, the right to privacy, the right to travel freely, the right to free speech, the right to assemble peacefully, and the right to express opinions against the government.

According to Webster, civil rights are "the nonpolitical rights of a citizen; especially the rights of personal liberty guaranteed to U.S. citizens by the 13th and 14th amendments to the constitution and by acts of Congress".

When we hear the term "civil rights" we may think of the civil rights movement of the 1960's, which was largely about guaranteeing African-Americans the same opportunities as all other U. S. citizens. Since then many other "movements" or citizen efforts have been launched, that opened to a lot of other key civil rights legislation, such as the Older Americans Act of 1966 and the Americans with Disabilities Act of 1990.

Don't forget that the term civil rights refers to the individual rights of all citizens and is based on all of the areas that civil rights cover; any of us could experience what could be seen as discriminatory practices.

What does all of this have to do with the WIC Program? When we talk about civil rights as it relates to the WIC Program, we are often talking about legislation related to Title VI of the Civil Rights Act of 1964.

Title VI refers to rules for programs receiving federal funds. It states that "no person in the United States shall be discriminated against on the grounds of race, color or national origin sex, age, religion or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity."

WIC is a federally funded program, run locally, but administered by the U.S. Department of Agriculture (USDA). USDA expects that its programs will be available to persons in the same way that taxes are collected ~~without~~ without discrimination.

Civil Rights and Discrimination

Discrimination occurs when the civil rights of an individual are denied or interfered with because of that person's membership in a particular group or class. Laws have been passed to prevent discrimination because of a person's race, color, national origin, age, sex, or disability.

Stop: *Go to your copy of the Self-Check Workbook. Answer questions to Self Check #1.*

II. Some Common Terms Related to Civil Rights

There are certain terms that we tend to hear over and over when we discuss protecting or violating civil rights. In the WIC program, when we talk about civil rights we are talking about providing services free from discrimination to all eligible persons.

Let's look at some of the concepts that we often hear when we talk about civil rights:

- **Stereotyping** is a preconceived or oversimplified generalization involving *beliefs* about a particular group of people.

Stereotypes may be positive or negative. For example, we may believe that all members of a certain group are wealthy or always do well in school. That's a positive stereotype.

On the other hand, we may believe that some groups are all lazy or don't bathe (negative stereotypes). Negative stereotypes are frequently the foundation of prejudice.

The danger of stereotyping is that it ignores people as individuals and instead categorizes them as members of a group who supposedly all think and behave the same way. We may pick up these stereotypes from what we hear other people say, what we read, and what people around us believe.

- **Prejudice** describes a set of rigid and unfavorable *attitudes* toward a particular group that is formed without considering facts.

Prejudice is a learned concept. People are not born with prejudices but acquire them as they go through life. For example, we may have learned attitudes about certain groups of people whom we have rarely been around, or we may form attitudes about an entire group of people based on our interactions with one person or a small group of people.

- **Discrimination** is the *practice* of treating persons differently because we have grouped them in our minds according to our prejudices.

Discrimination often involves keeping people out of activities or places because of our prejudice against the group we've assigned them to. For example, if we treat some people with less respect or deny them certain things because they belong to a

certain group, that could be considered discrimination.

Stop: Go to your copy of the *Self-Check Workbook*. Answer questions to *Self Check #2*.

III. What's In a Policy?

The purpose of most policies and procedures in any organization and workplace is to give staff members guidelines for operating on a day-to-day basis.

In the case of civil rights policies, the federal government or, in some cases, the state government tries to ensure that persons seeking WIC services all have the same access to services, free from discrimination. There are also policies to describe what to do when a person does feel that they have experienced discrimination in our clinics.

The questions and answers below provide information on which policy contain information about commonly asked questions. The next section gives a fuller summary of the policies. Your agency also has a complete copy of each civil rights policy if you wish to look at any one in more detail.

Which Policy do I need?

Where do I find information about collecting racial and ethnic data?

