

# **ITCA WIC TRAINING PROGRAM**

## **Module 11:**

# **Protecting the Civil Rights of Our Clients**



**May 2017**  
ITCA WIC Competencies

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# Instructions

To complete each competency unit complete the following steps:

1. Read the introduction.
2. Read each section.
3. Complete the Self-Evaluation at the end of each section.
4. If you have trouble answering the questions, read the section again or ask your director for more information.
5. Make arrangements with your director at the Skill Checks to demonstrate your ability to apply your knowledge in the clinic.
6. After you complete all of the Self-Evaluations and Skill Checks, make arrangements with your director to complete the Unit Assessment.
7. Submit the original Unit Assessment and Skill Checks to ITCA. Copies should be kept at the local agency.

# 11 – 1 Introduction to Civil Rights

## **Objectives**

After completing this section, you will be able to:

- ✓ Understand what civil rights means in the WIC Program.
- ✓ Name the laws that protect our civil rights

## **Overview**

Civil rights is a term that is used often in the media. But you may be unclear on what it really means, especially in regard to the WIC program. In this unit you will learn about the federal regulations that protect an individual's civil rights in federally assisted programs such as WIC.

Everyone who works in the WIC program is required to be trained in the area of civil rights at least once a year. This may seem like a lot of training, but it is important for WIC employees to be knowledgeable in the area of civil rights so we can guide WIC clients correctly. After all, we do want to provide them with the best customer service possible!

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 related to protecting the civil rights of your customers.

## What are Civil Rights?



Civil rights laws in the United States have been around for over 200 years. After the Constitution was ratified, the first 10 amendments, known as the Bill of Rights, established several civil rights. These include the right to practice a religion freely, the right to free speech, the right to assemble peacefully, and protection against unlawful searches and seizures, among others.

There are now 27 amendments to the Constitution, several of which added additional civil rights. These include: the 13<sup>th</sup> amendment that abolished slavery, and the 15<sup>th</sup>, 19<sup>th</sup>, and 24<sup>th</sup> amendments that protect the right to vote based on race, color, and sex and prevent the use of poll tax or any other tax to prevent people from voting. The 14<sup>th</sup> amendment that calls for equal protection of the laws has been used successfully in a number of landmark cases, including *Brown v. Board of Education* (racial discrimination), *Roe v. Wade* (reproductive rights), and *University of California v. Bakke* (racial quotas in education).

In addition to Constitutional amendments, other laws have been passed to protect civil rights. One of the most well-known is the Civil Rights Act of 1964 that resulted from growing demand to guarantee African-Americans the same opportunities as all other U. S. citizens. It was launched by the federal government as an attack against racial discrimination.



Many other laws have been passed since the 1960s, including the Age Discrimination Act, the Americans with Disabilities Act, the Equal Pay Act, and the Family and Medical Leave Act that protect the civil rights of many groups of people.

The Indian Civil Rights Act of 1968 was passed by Congress to impose most of the provisions of the Bill of Rights upon the tribes. Although tribes are exempt from many federal laws, the tribes and the WIC program are required to comply with the policies found in this unit since they receive federal funds.

## ***What laws are the Civil Rights Regulations based on?***

The Civil Rights regulations are based on the following laws:

- Title VI of the Civil Rights Act of 1964
- Civil Rights Restoration Act of 1987
- Americans with Disabilities Act
- Title IX of the Education Amendments of 1972
- section 504 of the Rehabilitation Act of 1973
- Age Discrimination Act of 1975



WIC is run locally but funded federally and administered by the U.S. Department of Agriculture (USDA). Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Food and Nutrition Services (FNS), the agency of the USDA that is responsible for federal nutrition programs, provides further guidance.

Civil Rights regulations for WIC are defined in FNS Instruction 113-1. This regulation states that no person shall, on the grounds of race, color, national origin, age, sex or disability, be excluded from participation in, be denied benefits of or be otherwise subjected to discrimination under the program. These characteristics are known as- protected bases.



# 11 – 2 How to Comply with the Regulations

## **Objectives**

After completing this section, you will be able to:

- ✓ Define discrimination.
- ✓ Understand the Civil Rights regulations that apply to WIC.
- ✓ Follow the regulations in your day to day responsibilities.

## **Overview**

As a WIC employee, you have an obligation and responsibility 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 his or her race, color, national origin, sex, age 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.



