



## 2026 Civil Rights Training

For continuing WIC staff

### Facilitator Guide for Civil Rights Refresher 2026

#### **Who must take this course**

All WIC staff who have already taken the Civil Rights training.

Note: New staff take the Civil Rights training course on their own in Workday Learning during first month of hire during orientation.

#### **Complete by:**

December 31, 2026

#### **Time needed:**

30 minutes to 1 hour

#### **Who can provide this training:**

This in-service can be facilitated by a Training Supervisor or WIC Coordinator. May also be done in collaboration with an experienced certifier or CPA.

#### **When to provide this training**

This training can be provided at any time during the year before the December 31, 2026, deadline.

State WIC recommends providing the Civil Rights Refresher in January 2026 to prevent training overlap later in the year.

## What's included in this facilitator guide

---

- [The purpose of the Civil Rights Refresher](#)
- [Tips for facilitators](#)
- [PowerPoint presentation with notes for training](#)
- Resources

## The purpose of the Civil Rights Refresher

---

The Civil Rights refresher must be completed by all WIC staff each year. The training covers civil rights topics required by FNS. For more information on this requirement, see Oregon WIC [Policy 452 – Civil Rights](#).

### Required topics to include in Civil Rights training

The civil rights topics below are required by FNS and are included in the PowerPoint provided by the state WIC office:

- The six protected classes
- How to identify a civil rights violation
- Data collection
- Reasonable accommodations for disability
- Language access services
- The “And Justice for All” poster
- Complaint procedures
- Compliance review and resolution
- Conflict resolution and customer service

### Tailoring this Civil Rights Refresher for staff

The state WIC team has provided a PowerPoint that covers all topics required by FNS. You can add more details or examples to connect the Civil Rights training to your clinic or local agency. For example: you may change the order of topics or adjust the stories or case study scenarios to explain civil rights violations in a different way.

You are free to expand on the required topics and set the pace of the training to fit your needs. Just make sure all required FNS topics are included. These topics can be discussed in either a formal or informal way.

## Tips for facilitators

---

Use the PowerPoint slides and this document to facilitate your own Civil Rights Refresher training.

- Tailor the PowerPoint slides to fit your agency needs.
- You may “Hide” slides you would like to cover in a different way. Hidden slides will not show when you are in Present mode in PowerPoint.
- Print out the [Civil Rights job aid](#) for staff to refer to after the training.
- Print out this facilitator guide and add notes next to slides where you want to add more context and details for staff when presenting.

## PowerPoint slides with notes for training

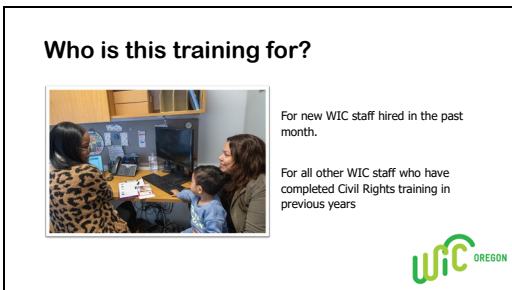
---



This training is a refresher for staff who completed the Civil Rights training during the first month of hire. FNS requires WIC staff to take this training every year.



This training takes about 30 minutes with a group without long pauses for discussion.



This training is for WIC staff who have already completed the Civil Rights course in Workday during their orientation.

### You will learn about:

- The six protected classes
- Identifying civil rights violations
- Data collection requirements
- Reasonable accommodation for disability
- Language access services
- The "And Justice for All" poster



These civil rights topics are required by FNS to be trained on each year for all WIC staff.

### You will also learn about:

- Complaint procedure and requirements
- Compliance review and resolution at local agencies
- Good customer service, conflict resolution, and complaint prevention



These civil rights topics are required by FNS to be trained on each year for all WIC staff.

