

## POLICY AND PROCEDURE MANUAL

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### 1. GENERAL ADMINISTRATION.

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#### 1.01 Program Management.

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##### A. POLICY:

PA WIC shall achieve program consistency, standardization and integrity through a formal system of communication, expenditure, staff competence, training, program monitoring and emergency planning to guide staff in the execution of their duties. The WIC State Agency Policy and Procedure Manual contains the policies and procedures of WIC. All local agencies and clinics shall follow the policies and procedures as written in this manual.

##### B. PROCEDURE:

###### 1. Communication

The State Agency (SA) utilizes a variety of channels to communicate with its grantees, vendors and contractors, including:

- a. Numbered memoranda are issued as official written program guidance and constitute new or updated Program policy and procedure, as well as any other significant Program communication.
- b. The policy and procedure manual serves as a written guide for local agency (LA) operation.
  - (1) Current policies and procedures are available via the Management Information System (MIS).
  - (2) New or updated policies and procedures will be issued via numbered memo to LA WIC Directors and uploaded to the MIS.
  - (3) Bureau Project Officers will be responsible for ensuring that new or updated policies and procedures are thoroughly explained to all affected grantee personnel involved with any aspect of program operations, budget and management.
  - (4) If a LA develops or updates its own policy and procedure manual, it shall be done in consultation with and submitted to their respective Project Officer to ensure it is not against Federal and State regulations and protocols. Confirmation of document receipt and SA approval must be received prior to distribution and implementation.
- c. Vendor Alerts are generated to notify authorized retail stores of operational changes or other significant issues that impact food instrument (FI) and cash value voucher (CVV) exchange for food products, food list updates, competitive prices, and other issues such as annual training schedules, availability or requirements. These documents are posted on the program's Vendor Assistant system and a hard copy is mailed to those authorized vendors without Internet access.
- d. Informal email is utilized to address questions or concerns that arise during normal daily program operations.
- e. WIC Grantee and CEO Meetings are held three times per year to provide programmatic and/or system updates, provide additional training as needed, elicit grantee feedback, collect and/or distribute equipment, and address other issues as necessary.
- f. Nutrition Education and Breastfeeding Meetings are held once per year to provide programmatic and/or system updates, provide additional training as needed, elicit feedback, and address other issues as necessary.

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- g. Vendor Advisory Workgroups are held two times per year in accordance with state regulations to elicit vendor feedback.
- h. Retail Store Coordinator Meetings are held via conference call every other month to provide programmatic and/or system updates, provide additional training as needed, elicit feedback, and address other issues as necessary.
- i. Telephone and/or conference calls occur to address issues of immediate concern or significance. LA staff should address concerns to the specific staff assigned responsibility for tasks in question (Attachment 1).
- j. LA grantees shall submit the name and telephone number of an emergency contact to the SA and shall be responsible for immediately notifying the SA of any change in emergency contact.

#### 2. Reporting Requirements

LA grantees are required to report the following on the due dates indicated:

- a. Requests for partial or full day temporary clinic closures due to weather or other emergency or disaster must be submitted to the Project Officer as soon as the grantee learns about the need to close. The grantee must take all necessary and reasonable steps to notify participants of the closure and reschedule appointments in a timely manner.
- b. A permanent closure must be coordinated with the SA who must give approval for the closure. LAs must provide a Civil Rights Impact Analysis (CRIA) providing for the timely and efficient transfer of participants to another clinic, documentation of expenditures to date and a plan for transfer or return of remaining funds, as well as a complete inventory of equipment, supplies, etc., and a plan for their return to the SA or transfer to another clinic or LA provider. Please reference Policy 1.10 for additional information.
- c. The following financial reports are due 45 days after the end of each federal fiscal year: Final Invoice and the Year End Final Reports.
- d. The following reports are due to the SA on a monthly basis: Redeemed/Voided, Lost or Stolen Report and the 10% Random Sample of Voided FI's with Void Code Other "R". The LA has 30 days from the date the report is posted to complete the report and return it to the SA in order to allow SA review of FIs and CVVs for financial reporting to USDA. The Dual Participation and Interstate Dual Participation Reports are generated twice a year and are due to the SA within 30 days from the dates the reports are posted.
- e. Outreach, Nutrition Education, Retail, and Breastfeeding plans shall be submitted annually to the SA. The SA shall identify content required in the plan by providing written guidance annually.