## ***Defining Discrimination***

There are certain terms that we hear 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 hear when civil rights are discussed.

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. These are 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.

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

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.

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

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.

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

## ***Purpose of Policies***

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

In the case of civil rights policies, the federal 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 feels they have experienced discrimination in our clinics.

The policies below ensure that the federal regulations are being followed and that WIC clients do not experience discrimination in our program.

## ***How We Do Business in WIC***

Clients need to be told about their civil rights and other rights they have regarding their participation in the WIC program. They also need to understand their responsibilities. At each certification, you are required to have the client or caregiver read, or have read to them, the rights and responsibilities of participating in the WIC program. These are listed on the Rights and Responsibilities Form. The client must sign the form via electronic signature. If the signature cannot be captured electronically, the form will be printed and manually signed and a copy must be kept in the daily, weekly or month files.

If a client reads Spanish, the form should be provided in Spanish.

If a client does not read English or Spanish, the statement should be read to the person in a language that the client can understand. A client who cannot write can make an 'X' or other symbol to acknowledge that they have read or heard the information. The staff member should acknowledge the mark by initialing it.



# Applying the Same Standards to All Persons



The same standards for determining eligibility and participation in the WIC Program apply to everyone regardless of **race, color, sex, age, national origin, or disability**. Although there are some categories that do not apply to WIC regulations such as religion and sexual orientation, these clients should also be treated fairly.

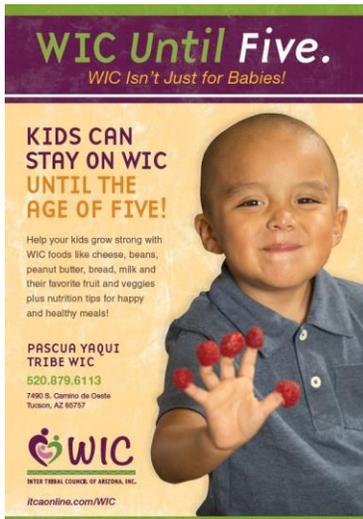
A copy of the USDA poster, “And Justice for All” must be displayed in each clinic where it can be *easily seen*. This poster lets clients know whom to contact if they feel they have experienced discrimination in the WIC Program.

# Providing Program Information and Services to People Who Speak Languages other than English

Each local agency should make arrangements to make program information available to persons who do not speak English or who may have limited English-speaking ability. Program information should be provided to such persons in the appropriate language, orally or in writing.

Local agencies who serve a significant number of non-English speaking clients should hire bilingual staff members or interpreters to serve non-English speaking or limited English speaking persons. If no staff is able to translate, there is a phone service available with translators for a wide variety of languages, Program materials should be developed in the languages used by the local WIC populations.

## Outreach Materials



Outreach materials are brochures, newspaper articles and other pieces of information that are used to inform potential clients or those who might refer clients to us about the WIC program and what services WIC provides.

All locally developed materials concerned with outreach, program information, or clients' rights that are distributed to the public or posted for public viewing must include the nondiscrimination statement below in a prominent place on the materials.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this agency is prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

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 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**. Additionally, program information may be made available in languages other than English.

To file a complaint alleging discrimination, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at:

[http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or 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](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.



WIC newspaper advertisements, radio or television announcements or other outreach materials that are less than one page may use the short nondiscrimination statement as follows:

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**This institution is an equal opportunity provider.**

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Outreach activities must *at the very minimum* include public announcements about WIC in the local media such as the newspaper or radio station and distribution of WIC information *at least* once yearly to those organization/agencies who serve persons who might be eligible for WIC services. Such organization/agencies may include OB/GYN doctor's offices, women's health clinic, or local non-profit or charity groups.

Outreach information must include the following:

- the purpose of WIC
- who might be able to participate in WIC
- the Local Agency/clinic location
- the non-discrimination statement

Outreach materials should be provided in the languages that the people who live in your service area are able to read. ITCA provides outreach materials in both English and Spanish.

Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) can be directed to USDA's TARGET Center at (202) 720-2600 (voice and TTY).

## ***How ITCA Monitors the Local Agency***

ITCA's job is to make sure that each local agency complies with the requirements of the civil rights regulations. ITCA monitors local agencies in civil rights annually.

