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Revised 03/2024

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.00

Effective Date: July 13, 1994 Revised: April 13, 2023

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Civil Rights Responsibilities of Local Agencies

A. Policy

- 1. The local agency shall comply with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Department of Agriculture regulations on nondiscrimination (7 CFR Parts 15, 15a and 15b), and FNS Instruction 113-1, Civil Rights Compliance and Enforcement Nutrition Programs and Activities, November 8, 2005 to ensure that no person shall, on the grounds of race, color, national origin, age, sex or handicap, be denied benefits of, or be otherwise subjected to discrimination under the Program. All of the above documents can be accessed on the internet.
- 2. The local agency shall comply with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and subsequent regulations and instructions by:
 - a. Signing an assurance document every state fiscal year as part of the conditions of award acknowledging civil rights and non-discrimination practices.
 - b. Notifying the public of the nondiscrimination policy and complaint rights of participants and potentially eligible persons.
 - c. Reviewing and monitoring activity to ensure Program compliance with the nondiscrimination laws and regulations. Allowing review of civil rights compliance by the state agency when requested and quickly resolving any areas of non-compliance.
 - d. Collecting and reporting racial and ethnic participation data as required by Title VI of the Civil Rights Act of 1964.
- 3. The local agency shall accept complaints of discrimination, in compliance with Policy and Procedure 7.01

4. The local agency shall provide civil rights training to a new employee as part of the orientation to WIC and once every state fiscal year to all staff at either an in-person meeting, virtually, or electronically. Documentation of provision of training shall be maintained and made available for review.

B. Procedure

- 1. The local agency will notify applicants/participants and the general public, particularly minorities, women, and grassroots organizations of the availability of Program benefits and services, location of local agencies, clinics, as well as hours of operation.
 - a. Notification may consist of letters, leaflets, brochures, bulletins, media advertisements or announcements.
 - b. Vital documents and materials that are critical to program participation must reflect the full version of the current USDA non-discrimination statement, without alteration, in a readable font size (FNS recommends not less than 8-point). Vital documents and materials include, but are not limited to, program rights and responsibilities, notices of eligibility/ineligibility, notices which impact benefits and accessibility such as free language interpretation access for customers with limited English proficiency and reasonable modifications for individuals with disabilities, adverse action notices, sanction notices, program literature, and all state and local agency WIC websites.

USDA Non-Discrimination Statement ENGLISH (full version)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written

description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or

2. fax:

(833) 256-1665 or (202) 690-7442; or

3. **email:**

Program.Intake@usda.gov

This institution is an equal opportunity provider.

<u>USDA Non-Discrimination Statement SPANISH (full version)</u>

De acuerdo con la ley federal de derechos civiles y las normas y políticas de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta entidad está prohibida de discriminar por motivos de raza, color, origen nacional, sexo (incluyendo identidad de género y orientación sexual), discapacidad, edad, o represalia o retorsión por actividades previas de derechos civiles.

La información sobre el programa puede estar disponible en otros idiomas que no sean el inglés. Las personas con discapacidades que requieren medios alternos de comunicación para obtener la información del programa (por ejemplo, Braille, letra grande, cinta de audio, lenguaje de señas americano (ASL), etc.) deben comunicarse con la agencia local o estatal responsable de administrar el programa o con el Centro TARGET del USDA al (202) 720-2600 (voz y TTY) o comuníquese con el USDA a través del Servicio Federal de Retransmisión al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe llenar un formulario AD-3027, formulario de queja por discriminación en el programa del USDA, el cual puede obtenerse en línea en: https://www.fns.usda.gov/sites/default/files/resource-files/usdaprogram-discrimination-complaint-form-spanish.pdf, de cualquier oficina de USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida a USDA. La carta debe contener el nombre del demandante, la dirección, el número de teléfono y una descripción escrita de la acción discriminatoria alegada con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR) sobre la naturaleza y fecha de una presunta violación de derechos civiles. El formulario AD-3027 completado o la carta debe presentarse a USDA por:

(1) correo:

U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 202509410; o

(2) fax:

(833) 256-1665 o (202) 690-7442 o;

(3) correo electrónico:

program.intake@usda.gov

Esta institución es un proveedor que ofrece igualdad de oportunidades.

If materials are too small to permit the full statement to be included, the material, at a minimum shall include the following short version of the Non-Discrimination Statement, in print size no smaller than the text:

USDA Non-Discrimination Statement ENGLISH (short version)

This institution is an equal opportunity provider.

<u>USDA Non-Discrimination Statement SPANISH (short version)</u>

Esta institución es un proveedor que ofrece igualdad de oportunidades.

The short version is to be used in very limited circumstances.

- c. Provide information and other materials in languages other than English, as needed.
- d. Ensure that appropriate staff, volunteers or other translation resources are available to serve non-English speaking or limited English-speaking applicants/participants. Refer to Policy and Procedure 7.02 Limited English Proficiency (LEP) Policy.
- e. Display the nondiscrimination poster, "And Justice For All," or an FNS approved substitute in prominent places, such as clinic waiting rooms.
- 2. The local agency must periodically review Program policies and practices to evaluate the effect of those procedures on applicants and participants. In doing so, staff should be monitored to determine if services are being delivered in a manner consistent with civil rights policies. Local agencies shall also allow civil rights compliance reviews when requested by the State

- office. Any areas of non-compliance found during any review (local agency, state, or federally driven) shall be quickly resolved.
- 3. Accommodations must be made for individuals with disabilities to ensure that the Program is accessible to them.
- 4. The local agency shall report participation by category of women, infants and children and by racial/ethnic categories as defined in FNS Instruction 113-1, Civil Rights Compliance and Enforcement Nutrition Programs and Activities, November 8, 2005. Reporting shall be accomplished by entering the data in the management information system. More than one racial box can be checked.

Staff shall explain to the applicant or the parent or caregiver of an infant or child applicant that the collection of racial/ethnic categories is for statistical purposes only and has no effect on the determination of their eligibility to participate in the Program. Staff shall tell the person that self-identification is the preferred method of obtaining this information and then ask them their racial designation. Visual identification shall be used only if the applicant or the parent or caregiver of an infant or child applicant refuses to answer.

- 5. Complaints of discrimination shall be processed consistent with State Policy and Procedure 7.01.
- 6. The annual staff training on civil rights shall include, at a minimum, the following topics:
 - a. Collection and use of data.
 - b. Effective public notification systems,
 - c. Complaint procedures,
 - d. Compliance review techniques,
 - e. Resolution of noncompliance
 - f. Requirements for reasonable accommodation of persons with disabilities,
 - g. Requirements for language assistance,
 - h. Conflict resolution, and
 - Customer service.

7. The local agency shall send documentation of the annual civil rights training by e-mail or fax to the State WIC Civil Rights Coordinator within 15 days of the training. Documentation shall consist of a copy of the meeting agenda, staff sign in sheet and the civil rights annual training agenda.

Attachments:

7.00A Annual Civil Rights Lesson Plan

References:

- 1. CFR 246.8
- 2. FNS Instruction 113-1, <u>Civil Rights Compliance and Enforcement Nutrition Programs and Activities</u>, November 8, 2005
- 3. USDA, Food and Nutrition Service, Civil Rights Division May 5, 2022 memo regarding "Bostock v. Clayton County, 140 S. Ct. 1731, 590 U.S. (2020).

Revised:	
10/01/98	Reference General Administration Bulletin 98-01 (SFP 98-039)
02/15/06	Changed telephone numbers in the Discrimination Statement
04/03/07	Revised nondiscrimination statement
10/01/10	Deleted the requirement that all civil rights documents be kept on file;
	added that they are accessible by the internet; added in B. 6 topics to cover
	during training; and B.7. Documentation of training. Added Attachment
	7.00A
01/06/12	Added second paragraph in B.4. to state that self-identification is the
	preferred method to obtain racial designation.
	Updated revised nondiscrimination statement in B.1.b
10/1/2015	Updated revised nondiscrimination statement in B.1.b, fixed typos in B.1.e
	and B.7, slight change in wording in B.4, corrected FNS Instruction to 113-1
2/25/2016	Updated nondiscrimination statement in B.1.b based on the non-
	discrimination statement from the USDA Office of Civil Rights,
	Compliance Branch October 14, 2015. In Section A.4 - redefined "annual"
	training as once per state fiscal year
08/22/2018	Clarified the use of the full Non-Discrimination Statement (NDS) vs the
	short version. Included Spanish versions of the full and short NDS.
	Added statement 2.a. regarding an acknowledgement of civil rights
	responsibilities
04/2023	Updated nondiscrimination statement based on USDA Office of Civil
	Rights May 5, 2022, memo "Bostock v. Clayton County".

Annual Civil Rights Lesson Plan

OBJECTIVE: All Local Agency WIC staff who have contact with WIC applicants

and/or participants shall understand civil rights related laws,

regulations, procedures and directives.

WIC staff are required to abide by the provisions in five civil rights laws. The following Civil Rights Laws can be accessed on the internet:

Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d to 2000d-6

Americans with Disabilities Act of 1973 (28 CFR Part 35, Title II, Subtitle A)

Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.)

Section 504 of the Rehabilitation Act of 1973

Age Discrimination Act of 1975 (45 CFR Part 91)

CONTENT:

Local agency staff should know the procedures for the following:

- 1. Racial Collection and Reporting
 - a. Self- identification or visual identification; and
 - b. Ethnicity Definition

Two question format

- i. Hispanic/Latino or Not Hispanic/Latino; and
- ii. Race Can select more than one of the following:
 American Indian, Alaskan Native Asian, Pacific Islander,
 Black or African American, Native Hawaiian or Other Pacific Islander White.
- 2. Effective Public Notification Systems
 - a. Program Availability;
 - b. Complaint Information; and

- c. Nondiscrimination Statement.
- 3. Complaint Handling and Processing Procedures (Policy and procedure 7.01)
 - a. The local agency staff is responsible for explaining the complaint system to each applicant/participant. The following information must be provided:
 - i. Anyone can file a complaint of discrimination within 180 days of the alleged act;
 - ii. A complaint can be filed with the Secretary of Agriculture, the Administrator of FNS or the State or local WIC agency; and
 - iii. Local agency staff must assist applicants/participants who wish to file complaints of discrimination;
 - b. All complaints of discrimination received by the local agency, written or verbal, must be accepted and forwarded to the State office immediately, but no later than 5 days after the acceptance of the complaint: and
 - c. Attachment 7.01A must be used to document and forward complaints of discrimination to the State office.
- 4. Compliance Reviews (Management Evaluations)

State WIC Program is required to conduct monitoring reviews of local agencies at least once every two years.

5. Resolution of Noncompliance

If applicable, the State WIC Program shall provide written notice to the local agency indicating the areas of noncompliance and the action required to correct the situation.

- 6 Requirements for Reasonable Accommodation of Persons with Disabilities
 - a. Clinic must be accessible to the handicap;
 - b. Nutrition education and other program materials provided in the format preferred by the person making request, i.e. large print, audio tapes, captioned videos, Braille text; and
 - c. Qualified interpreters must be provided for the hearing impaired.

7. Requirements for Language Assistance

- a. Availability of bilingual staff members or interpreters to serve non-English speaking and/or limited-English speaking person; and
- b. Availability of a commercially available telephonic interpretative service.

8. Conflict Resolution

Ensure staff has the authority to resolve applicant and/or participant complaints or know the chain of command to refer the complaint or complainant (Policy and Procedure 7.91).

- 9. Customer Service (Policy and Procedure 7.90)
 - a. Treat all customers with courtesy and respect;
 - b. Promptly answer all customers' questions with accurate, objective information;
 - c. Resolve all customers' needs with the fewest number of calls possible;
 - d. Use language that all customers can easily understand; and
 - e. Promptly respond to all customers' concerns and complaints.

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.01

Effective Date: July 13, 1994 Revised: August 22, 2018

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Civil Rights Complaints of Discrimination

A. Policy

- 1. The local agency staff is responsible for explaining the complaint system to each applicant/participant. The following information must be provided:
 - a. Anyone can file a complaint of discrimination within 180 days of the alleged act.
 - b. A complaint can be filed with the Secretary of Agriculture, the Administrator of FNS or the State or local WIC agency.
 - c. Local agency staff must assist applicants/participants who wish to file complaints of discrimination.
 - d. All WIC staff at the local and state level shall protect the confidentiality and Privacy Act rights of civil rights complainants at all points during the complaints process.
- All complaints of discrimination received by the local agency, written or verbal, shall be accepted and forwarded to the State WIC Program Civil Rights Coordinator immediately, but no later than 5 calendar days after the acceptance of the complaint.
- 3. Attachment 7.01A shall be used to document and forward complaints of discrimination to the State office.
- 4. All complaints of discrimination received by the State office shall be forwarded to the USDA Mid-Atlantic Regional Office Civil Rights Coordinator no later than 5 calendar days after receipt of the complaint.

B. Procedure

1. When a complaint is filed, a case file shall be created and maintained with all pertinent information. This case file shall be retained until all issues are resolved or until the end of the three-year retention period, whichever is later.

- 2. The local agency shall complete Attachment 7.01A which must be used for gathering and submitting information when a complaint of discrimination is made. The following information is required:
 - a. Name of complainant.
 - b. Address and telephone number or other means of contacting person alleging discrimination.
 - c. Location and name of person, organization, or office that is accused of discriminatory practice.
 - d. Reason for the alleged discrimination.
 - e. Identity of others having knowledge of the discriminatory acts.
 - f. The name of the person who accepted the complaint and the date accepted.
 - g. The date the complaint was forwarded to the Civil Rights Coordinator at the State office.
- 3. All WIC staff shall protect the confidentiality and Privacy Act rights of civil rights complainants at all points during the complaints process.