### After this training, you will be able to:

- Recall:
  - How to appropriately talk to participants about data collection and program eligibility
  - Language access service rights for WIC participants
- Recognize:
  - Effective display locations for the "And Justice for All" poster
  - Examples of reasonable accommodations for WIC participants with disabilities



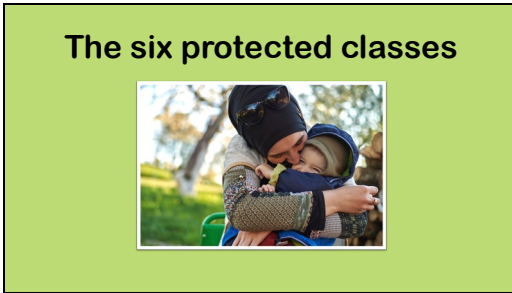
These are the skills learners will be able to show after this training. These skills are related to the required civil rights topics.

### After this training, you will be able to:

- Describe:
  - What information is needed to document civil rights complaints.
  - The state WIC program's review and resolution process for civil rights compliance.
- Identify:
  - An effective communication technique for conflict resolution.
  - The connection between good customer service, conflict resolution, and complaint prevention.



These are the skills learners will be able to show after this training. These skills are related to the required civil rights topics.



The next few slides are a refresher on what the six protected classes are and why they are important at WIC.




Age, race, national origin, sex, color, and disability are the six federally protected classes.

**Protected classes and discrimination**

**Protected classes**  
Groups of people who share a common trait and are legally protected from being discriminated against based on that trait.

Example: Age, race, national origin, sex, color, disability




The importance of protected classes is that they are legally protected from discrimination based on one of the six classes or traits. It is possible for a person to be discriminated against based on multiple classes.

**Protected classes and discrimination**

**Discrimination**  
Treating someone unfairly or differently because of who they are. This can happen on purpose, by accident, or even when someone fails to act.

Example: Staff member speaks kindly and helpfully to English-speaking participants but is impatient and dismissive towards those with limited English.



Discrimination is mistreatment against another person because of who they are. Discrimination can be against a protected class, but it also can be against some other characteristic someone has. For civil rights, it's important to recognize when discrimination is against a protected class and when it is not.

**How to identify a civil rights violation**



**A civil rights violation is not:** 

Any wrong or unfair treatment of a WIC participant.



Discrimination against a person based on one of the six protected classes is the definition of a civil rights violation at WIC. Any wrong or unfair treatment against a WIC participant is not a civil rights violation.

**How to identify a civil rights violation**



**A civil rights violation is:** 


Discrimination against a WIC participant based on one or more of the 6 protected classes.



At WIC, a civil rights violation is discrimination against one (or more) of the six federally protected classes.

**Is this a civil rights violation?**

Amina is at the store and finds WIC-approved items such as whole wheat naan, goat milk, and dried lentils—foods that are staples in their diet.



At checkout, the clerk looks at the items and says, "Why don't you people eat normal stuff like everyone else?" The clerk then questions whether the items are WIC-approved and delays the transaction, even though the items scanned through correctly.

Amina leaves embarrassed and without completing the purchase.



**Pause the slideshow** here so staff can think about the answer to this question. Take a moment to discuss thoughts and answers.

**Yes, this is a civil rights violation**



Store staff did not provide Amina with equal and fair service. They targeted her cultural or ethnic background, implying her food choices are abnormal or unacceptable.




This is a civil rights violation based on **national origin**.



The staff person's treatment of Amina was discriminatory and based on Amina's cultural or ethnic background based on the WIC foods she was trying to purchase ("Why don't you people eat like everyone else?").


There will be two more practice activities like this one later.

**Data collection**




WIC collects data from participants during certification. There is data we must collect based on policy set by state and federal government.

**Data collection requirement at certification**



- WIC staff must collect **race** and **ethnicity** data from participants.
- Data collection does not impact a participant being able to participate in WIC.



