

POLICY AND PROCEDURE MANUAL

1. GENERAL ADMINISTRATION

1.09 Material Development and/or Requisition

A. POLICY:

The PA WIC State Agency shall review and approve all written and audiovisual materials developed by grantees to assure compliance with Federal and State rules, regulations, policy, procedure and guidance statements. Materials available from the State Agency shall be made available to grantee via requisition.

B. PROCEDURE:Material Development:

1. The local agency may develop and produce WIC-related audiovisual and/or printed materials for participants, service providers, breastfeeding, nutrition, outreach, referrals, general public or retail store education when a need is identified and no appropriate materials from other sources are available.
2. Materials developed with WIC funds and distributed to WIC participants, service providers, retail stores and the general public must be submitted to the State Agency for review and approval prior to incurring cost. This policy pertains to all types of printed and electronic materials.
 - a. Materials developed with funds from other sources must be submitted to the State Agency for review and approval prior to use within the WIC Program.
 - b. Printed materials include, but are not limited to, brochures, flyers, billboards, bus ads, newspaper ads, press releases, websites, eLearning modules, pamphlets, booklets, posters, flip charts, forms, etc.
 - c. Audiovisual materials include, but are not limited to, radio, TV, movie theater ads, videotapes, eLearning modules, slides, audio-tapes, filmstrips, exhibits, etc.
 - i. The following audiovisual materials are exempt from approval:
 1. Bulletin boards
 2. Video-tapes of in-house training sessions
3. Printed Material Requirements (Attachment 1):

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Materials prepared by the local agency should include the following if applicable:

- a. Local Agency Identification - the complete local agency name, address, phone number, and logo (if available) shall appear on all materials, when space allows. When WIC funds are used, it must be clear on the materials being developed that the local agency is promoting the WIC Program and no other programs the local agency may offer to the general public.
- b. WIC Logo - materials specific to WIC and produced with WIC funds shall bear the WIC logo. Effective immediately, the Department of Health (DOH) logo shall not be used on materials developed by the local agency. If a local agency desires to use the DOH logo on printed materials, the State Agency would need to submit to the DOH Communications Office for approval. Materials approved by DOH Communications Office must be reviewed each time they are reused, revised, or redistributed outside of the timeframe previously approved.
- c. Non-discrimination Statement - all referral and outreach materials and any other materials which convey messages concerning WIC Program benefits and eligibility must contain the non-discrimination statement. Materials which convey only nutrition education information do not require the statement. The statement must be prominently displayed by means of bold type, underlining, capitalizing, blocking, etc. The statement shall read:

USDA Nondiscrimination Statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

The Spanish translation is:

De conformidad con la Ley Federal de Derechos Civiles y los reglamentos y políticas de derechos civiles del Departamento de Agricultura de los EE. UU. (USDA, por sus siglas en inglés), se prohíbe que el USDA, sus agencias, oficinas, empleados e instituciones que participan o administran programas del USDA discriminen sobre la base de raza, color, nacionalidad, sexo, discapacidad, edad, o en represalia o venganza por actividades previas de derechos civiles en algún programa o actividad realizados o financiados por el USDA.

Las personas con discapacidades que necesiten medios alternativos para la comunicación de la información del programa (por ejemplo, sistema Braille, letras grandes, cintas de audio, lenguaje de señas americano, etc.), deben ponerse en contacto con la agencia (estatal o local) en la que solicitaron los beneficios. Las personas sordas, con dificultades de audición o discapacidades del habla pueden comunicarse con el USDA por medio del Federal Relay Service [Servicio Federal de Retransmisión] al (800) 877-8339. Además, la información del programa se puede proporcionar en otros idiomas.

Para presentar una denuncia de discriminación, complete el [Formulario de Denuncia de Discriminación del Programa del USDA](http://www.ascr.usda.gov/complaint_filing_cust.html), (AD-3027) que está disponible en línea en: http://www.ascr.usda.gov/complaint_filing_cust.html y en cualquier oficina del USDA, o bien escriba una carta dirigida al USDA e incluya en la carta toda la información solicitada en el

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formulario. Para solicitar una copia del formulario de denuncia, llame al (866) 632-9992. Haga llegar su formulario lleno o carta al USDA por:

(1) correo: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; o

(3) correo electrónico: program.intake@usda.gov.

Esta institución es un proveedor que ofrece igualdad de oportunidades.

If the material is too small to permit the full statement to be included, the material will, at a minimum, include the statement, in print size no smaller than the text that **“This institution is an equal opportunity provider.”** The Spanish translation is **“Esta institución es un proveedor que ofrece igualdad de oportunidades.”**

Please note: When local agencies are submitting any type of advertising to media outlets, it is now mandatory to provide the full non-discrimination statement listed above. WIC staff shall inform the media contact the WIC agency must provide the full version of the non-discrimination statement to fulfill our requirement for civil rights. However, when the media outlet actually conveys the message to the general public, using the short version is acceptable. For example, recognizing that radio, television, billboard, bus, newspaper announcements are generally short in duration, the non-discrimination statement does not have to be voiced or printed in its entirety. Rather, a statement such as **“This institution is an equal opportunity provider.”** is sufficient to be voiced or printed.

- d. Funding Statement - all notices, outreach advertising, newspaper articles, informational pamphlets, press releases, research reports, and similar public notices prepared and released by the local agency shall include the statement, "The Pennsylvania WIC Program is funded by the United States Department of Agriculture." When an abbreviated statement is necessary due to the type

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of advertising or space allowed, use "PA WIC is funded by USDA." Spanish version: PA WIC es financiado por USDA. This statement need not appear if the material was produced without using WIC funds.