Attachment:

7.01A Complaint of Discrimination Form

References:

- 1. CFR 246.8
- 2. FNS Instruction 113-2

Revisions:	
01/2012	Added Section A. 1.d. and B.1.3. per STAR 2011 Civil Rights review
10/2015	Fixed typo in A.1.b
02/2016	Replaced reference to DHMH Form 4435, which no longer exists, with
	Attachment 7.01A; Section A.2 amended time Local Agency must forward
	complaint to 5 business days; added paragraph A.4 to include state office
	deadline to forward complaint to USDA.
08/22/2018	Changed A.2 to clarify where to send complaints and A.4 to 5 calendar days

MARYLAND WIC PROGRAM COMPLAINT OF DISCRIMINATION

1.	Name of Complain	nant:		
2.	Address and telephone number or other means of contacting person alleging discrimination:			
3.	Location and name	e of person, orga	anization or office that	is accused of discriminatory practice:
	Date of occurrence	e:		
4.	Nature of incident	or aspect of the	Program that led the p	person to allege discrimination:
5.	Reason for the alle	eged discriminati	on:	
	Race	Color	National Origin	Sex
	Age	Disability	Retaliation	Other (specify)
6.	Identity of others h	naving knowledge	e of the alleged discrir	ninatory acts:
7.	. Complaint accepted by (Name/Local Agency):			
	Date complaint received by Local Agency:			
	Date forwarded to State Civil Rights Coordinator:			
	Date received by State Civil Rights Coordinator:			
	Date forwarded to	FNS Civil Rights	s Division:	

Attachment 7.01A Page 1 of 1

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.02 Effective Date: October 1, 2018 Revised Date: June 28, 2022

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Limited English Proficiency (LEP) Policy

A. Policy

The Maryland WIC Program requires local agencies to have procedures in place to serve Limited English Proficient (LEP) persons. The Local Agency shall develop language procedures for (1) assessing the language needs of the population served; (2) translating both oral and written communications and documentation; (3) training staff in the language assistance program requirements; and (4) monitoring to assure that LEP persons are receiving equal access to services and are not treated in a discriminatory manner.

B. Procedure

1. LEP Assessment and Plan

Title VI of the Civil Rights Act of 1964 and its regulations require all State and Local Agencies to take reasonable steps to assure "meaningful access" to the information and services they provide. On an annual basis, the State and Local agencies shall review and update the Maryland WIC Program LEP Plan. There are a number of factors that shall be included in the plan that constitutes reasonable steps to assure meaningful access:

- a. The number or proportion of LEP persons served or likely to be encountered in the eligible population;
- b. The frequency with which LEP persons come in contact with the program;
- c. The nature and importance of the program, activity, or service provided by the program to people's lives; and
- d. The resources available to the recipient and the overall costs associated.

2. LEP Resources

The State Agency shall provide Local Agencies with interpretation resources for providing access to programs and services to LEP persons and provide training to access those services. These shall include telephone interpreter

services, translation of written materials, and on-site translation services. These resources are found in Attachment 7.02A Limited English Proficiency Vendor Brief.

3. Notification to Public

Local Agencies shall post the Language Line Solutions ID poster in Attachment 7.02A to inform the public, in various languages, that interpreter services are available.

4. Providing Services to LEP Persons

If a participant is determined to be LEP or deaf/hard of hearing, Local Agency staff shall:

- a. Inform the individual of their right to have interpreter services free of charge;
- b. Take the proper steps to ensure that interpreter services are provided free of charge to the participant. The following forms of service can be used:
 - i. Hiring of bilingual staff interpreters. Bilingual employees must be proficient to effectively communicate with LEP Participants or deaf/hard of hearing persons.
 - ii. Contracting with an outside telephonic, in-person or video interpreter service.
 - iii. Make arrangements for use of voluntary community interpreter services.
 - iv. TTY (telephones for the deaf/hard of hearing)
- c. Be instructed not to require/request that LEP persons utilize family members, especially minor children or friends as language interpreters. The "USDA Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition against National Origin Discrimination Affecting Persons with LEP Guidance on Services for Persons with LEP in Assisted Programs" states, "reliance on children is discouraged unless it is an emergency situation that is not reasonably foreseeable." The emotional involvement of family or friends with a LEP person can jeopardize interpretation and translation of critical information.
- d. Document that a person declines free interpreter services using Attachment 7.02B Waiver of Right to Free Interpreter Services. If an LEP or deaf/hard of hearing person declines the interpreter service offered by the local Agency, they may elect to use an individual of their choice if the Local Agency deems the use of the person appropriate.
- e. Document the LEP person's preferred language in the record so that

language services can be arranged for future appointments, if necessary.

- f. Follow these guidelines when working with LEP individuals and interpreters:
 - Let the individual and interpreter know that all information is confidential.
 - ii. The interpreter should sit where he/she does not block your view of the individual.
 - iii. Prepare the interpreter for any sensitive issues.
 - iv. Inform the interpreter that they are never to answer questions for you or the individual. There could be negative impacts even when the interpreter answers very simple questions.
 - v. Local Agency staff should speak directly to the individual as if the interpreter is not in the room. Talking with the interpreter instead decreases the opportunity of building trust and understanding with the participant.
 - vi. Don't assume that LEP individuals understand you. In some cultures, a person may say "yes" as you explain something, not meaning they understand but rather they want you to keep talking because they are trying to understand.
 - vii. Speak naturally, not louder, and speak clearly and slowly. Rushing can decrease the quality of the translation.
 - viii. Use simple terms. Avoid difficult, technical or slang words. Do not use sayings, acronyms or medical terms. Clarify unique terms and provide examples when needed.
 - ix. Avoid humor, Jokes do not translate well.
 - x. Use simple pictures when possible.
 - xi. Allow plenty of time for the visit. Using an interpreter often makes the appointment longer.
 - xii. Speak one or two sentences at a time.

g. LEP Reporting

The Local Agency shall submit the annual LEP report (Attachment 7.02C) for the state fiscal year, to their Local Health Department, and provide a copy to the State WIC Office. The Local Agency shall request written approval from the State WIC Finance Chief to use the LEP report form used in the Local Health Department instead of Attachment 7.02C and 7.02D.

Local private, non-profit agencies shall submit the annual LEP report directly to the State WIC Office. The annual LEP report shall include the following information:

- A summary of efforts to fully implement and improve LEP services during the reporting period;
- ii. An outline of possible initiatives to enhance LEP services that might be implemented during the forthcoming reporting period; and
- iii. A description (i.e., agency name, language requested, total cost, county, client gender and age, etc.) of the number of individual interpretation and/or translation services provided to LEP persons and the process used to deliver such services (e.g., telephonic, written, on-site, staff interpretation, etc.) (Attachment 7.02D).

Attachments

- 1. 7.02A Limited English Proficiency Vendor Brief
- 2. 7.02B Waiver of Right to a Free Interpreter Service
- 3. 7.02C Annual Reporting Form
- 4. 7.02D Interpretation & Translation Services LEP Tracker

References:

- MDH Policy 01.02.05 Limited English Proficiency (LEP) Policy effective March 22, 2016
- 2. USDA Guidance to Federal Financial Assistance
- 3. Title VI of the Civil Rights Act of 1964
- 4. Title IX of the Education Amendments of 1972
- 5. The rehabilitation Act of 1973: Sections 504 and 508
- 6. The Americans with Disabilities Act of 1990
- 7. The Age Discrimination Act of 1975
- 8. U.S. Department of Homeland Security's (DHS) 2012 Language Access Plan

Revisions:

06/2022 Added Local Agency will request to use a different form from 7.02C and updated forms to the current template available.

Limited English Proficiency - Vendor Resources Maryland WIC Program

Telephonic Services: Language Line Services, Inc.

- You will need: Language Line account number (contact the State WIC LEP coordinator if unknown); your phone number and office name; and the purpose of the discussion.
- For additional details call the demonstration line at 1-800-996-8808. Examples are available for: completing a medical history questionnaire (#2); and information on agency services (#3).
- 1. Use "Conference Hold" to place the client/end user on hold.
- 2. Dial 1-866-874-3972 and enter your 6-digit Language Line account number.
- 3. Press 1 for Spanish or 2 for other languages.
- 4. When the interpreter is connected, tell the interpreter what you wish to accomplish and any special instructions. Add the limited English speaker on the call.

Ad Astra Translation Services

Ad Astra, Inc holds a contract with the State to provide written and on-site translation services. All local health departments (LHD) have been assigned Ad Astra account numbers. To request your LHD account number contact your LHD Limited English Proficiency (LEP) liaison. A separate account number is not required to arrange written translation and on-site interpretation services. If a local agency does not have an account with Ad Astra, submit a new client form to receive an Ad Astra account number. The request and form may be submitted via email to translation@ad-astrainc.com. Registration takes 3-5 business days.

Written Document Translation: Ad Astra

- 1. Have Account # ready. Request a quote by:
 - a. Phone: Call 301-408-4242 (press option 4)
 - b. Online: Visit http://www.adastra.plunet.com/index.jsp
 - c. Email: Send an email to translation@ad-astrainc.com
 - d. You will need: Project description; language needed; project timeframe; your name and phone number.

On-site Interpretations: Ad Astra, Inc.

- 1. Have Account # ready. Request a quote by:
 - a. Phone: Call 301-408-4242 (press option 2)
 - b. Online: Visit www.scheduleinterpreter.com/ad-astra
 - c. Email: Send an email to interpreting@ad-astrainc.com
- 2. You will need: Date and time of the request; length and location of the assignment; name and phone number of an on-site point of contact; type of appointment (e.g. medical, legal, social services); and language of patient / end user (including regional dialect or country of origin if known).

Tracking **LEP** Interactions (Attachment 7.02D)

LEP Services Tab

- 1. Utilization of LEP vendor services should be tracked daily.
- Insert available information into the Excel tracking form in the "LEP Services Tracker" tab. Each use of a vendor
 or staffperson should be captured in a separate row. Information may be missing in certain sections if the client
 does not readily provide details up front.
- 3. Insert cost information by (1) retrospectively adding amount per the official invoice or (2) estimate based on

provided rates (available in MDH Interpretation and Translation Services Packet).

LEP Tracking Form: Bilingual Staff

- 1. All bilingual staff employed throughout the year shall be entered on the Bilingual staff tab.
- 2. For each staff person, indicate if they are certified or non-certified interpreters and which language(s) they are fluid in.

LEP Annual Report (Form 7.02C)

- 1. Each Local Agency shall submit a copy of Form7.02C and 7.02D to the WIC LEP Coordinator by July 31 each year.
- 2. The annual report includes (1) Section A: Summary of Agency Efforts; (2) Section B: Future Initiatives; (3) Section C: Vital Document Translation; and (4) Section D (7.02D): Interpretation and Translation Services.



Interpreter Request Form		
	Please fill out form completely	
Requesting Agency		
Agency Address		
Requestor's Name		
Requestor Phone		
Date Request <u>Placed</u>		
Assignment Information		
Language Requested		
Dialect (if applicable)		
End User Name		
Date of Assignment		
Assignment Start Time		
Assignment End Time		
Address of Assignment		
Building		
Floor/Room/Dept/Suite		
Point of Contact Informa	ation	
POC's name		
POC's phone		
Alternate POC		
,		
	f appointment, Language preference, Specific	
interpreter requested, s	pecific gender requirements, etcPlease be SPECIFIC)	

FAX: 301-408-4448 STATE OF MD REQUEST LINE: 800-3084807

acastra

New Client Account Form

Client Account Information

ent A	ccount information
1.	Organization/Agency/Facility/Hospital Name
2.	Sub-Agency/Department/Location Name (if applicable)
	a. Primary Contact Person Name
	b. Primary Contact Person Email Address & Direct Phone
	c. Primary Contact Person Physical Address
3.	How will you be requesting interpreters?
	Phone Email Online (Internal Scheduling System)
*Pleas	se refer to the 3 rd page for details on each request method and how to contact our team
4.	Please provide contact information (Full Name, Contact Phone, Contact Email) for all authorized requesters other than Primary POC.
5.	Please provide a list of all locations/facilities (full addresses) where you

anticipate needing services other than the Primary POC physical address.



New Client Account Form

Client Billing Information

6.	Primary Billing Cont Primary receiver of a Name:		e person to whom atte	ntion is requi	red.	
	Email Address & Dir	ect Phone Numbe	r:			
	Physical Address (St	reet Address, Suite	e/Room, City, State, Zi	p):		
7.	Secondary Billing Co	ontact Information	1			
	Email Address & Dir	ect Phone Numbe	r:			
8.	What is your preference for invoice submission?	Email		Mail		
9.	What information d	lo you require on	your invoice? (Check a	ıll thatapply)		
Date	Time	Language	Linguist Name	Assignmo	ent #	Address
Dej	ot./Unit Name	Requestor Nar	ne	Other (p	lease spe	cify)
10	. Billing Frequency	Monthly	Bi-Weekly			
11	. Payment Method	Check	Online Credit Card	Payment	EFT/	ACH
	This form was compl	eted by:				

Name:		
Date:		
Title		
	*9	Ţ.