#### 3. Competent Professional Authority (CPA)

LAs shall have a Competent Professional Authority (CPA) on staff who shall be responsible for assigning nutritional risk(s), completing value enhanced nutritional assessment, and prescribing WIC supplemental foods. Other tasks related to determining eligibility (hematological testing, anthropometric measurements, income eligibility determination) may be performed by a CPA or by other staff members who have received appropriate training to perform those tasks. However, interpretation of the hematologic and anthropometric results is to be done by a CPA.

- a. The following persons are authorized to serve as a CPA following review of credentials by the SA:

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- (1) Nutritionists (B.S., B.A., M.P.H., M.A. or M.S. in Clinical Nutrition, Public Health Nutrition, Nutrition Education, Community Nutrition, Dietetics, Nutritional Dietetics, Nutritional Science, or Home Economics with emphasis in Nutrition or Dietetics)
  - (2) Dietitians (Registered or eligible for registration)
  - (3) Physicians
  - (4) Registered Nurses with BSN or MSN degree(s)
  - (5) Physician Assistants
- b. Other persons with training in a health-related profession may be approved to act as a CPA on an individual basis by the SA. Such persons shall have their credentials approved by the SA before they are authorized to function as a CPA. This policy does not apply to such persons if they do not determine nutritional risk or prescribe supplemental foods.
- c. The LA is required to maintain on file a current list of all persons performing as a CPA at the LA, as well as designated CPAs at any referring agency. The file shall include the credentials of the CPAs and the supporting correspondence from the SA to confirm review and approval of the credentials of CPAs according to the procedures of this policy.
- (1) The LA shall submit to the SA at the time of application for employment names and credentials of CPAs who qualify under categories B.3.a.1 through B.3.a.5 in Section B.3 above. Credentials should include evidence of coursework in nutrition (transcripts) and/or copy of the type of degree and date of graduation, with a resume of prior experience. The SA will review the credentials to verify that qualifications have been met and will send acknowledgement to the LA within 10 working days of receipt of the information.
  - (2) The LA shall submit to the SA requests for approval of persons as CPA who do not qualify under categories B.3.a.1 through B.3.a.5 above prior to their functioning as a CPA. The request for approval shall include:
    - (a) Copy of college or professional school transcript with evidence of coursework in nutrition.
    - (b) Resume including details of prior experience related to nutritional assessment and counseling.
    - (c) LA plans for orientation, demonstration of adequate performance required skills, and ongoing professional development and education.
    - (d) Title and job description of the position the person will hold.
- d. Credentials for a CPA who was previously employed by another LA need not be resubmitted to the SA. To initiate a transfer of records, the LA shall provide the SA with the CPA's name and former employing LA. This request shall be made via the WIC MIS System Request Form. (P&P 1.08SP, Attachment 15)
4. Grant and Program Monitoring
- a. The Project Officer or other assigned SA representative monitors grant and program activity. Please refer to P&P 1.04 for details on the types and frequency of monitoring.
  - b. Please refer to P&P 1.04 for details on sanctions which may occur as a result of non-compliance with State and Federal regulations and/or Program policies and procedures.

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#### 5. Vendor Management

##### a. The SA Training Center staff will provide:

- (1) Training on WIC retail store management responsibilities to designated staff of new organizations that are awarded WIC LA contracts. This training will cover the items contained in Training Outline on Local Agency Responsibilities in Retail Store Management (Attachment 2). The SA will provide all necessary training materials.
- (2) Training to new staff with WIC retail store management responsibilities. This training will cover all aspects outlined in Attachment 2. The LA shall notify the SA concerning staff responsibility changes relating to WIC retail store management and shall request appropriate training.
- (3) "Refresher" training on any or all aspects of WIC retail store management as contained in Attachment 2 will be provided by the SA to LAs upon request. LA requests for refresher training must be submitted in writing.
- (4) Group training to LAs on changes or problem areas relating to WIC retail store management, as needed. This type of training may be offered in conjunction with periodic Local WIC Agency Retail Store Coordinator's Meetings. The SA will provide advance notification to the LA when group training on WIC retail store management will be held and the LA shall ensure that appropriate staff attends the training.