Race and ethnicity are the two pieces of data WIC staff must collect from participants. Participants can still enroll and participate in WIC even if they refuse to share this information.



### Explaining why we collect data



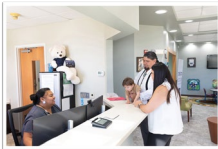
Use participant-centered language to:

- Reassure that their personal information does not affect eligibility.
- Explain that federal rules require that we collect the information.
- Explain that the information helps the WIC program understand the needs of participants.



Staff can explain to participants using participant-centered language why they are asking for this information.

### If participant declines data collection



WIC staff must rely on physical appearance to document race and ethnicity if participant declines to share.



Staff can use physical features to enter race and ethnicity data.

### Choose one or more race

Choose between American Indian/Alaska Native, Black/African American, Asian, Native Hawaiian/other Pacific Islander, and White



More than once race can be selected in TWIST.

### Choose only one ethnicity

Choose either Hispanic or Latino or Not Hispanic or Latino



Only one ethnicity can be chosen between these two options in TWIST.

**Knowledge check!**



Which protected class information does Oregon WIC collect from each participant?

Age

Sex

Disability

Race

**Pause the slideshow** here so staff can think about the answer to this question. Take a moment to discuss thoughts and answers.

**Knowledge check!**



Oregon WIC collects race, sex, and age from participants. Disability is not collected.

Age

Sex

Disability

Race

As of December 2025, Oregon WIC does not collect disability data from participants. We collect age, race, and sex. And age, race, and sex are information about one's protected class.

**Reasonable accommodations for disability**




We do not collect disability data, but we are required to provide what are called reasonable accommodations for participants.

**Reasonable accommodations**

WIC programs are required to provide reasonable accommodation to participants.

Reasonable accommodations remove barriers to allow all individuals to participate in WIC.



WIC tries to accommodate participants' needs whenever possible.

Reasonable accommodations are actions that clinics or local agencies take to remove barriers to participation in WIC. Participants may request accommodations, and the WIC program tries to meet those needs whenever possible.

**Examples of reasonable accommodations**



- Written materials in alternate formats like Braille, larger print, electronic, audio
- Wheelchair access at clinic sites
- Sign language interpreters for participants

Reasonable accommodations can be physical, like wheelchair access at clinics, but can also be in how we communicate with participants.

**Reasonable accommodation requests**

If you're not sure about an accommodation request, ask your WIC Coordinator.






Staff can ask their WIC Coordinator or other supervisory staff for questions if they are unsure about an accommodation being reasonable or not.

**Unreasonable accommodations**

Unreasonable requests are uncommon, but are something that would:


- Create a safety concern
- Need more staff, money, or equipment than a local agency has
- Require major changes to how the WIC program works

Unreasonable requests are not common. Here are examples of what would make a request unreasonable for the WIC program.


**Is this a civil rights violation?**

Marcy, who is Deaf, visits her local WIC clinic to enroll. Marcy requests a sign language interpreter, but the staff member is very busy and doesn't have time to schedule an interpreter.




The staff member writes a note saying only English and Spanish are supported, then leaves for lunch.

Marcy files a complaint against the staff member.





**Pause the slideshow** here so staff can think about the answer to this question. Take a moment to discuss thoughts and answers.

**Yes, this is a civil rights violation**



Staff intentionally declined interpreter services to Marcy.

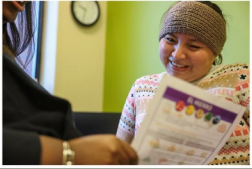
This is a civil rights violation based on **disability**.

This was a civil rights violation because the staff person actively chose not to assist Marcy for an accommodation based on her disability.


There will be one more practice activity like this.

**Language access services**




Language access services are how WIC provides equitable service to participants with Limited English Proficiency (LEP).

**Limited English Proficiency (LEP)**



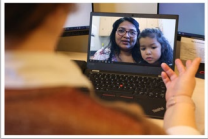
English is not a participant's first or main language they use.