C.R. 9.0, Collection of Race and Ethnicity Data

Where do I find information about filling a civil rights complaint?

C.R. 5.0, Civil Rights Complaints

Does each LA have to do Compliance Reviews?

C.R. 4.0, Civil Rights Compliance Reviews

Where do I find information about participants' rights and responsibilities?

C.R. 1.0, Rights and Obligations of an Applicant/Participant

What are the requirements for outreach materials and LA outreach plans?

C.R. 2.0, Nondiscrimination / O.R. 1.0, Local Agency Outreach

What is required to be on WIC materials?

C.R. 2.0, Nondiscrimination

What is the procedure for fair hearings?

C.R. 3.0, Fair Hearing Procedure for Applicants/Participants

How do we make sure not to exclude clients with disabilities from participating?

C.R. 6.0, Provision of Services to Individuals with Disabilities

How do we eliminate barriers to families with special health care needs?

C.R. 7.0, Provision of Services to Families with Special Health Care Needs

Does LA staff need to have civil rights training?

C.R. 8.0, Civil Rights Training

How can we make sure non-English speaking and limited-English speaking clients are not discriminated against?

C.R. 10.0, Providing Oral and Written Program Information to Non-English or Limited-English Speaking Persons

A More In-Depth Look at the Policies:

WIC policies about civil rights tend to fall under several categories:

HOW WE DO BUSINESS IN THE WIC PROGRAM:

WIC policy C.R.01.0 Rights and Obligations of an Applicant/Participant

At each certification, participants and parents/guardians/caretakers applying on behalf of a child shall be offered the opportunity to read or have read to them, the Supplemental Information Form (WIC-35-1).

The rights and obligations are spelled out thoroughly on the Supplemental Information Form (SF). The participant is required to sign and self-date the form. A copy is kept in the participant's record.

If a participant does not read English or Spanish, the statement should be provided in a language that the participant can understand. A participant who cannot write can make an 'X' or other symbol to acknowledge that they have read or heard the information.

Applicants found ineligible shall read or have the Ineligibility or Termination (WIC-5) form read to them. This notifies them of the right to a fair hearing. The applicant shall sign and date the form and a copy shall be kept in the chart.

PROVIDING PROGRAM INFORMATION AND SERVICES TO PERSONS WHO SPEAK LANGUAGES OTHER THAN ENGLISH:

WIC policy C.R.10.0 Providing Oral and Written Program Information to Non-English or Limited English Speaking Persons

Where a significant proportion of the population of the area served by a local agency (LA) is composed of non-English or limited-English-speaking persons who speak the same language, the LA shall ensure that required WIC services are provided to such persons in the appropriate language orally and/or in writing.

At the time the appointment is made, the LA staff should ask if interpreter services are needed and arrange for an interpreter. The LA shall ensure that bilingual staff members or interpreters are available to serve non-English or limited-English speakers. The LA should never require another applicant or

participant to interpret. A child under the age of 16 should not be allowed to interpret for the client. The client shall not be required to bring someone to interpret.

Stop: Go to your copy of the *Self-Check Workbook*. Answer questions to *Self Check #3*.

APPLYING THE SAME STANDARDS TO ALL PERSONS:

WIC policy C.R.02.0 Nondiscrimination

The same standards for determining eligibility and participation in the WIC Program apply to everyone regardless of race, color, national origin, age, sex or disability.

Copies of the “Fair Hearing” and the USDA poster, “And Justice for All” in both English and Spanish must be displayed in the clinic where they can be *easily seen*. Both of these posters let participants know whom to contact if they feel they have experienced discrimination in the WIC Program. All materials distributed to the public or posted for public viewing shall include the nondiscrimination statement.