The following items are checked at each clinic location during a monitoring visit:

- ☒ Fair Hearing notice and "And Justice for All" poster or authorized substitutions are 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 clients.
- ☒ 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.
- ☒ Clients are given an opportunity to read or have Rights and Responsibilities Form read to them before signing.
- ☒ Civil rights training with employees is documented including when it was done, what was covered and who attended.

## ***Meeting the Needs of Disabled Clients***



Each Local Agency should have ways to make services available to persons who are disabled. Since WIC receives federal funds, WIC agencies must make 'reasonable accommodations' for people with disabilities.

Reasonable accommodations for those with physical disabilities are those that can be made without much difficulty or expense. This would include things like adding grab bars on walls, ramping a few steps, or lowering a drinking fountain. Any renovations to a property are required to meet construction standards for accessibility.

If any clinic sites are not available to disabled persons, a written local policy will be developed that describes other ways that services will be provided to disabled people. These might include making home visits or doing appointments through Skype or other similar services and loading the client's eWIC card without them going to the clinic.

## ***How and When the Local Agency Handles Civil Rights Training***

Civil rights training must be provided once per year to each local agency employee. This is usually done through webinars, completing this module, in-services or other staff training. New employees will receive civil rights training as part of their orientation to WIC. Each Local Agency is required to maintain documentation of the training that has been provided to each employee including civil rights training.

## ***How and Why to Collect Racial/Ethnic Data***

Local Agencies must collect information by racial/ethnic category for each applicant or client on the WIC Program. FNS requires that all recipients of Federal financial assistance answer these questions. Collecting and tracking this information helps us assure that the WIC program is administered in a non-discriminatory manner.

This step is completed as part of the application process in STARS. It can be entered on the demographics tab in Client Services or from the WIC certification guide.

A client's ethnicity is determined by asking whether a client is Hispanic or not and marking the correct response in STARS. The race of the client will be determined by asking the client which racial group they belong to: Black, White, Asian or American Indian. If the client does not wish to identify themselves with a particular ethnic group, the staff member must determine the clients' ethnicity and race by visual observation. The employee should explain that the data is being collected *"for statistical purposes only and has nothing to do with whether or not the applicant or client gets/stays on the program."*





## ***Self-Evaluation***

1. What is the difference between stereotyping, prejudice and discrimination?
2. What is outreach and how often must it be done?
3. What must be included on all outreach materials?
4. What form must all clients read or be read and sign at certification?
5. What should you do if a client only speaks a language that you do not speak?

# 11 - 3 Handling Civil Rights Complaints

## ***Objectives***

After completing this section, you will be able to:

- ✓ Identify a complaint as a civil rights complaint.
- ✓ Know what to do when you have a civil rights complaint.
- ✓ Know the steps to follow to correctly handle a civil rights complaint.

## ***Overview***

Civil rights complaints must be handled in a specific way that is slightly different than other complaints. Civil rights complaints are very serious. It is important for staff to recognize civil rights and complaints and know how to handle them according to federal regulations.

## **Knowing a Complaint is a Civil Rights Complaint**

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.

Civil rights complaints are special because they must be handled in specific ways according to federal regulations. The first part of handling a complaint is to determine whether or not it is a civil rights complaint.

Some people may not come right out and say that they have been discriminated against. When applicants or clients use words such as “unfair” or “discrimination”, you may be dealing with a civil rights complaint. Clients may also refer to their race, ethnicity, language they speak or country they are from. You may need to ask for clarification from the client to find out more about their complaint. Some questions you may need to ask are:

- Do you think you were treated unfairly?
- Why do you think you were treated unfairly?
- Do you think that there is a reason you were treated the way you were?



If you suspect that there may be a civil rights complaint, the first thing you should do is refer the client to the USDA Program Discrimination Complaint Form, AD-3027, found online at:

[http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or 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](mailto:program.intake@usda.gov).

**Offer your assistance in filing a complaint.**

## Steps to Follow in Filing A Civil Rights Complaint

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 as outlined above.