- e. Credits - Credit must be given to the originating source when the material is not developed by the local agency or organizations involved in the production. The name and address (when space allows) of the agency that originated the material must be included along with the statement: "This material is being used (or adapted) with the express permission of." When using a photo provided by another agency, give them credit. (i.e. Photo credit: Washington D.C. WIC)
- i. Permission requesting use of the material and a response from the originator must be kept on file at the local agency. This applies to materials from other state WIC Programs and other agencies. Documented permission is not required to use material developed by local WIC agencies in Pennsylvania, but a credit line should state the name of the originating local agency.
- ii. Permission is required to use any part of any copyrighted publication. Unless the local agency provides the State Agency with written permission from the copyright owner the use of the material is prohibited.
- iii. Materials prepared by the U.S. Department of Agriculture are in the public domain and may be reproduced in whole or in part with or without credit.
- f. Evaluation - all participant nutrition education materials shall be evaluated using standards listed in P&P 5.01, Attachment 8 - "Written Education Materials Review"
- i. Materials with a one-time distribution (e.g. monthly calendars or newsletters) and internal administrative forms (e.g. control sheets or registers) do not require approval.
4. Any correspondence, in writing or e-mail which clarifies state agency policy or a WIC issue and is intended for distribution to any WIC stakeholder must be reviewed and approved by State Agency staff prior to distribution.

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5. Previously approved materials, which have been updated or revised by the local agency, must be re-submitted to the State Agency for review and approval.
6. Prior to beginning development of materials, the State Agency shall be consulted before beginning development or revision of audiovisual or printed material to establish a need.
 - a. Local agency shall submit one copy of the Justification for Developing Audiovisual/Printed Materials (Attachment 2) to the State Agency.
 - b. When developing nutrition education material for WIC participants, the local agency shall refer to "Tips for Writing Nutrition Education Materials", (Attachment 3), and up-to-date professional references on the topic of the material. The State Agency will, if requested, assist the local agency in locating appropriate references. A completed "Written Education Materials Review" Form from P&P 5.01 shall also be submitted with all participant nutrition education materials.
 - c. The State Agency may request that some materials submitted for review be field-tested prior to approval. The State Agency will assist the local agency with the field testing process.
7. If a need is established, the local agency may contact production companies to obtain further information on production costs and develop a proposed script.
 - a. The proposed script and project budget shall be submitted to the State Agency for review and approval for audiovisual materials.
 - b. The local agency shall submit a rough edit copy of the proposed print, electronic or media material to the State Agency for preliminary review and approval.
 - c. Materials prepared in another language which are submitted to the State Agency shall be accompanied by information which identifies the person who wrote/narrated the material and acted as the language resource person. All foreign language materials require an English translation. The dialect used in the translation shall be identified.
8. Approval from State Agency:
 - a. State Agency approval will be given in writing on all printed, electronic or

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- media materials developed by a local agency. Such approvals shall be maintained on file by the local agency.
- b. The State Agency must receive, review and approve any correspondence that is created or developed by local agencies or other WIC stakeholders. The correspondence can be either in letter or e-mail format. No information shall be distributed without the State Agency's approval. The approval or denial of draft correspondence will be provided via writing or e-mail.
 - c. Reproduction is not authorized until an approval code has been assigned.
 - d. Costs of printed materials must be incurred in accordance with existing fiscal policies.
9. All materials in their final form must bear the State Agency approval code, if assigned.
10. Nutrition Materials Clearinghouse:
- a. The State Agency will maintain a file of all approved materials.
 - b. A computerized file of audiovisual materials and printed materials and a sample of printed materials developed by local agencies to facilitate sharing with other local agencies.
 - c. Camera-ready copies of materials will be on file at the State Agency. Items of general interest will be provided to local agencies.

Requisition:

1. The State Agency will supply certain forms and materials to the local agencies upon receipt of the completed Stock Requisition Form (Attachment 4).
2. All Stock Requisition Forms sent to the State Agency must be complete with the following information: clinic name, clinic number, address and date. The person initiating the order must also sign it.
3. To complete the order, enter the Unit of Issue for each item. If the Unit of Issue is a package, then the Quantity is the number of packages. If the Unit of Issue is "each", then the Quantity is the actual number desired.
4. Single copies of completed Stock Requisition Forms may be faxed, mailed or e-

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mailed to the State Agency Office. It is not necessary to send duplicate copies of the form.

5. Local agencies will not routinely be notified if an item is temporarily out of stock. The item should be re-ordered at a later date. Local agency staff may contact the State Agency if they have a question about whether the item is out of stock or obsolete.
6. These guidelines must be followed for handling inventory at the local level:
 - a. It is the responsibility of the clinic and local agency to maintain inventory and order stock in a timely manner.
 - b. As many different forms as needed should be ordered at one time. This reduces the number of Stock Requisitions submitted and makes filling the orders more efficient.

Attachment(s):

1. Printed Materials Requirements
2. Justification for Developing Materials
3. Tips for Writing Nutrition Education Materials
4. Stock Requisition

Reference(s):

1. WIC Regulations: 7 CFR Part 246.8.
2. FNS Instruction 800-2, June 2, 1992.
3. FNS Policy on Copyrights, July 1, 1980.
4. Standard General Terms and Conditions.
5. USDA Memo dated May 24, 2013.
6. WIC Memo 13-077-1.00 November 18, 2013.
7. Departmental Regulation (DR) 4300-003, Equal Opportunity Public Notification Policy, June 2, 2015.

Policy and Procedure Status:

1. This P&P supersedes P&P 1.09, dated January 22, 2014.
2. This P&P supersedes P&P 1.21, dated October 9, 2007.
3. This P&P supersedes P&P 1.22, dated January 22, 2014.