PRODUCING OUTREACH MATERIALS:

(Outreach materials are any materials used to inform potential customers or persons who might refer customers about the WIC program and what we do)

WIC policy O.R.01.0 Local Agency Outreach

Outreach activities must *at the very minimum* include distribution of WIC information *at least* twice yearly to those organization/agencies who serve persons who might be eligible for WIC services. It is recommended that on an annual basis, the outreach plan include announcements, articles and/or appearances about WIC in local radio, television and/or newspapers.

Outreach material shall include:

- location of the local WIC program and a phone number for information

- current statement of nondiscrimination

Printed outreach materials and oral presentations must also include:

- description of WIC benefits
- criteria for participation

If the materials are for non-English speaking populations, they should be provided in the appropriate foreign language.

***Stop:** Go to your copy of the *Self-Check Workbook*. Answer questions to *Self Check #4*.*

HOW CIVIL RIGHTS COMPLAINTS ARE HANDLED:

WIC policy C.R.03.0 Fair Hearing Procedure for Applicants/Participants

If any individual wishes to appeal any State Agency (SA) or Local Agency (LA) actions which results in the individuals' denial of participation, suspension, termination or claim against the individual for repayment, the LA shall refer that individual to the SA.

Individuals may make an oral or written request for a "Fair Hearing" to the Director of the WIC Program at the address provided in Policy CR: 03.0.

WIC policy C.R. 05.0 Civil Rights Complaints

The local agency (LA) shall immediately refer by phone and follow up by written correspondence to the SA any complaint from an individual who feels or believes that his/her civil rights have been violated by an action which results in the individual's denial of participation, harassment, suspension or termination from the program or any complaint in regard to any action taken by the LA which the individual believes is discriminatory and a violation of his/her civil rights. The SA shall immediately refer in writing any such complaint, received either from the LA or directly from an individual, to the Regional Civil Rights Director for USDA's Southwest Region.

WIC policy C.R. 06.0 Provision of Services to Individuals with Disabilities

Each local agency (LA) shall make provisions to screen applicants with disabilities and provide all WIC services to all participants with disabilities. Program or Nutrition Education (NE) information is to be provided to persons with disabilities in the format they request in as timely a manner as possible, to include providing qualified interpreters for persons who are hearing impaired.

HOW THE STATE AGENCY MONITORS THE LOCAL AGENCY:

WIC policy C.R. 04.0 Civil Rights Compliance Reviews

The State Agency will monitor each Local Agency at least once every two years to determine the Local Agency's compliance with state and federal civil rights policies and legislation. (See Appendix, page 1)

***Stop:** Go to your copy of the Self-Check Workbook. Answer questions to Self Check #5.*

WHAT THE LOCAL AGENCY NEEDS TO DO TO MEET THE NEEDS OF ANY OF THEIR CUSTOMERS WHO MAY HAVE SPECIAL HEALTH CARE NEEDS:

WIC policy C.R.07.0 Provision of Services to Families with Special Health Care Needs

Each Local Agency (LA) shall make accommodations and provide services for families with special health care needs (FSHCN).

HOW AND WHEN THE LOCAL AGENCY WILL HANDLE CIVIL RIGHTS TRAINING:

WIC policy C.R.08.0 Civil Rights Training

Civil rights training must be provided once per year at each Local Agency. New employees will receive civil rights training as part of their orientation to WIC (that's you, right now). Each Local Agency is required to maintain documentation of which training has been provided to which employees.

HOW AND WHY TO COLLECT RACIAL/ETHNIC DATA:

WIC policy C.R.09.0 Collection of Race and Ethnicity Data

Each Local Agency must collect information by racial/ethnic category for each

applicant or participant on the WIC Program. Participants shall be asked to self-identify his/her racial and/or ethnicity group.

Stop: Go to your copy of the *Self-Check Workbook*. Answer questions to *Self Check #6*.

IV. “Will You Handle Complaints or Will Complaints Handle You?”

Almost no one likes to get complaints, but complaints are a fact of life in any job that involves serving the public. In the best of businesses and organizations, complaints are seen as customer feedback that can point to areas needing improvement.