Or when a participant has limited ability to read, speak, write, or understand English.




WIC serves many participants whose first language is not English or those who cannot read, write, speak, or understand English well.

**WIC provides services in the language a participant can use**



WIC staff must offer interpretation services to participants who have chosen a language other than English.



**Discuss** language access services available at your local agency with staff.

### Local agencies support language access services



Local agencies must:

- Know how to access interpreter services
- Offer interpreter services to participants who may need it



**Discuss** language access services available at your local agency with staff.

### The State WIC office supports language access services



The State WIC office:

- Provides clinics with translated documents
- Secures approved translators
- Translates critical print and digital materials into different languages



The state WIC office supports local agencies by providing print and digital materials in many different languages. These examples are promotional materials to educate participants on new WIC Food List items in 2025.

### Is this a civil rights violation?

Rania is a participant who immigrated to the U.S. this year.

Rania's friend, Amy, believes Rania needs help navigating the WIC program. Amy goes to the WIC clinic and requests Rania's information.

Staff do not have a Release of Information (ROI) to share out Rania's information. They tell Amy they cannot help without Rania's consent.

Amy submits a complaint, saying staff are discriminating against Rania based on national origin.



**Pause the slideshow** here so staff can think about the answer to this question. Take a moment to discuss thoughts and answers.

### No, this is not a civil rights violation



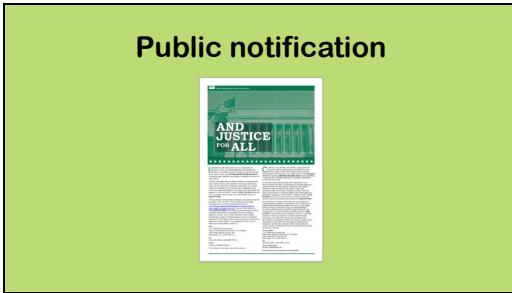
Staff did not share Rania's information with her friend Amy because they do not have a Release of Information (ROI).



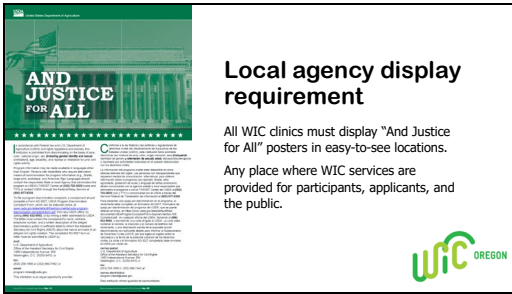
This is not discrimination or a civil rights violation.



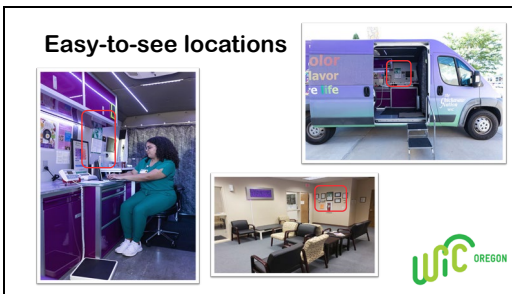
This is not a civil rights violation or discrimination because staff followed correct procedure and protected Rania's information when Rania did not give consent to share it.



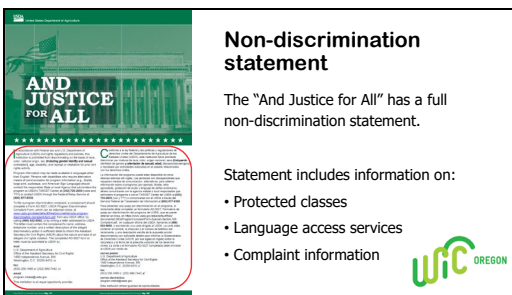
This poster is required to be printed at all WIC local agencies or clinics across the country and in Oregon.



It must be visible where participants enroll in WIC or receive services.




