

Civil Rights Compliance and Resolution**Policy No. CR-1150.01**

Effective date: October 1, 2019

No. of pages: 2

Policy

A formal resolution process must be initiated, for all identified Civil Rights Compliance Concerns, (See [Civil Rights Compliance Areas](#)) whether identified by formal or informal review processes.

When a civil rights compliance concern is identified during local self-review, the local agency must complete a resolution for the compliance concern within 60 days of the self-review.

When a civil rights compliance concern is identified by the state agency during any visit, the local agency has 60 days, upon receipt of written notification, to resolve the compliance concern.

Any compliance concern not resolved within 60 days of the written notification (or self-identification) must be reported to Georgia WIC Civil Rights Coordinator who will notify the U.S. Department of Agriculture, Food and Nutrition Service, Regional Civil Rights Officer (USDA-FNS-Regional Civil Rights Officer).

Purpose

To protect the civil rights of eligible Georgia residents to the Georgia WIC program by quickly resolving any civil rights concerns.

Procedures

- I. Develop a plan for resolution of civil rights compliance concerns identified during the self-review. The plan must include the following:
 - A. Date identified
 - B. Specific compliance concern (s) identified
 - C. The action(s) required to resolve the concern or to improve the situation to at least the minimum required standard.
 - D. Timeline for the resolution. The timeline must be less than 60 days.
- II. If the civil rights concern is identified by the state agency during monitoring reviews, compliance visits or informal visits, address civil rights compliance concerns and resolution in the Quality Improvement Plan (QIP).
 - A. If requesting any extension for the Corrective Action Plan, submit the resolution for the Civil Rights compliance concern (s) with the request for extension.
- III. Maintain civil rights compliance plans at the LA office.
- IV. Notify the Georgia WIC Civil Rights Coordinator on day 60 or before of any compliance concerns that cannot be resolved within the required 60-day window.
 - A. Identify barriers and adjusted timeline to resolution.
 - B. Develop a written plan for resolution with the Georgia WIC Civil Rights Coordinator.

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- C. Upon guidance from USDA-FNS Regional Civil Rights, maintain ongoing follow-up per written agreement for resolution with Georgia WIC.
- D. Maintain copy of Report of Findings of Noncompliance Letter provided by Georgia WIC Civil Rights Coordinator at the LA office.

Authority

Food & Nutrition Service Instruction-113-1, Section XIV

Master Agreement

WIC Annexes

Definitions/Supporting Information

Civil Rights – within the WIC program, rights that protect individuals' or groups' freedom to apply and participate fully in the program without discrimination or repression.

Civil Rights Compliance Concerns – non-compliance with any civil rights requirement as interpreted by federal or state statute or regulation, or with policies, procedures and/or practices designed to prevent a violation of an individual's or group's civil rights.

Report of Findings of Noncompliance Letter – notification letter sent to USDA-FNS Regional Civil Rights Officer that meets the requirements of FNS-113-1, Section XIV for inability to reach voluntary compliance within 60 days.

Resolution – an action to resolve noncompliance with any civil rights regulation, instruction, policy, or guidance that meets or exceeds the minimum standard of policy, procedure and/or practice.