#### 6. Staff Training and Development

##### a. The SA shall provide periodic training on the following topics to LA grantees:

- (1) Civil Rights (P&P 1.10)
- (2) Substance Abuse
- (3) Hemoglobin Testing
- (4) Anthropometric Training
- (5) Eligibility Training
- (6) Voter Registration Training
- (7) Compliance Buy Training
- (8) Breastfeeding Promotion and Support
- (9) Nutrition Services and Education
- (10) Redeemed/Voided, Lost or Stolen Report and the 10% Random Sample of Voided FI's with Void Code Other "R" Training

##### b. The SA shall provide initial orientation to the following LA roles:

- (1) Retail Store Coordinators
- (2) Nutrition Education Coordinators
- (3) LA WIC Directors
- (4) Outreach Coordinators
- (5) Breastfeeding Coordinators
- (6) All other LA staff will receive a "WIC 101" webinar orientation to be provided on a weekly basis.

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c. The LA shall provide:

(1) New employee orientation addressing:

- (a) Personnel and program policies
- (b) Introduction to WIC
- (c) Job-specific training based on the employee's job description, educational background and previous work experience
- (d) Mandatory breastfeeding promotion and support training
- (e) Supervisory staff shall be provided training in all areas for which they supervise

(2) Training on the following topics to all personnel:

(a) Semi-Annually

- 1. Nutrition-specific topics: the LA Nutrition Education Coordinator shall provide and document appropriate training to maintain proficiency and enhance knowledge and skills in field advancements.
- 2. Breastfeeding: The LA Breastfeeding Coordinator shall provide and document appropriate training to maintain proficiency and enhance knowledge and skills in field advancements (P&P 5.02).
- 3. Voter registration training: to be provided to all LA personnel.

(b) At Least Annually:

- 1. Civil Rights: to be provided to all LA personnel.
- 2. Hemoglobin Training Refresher: to be provided to all certified LA personnel.
- 3. Blood Testing Safety Precautions: to be provided to all certified LA personnel at risk for exposure to blood or bodily fluids (P&P 3.03).
- 4. Customer Service training: to be provided to all LA personnel.

(c) Every Two Years: Anthropometry: the LA Nutrition Education Coordinator shall provide training to all LA personnel who are responsible for weighing and measuring participants at intervals appropriate to monitoring results.

(d) Every Three Years: Substance Abuse Training: to all LA personnel to enhance knowledge of chemical dependence and addiction, effects of tobacco smoking and environmental smoke exposure, alcohol, and use of illicit drugs on pregnancy and breastfeeding and how to provide

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education and referral in a non-threatening, positive, and objective manner.

- d. LA training activities constitute any of the following:
  - (1) Presentation of state-developed materials
  - (2) Regularly scheduled in-service training on appropriate topics
  - (3) Policy and procedure review
  - (4) Instruction on available resources
  - (5) Structured reading and/or audiovisuals followed by discussion
  - (6) Demonstration/observation followed by supervised practice
  - (7) Role playing and/or case studies
  - (8) Other materials or activities as approved by the appropriate SA representative and Project Officer
- e. Orientation training shall be documented on the Orientation and Training Checklist for New Employees (Attachment 3) and maintained in LA personnel records.
- f. The LA shall maintain a record of all training activities, training materials used and participant evaluations. (Attachment 4)
- g. LA personnel shall be cross-trained to provide for coverage in emergency, leave or other circumstances to assure there is no lapse in covered roles and responsibilities.

#### 7. Breastfeeding Support In the Workplace

- a. Breastfeeding employees shall be allowed to express milk at regular intervals according to their needs during work hours using their normal breaks and meal times.
  - (1) Employees shall keep supervisors informed of their needs so that appropriate accommodations and scheduling of breaks can be made which satisfy the needs of both.
  - (2) For time that may be needed beyond the usual break times, employees may use personal leave or may make up the time as negotiated with their supervisors.
- b. A private location to express milk, not a toilet stall or restroom, shall be available for employees to breastfeed or express milk. The area will be private and sanitary, located near a sink with running water for washing hands and rinsing out breast pump parts, and have an electrical outlet. If employees prefer, they may also breastfeed or express milk in their own private offices, or in other comfortable locations agreed upon in consultation with the employee's supervisor.
- c. Breastfeeding employees are responsible for keeping milk expression areas clean, using anti-microbial cleaners or wipes to clean the pump and area around it. Employees are also responsible for keeping the general lactation area clean for the next user. This responsibility extends to both designated milk expression areas, as well as other areas where milk expression will occur.
- d. In accordance with OSHA regulations, each employee is responsible for proper storage of her milk in a common refrigerator, if available, or personal storage cooler. Employees should label all milk expressed with their name and date collected so it is not inadvertently confused with another employee's milk.