Examples of the poster in a mobile WIC clinic and in the front office area.



The "And Justice for All" poster has information touched on in previous slides: protected class information and language access services. It also includes information on where a participant or member of the public can submit a complaint.

Complaints are the next topic in this training.

**Non-discrimination statement outreach requirement**




- We provide fruits, veggies, milk and more
- We offer nutrition education and breastfeeding support
- We connect you to the services you need

Call your local WIC office: **971-673-0040** or **800-735-2000**



To check eligibility, visit [healthonoregon.org/wic](http://healthonoregon.org/wic)

Non-discrimination statement must be included on any print or digital outreach materials on WIC benefits and services.




Local agencies and clinics must include a non-discrimination statement on materials that mention WIC benefits and services.

**Non-discrimination statement outreach requirement**





Shortened versions available for smaller items.

If you need this information in large print, call 971-673-0040 or TTY 800-735-2000.

This institution is an equal opportunity provider.

Local agencies may require their own non-discrimination statements, which can supplement—but not replace—the USDA statement.




At the very least, this shortened statement is required on outreach materials. Some local agencies will use additional language for outreach items, but this shortened statement is still required.

**The complaint process**




Local agency staff may receive a complaint from a participant. The next section goes over what to do when you receive a complaint.

**Local WIC staff accept and document all complaints**



WIC staff document all complaints about poor customer service, civil rights violations, or a combination of both.



Complaints can be about poor customer service, discrimination, or even discrimination against a protected class (a civil rights violation). It can even be a combination of all those things.

### Local WIC staff accept and document all complaints



Complaints can come from phone calls, fax, emails, social media, written statements, in person, or online.



Complaints can be shared from participants in person, on the phone, or online. We do not ignore complaints. There is a process we follow to document them in the right place.

### Complaints that go in WIC data system



WIC staff document customer service complaints and civil rights violations in the WIC data system.

- These include complaints against:
- Store staff or grocery stores
  - Farmers or farmer's markets
  - Community partners



Participant complaints against a store, farmers market, or community partner goes into TWIST.

### Voiced civil rights complaints

Once a participant voices a civil rights complaint:

- Share with them their right to file a complaint directly with USDA within 180 days.
- Offer to help write and submit the complaint if necessary.
- Share that local staff will document the complaint and forward to the state office.
- **Document** complaint in the WIC data system.
- **Immediately notify** state WIC Compliance and Civil Rights Coordinator.

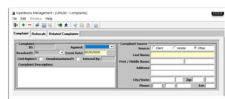


Once a participant voices a complaint that **includes discrimination against one of the six protected classes**, staff need to communicate the participant's right to file a complaint, document the complaint, and notify the state WIC team who resolve complaints.

### Complaint form in the WIC data system

In Complaint form, include:

- Who complaint is against
- Participant name and contact information
- Event date
- Description of event
- ☐ Civil Rights?



Staff use the Complaint form in TWIST for complaints against a store, farmers market, or community partner. If it includes discrimination against one of the six protected classes, check the **Civil Rights?** box.



### Check box for possible civil rights complaint

Check this box when a participant's complaint includes discrimination that you think might be a civil rights violation.



Checking the Civil Rights box sends the complaint straight to the **state WIC Compliance and Civil Rights Coordinator** after it's entered in TWIST.

### Check box for possible civil rights complaint

It is OK if you are not 100% sure.

The state WIC Compliance & Civil Rights Coordinator reviews these types of complaints to determine if it was a civil rights violation or not.



It is the responsibility of the state WIC Compliance and Civil Rights Coordinator to make the final determination if a civil rights violation occurred or not.

### Include as much information as possible for civil rights complaints

- Who was involved
- What happened during the incident
- Where the incident happened
- When did the participant realize it happened
- Why this complaint may be a potential civil rights violation
- Which protected classes may have been involved
- Documents related to incident (if available)
- Information about witnesses (if available)



Include as much information as possible. The job aid: [Civil Rights](#) includes this information for future reference.