Maryland Department of Health

STEPS TO ACCESS LanguageLine Solutions TELEPHONIC INTERPRETERS

(using NEC Dterm Series i telephone)

Step 1

•With the LEP constituent on the line, PRESS "TRANSFER"

Do NOT press Hold

Step 2

•When you hear the tone, DIAL 1-866-874-3972 to reach a LanguageLine Solutions interpreter

Step 3

•Enter the CLIENT ID your office was assigned:

•If you are unsure of your office client ID number, contact the OEOP Equal Access Compliance Unit at (410) 767-6600.

Step 4

Select the Language Needed

Press 1 for Spanish

Press 2 for all other languages. You must state the language needed.

Press 0 for assistance if you do not know the language you need.

Step 5

- •Wait for the LanguageLine Solutions interpreter to answer.
- •Inform the interpreter that you are adding the LEP constituent to the call.

Step 6

•PRESS "CONF" to add the LEP constituent to the call (three-way conference call).

A red light will illuminate from the CONF button which confirms all three callers are on the line.

Step 7

- •Speak to the interpreter in FIRST PERSON (as if s/he is the LEP constituent).
 - Remain on the line with the interpreter and LEP constituent for the duration of the call.

Step 8

- Provide the information and number(s) to the office(s) the LEP constituent is trying to reach.
- After the LEP constituent receives all information, **END THE CALL** by hanging up the phone.

Step 9

- TRACK THE CALL using the MDH LEP Tracker.
- To obtain a MDH LEP Tracker, contact your local LEP Coordinator or the OEOP Equal Access Compliance Unit at (410) 767-6600.

LanguageLine Solutions®

Interpretation Services Available

English Translation: Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

Arabic



أشر إلى لغتك وسيتم الاتصال بمترجم فورى. كما سيتم احضدار المترجم الفوري مجافًا.

Burmese



သင့်ဘာသာစကားကို ညွှန်ပြပါ၊ စကားပြန် ခေါ်ပေးပါမယ်။ သင့်အတွက် ကေားပြန် အခမဲ့ ပေးပါမယ်၊

Cantonese



請指認您的語言, 以便為您提供免費的口譯服務。

Farsi





زبان مورد نظر خود را مشخص كنيد. يك مترجم براى شما درخواست خواهد شدر متر جم بصورت رایگان در اختیار شما قرار می گیرد.

French



Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.

Haitian Creole



Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

Hindi



अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुशाषिया बलाया जाएगा। आपके लिए द्वभाषिया की निश्चल्क व्यवस्था की जाती है।

Hmong

Hmoob SI



Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.

Italian

Italiano 🖘



Indicare la propia lingua. Un interprete sarà chiamato. Il servizio è gratuito.

Japanese





あなたの話す言語を指してください。 無料で通訳サービスを提供します。

Korean





귀하께서 사용하는 언어를 지정하시면 해당 언어 동역 서비스를 무료로 제공해 드립니다.

Mandarin

國語 🐒

請指認您的語言、 以便為您提供免費的口譯服務。

Polish

Polski 🖘



Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.

Portuguese

Português 🚳



Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Punjabi





ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆਂ ਦੀ ਮਫਤ ਇੰਤਜ਼ਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।

Russian

Русский 🖘



Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.

Somali

Af-Soomaali 🖘



Farta ku fiiglugadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.

Spanish

Español 🖼



Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Tagalog

Tagalog 🐒



Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.

Vietnamese

Tiếng Việt 🐒



Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

Language Solutions: Over-the-Phone, Video Remote, and Onsite Interpreting / Bilingual and Interpreter Staff Testing and Training / Translation and Localization





Waiver of Right to Free Interpreter Services

Complete if you waive interpreter services and DO NOT want the WIC Local Agency to provide an interpreter.

l,		have been inform	ned of my right to receive
Name free interpreter services for		from	
	Language		Local Agency Name
I am providing my own in	nterpreter.		
_			
I do not want an interpre	ter.		
I understand I may ask for an i	nterpreter at r	no cost at any time.	
Signature			
Date			
Local Agency Use Only			
Name of Interpreter:			
Interpreter relationship to the p	articipant:		
If a minor, provide the approximation	nate age:		
Additional notes:			
Local Agency Signature			
Date			

Attachment 7.02B Page 1 of 1



AGENCY INFORMATION

MDH Agency Name:	
Completing	Contact
Employee's Name:	Number:
Completing Employee's Email:	Job Title:
Agency Head's Name:	
Date:	Review Period: to

INSTRUCTIONS

Pursuant to MDH POLICY 01.02.05, the MDH LEP Report is due on **JULY 31** of each calendar year.

- 1. Review your agency process and complete each section of this form.
- 2. To Complete Section D, note the following:

Date- date of service, **Language**- language requested, **Service Type** – Written (W); Oral (O) or Telephonic (T), **Provider** – Bilingual Staff, Community Volunteer, Language Line, Schreiber or Ad Astra; **Service Cost**- cost of service, **Client Sex**- Male or Female, **Client Age Group** – Child (0-12 years of age), Adolescent (13-20 years of age), Adult-(21-54 years) and Senior (55+ years of age), **Unit**- Name of unit within health department, program, board, commission or facility, **Region** – County where services rendered

- 3. Upon completion, review this report with the Agency Head.
- 4. Submit a copy of the Completed SFY Annual LEP Report to the State WIC Office Fiscal Chief or their designee via email.

Attachment 7.02C Page **1** of **5**



SECTION A: Summary of Agency Efforts

Provide a summary of efforts to fully implement and improve LEP services during this reporting period:

SECTION B: Future Initiatives

Provide an outline of possible initiatives to enhance LEP services to be implemented during the forthcoming period:

Attachment 7.02C Page 2 of 5



Attachment 7.02C Page **3** of **5**



SECTION C: Document Translations

Per the MDH LEP Policy, <u>Vital Documents</u> are defined as documents that individuals applying for services or benefits from a covered entity must understand, respond to or complete in order to access the services/benefits or continue to receive the services or benefit. Vital Documents also include documents that inform the participant of his/her rights under each covered entity. "Vital documents" does <u>not</u> include applications and examinations related to licensure, certification, or registration under the Annotated Code of Maryland: Health Occupation Article, Financial Institutions Article, and Business Regulation Article, within the jurisdiction of MDH or DLLR.

Provide a listing of all vital documents translated your agency. Include the name of the provider that translated each document (press tab to create a new row):

MDHAgency	DATE document(s) translated	Name of Document	Vendor / Provider used to translate document(s)	Language translated to	Total Cost
(EXAMPLE) Office of Equal Opportunity Programs	10/10/13	EEO Notice to Public	Schreiber Translations	French	\$950.00

Attachment 7.02C Page **4** of **5**



SECTION D: Interpretation & Translation Services

Provide a listing of the number of individual interpretation/translation services provided to LEP individuals and the process used to deliver such services. Use Policy and Procedure 7.02D to report unless agency has received written approval from the State WIC Finance Chief to use a comparable form.

Attachment 7.02C Page **5** of **5**

LEP Tracker Program name (no acronyms)	DATE OF SERVICE (Entry must be July - June)	SERVICE TYPE Telephonic On- Site Written	VENDOR [or] Staff Name Language Line Ad Astra [If staff: Enter Name]	LANGUAGE If not included in list, add as new entry.	# of DOCUMENTS TRANSLATED N/A if no documents were translated	TOTAL COST for service	DURATION In minutes, no units. N/A if no duration	COUNTY where services were rendered Note: Baltimore = Baltimore County For the city, select Baltimore City. For written documents, put N/A.	CLIENT GENDER (Female / Male) For written documents, put N/A.	CLIENT AGE Child (0-12) Adolescent (13-20) Adult (21-54) Senior (54+) For written documents, put N/A.	WIC EMPLOYEE Insert your first and last name, not program name.	Covid 19 Related (Yes/No)

MDH "Bilingual Staff" Agency \ Department	CERTIFIED INTERPRETERS Last_Name of Employee \ Staff	CERTIFIED INTERPRETERS First_Name of Employee \ Staff	NON-Certified INTERPRETERS Last_Name of Employee \ Staff	NON-Certified INTERPRETERS First_Name of Employee \Staff	Language	Additional Language	Additional Language
(Non-CERTIFIED EXAMPLE) Office of Equal Opportunity Programs	N/A	N/A	Doe	John	Spanish	N/A	N/A
(CERTIFIED EXAMPLE) Office of Equal Opportunity Programs	Doe	Jane	N/A	N/A	Arabic	Vietnamese	Dutch

INSTRUCTIONS: 1. Every cell must have a value. If it is not applicable, insert "N/A". If the value is unknown, insert "unknown." Do not leave any cells blank. 2. For written translations, enter "N/A" for Duration, County, and Client Age/Gender. 3. Do not use acronyms or abbreviations, including for program/center name. 4. Enter time in minutes with no units. 5. You can select various languages from the drop-down list. If the language is not listed, simply type it into the cell. 6. If the client was in Baltimore County, select Baltimore. If the client was in Baltimore City, select Baltimore City. Note: This spreadsheet uses data validation.

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.10 Effective Date: November 23, 2015 Revised Date: July 1, 2020

SECTION: Local Agency Operations and Management

SUBJECT: WIC Disaster Response and Continuation of Operations

A. Policy

The WIC Program is not designed to be a disaster assistance program and therefore, is not considered a first response option for disaster survivors. There is no legislative authority for using WIC food funds for purposes other than providing allowable food benefits to categorically eligible participants. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) responds to disasters through various other means (see Attachments A-E).

Disaster situations include but are not limited to:

- Fire
- Weather-related: flood, tornado, hurricane, snow or other storm-related disruption
- Civil Disorder or other violent crime-related disruption
- Interruptions in governing agencies' functions or funding
- Power or water outage
- Earthquake
- Hazardous materials incidents
- Human Pandemic

Disasters can affect some or all of the State's operations; potential situations requiring action include:

- State Office involvement in a disaster affecting state office operations
- State Office response to a disaster affecting local agency operations
- Local agency involvement in a disaster affecting local operations
- State and Local Agency involvement or response to statewide disasters

The following procedure may be applicable in some but not every situation and is intended to provide guidance for a coordinated response during a disaster to ensure,

to the extent possible, the continuation of WIC services to participants within its current program context and funding.¹

B. Procedure

1. State Agency Responsibilities

a. Communication

Designated State WIC Office staff (Attachment 7.10G) shall maintain communication with the following entities before (if possible), during and after a disaster:

- i. Designated state staff to provide:
 - Current/updated contact information to supervisors.
 - Updated information about the closing and reopening of state office facilities and the need for employees to report for duty.
 - Guidance to designated staff about updates to the MD WIC Facebook and other social media sites used to provide notification in an emergency.
- ii. Local agency staff to:
 - Maintain access to current contact information for designated local agency staff.
 - Assess need for and provide support and guidance.
 - Provide updates on vendor availability.
- iii. WIC answering service and messaging service to:
 - Provide updated information about the closing and reopening of the state office or local agency sites.
 - Notify affected participants via "reminder" calls and text messages as needed.
- iv. Vendors to:
 - Assess the availability of vendors where participants can redeem benefits.
 - Communicate any changes in WIC foods to be stocked.
 - Communicate if and how out-of-state benefits will be accepted in Maryland according to B.4., WIC Authorized Vendor Practices During a Disaster. Expedite pending vendor approvals, as needed.
- v. Health Departments and Funding Agencies to:
 - Provide notification and updates about emergency situations to the designated staff of the Maryland Department of Health (MDH) in Baltimore as well as to local Health Departments and other WIC Grant Agencies, as needed.

¹ Emergency procedures for employees that affect the evacuation of an office or clinic site are covered in state and local office policies and are not included in this document.

- Assess any damage, including damage to property, equipment or supplies and report such damage to the appropriate units.
- vi. Other State Agencies/Programs to:
 - Provide notification and updates about emergency situations to other agencies, including food banks, as needed.
- vii. USDA Food and Nutrition Service (FNS), Mid-Atlantic Regional Office (MARO) to:
 - Provide notification and updates about emergency situations, as needed.
 - Request assistance from the USDA FNS MARO, as needed.
 - Request waivers and seek authority for flexibilities in program operations.

viii. Bank/Fiscal Units to:

 Provide notification and updates about emergency situations to banking and fiscal units responsible for ensuring WIC fiscal operations.

ix. Contractors to:

- Provide notification and updates about emergency situations, as needed, in order to reschedule meetings or other interactions with State WIC staff that may be affected by the emergency.
- Request assistance in making system modifications to implement emergency system changes to continue certifying and providing benefits to participants.
- x. MDH Office of Communications to:
 - Provide pertinent information to the media.

b. Support of Local Agencies

Designated State Office staff shall provide support to local agencies and their staff by:

- i. Assessing and maintaining, to the extent possible, the accessibility of the Management Information System, utilizing all backup and emergency procedures available as described in the *Maryland WIC System Security Plan*.
- ii. Interpreting and assisting in the enforcement and flexibility of policies that ensure, to the extent possible, continued operation of the Program.
- iii. Ensuring, to the extent possible, that funding is in place for continued operations of the Program.
- iv. Working with other state, national, or privately funded programs to help ensure that participants will have access to WIC or other resources for food during an emergency.

