



ANNUAL CIVIL RIGHTS TRAINING CHECKLIST INSTRUCTIONS FOR FRONTLINE AND NON-FRONTLINE STAFF WHO ASSIST WITH TEFAP AND/OR 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 TEFAP and CSFP.

Contractors are responsible for providing their staff and volunteers that interact with clients and/or who handle personal information of clients with training on civil rights on an annual basis. Contractors will ensure that their Subcontractors provide training for their staff and volunteers on an annual basis.

Contractors will ensure that they and their Subcontractors have in place a notification system that includes informing applicants and clients, at the service delivery point, of their right to file or make a verbal complaint including an anonymous complaint. At a minimum, this can be accomplished by posting the USDA Title VI "[And Justice For All](#)" non-discrimination poster displayed in a conspicuous location at all Food Pantries and Meal Programs.

WSDA has provided two approved Civil Rights Training Tools for agencies to use when conducting training. One for frontline staff/volunteers/management and one for non-frontline staff/volunteers (see definitions below). These Civil Rights Training Tools are available on the [Food Assistance Programs](#) website on the [Training Resources](#) page.

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

Instructions for Civil Rights Training – Frontline Staff/Volunteers/Management

Definition – Staff/volunteers who regularly interact with program applicants and participants, determine eligibility or handle 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.

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Frontline staff/volunteers/management must receive civil rights training. In order to certify that the staff or volunteer has received the training, each person must read Section 1 of the training tool and indicate, with their initials, to the left of each bullet that they have read and understood the content. In addition, those staff or volunteers who have management responsibilities for making sure that USDA policies are followed must also read and initial each bullet in Section 2 of the training. Upon completing the training, all frontline staff, volunteers, and management must sign and date the bottom of the form. If a staff or volunteer has management responsibilities for the TEFAP or CSFP program(s) and has minimal contact with clients, they must read and sign-off on both sections of the training checklist.

Training for these frontline staff, volunteers, and management should first occur during each individual's orientation prior to any contact with clients or their personal information and be repeated annually. The recipient agency must keep a copy of the signed training checklist on file for each of the frontline staff, volunteers, or management personnel as proof of compliance with the required training policy. In accordance with Food Assistance Programs document retention regulations, all program related paperwork must be maintained for a minimum of six (6) years.

Instructions for Civil Rights Training – Non-Frontline Staff/Volunteers

Definition – Staff/volunteers, including minors, who do not handle personal information and who infrequently interact with program applicants, participants, or frontline staff.

Non-frontline staff/volunteers must receive civil rights training. In order to satisfy the civil rights training requirements, the training tool must be reviewed by volunteers and staff prior to signing in for their shift the first time and be repeated annually. When convenient, large groups such as school classes or church groups may be read the civil rights training tool together. Agencies must then provide a way for the group's participants to indicate they have reviewed or heard the points in the training tool. For instance, the agency may have a single signature page where everyone can sign their names or a checkbox volunteers can check on a volunteer sign-in log indicating they have been read the document. Any kind of group form indicating those who received the training must list the day the training took place. A school teacher may initial each bullet and sign the checklist on behalf of their students.

The civil rights training for non-frontline staff/volunteers must occur prior to their shift on the first day they begin working or volunteering for the agency. Refresher training should be given as needed, but everyone must receive the training at least once a year. The recipient agency must keep a copy of the signed checklist, on file for each of the non-frontline staff or volunteers trainings as proof of compliance with the required training policy. In accordance with Food Assistance Programs document retention regulations, all program related paperwork must be maintained for a minimum of six (6) years.

Instructions for Civil Rights Training – Other Staff/Volunteers

Staff/volunteers who do not interact in any way with program applicants and participants and who do not handle clients' personal information do not need civil rights training.