The rules for handling complaints in local WIC agencies may vary slightly from agency to agency, but civil rights complaints must be handled in a particular way.

(Note: the person who makes a complaint is known as a complainant)

Step 1:

Identify the complaint as a civil rights complaint. This may sometimes be trickier than it sounds. Sometimes people do not come right out and say that they experienced discrimination.

Sometimes you will need to listen carefully and ask the complainant questions, such as “Do you think that you were being treated unfairly?” “On what basis do you think you were treated unfairly--sex, age, race?”

Send the call to whoever in your agency handles complaints. Sometimes a particular person handles civil rights complaints. In those cases they will need to get specific information in addition to information you may sometimes collect for a non-civil rights related complaint.

A complaint can be accepted in any form—written or oral, anonymous or signed.

The complainant should be notified that the complaint will be immediately reported to the USDA. The complainant should be provided with the contact information for the State and USDA found in policy CR: 05.0 so they may choose to report the complaint on their own.

Step 2:

If the complaint is presented orally and the complainant does not want to submit the allegation in writing, whoever receives the call shall gather the following information and submit the complaint.

- Name, address and phone number of complainant
- The location where the alleged discrimination occurred
- The nature of the incident or action that led to it

- What basis the complainant feels discrimination exists.
- Names, titles and addresses of those who may have knowledge of the discrimination.
- The date or dates the alleged discrimination occurred.

Step 3:

The Local Agency must notify the State Agency of the complaint.

At that point another set of procedures take place, sometimes ending with the U.S. Department of Agriculture making an investigation into the Local Agency.

Note: The Office of Civil Rights at the Texas Department of State Health Services is available for counseling and technical assistance in matters related to an employee's own civil rights questions related to their employment.

Stop: Go to your copy of the *Self-Check Workbook*. Answer questions to *Self Check #7*.

V. Your Obligations and Responsibilities

As a WIC employee, you are expected to treat every person as a valued customer... because they are! You are expected to be as fair and consistent as you know how to be with each and every customer who walks through the door regardless of their race, color, national origin, age, sex or disability.

If a customer is hearing-impaired or speaks another language, we must make sure that they are able to get the maximum benefits from the program in the same way that everyone is entitled to.

If a father has custody of his children, he should be treated as respectfully as anyone else.

If someone from another country comes in and dresses in a way that is unfamiliar to us or has practices that are unfamiliar to us, we will still continue to provide services in the most considerate and courteous way that we know how.

There are several common practices that many people and groups do not find respectful:

- Addressing customers as ‘you people’ or ‘those people’
- Making jokes that involve putting down other groups of people, for example, jokes about people from other countries, races or who are disabled
- An unwillingness to make any accommodations for persons with needs that may require extra effort, such as persons needing interpreters or who may have children with special needs.

Extend basic human courtesy and respect. Follow WIC policies and procedures. Take time to explain the “why’s” of clinic program processes and procedures. This will go a long way to *prevent* complaints, especially when something is denied, changed, terminated, etc. or when a person is new to the program.

The “bottom line” in protecting the civil rights of your customers is providing good customer service for everyone. You may not be able to keep anyone from complaining, but you’ll know you’ve done your best to protect the civil rights of our participants.

Appendix

THE FOLLOWING ITEMS BRIEFLY SUMMARIZE THE AREAS MONITORED AT THE LOCAL AGENCY BY THE STATE AGENCY:

- Fair Hearing notice and “And Justice for All” poster (or authorized substitute) is prominently displayed.
- Local Agency project has a plan to address accessibility for the disabled.
- If there are more than 15 employees, there is a “504” Coordinator.
- Arrangements are made to communicate with non-English-speaking participants.
- Public notification and outreach are done (and translated into the languages of the communities served).
- The non-discrimination statement is included on any public notification and/or outreach materials.
- Participants are given an opportunity to read or have the Supplemental Information Form read to them before signing.
- Civil rights training with employees is documented including when it was done, what was covered and who attended. (Monitors will ask staff if they have been trained, when, what was covered, and whether they know how to handle complaints.)