2. Local Agency Responsibilities

a. Emergency Procedures Plan

Local agencies shall develop a written emergency procedures plan that will be reviewed during the management evaluation process. The plan shall include, but is not limited to, the following:

- i. Designated alternative certification and/or benefit distribution sites;
- ii. Location of mobile equipment to be used at remote sites;
- iii. Availability of manual certification materials, benefit issuance supplies, daily schedules and participant contact information;
- iv. Plans for issuance of breast pumps;
- v. Changes in routine practices, including those described in B.3., WIC Certification Procedures During a Disaster.
- vi. Information for participants about alternate sources of food and other services in an emergency;
- vii. Information for participants about food preparation and safety in an emergency;
- viii. Plan for securing property and equipment during a disaster;
- ix. Plans for communicating with local media; and
- x. Local procedures for an emergency as outlined by the health department or funding agency to which they report.

b. Communication

Local agencies shall notify designated state office staff and the state WIC Director or Deputy Director immediately when there is a disruption in service of any type and immediately upon restoration of services. The following information, as applicable, should be included in their contact with the state WIC office during an emergency or disaster:

- i. The type of emergency or disaster and the estimated length of the event:
- ii. The number of staff affected;
- iii. The status of clinic closures;
- iv. Any clinic damage, including damage to property, equipment or supplies;
- v. The number of WIC vendors in the area that are closed. Availability of infant formula at vendor sites; at pharmacy sites;
- vi. Contingency plans for providing services to participants, including plans to implement any adjustments to certification and participation procedures;
- vii. Current/updated contact information for a spokesperson during any type of extended emergency;
- viii. A plan to contact affected participants via phone or email to provide notification of changes or interruptions in service and to reschedule appointments, as needed; and

ix. A post-disaster assessment (Attachment 7.10 F), submitted within 10 working days after the disaster has been resolved.

3. <u>WIC Certification and Participation Procedures During a Disaster</u> Victims of a documented disaster shall be given first priority for appointments and benefit issuance and shall be given expedited certification processing. The following guidance applies in disaster situations:

a. Income, Residency and Identity:

- i. Disaster-related evacuees who seek WIC benefits shall be considered as special nutritional risk applicants and receive expedited certification processing. As stated in Section 246.7(f)(2)(iii)(A) of WIC Program regulations, special nutritional risk applicants must be notified of their eligibility or ineligibility within 10 days of the date of the first request, in person, for Program benefits. With approval from the State Office, the notification period may be extended to a maximum of 15 days if a local agency can justify such a request; however, every effort must be made to certify these individuals immediately, and at a maximum, within 10 days of an in-person request for WIC benefits. These individuals should be served ahead of others seeking benefits.
- ii. In cases where disaster related evacuees move in with another household, the displaced individuals should be treated as a separate economic unit.
- iii. The documentation requirements for income do not apply to disaster survivors whose documentation has been damaged, lost or destroyed or if the agency determines that the income documentation requirement would present an unreasonable barrier to participation. Adjunct eligibility provisions apply to disaster situations, even if the benefits are received based on special disaster provisions (e.g., emergency SNAP benefits). [SFP92-012]
- iv. Temporary losses of income can be estimated on a current or annualized basis and eligibility should be determined on a case by case basis depending on the particular circumstances of the participant. [SFP92-012]
- v. The documentation requirements for residency and identity do not apply to a disaster survivor whose documentation has been damaged, lost or destroyed.

b. Nutrition Risk Assessment

- i. Disaster-related evacuees can be determined to be at nutritional risk if they are considered homeless.
- ii. Hematological test results may be obtained within 90 days of certification for persons with a documented nutritional risk.

- iii. Anthropometric measurements may be deferred for 60 days, if necessary, to expedite the certification process.
- iv. Every effort should be made to provide a full health and nutritional assessment at the time the individual seeks services to ensure that s/he is linked into the health and social services network in the State.

c. Benefits

- Benefits or foods that have been lost or damaged in a disaster may be replaced by a local agency as per MD Policy and Procedure 4.10.
- ii. Replacement of unredeemed food benefits cannot result in the allocation of retroactive food benefits. The quantity of food benefits should be based on that portion of food benefits for which the participant would normally still be eligible (i.e., from the present to the remaining days in the month). [SFP 96-035]
- iii. Food Instruments may be replaced as per MD Policy and Procedure 4.30.
- iv. Exempt infant formula and WIC-eligible medical foods benefits may be provided for participants with serious medical conditions as per MD Policy and Procedure 3.02.
- v. Medical documentation can be provided as an original written document, electronically, or by facsimile. Medical documentation also may be provided by telephone to a competent professional authority who must promptly document the information which must be kept on file at the local clinic. However, this method may only be used until written confirmation is received and only when absolutely necessary on an individual participant basis to prevent undue hardship to a participant or to prevent a delay in the provision of infant formula that would place the participant at increased nutritional risk. The local clinic must obtain written documentation of the medical documentation within a reasonable amount of time after accepting the initial medical documentation by telephone. The written documentation must be kept on file with the initial telephone documentation.
- vi. Participants presenting at WIC clinics in Maryland from another State with a food instrument that specifies an exempt infant formula or WIC-eligible medical food may be issued food instruments for the specified item up to the end of their certification period.
- vii. Participants presenting at WIC clinics in Maryland from another State without a food instrument, but who can provide the name of the exempt infant formula or WIC-eligible medical food that the individual was receiving before relocating, may be issued a 1-month food instrument for that specific item.

- viii. Persons seeking WIC benefits who were not participants prior to the disaster must obtain medical documentation prior to issuing the exempt infant formula or WIC-eligible medical foods.
- ix. Food package tailoring may be necessary and appropriate during a disaster. When assigning food packages, an individual's situation regarding the storage of foods, access to authorized vendors, living arrangements, water supply and the use of specific food items must be considered.
- x. In some cases, the state may elect to issue future month benefits in advance of an impending disaster to allow for the purchase of non-perishable food items in advance. This action would be made in consultation with the USDA and communicated to local agencies at the time the decision is made.
- xi. In cases where there is difficulty for participants and/or staff to access the clinic to obtain and/or issue benefits, benefit issuance, education and food package tailoring may be performed remotely.

d. Transfers

- i. Participants who are vacating the State due to a disaster should be issued a VOC.
- ii. Participants with a VOC who have migrated to Maryland as a result of a disaster in another state may be transferred into the state without the need to show proof of identity, residency or income.

e. Certification Periods

- A shorter certification period may be provided on a case-by-case basis.
- ii. In cases where there is difficulty in scheduling appointments for breastfeeding women, infants and children who have not reached their fifth birthday, the certification period may be shortened or extended by a period not to exceed 30 days. In such cases, one month of food benefits can be issued to those participants until an appointment can be rescheduled

4. WIC Authorized Vendor Practices During a Disaster

a. Reduced Minimum Required Stock

- i. At the State agency's discretion, the minimum required stock may be temporarily adjusted to the following:
 - two varieties of fruits,
 - two varieties of vegetables; and
 - one whole grain cereal that is included on the WIC Authorized Food List

- Once stocking shortages caused by the disaster or emergency have passed, the standard minimum required stock will be reinstated.
- ii. Vendors must continue to obtain infant formula and medical foods only from the manufacturer, distributor, and wholesaler sources listed on the Authorized Infant Formula and Medical Foods Supplier Directory.

b. Routine Vendor Monitoring Visits and Compliance Activities

 Once a state of emergency has been declared, all routine vendor monitoring visits and compliance activities may be suspended until normal vendor operations can resume.

c. Out-of-state food instruments

- i. If possible, and at the discretion of the State Agency, WIC vendors may be allowed to accept out-of-state paper food instruments during disaster situations. The State WIC office will advise vendors and local agencies if and when this is to be implemented.
- ii. The originating WIC State Agency where the participant was initially certified is responsible for the cost of the food instrument. The outof-State vendor should deposit each WIC check into the vendor's bank account for payment.

d. Authorized foods for out-of-state food instruments

- If at all possible, the exact brand of infant formula specified on the out-of-state food instrument should be provided.
- ii. If it is not possible to provide the exact brand items for foods listed on the out-of-State WIC food instrument, a similar item from the neighboring State's WIC approved food list may be substituted.

Attachment(s):

Allachmeni(s).	
7.10A	USDA Food and Nutrition Service: Office of Emergency Management, WIC During Disaster
7.10B	USDA Food and Nutrition Service: Office of Emergency Management, Disaster Supplemental Nutrition Assistance Program (D-SNAP)
- 400	, ,
7.10C	USDA: The Food Bank Response to Disasters
7.10D	USDA Food and Nutrition Service: Office of Emergency Management, USDA Foods During Disaster
7.10E	USDA Food and Nutrition Service: Office of Emergency Management, Child Nutrition Programs During Disaster
7.10F	MD WIC Post Disaster Report
7.10G	Emergency Operations Worksheet
D . (

References:

(2) Detailed Policy Guidance for State Cooperators in Disaster Situations 2012 https://www.partnerweb.usda.gov/communities/WIC-FMNP-

<u>SFMNP/Disaster%20Assistance/Detailed%20Policy%20Guidance%20for%20State%</u> 20Cooperators%20in%20Disaster%20Situations%202012.pdf

(3) WIC On the WEB (WOW) Maryland WIC System Security Plan, Version 4.0 (4/25/2014)

Revisions:

10/1/2016: Added Attachment 7.10G

1/26/2018: Updated to refer to eWIC terminology; changed reference from Policy and Procedure 4.04 to Policy and Procedure 4.30 in B.3c(iii).

2/5/2019: Added issuing benefits remotely and/or in advance of a disaster and food package tailoring.

7/1/2020: Added new emergency minimum stocking requirements for vendors. Added provision for the suspension of vendor activities in the event of a state of emergency. Added state office responsibility to request waivers and program flexibilities.

Food and Nutrition Service

Office of Emergency Management

WIC During Disaster

The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) is not designed to be a disaster assistance program, and is, therefore, not considered a first response option for disaster survivors. WIC policies allow State agencies flexibility in program design and administration to support continuation of benefits to participants during times of natural or other disasters. WIC State agencies are encouraged to work with FEMA as well as their own State and local emergency services offices to assist participants during a disaster.

WIC State Agencies

- Disaster-related evacuees who seek WIC benefits should receive expedited certification processing.
- In cases where disaster-related evacuees move in with another household, the displaced individuals may be treated as a separate economic unit.
- Verification of certification (VOC) information should be provided by the local WIC office to WIC participants when a disaster-related evacuation is anticipated.
- The documentation requirements for income, residency and/or identity do not apply to a disaster survivors whose documentation has been damaged, lost or destroyed, or if the agency determines the income documentation requirement would present an unreasonable barrier to participation.
- State agencies may allow the participant's certification period to be shortened or extended by a period not to exceed 30 days.
- State agencies may establish their own policies and procedures with regard to replacement of unredeemed WIC checks or vouchers that are destroyed in disasters.
- State agencies may mail food instruments to persons who are not scheduled for nutrition education or a second or subsequent certification.

WIC Participants

Participants/evacuees do not have to present proof of identity, residency or income that is normally required (that is, if one had to leave home in such a hurry that she was unable to bring the necessary documents, or if those documents were destroyed).

- Participants/evacuees may be able to use their original WIC checks or vouchers in the State to which they have been relocated. The WIC State agency will inform participants if this is the case, usually through a toll-free telephone number and/or other public announcement.
- Contact information for State WIC agencies can be found on the Food and Nutrition Service website: http://www.fns.usda.gov/wic/contacts/statealpha.htm.

WIC-Authorized Vendors

- WIC vendors may be allowed to accept out-of-State food instruments during disaster situations. The State WIC office will advise vendors if this is allowed.
- If at all possible, the participant should receive the exact brand of infant formula specified on the out-of-State food instrument.
- If it is not possible to provide the exact brand items for the other foods listed on the out-of-State WIC food instrument, a similar item from the neighboring State's WIC-approved food list may be substituted.
- The originating WIC State agency (i.e., the WIC State agency in which the participant was initially certified) is responsible for the cost of the food instrument. The out-of-State vendor should deposit each WIC check into his or her bank account for payment. If the originating WIC State agency issues vouchers instead of checks, the out-of-State vendor should submit the vouchers for payment to the originating WIC State agency.

These WIC vendor policies do not apply to Mississippi and Vermont because the WIC Programs in these States do not operate through grocery stores.

the following links: http://www.fns.usda.gov/wic/disasterresponse.htm and http://www.fns.usda.gov/wic/disasterpolicyguidance.htm

Food and Nutrition Service

Office of Emergency Management

Disaster Supplemental Nutrition Assistance Program (D-SNAP)

- Through the Disaster Supplemental Nutrition Assistance Program (D-SNAP), FNS is able to quickly offer short-term food assistance benefits to families suffering in the wake of a disaster.
- Eligible households receive one month of benefits, equivalent to the maximum amount of benefits normally issued to a SNAP household of their size. Benefits are issued via an electronic benefits transfer (EBT) card, which can be used to purchase food at most grocery stores.
- Through D-SNAP, affected households use a simplified application. D-SNAP benefits are issued to eligible applicants within 72 hours, speeding assistance to disaster victims and reducing the administrative burden on State agencies operating in post-disaster conditions.
- Households not normally eligible for SNAP may qualify for D-SNAP as a result of their disasterrelated expenses, such as loss of income, damage to property, relocation expenses, and, in some cases, loss of food due to power outages.
- When States operate a D-SNAP, ongoing SNAP clients can also receive disaster food assistance. Households with disaster losses whose SNAP benefits are less than the monthly maximum can request a supplement. The supplement brings their benefits up to the maximum for the household size. This provides equity between D-SNAP households and SNAP households receiving disaster assistance.
- FNS approves D-SNAP operations in an affected area under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act when the area has received a Presidential disaster declaration of Individual Assistance (IA) from the Federal Emergency Management Agency (FEMA).
- State agencies request FNS approval to operate a D-SNAP within the disaster area. FNS approves program operations for a limited period of time (typically 7 days) during which the State agency may accept D-SNAP applications.