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- e. If more than one breastfeeding employee needs to use the designated lactation area, employees can use a sign-in log to negotiate milk expression times that are most convenient or best meet their needs.
- f. Participants or visitors may breastfeed in public in any area of the agency where mothers and children are normally permitted, irrespective of whether or not the mother's breast is covered during or incidental to the breastfeeding.
- g. Individuals who may complain about employees who express milk at work or mothers who breastfeed in public at the agency should be given information about the Affordable Health Care Act or Freedom to Breastfeed Act as appropriate. Refer them to the references listed.

#### 8. Disaster Response and Recovery

- a. LA grantees shall notify their respective Project Officer as soon as possible after identifying disaster or emergency circumstances impacting clinic operation and service to participants, retail store and/or formula warehouse distribution, data system support and/or financial management activities.
  - (1) Assess LA ability to continue the provision of services to participants and potentially eligible participants.
  - (2) Seek guidance from the State Agency Emergency Response Team (SAERT).
  - (3) Provide benefits and outreach to participants within program context and funding (WIC funds may not be used for general disaster relief activity).
    - (a) USDA approval will be requested to modify food packages and revise FIs as necessary due to loss of electricity, refrigeration, and/or safe water supply (P&P 7.05).
    - (b) Provide counseling on food preparation and safety concerns under disaster conditions.
    - (c) FIs may be mailed to endorsers scheduled for FI pick-up.
- b. Isolated or Private: LA grantees may replace FIs in an isolated personal misfortune where one or a few households are affected by a disaster such as a gas line explosion, water main break or house fire.
  - (1) Replacement FIs shall be based on that portion of FIs for which the participant would normally still be eligible and shall not exceed one month's set of FIs.
  - (2) The participant shall sign a statement verifying that their FIs have been destroyed as a result of a disaster.
  - (3) Clinic staff shall verify that the endorser was involved in the disaster.
    - (a) Obtain a signed consent for release of information (P&P 1.07). The clinic staff shall contact the appropriate agency, such as the fire department, police department or Red Cross, to verify the endorser's involvement in a disaster.
    - (b) Maintain in the participant file the consent for release of information and a signed statement by the endorser detailing the emergency and verifying that their FIs or WIC foods were destroyed as a result of a disaster.

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- (4) Fls or WIC foods shall not be replaced when emergency feeding services are provided as a result of a personal emergency.

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#### Attachments:

1. Channels of Communication Between State and Local Agencies
2. Training Outline on Local Agency Responsibilities in Retail Store Management
3. Orientation and Training Checklist for New Employees
4. In-service Education Program Form (Local Reproduction)

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#### Reference(s):

1. USDA Memo 95-067.
2. USDA Memo 96-035.
3. USDA Memo 96-042.
4. WIC Regulations: 7 CFR part 246.11.
5. WIC Regulations: 7 CFR Part 246.2
6. United States Department of Labor, Wage and Hour Division. "Fact Sheet #73:Break Time for Nursing Mothers under the FLSA." <http://www.dol.gov/whd/regs/compliance/whdfs73.htm>
7. United States Department of Labor, Occupational Health & Safety Administration. Standard Number 1910.1030 [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=20952](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=20952)
8. Pennsylvania Legislature: Freedom to Breastfeed Act, July 8, 2007, P.L. 90, No.28, Cl.35 <http://www.legis.state.pa.us/cfdocs/legis/PN/Public/btCheck.cfm?txtType=HTM&sessYr=2007&sessInd=0&billBody=S&billTyp=B&billNbr=0034&pn=1252>
9. United States Department of Health and Human Services, Office on Women's Health: Business Case for Breastfeeding tool kit. <http://www.womenshealth.gov/breastfeeding/employer-solutions/business-case.html>
10. P&P 1.10 – Civil Rights

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#### Policy and Procedure Status:

1. This P&P supersedes P&P Number 1.01, dated October 1, 2003.
2. This P&P supersedes P&P Number 1.07, dated October 7, 2013.
3. This P&P supersedes P&P Number 1.14, dated January 16, 1989.
4. This P&P supersedes P&P Number 1.23 dated December 1, 2002.
5. This P&P supersedes P&P Number 1.28, dated March 26, 2004.
6. This P&P supersedes P&P Number 1.29, dated August 9, 2013.
7. This P&P supersedes P&P Number 1.31, dated January 7, 2013.
8. This P&P supersedes P&P Number 2.03, dated September 9, 2013.
9. This P&P supersedes P&P Number 4.17, dated December 1, 2003.