### Use WIC Notes to include more detail

If you run out of room on Complaint form:

- Write "See WIC Notes" in Complaint Description box
- Use WIC Notes to add details about the complaint



There isn't a lot of room in TWIST to add all this information. Use WIC Notes to add more detail and note that in the Complaints box.

### Email the state WIC Compliance & Civil Rights Coordinator

Right after you submit a complaint with Civil Rights box checked:

- Send an email directly to the State WIC Compliance & Civil Rights Coordinator.
- Let them know a potential civil rights complaint has been submitted.



Emailing the state WIC Compliance and Civil Rights Coordinator after submitting a civil rights complaint helps them support the participant as soon as possible.

#### How we protect employee confidentiality

Complaints against local WIC staff:

- Refer general complaints directly to the WIC Coordinator
- Send civil rights complaints directly to state WIC Compliance and Civil Rights Coordinator



We do not submit complaints in TWIST that are against local agency staff to protect their privacy. Refer these to other staff member or state WIC Compliance and Civil Rights Coordinator depending on the situation.

#### How we protect employee confidentiality

Complaints against state WIC staff members:

- Refer complaints against state WIC staff directly to the state WIC program manager.

Complaints against local agency or WIC program in general:

- Enter complaints against local agency or WIC program in general into the [Online WIC Complaints form](#).



Complaints against state WIC staff or general complaint against a WIC program are submitted in different places.

#### Submit complaints as soon as possible



Federal rules require state WIC staff to report civil rights violations in a short window of time.

Please submit complaints as soon as possible so we can respond to them and support participants quickly.



The reason why we ask staff to submit complaints as soon as possible and to notify the state WIC Compliance and Civil Rights Coordinator is because FNS requires civil rights violations to be sent from the state to the federal government in under 2 weeks' time.

#### Civil rights compliance review



Following civil rights policy and procedure is important for local WIC agencies because programs are reviewed for compliance every two years.

### Civil rights compliance review process

#### Federal review of civil rights compliance

> United States Department of Agriculture (USDA) Western Region staff review state and local WIC programs for civil rights compliance.

#### > State review of civil rights compliance

State WIC review local agencies for civil rights compliance during the biennial review.



Federal and state agencies are responsible for ensuring all local WIC programs comply with civil rights policy and procedure.

### Corrective action and cooperation

#### Corrective action

> Local agencies not complying with civil rights policies may be issued corrective actions.

#### > Failure or refusal to cooperate

Failing or refusing to cooperate with civil rights policies may result in loss of federal funding for WIC program.



Corrective actions may be issued if a local agency is not in compliance with civil rights policy and procedure.

### How noncompliance is resolved

When a local agency is not complying with civil rights requirements:

- 1 Any findings during biennial review are provided in writing to the local agency.
- 2 State Nutrition Consultants and Compliance & Civil Rights Coordinator work with the local agency to resolve findings of non-compliance.



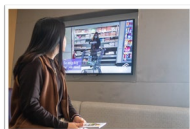
The state WIC team works with local agencies to resolve issues of non-compliance.

### Conflict resolution and customer service



Conflict resolution skills and good customer service are ways we can prevent complaints.

### One-minute brainstorm



**What situations make participants upset?**

Share your thoughts as a group, out loud, or in the chat for one minute.



**Pause the slideshow** here so staff can think about the answer to this question. Take a moment to discuss thoughts and answers.

### When participants could become upset



When they:

- Are denied benefits or determined to be ineligible.
- Experience poor customer service at clinic, store, or market.
- See others receiving what they view as better service than them.



**Discuss** together why a participant may make a complaint.

### LOVE can de-escalate negative experiences or conflict



**L**isten

Ask **O**pen-ended questions

**V**alidate their concerns

**E**mpower, educate, and empathize



When a participant is upset, LOVE is a conflict de-escalation tool that is also good customer service.