For more information and resources, please visit the FNS website at: www.fns.usda.gov/disaster

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The Food Bank Response to Disasters

Food banks are an important resource to help meet the food needs of those affected by emergencies and disasters. For food banks that participate in The Emergency Food Assistance Program (TEFAP), one effective way to address disaster food needs is to enroll affected individuals and families in TEFAP. Under certain conditions, food banks may also work through their State agency to request approval from USDA's Food and Nutrition Service (FNS) to operate a household disaster food distribution program using USDA Foods. TEFAP and household disaster feeding are two separate and distinct programs that can be used to respond to emergencies and disasters.

TEFAP Feeding During Disasters

TEFAP offers an immediate means of providing food to those in need during an emergency or disaster. TEFAP is an ongoing program with an already established distribution network. States determine the income eligibility guidelines, and disaster survivors often qualify. USDA Foods distributed through TEFAP during a disaster are part of the State's TEFAP allocation, and are not eligible for replacement.

Establishing a Household Disaster Feeding Program Using USDA Foods

Household disaster feeding using USDA Foods takes place only as needed, requires approval from FNS Headquarters, and comes with certain conditions that must be met. Only FNS has the authority to redesignate TEFAP food for use in disaster feeding. Food banks should **not** distribute TEFAP foods as part of a household disaster food distribution program without first working through their State Distributing Agency to obtain approval from FNS. The State Agency will work through their FNS Regional Office to obtain approval from FNS Headquarters. Approval from FNS Headquarters ensures that all conditions for replacement of the USDA Foods used have been met. Keep in mind that FNS has no authority to reimburse food banks for administrative expenses associated with any household disaster food distributions.

Before FNS will consider approval of a household disaster food distribution program, the following circumstances must exist in the disaster area:

- Commercial food distribution channels are disrupted making it difficult for food retailers to operate, and for Supplemental Nutrition Assistance Program (SNAP) benefits to be redeemed.
- Congregate feeding is not practical or expected to be inadequate to meet the needs of all affected households.

- Households are sheltering in place at home and are in need of food.
- The local disaster feeding organization can efficiently and effectively receive, store, and distribute USDA Foods.

Applications to use USDA Foods in a household disaster food distribution program must be submitted to FNS Headquarters through the State Distributing Agency. The application should, to the extent possible, include the following information:

- A description of the disaster, emergency, or situation of distress.
- Identification of the specific areas that would be served, and the number of households expected to participate in disaster feeding.
- An explanation as to why household distribution is warranted, and the anticipated distribution period.
- The quantity and types of food needed.
- Assurances that households will not receive both USDA Foods and Disaster SNAP benefits, and a description of the system used to prevent dual participation.
- The method(s) of distribution available.

Food banks approved to a household disaster food distribution program are required to collect minimal household information and, if Disaster SNAP is also operating, obtain a signed statement from each household that they are not also receiving Disaster SNAP benefits.

FNS regulations addressing USDA Foods for disasters can be found at 7 CFR 250.69 and 250.70. More information on this topic can also be found at http://www.fns.usda.gov/fdd/programs/fd-disasters/ or by contacting your FNS Regional Office.

June 2011

Food and Nutrition Service

Office of Emergency Management

USDA Foods During Disaster

Using USDA Foods during Disasters

- USDA's Food and Nutrition Service (FNS) supplies USDA Foods to disaster relief organizations such as the Red Cross and the Salvation Army for congregate feeding or household distribution.
- Disaster organizations request food through State agencies. States, in turn, notify USDA of the types and quantities of food that emergency feeding organizations need.
- States may use existing inventories of USDA Foods stored at State, local, and school warehouses intended for the National School Lunch Program (NSLP), The Emergency Food Assistance Program (TEFAP) and other USDA nutrition assistance programs.
- USDA Foods include a variety of non-perishable fruits, vegetables, meat, poultry and whole grain products.

Disaster USDA Foods for Mass Feeding Sites

- States have authority to release USDA Foods to disaster relief agencies for mass feeding when the President issues a disaster declaration, and in certain other types of emergencies.
- USDA Foods intended for the NSLP are most often used for mass feeding. School inventories are depleted as the end of the school year approaches which may affect what types of USDA Foods are available.

Disaster USDA Foods for Direct Distribution to Households

- Emergency feeding organizations sometimes request USDA Foods in smaller sizes to individual households for preparation and consumption at home.
- States must get approval from the USDA Food and Nutrition Service to distribute USDA Foods to disaster survivors.
- USDA Foods for household consumption are most often obtained from State and recipient agency inventory intended for The Emergency Food Assistance Program.
- Households cannot receive both disaster SNAP benefits and disaster USDA Food household food packages at the same time. States must take reasonable steps to prevent households from participating in both programs.

Food and Nutrition Service

Office of Emergency Management

Child Nutrition Programs During Disaster

Natural disasters, such as hurricanes, tornadoes, and floods, can be devastating to communities and require a quick response. Schools, child care centers, and summer sites that operate the National School Lunch (NSLP) and School Breakfast Programs (SBP), the Child and Adult Care Food Program (CACFP), or the Summer Food Service Program (SFSP) can help minimize disruptions to your family.

Here are some tips to help your children access healthy meals in the event of a disaster in your area:

Eligibility

- Children in households' receiving D-SNAP (Disaster-Supplemental Nutrition Assistance Program) benefits are eligible for free meals regardless of income.
- Children identified as homeless by a school or emergency shelter official are also eligible for free meals regardless of income.
- Eligibility for free meals will continue for the rest of the school year under NSLP and SBP or for a full year through CACFP or SFSP.
- Impacted families should contact their local school or child care center or summer site for more information on how to receive free meals through our programs.

Site Types

- Summer sites and child care centers may serve free meals to families in the event of a disaster. You should contact the local child care centers, schools and summer sites in your area to determine what sites are providing free meals.
- Emergency shelters in your area also may be able to provide your family with free meals. Contact your local shelter for this information.

Safety Tip

Remember, the safety of you and your family is important. Some sites normally serving free meals to children may be relocated for safety reasons so check with your local providers before you travel to the site.

MD WIC Post Disaster Report

Local agency:
Location:
Location: Complete one Post Disaster Report for each location affected
Date(s) of disaster (from) (to)
Description of disaster:
Description of procedures used to manage disaster:
Description of current issues (include issues affecting staff, vendors, and participants):

Person Completing Form:		Date:
	Print	
Person Completing Form:		
· 5 <u>—</u>	Signature	
Local Agency Coordinator:		
<u> </u>	Signature	

Subtasks	Responsible	Information to	Timing	Communicate To	Notes
	Unit/Individual	Convey/Gather			
a. Verify Employee	Unit Chief/ Supervisor	Any changes from	Ongoing;	Director; Deputy	Out of office messages as
contact		current list	Before leaving	Director	appropriate
information			building		
b. Verify IT	IT Unit	Confirm plans,	As soon as	Director; Deputy	
Contingency Plan		responsible parties	disaster is	Director; others as	
,		and timing	suspected;	needed	
			before leaving		
			building		
c. Verify eWIC	IT Unit	Confirm plans,	As soon as	Director; Deputy	
Processor		responsible parties	disaster is	Director; others as	
Contingency Plan		and timing	suspected;	needed	
			before leaving		
			building		
d. Designate Help	IT Unit	Who to contact on	Before leaving	Director; Deputy	Ensure that contact(s) have
Desk contacts		help desk; back up	building	Director; LA	state issued phone
		contact		Contacts	
e. Designate	Nutrition Unit	Who to contact; back	Before leaving	Director; Deputy	Ensure that contact(s) have
Formula Line		up contact	building	Director; LA	state issued phone
contacts				Contacts	
TASK 2: Gather and	Assess Information				
Subtasks	Responsible	Information to	Timing	Communicate To	Notes
	Unit/Individual	Convey/Gather			
a. Gather current	All	Information about LA	As soon as	Director, Deputy	Information will be shared
status of LA's		Closings	made aware	Director, liaison to	with answering service and
				Answering Service	USDA/MARO as appropriate
b. Assess any	All	Issues that prevent	Daily	DGS	Assess any damages to
damages to State		ability to work in a			State Office
Office		safe environment			
c. Identify vendors	Vendor Unit	Availability of vendors	Daily	LA's; participants;	
that are closed				vendors	

TASK 3: Implement Changes and Approvals Subtask Responsible Information to Timing Communicate To Notes					
Sublask	Unit/Individual	Convey/Gather	Tilling	Communicate 10	Notes
a. Change or turn	IT Unit	Remind Local Agencies	As needed	Reminders to LA,s	
off Auto Dialer	11 Offic	how to turn off auto	As needed	Reminders to LA,s	
On Auto Dialei		dialer/ or let them			
		know of any change in			
		messages			
b. Implement	Vendor Unit;	IIIessages	As needed	LA's; participants;	
changes in vendor	Director/		As fieeded	vendors	
policies and	Deputy/Nutrition			Vendors	
procedures during	Deputy/Nutrition				
the disaster					
c. Expedite	Vendor Unit	Determine participant	As needed	LA's; participants;	
Vendor Approvals		access	7.0.7.0000	vendors	
	ications and Updates				
Subtask	Responsible	Information to	Timing	Communicate To	Notes
	Unit/Individual	Convey/Gather			
a. Post messages	IT	Vendor information;		Participants;	Check with all units to
on Facebook,	Unit/Communications	food issues; local		public	determine what is needed
website		agency closings			
b. Notify	Liaison or	Status of Local	Daily	Answering service	
Answering Service	Director/Deputy	Agencies and State		contact	
		Office			
c. Notify LA Staff	Director/Deputy	Status of state office;	Daily	LA Contact and	Verify contact person
		updates on Local		backup	
		Agencies' status;			
		Updates to policies			
		and procedures;			
		Contact information			
		for Help Desk,			
		Nutrition Line and			
		main contact for other			
	1		1	į –	İ

d. Status Updates to DHMH/PHPA	Director/Deputy	Status of State Office staff; status of LA's	Daily	MCH Director; PHPA Director and Deputy	
e. Status Updates to MARO/USDA	Director/Deputy	Status of State Office staff, LA's and vendors	Daily	MARO Branch Chief and Deputy	
f. Updates to Bank and financial institutions and/or MD Department of Treasury	Fiscal Unit	Ability to transfer funds to bank account for vendor payments	Daily	Current bank processor	
g. Updates to Contractors and or suppliers and manufacturers, as needed	All Units	Any changes in pending payments or ability to accept orders	As needed		
h. Updates to DHMH Office of Communications	Director/Deputy	Status of LA's and vendors	As needed	As needed	

Attachment 7.10 G 10/1/2016 Page **3** of **3**

Policy and Pr	ocedure 7.20 has b	een deleted effec	ctive October 1
	on on administrativocedure 6.00.	ve funds distribut	ion is included

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.21 Effective Date: October 1, 1990 Revised Date: October 1, 2001

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Appointment No-Show Rates

A. Policy

As a means of enhancing Program operations, the local agencies shall implement the following no show policies and procedures.

Each local agency must track no show rates for certification appointments.

No Show Tolerance Levels

1. Local agencies must attempt to maintain no-show rates within the following range:

Certification: 30% maximum no show rate

- 2. Review of agency no show rates will be incorporated into the management evaluation of each local agency. Agencies whose no show rates exceed the maximum standard must document what steps they are taking to decrease the no show rate.
- 3. A local agency must contact all pregnant women who do not keep a certification appointment. Contact can be made in writing or by telephone.

B. Procedure

Local agencies shall abide by the above policy.

Policy and Procedure 7.22 has been removed.

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.40 Effective Date: October 1, 1990 Revised Date: October 1, 2004

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: WOW Information Systems Usage

A. Policy

Local Agencies are to monitor the use of their computer resources to ensure that resources are being used solely in support of authorized WIC objectives, and that the computers, networks and peripherals are not being abused.

B. Procedure

- 1. Local Agencies shall ensure compliance with State and Federal copyright laws:
 - a) Only State or approved Local Agency licensed software can be installed or used on WIC computers.
 - b) Local Agencies must maintain a record of software licenses for any software installed on WIC computers. Unauthorized software may be removed at any time by the State.
- 2. Local Agencies shall monitor the use of their computer resources to protect against non-business use.
 - a) WIC computers are not to be used for internet access to sites unrelated to WIC or WIC's business needs. Internet use consumes an enormous amount of bandwidth and will decrease the overall performance of the system significantly, as well as exposing the system to risk of a computer virus.
 - b) WIC computers are not to be used for sending or receiving personal, inappropriate or non WIC communications.

Attachments:		
References:		
Revisions: 10/2004		

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.41 Effective Date: October 1, 1990 Revised Date: April 1, 2013

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: WOW Information Systems Security

A. Policy

Local Agencies are to ensure confidentiality of WIC data and protect WIC information systems against unauthorized access.

