

Nutrition/Health Volume
Certification Section

Civil Rights Impact Analysis-Change in Clinic- **Opening, Closing** Reducing Hours or Moving (3.01500)

ER# 3.01500

Authority 7 CFR 246.5, 246.8(a), FNS Instruction 113-1 Civil Rights Compliance and Enforcement - Nutrition Programs and Activities Section XIII, D6.

Issued 10/09

Revised **6/10**

POLICY: To ensure appropriate services to participants, a civil rights impact analysis study shall be performed by the local agency when **opening, closing, reducing hours or moving** a WIC site.

The impact analysis shall be sent to the district technical assistance team for approval at least 60 days prior to the change.

LWPs shall notify heads of household, guardians or participants affected by the change at least 30 days prior to relocating, reducing hours or closing a WIC site.

PROCEDURES:

- A. LWPs must provide an impact analysis to the district technical assistance team prior to opening, closing, reducing hours or moving a clinic site. The local WIC provider will provide the reasons/rationale for making the change and identify the impact on the participants that use that site for WIC services. The impact analysis will address caseload at the location, race and ethnicity of the participants, distance from current location to new location, hours and day of week clinic is in operation, number of staff at clinic, type of services provided and the plan to maintain services to existing program participants. District technical assistance staff will visit the clinic prior to the requested change. **See the [Impact Analysis Template](#) for all information that is required. LWP may use the Impact Analysis Template to capture this information or an alternate form that captures the same information.**
- B. If the site is closing, the plan must include disposition of the equipment located at the site. Equipment may be moved to a new location or an existing site.
- C. Only under extenuating circumstances (examples are fire, loss of lease, tornado and eviction) will the time frame for submitting the plan for approval (listed in policy above) be waived.
- D. Notification to heads of household, guardians or participants regarding change to site shall be made by either phone, mail, handout or in person.