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Self-Check Workbook

Training Section

Bureau of Clinical and Nutrition Services

Texas Department of State Health Services

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Self Check #1: It's the Law

On the following questions, please circle the correct answer.

1. Which of the following are considered “civil rights” in the United States?
 - A. The right to have shelter
 - B. The right to be free from discrimination
 - C. The right to be treated kindly

2. Which key legislation is directly related to WIC participants and civil rights?
 - A. The 4th Amendment to the U. S. Constitution
 - B. Title VI of The Civil Rights Act of 1964
 - C. The 8th Amendment to the U. S. Constitution

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: **I. It's the Law.**

Self Check #2: Some Common Terms Related to Civil Rights

Check the blank next to the term which best describes the scenarios described below:

1. The WIC employee believes that the WIC clients who come in from the rural area are all poor, not very smart and not capable of understanding how best to feed their children.

_____ prejudice (an attitude)

_____ discrimination (a practice)

_____ stereotyping (a belief)

2. The WIC employee treats WIC clients from rural areas differently than those in the city where she works. She frequently talks “down” to them and does not mind making them wait.

_____ stereotyping (a belief)

_____ discrimination (a practice)

_____ prejudice (an attitude)

3. The WIC employee’s attitude changes completely on the days when she knows that the group from another country is coming in for their appointment. She feels that her work is a lot harder on those days and resents “those people” intruding on her day.

_____ discrimination (a practice)

_____ stereotyping (a belief)

_____ prejudice (an attitude)

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: II. **Some Common Terms Related to Civil Rights.**

Self Check #3: What's in a Policy?

Please write (T) for true and (F) for false on the following statements:

1. _____ if a participant does not read English or Spanish, she should bring someone to the clinic who can translate any written information.
2. _____ at each certification the participant and parent/guardian/caretaker should read, sign and date the SIF.
3. _____ the clinic should use bilingual staff or provide interpreters to make WIC services available to persons who do not speak English.

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: III. What's In a Policy?

Self Check #4: Applying the Same Standards to All Persons

1. Which of the following materials do you think would **NOT** require the non-discrimination statement (check all that may apply):
 - A. _____ A pamphlet about the foods offered by the WIC program
 - B. _____ All locally developed outreach materials
 - C. _____ A notice about free pet vaccination shots at the WIC clinic
 - D. _____ A notice about a breastfeeding celebration day at the WIC clinic
2. Which of the following information is **required** on WIC outreach materials (check all that apply):
 - A. _____ Information about the local Medicaid office
 - B. _____ A non-discrimination statement

- C. _____ A telephone number and location of the local WIC program
- D. _____ The services offered by the WIC program
- E. _____ Who might be able to participate in the WIC program

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: **Applying the Same Standards to All Persons**

Self Check #5: How Civil Rights Complaints are Handled

Unscramble the following words first and write the one that fits in the following sentences. On the following questions fill in the blank with the appropriate answer.

- A. GRHIAEN
- B. CNOE
- C. OTW
- D. ESTTA GCAYNE
- E. ALRO
- F. MINTCPOASL

1. An individual may make a written or _____ request for a fair hearing.
2. The Local Agency must immediately send any civil rights complaints to the _____.
3. The State Agency will monitor the Local Agency at least every _____ years for compliance with Civil rights policies.

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and

read the section: **How Civil Rights Complaints are Handled**

Self Check #6: Applying the Same Standards to All Persons

Please write (T) for true and (F) for false on the following statements:

1. _____ Program information or Nutrition Education should be provided to persons with disabilities in the format they request in a timely manner
2. _____ Each Local Agency is required to keep records of civil rights training for their employees
3. _____ each local Agency must collect data on racial/ethnic category for each applicant/participant

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: **What the Local Agency Needs to do**

Self Check #7: “Will You Handle Complaints or Will Complaints Handle You?”