**Step 2:** Once a civil rights complaint is identified, ask the client or applicant if they would like to make a formal civil rights complaint. Complainants have up to 180 days from the occurrence of an incident to file a complaint. If the client does not choose to make a formal complaint to USDA, you can handle the complaint internally according to your local agency policy. If the client chooses to make a complaint, make every effort to get the following information:

- Complainant's name, address, phone number or other means of being reached. Anonymous complaints are accepted, however, it is difficult to investigate an anonymous complaint.
- Specific location where the incident occurred.
- Nature of the incident that led the complainant to feel that discrimination had occurred. Person (s) against whom complaint is filed.
- Basis on which the complainant feels discrimination exists (race, color, national origin, age, sex or disability).
- Names, job titles and addresses of persons who may have witnessed what happened.
- Date or dates during which the alleged discrimination occurred or, if it continued over a period of time, during which time period did it take place.
- Date complaint was filed and with whom.



**Step 3:** The Local Agency must refer all complaints of discrimination to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410. You may also call (866) 632-9992.

**Step 4:** The Local Agency must notify the State Agency of the complaint. The local agency will immediately notify the ITCA WIC Director of the complaint by phone and must submit a written copy of the complaint to ITCA within four working days.

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.

**Step 5:** The Local Agency must log the complaint in STARS and maintain it on file for three years and five months. The State Agency must maintain them in a file with all of the above information for three years and five months.



## ***Self-Evaluation***

1. Describe how you may identify a civil rights complaint.
2. What is the first thing to do if you identify a complaint as a civil rights complaint?
3. What are the steps to follow in filing a civil rights complaint?

# Answer Key to Self-Evaluations

## **Self Evaluation 10 - 1:**

1. These include the right to practice a religion freely, the right to free speech, the right to assemble peacefully, and protection against unlawful searches and seizures, among others.
2. Race, color, national origin, sex, age and disability

## **Self Evaluation 10 - 2:**

1. See Page 8.
2. Outreach is telling potential clients and programs that serve potential clients about WIC program services and eligibility requirements. Outreach must be done at least one time per year.
3. The WIC program services provided, who might be eligible, clinic address/location and the non-discrimination statement.
4. Rights and Responsibilities Form.
5. Find another staff person in your agency or hire an interpreter.

## **Self Evaluation 10 - 3:**

1. Listen for key words such as unfair or discrimination. Ask the client questions about whether they think they were treated unfairly.
2. Let the client know that they can file a civil rights complaint with USDA and provide the contact information.
3. See pages 18-19.

Name: \_\_\_\_\_  
Score: \_\_\_\_/100 points

Date: \_\_\_\_\_  
Percent correct: \_\_\_\_\_

## Unit 11: Civil Rights Unit Assessment

DIRECTIONS: Circle the correct answer. (4 points each)

1. Which of the following can you NOT discriminate against in the WIC Program according to USDA?
  - A. Race, color, sex, national origin or religion
  - B. Gender, age, language, national origin or color
  - C. Race, color, national origin, age, sex or disability
  
2. A generalization about a group involving beliefs about a particular group is a:
  - A. Prejudice
  - B. Stereotype
  - C. Discriminatory Practice
  
3. Discrimination is:
  - A. A belief about a group of people
  - B. An attitude toward a group of people
  - C. The same as prejudice
  - D. The practice of treating persons differently because we have grouped them in our minds according to our prejudices
  
4. Which of the following must be posted in every clinic?
  - A. The local agency outreach plan
  - B. The "And Justice For All" Poster
  - C. The clinic appointment schedule
  
5. How often does staff have to have civil rights training?
  - A. Every six months
  - B. Every year
  - C. Every other year
  
6. The local agency staff must
  - A. Read the client the Rights and Responsibilities Form
  - B. Have the client read the Rights and Responsibilities Form
  - C. Read or have the client read the Rights and Responsibilities Form
  
7. Which of the following materials would NOT require the non-discrimination statement?
  - A. A locally developed outreach handout
  - B. An article about WIC benefits and services in the newspaper
  - C. A pamphlet about the foods offered by the WIC program
  - D. A handout about high iron food

8. Which of the following does NOT have to be collected from a person who makes a civil rights complaint?
  - A. Date or dates the incident(s) occurred
  - B. Nature of the incident
  - C. Race of the complainant
  - D. Location where the incident occurred
  
9. Which of the following would be considered a civil rights complaint?
  - 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 2 years old.
  - C. A vendor who complains that WIC customers do not know which foods to get.
  - D. A postpartum WIC client who feels that it is unfair to give breastfeeding women tuna and carrots and not give them to non-breastfeeding women.
  
