

XI. Civil Rights

11.1.040 Civil Rights Impact Analysis - Opening, Closing, Relocation, or Reducing Hours

Authority 2019 7 CFR 246.5, 246.8(a), FNS Instruction 113-1
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POLICY: A civil rights impact analysis shall be performed by the local agency (LA) before opening, closing, relocating, or reducing hours at a WIC LA site to ensure appropriate services to participants will not be interrupted.

The impact analysis shall be submitted to the state agency (SA) for approval at least 60 days prior to the effective date. If the effective date is in less than 60 days, the LA must request an expedited review.

The LA shall notify authorized representatives and participants affected by the change at least 30 days prior to relocating, reducing hours, or closing a WIC site.

PROCEDURES:

- A. The LA must complete and submit the civil rights impact analysis form for SA approval. The impact analysis must include justification for the change, impact on the site's participants, plan to maintain services to existing program participants, and applicable equipment changes, if needed.
- B. Equipment may be moved to a new location or an existing site, or be returned to the state. If the site is closing, the plan must include disposition of all tagged equipment located at the site.
- C. The 60-day time frame for submitting the impact analysis will be waived only under extenuating circumstances (e.g., fire, loss of lease, tornado, eviction.)
- D. For a new or relocating site, SA technical assistance staff will visit the clinic and complete a WIC Clinic Pre-Opening Visit Checklist prior to the opening of the new site.
- E. Capital expenditures for general-purpose equipment, buildings, renovations, or land require prior written approval from United States Department of Agriculture (USDA), Food and Nutrition Service (FNS). Refer to policy [5.1.120](#).
- F. The LA shall notify authorized representatives and participants regarding the change to the site. The notification may be made by one of the following: email, phone, text, mail, handout, or in person.
- G. Changes to a site warrant public notification once approved. Refer to policy [11.1.020](#).