1. Which of the following information **DOESNOT** have to be collected from a person who makes a civil rights complaint? (Check all that apply)
 - A. _____ Date or dates the incident(s) occurred
 - B. _____ Nature of the incident
 - C. _____ Whether the complainant is married
 - D. _____ Location where the incident occurred
2. Which of the following would be considered civil rights complaints?

(Check all that apply)

- A. _____ A WIC father who feels that WIC mothers get better treatment than he does
- B. _____ A WIC parent who complains that too many of the nutrition education lessons are geared toward parents of children under 3 years old
- C. _____ A vendor who complains that WIC customers do not know which foods to get
- D. _____ A woman from another country who complains that women from this country don't have to wait as long as she does
- E. _____ A woman who is hearing impaired who complains that there are not captioned videos for most of the lessons

How did you do? You may check the answer key at the end of this workbook. If you were unable to answer the questions, please go back and read the section: **IV. Will You Handle Complaints or Will Complaints Handle you?**

Putting It All Together: Apply What You've Learned

Now it's time for you to apply what you have learned so far. You may have to go back and read and/or talk to your supervisor to answer the following questions. When you have finished, turn completed copy in to your supervisor.

1. Select one civil rights policy and, in your own words, describe how that policy is carried out at your agency.
2. A job aid is something written that helps you do your job. For example, a job aid for a receptionist might be a list of steps for answering the telephone. Develop a job aid that lists the steps you would take if you received a civil rights complaint *at your agency*.

Answer Key to Self Checks

Self Check– #1

1. The answer is **B**.

Note: While some persons might consider having shelter and not being treated kindly as human rights, these are not rights protected by law in the United States.

2. The answer is **B**.

Note: The fourth amendment has to do with the right to bear arms and the eighth has to do with the rights of those accused of a crime to have a fair trial. Title VI of the Civil Rights Act of 1964 has to do with the civil rights of persons who participate in programs receiving federal funds (such as WIC).

Self Check– #2

1. The answer is **stereotyping**. Notice this example has to do with the employee's *idea* about certain participants.
2. The answer is **discrimination**. Notice the issue is how she *acts*.
3. The answer is **prejudice**. Notice that this example has to do with the employee's *attitude*.

Self Check– #3

1. **False**. According to WIC Civil Rights policy 10, if a person does not speak English nor has a limited English speaking ability, the Local Agency should make arrangements to provide program information. They should either hire bilingual staff members or interpreters, or develop in languages that can be used by local WIC populations.
2. **True**. According to WIC Civil Rights policy 1.0, the WIC participant is required to sign and date the Supplemental Information Form (SIF) themselves.
3. **True**.

Self Check– #4

1. The answer is **C**. Civil Rights policy 2 states that the non-discrimination statement should be on all locally-developed materials concerned with outreach, program information, or participant's rights. The notice about the free pet shots would not apply here.

2. The answers are **B**, **C**, and **E** Outreach policy 1 states that at least the non-discrimination statement, the Local Agency location, and information about who might be able to participate in the WIC program should be included on outreach materials. Neither the information about the Medicaid office nor the information about services that the WIC Program offers are required information.

Self Check– #5

- A. Hearing
- B. Once
- C. Two
- D. State Agency
- E. Oral
- F. Complaints

- 1. oral
- 2. State Agency
- 3. two

Self Check– #6

- 1. True
- 2. True
- 3. **True.** According to WIC policy CR: 09.0, participants shall be asked to self-identify his/her racial and/or ethnicity group. Sometimes a participant is reluctant to identify his or her racial/ethnic identity. The employee should let them know that information is for statistical purposes only, and has nothing to do with whether or not they get on the program.

Self Check– #7

- 1. **C.** You are not required to find out the complainant's marital status.
- 2. **A, D, and E** In these cases, a participant could make civil rights complaints based on sex (A), national origin (D), or disability (E).