B. Procedure

- 1. To safeguard WIC data and system access, all employees and contract personnel shall:
 - a) Be aware of their responsibilities in protecting the confidential and sensitive information of their agency and the State of Maryland. Verification that all users are in compliance will be reviewed during the Local Agency Management Evaluation (ME).
 - b) Use information resources only for their intended purposes as defined by State and agency policies and the laws and regulations of the State. Refer to MDH policy 02.01.01 on the use of MDH Electronic Information Systems (EIS); (http://www.dhmh.state.md.us/policies/020101.pdf)
 - c) Annually receive security awareness training regarding WIC and Internet Safety to protect program and participant data.
 - d) Annually sign the Combined IRMA Policy Acknowledgement Form (http://www.dhmh.state.md.us/policies/cipaf-4518.pdf) for MDH computer-related policies.
 - e) Not allow the unauthorized sharing of protected and proprietary information.
 - f) Protect their passwords to prevent unauthorized access to the system by maintaining the privacy of the password and ensuring that passwords are not posted, written down or shared with anyone.
 - g) Change their passwords at least once every 90 days.
 - h) Choose "strong" passwords that are at least 8 characters long containing a mix of letters, numbers, punctuation, symbols and underscore that comprise a password which should not be easily

Policy and Procedure Page 1 of 3

- discovered (do not use names, birth dates, or similar common designations). A password cannot contain a blank space. Examples of strong passwords are "brea\$tf@@ding" instead of "breastfeeding," "W!C_W!NS" instead of "WICWINS," and "pa\$\$w0rd" instead of "password.
- i) Protect their system access by logging out of the system when leaving the computer for more than a brief period of time; and by using a screensaver password to protect against intrusion for brief periods of possible exposure.
- j) Ensure that the use of their computer account is limited to their individual username. Staff must not allow anyone else to use their account, must not share their password, and must log off when another authorized user needs to use their system.
- 2. To safeguard WIC data and system access, Local Agencies shall:
 - a) Notify the State office in writing to request authorization for system access.
 - b) Notify the State office in writing within 1 day when an employee or contract personnel with system access is terminated or will no longer require access to the system.
 - c) Maintain accurate and up-to-date roles assignments in the system for their staff so that the system access granted by user roles is appropriate for each user.
 - d) Annually, have staff review and sign the combined IRMA Policy Acknowledgement Form (http://www.dhmh.state.md.us/policies/cipaf-4518.pdf) for MDH computer-related policies and receive submit the Compliance with MDH Security Policies (P&P 7.41A) affidavit. Copies of the forms signed by staff must be kept on file in accordance with Policy and Procedure 6.00 B.3 (record retention schedule) and be available for review during the Local Agency Management Evaluation (ME).
 - e) Annually present security awareness training to all staff.

 Documentation of the training (i.e., staff meeting agenda and sign-in sheet) must be kept on file in accordance with Policy and Procedure 6.00 B.3 (record retention schedule) and be available for review during the Local Agency ME.
- 3. To safeguard WIC data and system access, The State shall:
 - a) Ensure that WOW automatically requires the user to change their password at least once every 90 days and will require the password to be at least 8 characters long containing a mix of letters, numbers, punctuation, symbols and underscore that comprise a password which should not be easily discovered.

Policy and Procedure Page 2 of 3

- b) Respond to requests for system access within 3 working days of receiving the complete request documentation.
- Remove account access from terminated employees on the day of termination or on the day of receiving notification of employee termination.
- d) Prepare security awareness training materials on an annual basis for local agencies to present to staff.
- 4. Local agencies and their staff are responsible for securing computer equipment against theft, intrusion, and unauthorized access.
 - a) All computer equipment must be protected against theft by being kept in a locked room when not in use or secured to non-movable objects.
 - b) Computer equipment must be protected against intrusion and equipment which will be left unattended must be either locked down or put in a secure, locked location.
 - c) Laptops are especially vulnerable to theft and extra diligence must be given to ensure their protection. Never leave laptop computers unattended, especially in open or plainly visible areas.
 - d) All computer equipment must be protected against damage, including flooding. When conditions threaten to damage equipment, contact the Help Desk for guidance and take appropriate precautions such as removing the equipment from the threatened area and/or covering the equipment to protect against water, dust, or other intrusive materials.
- All WIC computers must run antivirus software. If the antivirus software is not managed by local IT staff, the State shall install antivirus software and regularly update the signature files

Attachments:

7.41A Compliance with MDH Security Policies

7.41B Combined IRMA Policy Acknowledgement Form

References:

1. DHMH Policy 02.01.01DHMH Electronic Information Systems (EIS)

Revisions:

10/2004	Modified to include the use of strong passwords and timeframe for
	termination notification and removal of system access.
7/2010	Modified to include Compliance with DHMH Security Policies.
1/2013	Modified to include annual security training and ME requirements.

Policy and Procedure Page 3 of 3

MEMORANDUM

TO:	Director, Maryland WIC Program
FROM:	
DATE:	
RE:	Compliance with MDH Computer Related Policies
This mem Policies:	norandum is to advise that my local agency is in compliance with MDH
02.01.02	Policy on the Use of MDH Electronic Information Systems (EIS); Software Copyright Policy and the State of Maryland Software Code of Ethics; and Policy to Assure Confidentiality, Integrity and Availability of MDH Information (IAP).
potential (establishr	ce includes completion of the Software Code of Ethics Form for all known and computer users, distribution of the employee education package, and ment of controls for all software and software licenses. Submission of this dum also confirms that all staff in my Local Agency have received annual raining.
cc:	WIC Help Desk

Maryland Department of Health and Mental Hygiene Information Technology Security Policy, Standards & Requirements

COMBINED OIT POLICY ACKNOWLEDGMENT FORM

		nbined policy acknowledgment form for DHMH computer-related policies. Following consultation lease read and initial the appropriate acknowledgment sections, then sign the signature block		
Acknowledgement Section- Initials		Policy Number-Statement		
Employee	Supervisor	02.01.01 DHMH Information Technology Security Policy Policy, Standards and Requirements for the protection of Information Technology. I hereby acknowledge awareness of DHMH Policy 02.01.01, and that my use of these systems constitutes my consent to comply with this directive.		
		O2.01.02-Software Copyright Policy & the State of Maryland Software Code Of Ethics- Unauthorized duplication of copyrighted computer software violates the law and is contrary to the State's standards of conduct. The State disapproves of such copying and recognizes the following principles as a basis for preventing its occurrence. 1. The State will not permit the making or using of unauthorized software copies under any circumstances. 2. The State will provide legally acquired software to meet its legitimate software needs in a timely fashion and in sufficient quantities to satisfy those needs. 3. The State will enforce internal controls to prevent the making or using of unauthorized software copies, including measures to verify compliance with these standards and appropriate disciplinary actions for violations of these standards. I understand that making or using unauthorized software will subject me to appropriate disciplinary action. I understand further that making copies of, or using unauthorized software may also subject me to civil and criminal penalties. My signature below indicates that I have read and understand Policy 02.01.02- Software Copyright Policy and the State of Maryland Software Code of Ethics.		
		02.01.06-Policy to Assure Confidentiality, Integrity and Availability of DHMH Information (IAP) I acknowledge that I am required to comply with the general applicable sections of this policy as it relates to my current job duties. I further acknowledge that should I breach this policy, I am subject to disciplinary, civil, and criminal consequences. 02.01.06-IAP-"Specific Personnel" Acknowledgement [] Check here if this applies. If I am currently designated, or at any time my job duties require me to be designated as a Custodian, Data Steward, Designated Responsible Party, Database Administrator, and/or Network (System) Administrator, I acknowledge that I am required to comply with the corresponding responsibilities assigned to specific personnel. Likewise, if I am currently required, or if at any time my duties include the requirement for preparation or monitoring of contracts or memoranda of understanding, I acknowledge that I am required to comply with the specific personnel provisions of the Information Assurance Policy and guidance.		

Employee/User Signature Block- I hereby acknowledge that I have reviewed and understand the above-initialed policies.		
Employee/User Signature: DATE:		
Employee/User		AGENCY/COUNTY:
Identification	NAME:	ADMINISTRATION/UNIT:
(Please Print)	PIN # or CONTRACT#:	_ LOCATION:
Supervisor's	Supervisor Signature	°Supervisor verifies that the employee/user
Verification	DATE:	has acknowledged and initialed the
		appropriate policies for his/her position.
DHMH 4518 (REV Nov 2010) This form will be retained in the employee's DHMH personnel file.		

All pertinent policies can be accessed and read at http://doit.maryland.gov/SitePages/op02.aspx and State IT Security policy http://doit.maryland.gov/support/Documents/security_quidelines/DoITSecurityPolicyv3.pdf

Attachment 7.41B

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number 7.42 Effective Date: October 1, 2003 Revised Date: November 8, 2017

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Adding, Removing and Modifying Staff Access to WOW

A. Policy

Local agencies are required to submit a request to the State agency to add or remove staff from the WOW information system. State agency staff with the required role assignment will assign or change roles for local agency staff.

B. Procedure

Local agencies shall:

- 1. Submit a WOW Staff Data Sheet (Attachment 7.42A) to the WIC Help Desk to request that a new user be added, removed, or changed in the WOW information system.
- 2. Determine the appropriate roles to assign to staff based on qualifications (i.e., CPA, CPPA), job function and need for separation of duties within the local agency. The list of WOW roles allowed for use by local agency staff are contained in Attachment 7.42B.
- 3. Determine the appropriate time study type to assign to staff based on the time study frequency requirements contained in Policy and Procedure 6.01.
- 4. Submit a request to remove a staff person from WOW within 1 day of the employee termination date of an employee.
- 5. When a staff person is suspected of abusing their roles within WOW, contact the State agency immediately to determine the appropriate course of action.

State agency shall:

1. Process requests for terminations on the day of termination or on the day of receiving notification of employee termination.

- 2. Process requests for adding and modifying staff within 3 working days of receipt of the WOW Staff Data Sheet and notify the local agency that the requested action has been taken.
- 3. Maintain a record of all requests for staff additions, deletions and modifications and monitor role assignments as part of the local agency management evaluation process (Policy & Procedure 7.81).

Attachment(s):

7.42A WOW Staff Data Sheet7.42B WOW Security Roles and Internet Access

References:

Revisions:

7/2010	Added BF Aids Inventory Role
10/2010	Added Time Study Role and Timeframes for Submission
4/2011	7.42 Added reference to time study types. 7.42A Added
	additional time study type. 7.42B Updated role and access level
	definitions.
4/2012	7.42A Added new change fields and comments section 7.42B
	Added new instructions for Employee Status, Employee
	Information, Job Classification, and Training
8/2017	Modified 7.42B to include eWIC functions.

Local Agency Staff Data Request Form - Attachment 7.42A

Employee Status:		☐ Change Date_	//	
☐ New Date// ☐ Change Last Name (i			ame (Old)	
Reinstate Date/	Change Local A	gency (Old)		
Resign Date/_	/ CORE User	Change Other		
Last Name:		First Name:		MI:
Agency:		Time Study Type: 〇	Exempt (BFPC)	○ Daily ○ Quarterly
Email:		SharePoint Access:	○ Yes ○	No
WOW User Security Ro	oles (Check the ro	les to be assigned to	or removed fro	m this staff member.)
	Clinic			Admin
Add/Remove	Add/Remove		Add/Remove	
☐ ☐ Appt Scheduler/Pre		emographics (R/O)		ds Inventory
☐ ☐ Appt Scheduler/Pre		ood Issuance		Setup
☐ ☐ BF Peer Counselor (raud and Abuse	<u> </u>	dule Set-up Tasks
☐ ☐ BF Support		raud and Abuse (R/O)		Study Approval
☐ ☐ CPA	_ _	lonitoring	User Setup (State Only)	
☐ ☐ CPPA		eports		Ploper (State Only)
☐ ☐ Demographics			Data	Maintenance (State Only)
Internet Access	Jol	o Classification		Training
Add/Remove	Add/Remove	Add/Remove		
☐ ☐ Full	State	☐ ☐ CPA		☐ New Employee
Limited	LA Coordina			Date:
☐ ☐ WOW Only	LA Administ	trative 🔲 🔲 BF Pe	eer Counselor	
Comments:				
Canadinatada Cinnatura				
Coordinator's Signature			Date	
Please returned signed for Fax: 410-333-5683 Emai	m to WIC Help Desk vi l: wic.helpdesk@mary			
For Office Use Only				
	FOIC	DEMONE.		
	<u>IEW</u>	REMOVE	SENT to Tra	in Ctr Dist Ctr Nutri Unit
User Name:	<u>NEW</u> WOW:	REMOVE	Date:	in Ctr Dist Ctr Nutri Unit
User Name:ID #:	NEW WOW: WIC DC:	REMOVE		in Ctr Dist Ctr Nutri Unit
User Name:	<u>NEW</u> WOW:	REMOVE	Date:	in Ctr Dist Ctr Nutri Unit

Using the Staff Data Sheet

EMPLOYEE STATUS		
Status		
New	Add a new user to the system, provide their start date	
Reinstate	Re-activate an existing user in the system, provide their new date	
Resign	De-activate a current user, provide their last date as an employee	
Change	Please indicate the date that the change will or has occurred	
 Name 	Marriage, etc give their previous last name in the space provided	
Local Agency	Use when switching to a new agency – provide the new agency name further down in the form	
Other	Write any other changes you are making to a staff's role, internet access, job classification, time study type, etc.	

EMPLOYEE INFORMATION		
Field		
Time Study Type	Always mark whether an individual should be reporting Time Study quarterly or daily, <i>or</i> if they are paid entirely from the BFPC budget. See P&P 6.01 for more details.	

