



Annual Civil Rights Compliance Instructions For Frontline and Non-frontline Staff Who Assist with The Emergency Food Assistance Program (TEFAP) and/or the Commodity Supplemental Food Program (CSFP)

Federal Requirement Regarding Civil Rights Training

In accordance with [FNS Policy Memo FD-113](#) all agencies that receive federal financial assistance (including food) must provide civil rights training for volunteers and staff involved in all levels of the administration of these programs on an annual basis. This requirement applies to all Lead Agencies and Sub Agencies administering The Emergency Food Assistance Program (TEFAP) and the Commodity Supplemental Food Program (CSFP).

Lead Agencies are responsible for providing their staff and volunteers who interact with clients and/or who handle clients' personal information with training on their role in ensuring the civil rights of all clients. All volunteers and staff must take this training every year. Lead Agencies must ensure that their Sub Agencies provide training for their staff and volunteers annually.

Lead Agencies must ensure that they and their Sub Agencies have a notification system in place that includes informing applicants and clients, at the service delivery point, of their right to file or make a verbal discrimination complaint, including an anonymous complaint. At a minimum, this can be accomplished by displaying the USDA Title VI "[And Justice For All](#)" nondiscrimination poster in a conspicuous location at all food pantries, distribution sites, and meal programs.

Lead agencies and sub agencies must also display both the USDA Nondiscrimination Statement and current Income Guidelines at the point (location) of client intake, for TEFAP, and during the application process for CSFP. The full USDA "All Other Programs" Nondiscrimination Statement is available on the Food and Nutrition Services website at: <https://www.fns.usda.gov/civil-rights/nds>.

WSDA provides required civil rights training checklists for agencies to use when conducting staff and volunteer training. There are two versions, one for **frontline** staff/volunteers/management and one for **non-frontline** staff/volunteers (see definitions below). These civil rights training checklists are available on the Food Assistance website. Lead Agencies and Sub Agencies must keep a record of all staff and volunteer training. The checklists include a space for a signature certifying that the staff and/or volunteer has read and understands their responsibility to ensure clients' civil rights.

Civil rights training for staff and volunteers should be approached in the following manner:

Frontline Staff/Volunteers/Management — is defined as any staff or volunteer who regularly interacts with program applicants and participants, determines eligibility, or handles personal client information. Staff or volunteers with management responsibilities for the administration of TEFAP or CSFP are considered frontline staff/volunteers even if they have minimal client contact.

Training for these frontline staff, volunteers, and management should occur during each individual's orientation prior to any contact with clients or their personal information and be repeated annually, thereafter. In order to certify that the staff or volunteer has received the training, each person must read through Section 1 of the training checklist and certify, by their signature that they have read and understand their responsibility to ensure clients' civil rights.

Staff or volunteers who have management responsibilities, including USDA policy compliance and/or managing any aspect of TEFAP or CSFP, must also read Section 2 of the training checklist, even if they have minimal client contact. Upon completing the appropriate sections of the training checklist, all frontline staff, volunteers, and management must sign and date in the space provided agreeing to follow the civil rights instructions.

Non-Frontline Staff/Volunteers — is defined as any staff or volunteer, including minors, who do not handle personal information and who infrequently interact with program applicants, participants, or frontline staff.

Non-frontline staff and volunteers must also receive civil rights training. To satisfy the civil rights training requirements, the training checklist must be reviewed by volunteers and staff during each individual's orientation prior to beginning their shift and be repeated annually, thereafter. When convenient, large groups such as school classes or church groups may be read the civil rights training tool together. You may attach a list of the individuals who received the training with their signatures, a teacher may sign the checklist on behalf of their students along with a list of their names, or a checkbox on a volunteer sign-in sheet may be used to indicate that they have read and understand the training. All supporting documentation must include the date that the training took place.

Other Staff/Volunteers — if you have staff or volunteers who **do not** interact *in any way* with program applicants and participants and **do not** handle clients' personal information they do not need to complete the civil rights training.

Civil Rights Training Requirement Compliance

Lead Agencies and Sub Agencies must keep a record of all staff and volunteer training on file as proof of compliance with the required training policy. In accordance with the recordkeeping and reporting requirements of the Agreement, all program related records must be maintained for a period of six (6) years following the end date of the Agreement.