10. How often must public announcements about WIC services be made in the local media?
  - A. At least once a year
  - B. At least four times a year
  - C. At least two times a year
  - D. At least once a month
  
11. Which of the following information must be included in outreach information?
  - A. The purpose of WIC, who might be eligible, the clinic location, non-discrimination statement
  - B. The purpose of WIC, the clinic location and phone number, non-discrimination statement
  - C. Clinic location and phone number and non-discrimination statement
  
12. If a WIC applicant does not speak English, what should the local agency do to serve the client?
  - A. Hire a bilingual staff member or interpreter
  - B. Tell the person that they must bring an interpreter
  - C. Use pictures to get your message across
  - D. Speak very loudly and slowly so they can understand
  
13. Which of the following is the correct procedure for handling civil rights complaints?
  - A. Identify the complaint as a civil rights complaint, refer the client to USDA, Ask the client whether they would like to file a complaint, get the required information, send the complaint to USDA, and notify ITCA.
  - B. Identify the complaint as a civil rights complaint and refer the client to USDA.
  - C. Refer the client to USDA.
  - D. Notify ITCA, get the required information, identify the complaint as a civil rights complaint

14. What should you do if a person with disabilities requests WIC services and they are unable to access the clinic?
- A. Follow your local agency policy
  - B. Tell them they will have to get services elsewhere
  - C. Serve them in the parking lot
15. Ethnicity can be determined
- A. Visually
  - B. By personal recognition
  - C. Self declaration by the client or authorized representative
  - D. All of the above
16. Which of the following may be considered disrespectful to some groups of people?
- A. Saying “You people” or “those people”
  - B. Making jokes about groups of people such as disabled people or people from certain ethnic groups
  - C. Unwillingness to make accommodations for persons with needs such as interpreters or children with special needs
  - D. All of the above
17. Which of the following is an example of discrimination?
- A. A mom who complains that she has to wait 1 hour when she goes to the mobile clinic near her home, but only waits 15 minutes when she goes to the main office.
  - B. A grandmother who complains that the clinic is too far from her home.
  - C. A woman who is hearing impaired who complains that there are not captioned videos for most of the lessons.
  - D. A dad who complains that he doesn’t get a food package for himself.
18. How long from the date of the incident does a client have to file a civil rights complaint?
- A. 30 days
  - B. 60 days
  - C. 90 days
  - D. 180 days
19. Title VI of the Civil Rights Act helps to ensure that
- A. Federal funds are not being used to subsidize discrimination.
  - B. Federal programs are provided without regard to race, color, or national origin
  - C. People are not excluded from participation in, denied the benefits of, or subjected to discrimination under any federal program or activity.
  - D. All of the above
20. How long must known complaints of discrimination made by WIC applicants or clients be kept on file?
- A. 3 years
  - B. 3 years and 5 months
  - C. 3 years and 6 months

21. How do you determine whether a complaint is a civil rights complaint?
- A. Ask the client whether the complaint is a civil rights complaint.
  - B. Listen for the words unfair and discrimination. Ask questions about whether they feel they were treated unfairly.
  - C. Assume all complaints are about civil rights and refer the clients to USDA.
  - D. Assume that all complaints are not civil rights complaints unless the client tells you it is a civil rights complaint.

**DIRECTIONS:** Write in the correct answer. 'F' for False or 'T' for True.  
**(2 points each)**

- \_\_\_\_\_ 22. If a client does not read English, she should bring someone to the clinic who can translate written information.
- \_\_\_\_\_ 23. A WIC staff person can sign the Rights and Responsibilities Form for a WIC client.
- \_\_\_\_\_ 24. If a client does not want to identify his or her racial/ethnic group, the employee should explain why the information is collected.
- \_\_\_\_\_ 25. If a client refuses to identify his or her racial/ethnic group, the employee should record the group based on visual information.
- \_\_\_\_\_ 26. When taking a civil rights complaint, the WIC staff person must get the name of the complainant.
- \_\_\_\_\_ 27. The WIC client must notify the local agency before filing a civil rights complaint with USDA.
- \_\_\_\_\_ 28. A staff member must complete the Complaint Screen in STARS for all complaints that are known to the staff member.
- \_\_\_\_\_ 29. You should treat every client equally.
- \_\_\_\_\_ 30. Stereotyping clients helps to provide good customer service.
- \_\_\_\_\_ 31. It is important not to be friendly to WIC clients so they don't think you have favorites.