SECURITY ROLES		
Role	Permissions	
CLINIC MODULE		
Appt Sched/Precert	Has full access to all Appointment Scheduler functions, including: scheduling, moving, rescheduling and canceling appointments, scheduling classes, the appointment waiting list and time study entry. Has access to NoteMaster and Communications. Has access to the Precert screen and can perform functions of transferring participants and issuing VOCs.	
Appt Sched/Precert (R/O)	Read only access to all screens accessible by Appt Sched/Precert role.	
BF Peer Counselor Coordinator	Has access to the Counselor dropdown on the Breastfeeding Support tab.	
BF Support	Has the ability to make participants active, schedule appointments and access all breastfeeding support screens, communications, referrals and print documents. In addition this role provides readonly access to the following screens: Women's Medical, Food Prescription, Nutrition History and Risk Factors.	

Attachment 7.42 B Page 1 of 3

Attachment 7.42 B

	Attachment 7.42 B
СРА	Has rights to access special formulas, customize food packages and assign/remove high risk indicators.
СРРА	Has full access to all Appointment Scheduler functions to include accessing the daily schedule, scheduling, rescheduling, moving and canceling an appointment. Has full access to the following screens: Infant/Child/Woman Medical, Immunizations, Risk Factors, Nutrition Education, Referrals, Food Prescription, and Formula Calculator.
Demographics	Has full access to the following screens: Family Information, Participant Registration, Income Calculator, Cert Action.
Demographics (R/O)	Read only access to all screens accessible by the Demographics role.
Food Issuance	Has full access to functions involving issuance, cancellation and replacement of eWIC cards and food benefits.
Fraud & Abuse	Has full access to resolving dual participation, participant complaints, sanctions, warnings and disqualifications.
Fraud & Abuse (R/O)	Has read only access to screens accessible by the Fraud and Abuse role.
Monitoring	Has full access to all monitoring buttons.
Reports	Has full access to all reports.
ADMIN MODULE	
BF Aids Inventory	Has full access to the Breastfeeding Aids Inventory component of the Admin Module. Provides access to the Inventory Summary and Inventory Maintenance screens to maintain breastfeeding aids inventory.
Clinic Set-up	Has full access to all clinic demographic information. Includes maintaining local providers, referrals, and eWIC card inventory.
Schedule Set-up Tasks	Has full access to all functions related to creating schedules. Includes office closed days, schedule templates, generating schedules, mass rescheduling, autodialer set-up, etc.
Time Study Approval	Has full access to review and approve time study entries.
User Set-Up (State Only)	Available for STATE WIC staff only. Has full access to set-up new users, assign agencies and roles, and role permissions.
Developer (State Only)	Available for STATE WIC staff only. Has full access to all screens and functions.
Data Maintenance (State Only)	Available for STATE WIC staff only. Has full access to maintaining tables, referral categories, web-based training questions and state surveys. Also allows cert start date and birth date changes.

Attachment 7.42 B Page 2 of 3

INTERNET ACCESS LEVELS

Domain: Workstations and servers that share a security account manager.

NOTE: Internet access can only be controlled for users accessing the internet through the WIC Domain (i.e., sites with a WIC installed T1 connection and some local health departments). Internet access cannot be controlled for users accessing the internet at sites using a Local Health Department Domain, DSL or cable connection.

Level	Permissions
Full	Has full access to the internet.
Limited	Has restricted access to the internet to sites such as .gov, .edu, .org, .us, .net and other selected sites required for normal business operations.
WOW Only	Has access to WOW and selected internet sites required for normal business operations (i.e., Microsoft.com, windowsupdate.com, Baltimorecity.gov, etc).

	JOB CLASSIFICATION
Classification	
State	201 W. Preston and Training Center Staff
LA Coordinator	Person responsible for the administration of WIC Program at the Local Agency
LA Administrative	Anyone who provides administrative services to the clinics and does not perform certifications.
СРА	Physician, nutritionist, dietician, registered nurse, physician's assistant, State or locally medically trained health official, or individuals with a bachelor's, master's, or doctoral degree, who is required to complete WIC WISE 1 and 2 and CPA training. See P & P 7.63.
СРРА	Paraprofessional required to demonstrate proficiency through the completion of a series of competency checklists after completing WIC WISE 1 training. See P & P 7.60
BF Peer Counselor	Paraprofessional peers who help mothers with breastfeeding and are required to satisfactorily complete peer counselor training. See P & P 5.13.

	TRAINING
New Employee	Please indicate if this employee needs to begin new employee orientation training. This begins with WIC WISE I.

Attachment 7.42 B Page 3 of 3

Policy and Procedure 7.43 has been removed.

Policy and Procedure Number: 7.60 Effective Date: January 2, 1990 Revised Date: January 31, 2018

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Competent Paraprofessional Authorities (CPPAs) and Competent Professional

Authorities (CPAs)

A. Policy

Federal regulations require that a qualified individual on the staff of the local agency, referred to as a WIC Competent Professional Authority (CPA), determine nutritional risk and prescribe supplemental foods. The CPA designation is limited to physicians, nutritionists¹, dietitians, registered nurses, physician's assistants², or State or local medically trained health officials.

A paraprofessional is an individual on the staff of the local WIC agency who does not meet the federal definition of a CPA, but who, following successful completion of a training program, will receive the designation as a WIC Competent Paraprofessional Authority (CPPA). The CPPA may perform certifications under the supervision of a CPA with the following limitations:

- Only a CPA shall prescribe a food package that provides a ready-to-use infant formula, special or non-contract standard infant formula, or special formula for women or children with special dietary needs.
- Only a CPA shall provide high risk (nutrition care) counseling.

WIC CPPAs and CPAs are called upon to demonstrate an array of competencies. These competencies include the ability to determine nutritional risk, prescribe supplemental foods, make referrals, and provide simple, practical, and accurate nutrition education and breastfeeding messages to WIC participants.

To gain these competencies, staff must complete a formal training program as outlined in Policy and Procedure 7.66 New Employee Training.

¹ A nutritionist is defined as having a bachelor's or master's degree in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics, Public Health Nutrition, Home Economics (with an emphasis [9 or more college credit hours] in Nutrition), or Health Education (with an emphasis [9 or more college credit hours] in Nutrition).

² Certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority.

B. Procedure

- Local agencies will abide by policy and ensure that CPPAs do not perform CPA duties.
- 2. All newly hired CPAs and CPPAs shall attend new employee training as described in Policy and Procedure 7.66. A trainee who does not gain competency within 9 months of completion of WIC Wise 1 should not be permitted to perform certifications.

References:

- 1. 7 CFR 246.2
- 2. WIC Nutrition Services Standards, August 2013 Standards 3-5

Revisions:

Deleted sentence in Policy A that listed the four courses in the new employee training.

10/2008 – Section B.1.d. Clarified wording on completing competency checklists. New sentence that reads "For local agency staff that have been retrained the competency checklists must be completed within 6 months of the completion of WIC WISE part 1 training.

10/2010 – Section B.1.b. changed "WIC WISE web-based training modules" to "WIC WISE part 1 and part 2 training" Section A removed low iron formula from the first bullet of CPA duties since we no longer issue low iron formula.

10/2011 – Clarified wording in B.1.b and d. Added phone number line for the supervising CPA; Clarified language on proxy/designee, wiping the cuvette, weight in ounces for women and older children, disposal of soft hazardous waste, and goal setting on attachments A–G.

10/2013 – Changed deadline for completing competency checklists to 9 months from date of hire, deleted posttests from WIC WISE training and included new CPAs in the requirement to complete competency checklists. Supervising CPA has to have completed competency checklists. Revised column headings on Attachment 7.60 A-F and added a line for phone number of supervising CPA.

10/2015 – Clarified language and reformatted sections A and B and reformatted the Revisions section by removing excessive spaces. Reformatted Attachment 7.60 A–E by adding a "Not Observed but Competent" column and changed the title of the last column to "Additional Comments".

6/7/2017 – updated attachments to replace "checks" with "benefits".

01/31/2018 – Moved training requirements and Competency checklists under attachments to Policy 7.66 New Employee Training.













Policy and Procedure Number: 7.61 Effective Date: October 1, 2003 Revised Date: October 1, 2012

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Ongoing Staff Training

A. Policy

Regulatory requirements, technology, and nutrition science continue to change. WIC is committed to ongoing training of its staff to ensure that the Program remains in compliance, is technologically up-to-date, and that nutrition and breastfeeding information provided to participants and to non-WIC colleagues is accurate.

The State Agency shall be available to assist the local agency in providing training to its staff.

B. Procedure

- 1. All newly hired WIC staff shall attend the new employee training as detailed in Policy and Procedure 7.66.
- 2. Ongoing staff training will be developed to meet needs as they arise. Designated staff are required to attend State sponsored trainings as scheduled.
- All WIC staff shall attend the State WIC Conference as scheduled.
- 4. The Local Agency Coordinator or a designated representative shall attend the monthly Local Agency Coordinators' meetings.
- 5. Local agencies shall send designated staff to the statewide WIC Nutrition Services Updates and Breastfeeding Coordinators' meetings as scheduled. Meetings are used to review changes to WIC policies and procedures, to update knowledge and skills, and to share ideas and educational materials from other local agencies.

If a local agency is unable to send a representative, the State WIC Nutrition Services or Breastfeeding Services Unit, as appropriate, should be informed in advance of the meeting.

Reference:

WIC Nutrition Services Standards, Section 3

Revisions:

10/2010 Added All Local Agency WIC staff, except peer counselors,

shall Attend Grow and Glow Breastfeeding Training. Removed references to the number of times specific meetings will be held each year. Changed Nutritionists meetings to Nutrition Services Updates. Changed

notification requirement for local agencies regarding whom to contact if unable to send a representative to a meeting.

10/2012 Moved B.2 to Policy and Procedure 7.66.

Policy and Procedure Number: 7.62 Effective Date: October 1, 2003 Revised Date: June 27, 2024

SUBJECT: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Equipment for Performing Weight and Height Measurements

A. Policy

Local agencies shall purchase and maintain equipment to perform weight and height measurements accurately, uniformly and safely.

B. Procedure

1. Length and Height Measurement Equipment

- a. For infants and children under 2 years of age, an infant length board suitable for table-top measurements shall be used. The board shall be sturdy, made of wood or plastic with an unpadded surface, contain a fixed (unmovable) headboard and a freely-sliding foot piece, and have an attached ruler that measures in 1/8 inch (recommended) or 1/16 inch increments to at least 39 inches. The length board shall allow unobstructed reading of the length measurement.
- b. For women and children 2 years of age and older, a stadiometer (height board) shall be used. The stadiometer may be wall-hung or free-standing and shall consist of a flat measuring ruler (against which the applicant's back is placed) with 1/8 inch (recommended) or 1/16 inch increments and a freely-sliding head piece (set perpendicular to the ruler). It shall measure to at least 76 inches and allow unobstructed reading of the height measurement.
- c. When using rulers that measure to 1/16 inch, 16ths shall be converted to 8ths inch as shown in Attachment 2.32A.

2. Weight Measurement Equipment

a. For infants and children under 2 years of age, either a beam balance or electronic (digital) table-top infant scale or an electronic floor scale (for children who can stand alone.)shall be used. The scale shall measure to the nearest one ounce and allow unobstructed reading of the weight measurement.

The infant scale shall be sturdy, contain a tray or seat upon which the infant can be safely placed and measure up to at least 44 pounds.

- b. For women and children 2 years of age and older, a beam balance or electronic (digital) floor scale shall be used. The scale shall measure to the nearest 4 ounces, up to at least 440 pounds and shall allow unobstructed reading of the weight measurement.
- c. When using digital scales that display ounces in decimals, decimals shall be converted to the nearest full ounce as shown in Attachment 2.32A

3. Equipment Installation, Maintenance, and Training of Staff

Equipment shall be installed, maintained, and checked for accuracy according to the manufacturer's specifications. Local agency staff designated to perform nutritional risk screening shall be trained on the use and maintenance of the equipment.

4. Resources

The following companies are examples of distributors of equipment and can provide technical assistance regarding the products they offer.

Med-Electronics, Inc.

6608 Virginia Manor Road Beltsville, MD 20705 Phone: 888-321-1300 www.med-electronics.com

Perspective Enterprises

7829 S. Sprinkle Road. Portage, MI 49002 Phone: 800-323-7452 www.perspectiveent.com

QuickMedical

Phone: 888-345-4858 30200 S.E. 79th St., Suite 120 Issaquah, WA 98027-8792 Phone: 888-345-4858

www.quickmedical.com

References:

- 1. 29 CFR 1910.1030
- 2. 42 CFR 493

Revisions:

10/2011 Updated company contact information.

10/2013 Removed B.1.c. disallowing length/height board attached to scale.

Updated technology makes such equipment acceptable. Updated

company contact information.

10/2014 Changed B.1.a. and B.1.b. to read "1/8 inch (recommended) or

1/16 inch."

Inserted B.1.c "When using rulers that measure to 1/16 inch, 16ths shall be converted to 8ths inch as shown in Attachment 2.32A." Inserted B.2.c. "When using digital scales that display ounces in decimals, decimals shall be converted to the nearest full ounce as

shown in Attachment 2.32A."