### LOVE in practice



**L**isten. Be sincere and try to understand.

"It sounds like this has been really frustrating for you."

Ask **O**pen-ended questions to identify the root of the issue.

"What happened from your perspective?"

"What part of this experience was most upsetting?"



**Discuss** what strategies staff use to help participants feel heard and supported.

### LOVE in practice



**V**alidate their concerns.

"I hear you, and you're not alone in feeling that way. This system can be confusing."

**E**mpower, educate, and empathize to find a realistic solution.

"One thing that might help is..."

"Let's see if one of these options could work for you..."



**Discuss** what strategies staff use to help participants feel heard and supported.

### Why conflict resolution is important



- Conflict resolution skills are customer service skills
- Good customer service can help prevent complaints



Listening to participants, asking open-ended questions, validating their concerns, and empathizing with their situation is not only good customer service, but can de-escalate situations where a participant is upset.

### Recap



**Recap:** Decide whether to go over the main points from each civil rights topic together. The next slides provide main takeaways for each topic covered.

### Recap: Civil rights

- Civil rights violations include discrimination based on one or more of the six protected classes.
- WIC staff must enter one or more races and only one ethnicity in the WIC data system.



### Recap: Civil Rights

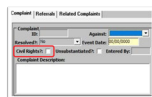
- Reasonable accommodation removes barriers for all individuals to participate in WIC.
- WIC staff must know where and how to offer language access services to participants who choose a language other than English.



### Recap: WIC data system

Submit participant complaints against stores, farmer's markets, or farmers in WIC data system.

- Check Civil Rights box if complaint included discrimination against one or more protected classes.
- Use WIC Notes to add more details.
- Email the state Civil Rights Coordinator after submitting possible civil rights complaint.



## Recap: Protect employee confidentiality



- Refer general, non-civil rights complaints against local WIC staff to your WIC Coordinator.
- Send civil rights complaints against local WIC staff directly to the state WIC Compliance and Civil Rights Coordinator.



## Recap: Protect employee confidentiality



- Refer complaints against state WIC staff directly to the state WIC program manager.
- Enter complaints against local agency or WIC program in general into the [Online WIC Complaints form](#).



## Recap: Compliance review

- Local agencies are reviewed for civil rights compliance during every biennial review.
- Non-compliance is resolved with corrective actions and working with Nutrition Consultant and state Compliance & Civil Rights Coordinator



## Recap: Customer service and conflict resolution



LOVE is a conflict resolution tool that can help improve customer service and prevent complaints.



## Civil Rights policy for WIC staff



**WIC Policy**  
[Policy 452 - Civil Rights](#)  
[Policy 588 - Program Integrity: Complaints](#)  
[Policy 635 – Participant Notification: Eligibility, Rights, and Responsibilities](#)



These policies cover civil rights, complaints, and participant rights.

**State WIC Compliance & Civil Rights Coordinator**

Contact for information, questions, or help with civil rights policy or complaints.

**Liliana Auw**

[Liliana.L.Auw@oha.oregon.gov](mailto:Liliana.L.Auw@oha.oregon.gov)

503-209-8365



Email the state WIC Compliance and Civil Rights Coordinator to let them know when a civil rights complaint has been entered in TWIST, ask questions about civil rights and complaints in general.



**You did it!**

You have completed the 2026 Civil Rights training.



## Resources

---

- [Online Complaint Form](#) (Microsoft Form): This new multi-use form allows WIC staff to submit participant complaints against a local agency or the WIC program in general.
  - Access through the Oregon Health Authority website at: [Reporting complaints, fraud, or abuse.](#)
- [Civil Rights Job Aid](#) (PDF): This job aid gives an overview on the six protected classes, definition of disability, information to include when a complaint is filed in the WIC data system, and state WIC contact information for civil rights questions.