06/2024 Updated B.2.a, added "for children who can stand" and deleted "with a

tare function"

Policy and Procedure Number: 7.63
Effective Date: October 1, 2005
Revised Date: December 19, 2023

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Competent Professional Authority Application and Training

A. Policy

Federal regulations require that a qualified individual on the staff of the local agency, referred to as a WIC Competent Professional Authority (CPA), determine nutritional risk and prescribe supplemental foods. The CPA designation is limited to physicians, nutritionists¹, dietitians, registered nurses, physician's assistants², or State or local medically trained health officials. Individuals with a bachelor's, master's, or doctoral degree from an accredited college or university, who do not meet one of these categories for CPA designation, may apply to become a CPA.

B. Procedure

- 1. An applicant for the WIC CPA position shall meet the following requirements in order to be considered for the CPA designation:
 - a. A bachelor's, master's, or doctorate degree from an accredited college or university.
 - One year of experience in health or human service delivery providing client education or counseling services or performing nutrition or health assessment.
 - c. Completion of the Maryland WIC new employee training program, including WIC Wise 1, WIC Wise 2, and CPA Training, according to Policy and Procedure 7.66.
 - d. Demonstrated competency in CPA level duties, including but not limited to:
 - The prescription of food packages that provide a non-contract formula, including a non-contract standard or exempt (special) infant formula or exempt formula for women or children with special dietary needs.

¹ A nutritionist is defined as having a bachelor's or master's degree in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics, Public Health Nutrition, Home Economics (with an emphasis [9 or more college credit hours] in Nutrition), or Health Education (with an emphasis [9 or more college credit hours] in Nutrition).

² Certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority.

- ii. The provision of nutrition counseling and follow up to WIC participants with certain high-risk conditions.
- iii. The provision of counseling and follow up to WIC participants with certain breastfeeding problems.
- iv. Planning and provision of group nutrition education classes.
- e. Successful completion of at least nine credits of approved coursework to include at least:
 - i. 3 credits in Basic Nutrition
 - ii. 3 credits in Maternal or Pediatric or Life Cycle Nutrition
- iii. 3 credits in Medical Nutrition Therapy, Community Nutrition, or Advanced Nutrition
- 2. Applicants shall provide documentation of:
 - a. A degree received from an accredited college or university.
 - b. Previous work experience that meets the requirements of the policy.
- 3. Applicants shall complete WIC Wise 1, WIC Wise 2, and CPA training programs and demonstrate competency as outlined in Policy and Procedure 7.66.
- 4. In addition to the requirements of WIC Wise trainings, applicants shall complete, under the supervision of a CPA, the following CPA Applicant Observation Checklists:
 - a. Provision of Formula Food Packages (Attachment 7.63A)
 - b. Nutrition Education Counseling for High Risk Participants (Attachment 7.63B)
 - c. Group Nutrition Education (Attachment 7.63C)

The CPA supervising the training shall submit the CPA Applicant Observation Checklists to the Training and Temporary Services Unit. Copies of these documents shall be kept in the CPA applicant's employment file at the local agency.

6. Applicants shall use Attachment 7.63 D, Prior-Approval Request for CPA Courses, to obtain approval from the State Agency, Nutrition Services Unit prior to registering for any course(s) to be used to meet the requirements of the Policy. A copy of the course description from the college or university must be submitted with the Prior-Approval form. The form and course description should be submitted to the State Nutrition Services Unit at least 30 business days prior to the course start date. Applicants will be notified within 15 business days of receipt of the request as to the approval or denial of the course(s).

- 7. Documentation of coursework completed to fulfill the requirements of this policy shall be submitted to the State Agency, Nutrition Services Unit. Documentation shall consist of a transcript with the final grade of B (80 percent) or above. Coursework must have been completed within five years prior to application.
- 8. Upon successful completion of the requirements for CPA designation, the Local Agency Coordinator shall be notified in writing by the State Agency that the applicant has been designated as a Competent Professional Authority.

Attachments:

CPA Applicant Competency Observation Checklist Provision
of Non-contract Formula Food Packages for Infants
CPA Applicant Competency Observation Checklist Nutrition
Education Counseling for High Risk Participants
CPA Applicant Competency Observation Checklist Group
Nutrition Education
Prior Approval Request for CPA Courses

References: CFR 246.2

Revisions:

10/10 Updated training requirement to include WIC WISE and CPA training.

B.4: Changed Nutrition Services Unit to Training and Temporary Services

Unit.

Changed submission from State Agency QA Nutritionist to State Nutrition

Services Unit.

10/11 Formatted the header and footer to proper font, added reference, minor wording changes.

7.63A: Changed language from "Certifier" to "CPA Applicant." Deleted #6 which was a duplicate of #4. Deleted "low iron formula."

7.63B: Changed language from "Certifier" to "CPA Applicant." Clarified #14. 7.63C: Changed language from "nutrition educator" to "CPA Applicant."

In Successful completion of at least 9 credits, 3 credits in Life Cycle
Nutrition was added as an option to Maternal or Pediatric Nutrition; 2
credits in Nutrition or Health Counseling Skills was changed to 3 credits in
Medical Nutrition Therapy.

7.63D: added Life Cycle Nutrition option to Maternal or Pediatric Nutrition (at least 3 credits required); changed Nutrition or Health Counseling Skills (At least 2 credits required) to Medical Nutrition Therapy (At least 3 credits required).

10/15 Added Community Nutrition and Advanced Nutrition to list of approved coursework. Updated format.

- 11/19 Added to B.3. and demonstrate competency. Removed from B.4. available from the WIC Temporary Services and Training Unit.
- 12/23 Changed Paraprofessional Trainings to WIC Wise Trainings.
 7.63A Removed special issue contract infant formulas
 7.63B Replaced Note Master with Client Care.

CPA Applicant Competency Checklist Provision of Formula Food Packages

WIC StaffI	Date o	t Obse	ervatio	n
Local Agency				
Participant Category/ ID number				
Type and name of formula				
Complete 1 checklist for each of the following: ☐ Exempt (Special) Infant Formula ☐ Toddler Formula (Medical Food)				
Procedure:	Yes	No	NA	Comments:
1. CPA Applicant follows guidelines for issuing formula as outlined in Policy and Procedure 3.02.				
2. CPA Applicant issues the appropriate form and quantity of formula as outlined in Policy and Procedure 3.02.				
3. CPA Applicant obtains the required documentation as outlined in Policy and Procedure 3.02 and files the documentation according to local agency guidelines.				
4. CPA Applicant explains to the participant any special requirements for use of formula use (such as mixing instructions).				
5. If necessary, certifier clarifies formula prescription with health care provider.				
CPA observing the trainee:				
(Signature)				

Attachment 7.63A 12/19/2023 Page 1 of 1

CPA Applicant Competency Observation Checklist Nutrition Education Counseling for High Risk Participants

WIC Staff	f	Date of Observation
Local Age	ency	
Participar	nt Category/ ID number	
Nutrition I	Risk	
	Formula fed Infant Breastfeeding Infant Pregnant Woman Breastfeeding Woman Postpartum Woman Child	participant categories:

Procedure:	Yes	No	NA	Comments:
CPA Applicant introduces self to participant.				
CPA Applicant explains to participant reason for visit.				
3. CPA Applicant builds rapport with participant/puts participant at ease.				
4. CPA Applicant explores participant knowledge about high risk condition.				
5. CPA Applicant uses open ended questions.				
6. CPA Applicant listens to and, when necessary, clarifies participant responses.				
7. CPA Applicant accurately addresses participant concerns about high risk nutrition condition.				
8. CPA Applicant provides appropriate, accurate and individualized nutrition information and advice in relation to nutrition risk.				
9. CPA Applicant helps participant set realistic, action-oriented, measurable goal(s) related to nutrition risk condition.				
10. CPA Applicant uses tools such as food models.				

Attachment 7.63B 12/19/2023 Page 1 of 2

CPA Applicant Competency Observation Checklist Nutrition Education Counseling for High Risk Participants

Procedure:	Yes	No	NA	Comments:
11. CPA Applicant provides and reviews appropriate written materials.				
12. CPA Applicant discusses need for and offers follow-up appointment with participant.				
13. CPA Applicant allows participant to ask questions.				
14. CPA Applicant accurately documents content of high risk visit in the Care Plan section under Client Care in management information system.				
15. CPA Applicant documents High Risk Counseling as topic in Nutrition Education Screen in management information system.				
16. CPA Applicant makes follow up appointment in management information system.				

CPA observing the applicant:		
	(Signature)	

Attachment 7.63C

CPA Applicant Competency Observation Checklist Group Nutrition Education

WIC Staff Da	ate of C	Obser	vation	
Local Agency				
Title of Nutrition Education Class				
	ı	1	T	
Procedure:	Yes	No	NA	Comments:
1. The CPA Applicant introduces self to group.				
2. The CPA Applicant introduces topic to group.				
3. The CPA Applicant involves the group in the session.				
4. Activities used help reinforce key concepts of the session.				
5. Visual aids are used to enhance learning.				
6. Written materials given to participants are accurate and support the information presented in the session.				
7. The CPA Applicant uses open-ended questions.				
8. Information is presented clearly and in a logical and organized flow.				
9. The presentation can be heard by all participants.				
10. The CPA Applicant uses active listening and responds to questions appropriately.				

CPA observing the trainee	
_	(Signature)

11. The CPA Applicant conducts an evaluation of

the session.

Attachment 7.63C 10/01/2011 Page 1 of 1

CPA Applicant Attachment 7.63D Prior-Approval Request for CPA Courses

Employe	e Name
Local Ag	ency
Date of R	equest
successful degree is in should be State Ager total of at le following in	to the position of WIC Competent Professional Authority I & II must document completion of required coursework, as specified below, if their bachelor's n an area other than Nutrition or Dietetics. Approval to take each course obtained from the State Agency prior to registering for the course. The ncy will not provide reimbursement of expenses for taking these courses. A east 9 credits is required in the following subject areas. Please provide the aformation and a copy of the course description from the college/university for se you plan to take.
	Basic Nutrition (At least 3 credits are required) Name of Course Number of Credits Semester/Year College/University Maternal or Pediatric or Life Cycle Nutrition (At least 3 credits are required) Name of Course Number of Credits Semester/Year College/University Medical Nutrition Therapy (At least 3 credits are required) Name of Course
	Number of Credits
	Semester/Year
State Age	ency Approval:
9 Approve	ed
9 Denied	
Reason for	denial

Attachment 7.63D 10/01/2014 Page 1 of 2

CPA Applicant Attachment 7.63D Prior-Approval Request for CPA Courses

Nutrition Unit			
Signature	Title	Date	
WIC Director			
Signature		Date	

Attachment 7.63D 10/01/2014 Page 2 of 2

Policy and Procedure Number: 7.64 Effective Date: October 1, 2007 Revised Date: November 18, 2019

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Laboratory Requirements for Performing Blood Tests

A. Policy

Local agencies shall abide by federal and state regulations regarding blood tests performed in WIC clinics.

B. Procedure

1. Standing Order, Letter of Permit Exception, and CLIA Waiver

- a. In order to perform hemoglobin tests on WIC participants, each local agency shall have:
 - A **Standing Order to Perform the Blood Test** from the local agency's Health Officer or Medical Director to perform the test:
 - A Letter of Permit Exception obtained from the MDH Office of Health Care Quality; and
 - A federal CLIA¹ Certificate of Waiver from the US Department of Health and Human Services, Centers for Medicare and Medicaid Services.
- b. To obtain a Standing Order to perform the blood test:

Each local health department or non-profit health agency has a medical director who is responsible for developing standing orders. A request should be made for this individual to write the standing order for your WIC agency.

c. To obtain the Letter of Permit Exception and federal CLIA Waiver:

Each local health department or non-profit health agency that operates a laboratory must have both the Permit and Waiver; determine if your WIC agency has been included in the application process. Note that each WIC clinic must have its own Letter of Permit Exception. A copy of the Letter of Permit Exception and the CLIA Waiver must be posted in each WIC clinic laboratory. The Permit

¹ CLIA refers to the Clinical Laboratory Improvement Amendment of 1988. Certain laboratory tests may receive a waiver that exempts them from the requirements of the regulation.

is non-expiring, the Waiver covers a 2 year period.

If you must complete the application for your WIC agency, contact the MDH Office of Health Care Quality to obtain an application packet and instructions.

Laboratory Licensing Programs
7120 Samuel Morse Drive, 2nd floor
Columbia, MD 21046
410.402.8015
ohcq.labs@maryland.gov
health.maryland.gov/ohcq

2. Blood Testing Equipment

The local agency shall:

a. Ensure that blood-testing equipment is installed and maintained according to the manufacturer's specifications. Local agency staff designated to perform blood tests shall be trained on the use and maintenance of the equipment.

The following companies are examples of distributors of equipment and can provide technical assistance regarding the products they offer.

HemoCue

Phone 800.323.1674
www.hemocue.us
customerservice@hemocue.com

EFK Diagnostics-Stanbio

Phone: 800-531-5535 www.efkusa.com

b. Use lancets that comply with the Needlestick Safety and Prevention Act regulation. Lancets shall have permanently retractable needles to reduce the risk of accidental needlesticks. The needle length of an adult lancet is typically 1.8-2.0mm and shall not exceed 2.4mm. The needle length of a pediatric lancet is typically 1.4-1.8mm and shall not exceed 2.0mm. There are a variety of lancets that meet this standard. Refer to Attachment 7.64A and 7.64B for more information.

3. Bloodborne Pathogens Exposure Plan

The local agency shall follow a written bloodborne pathogens procedure that

complies with Occupational Safety and Health Administration (OSHA) requirements. Refer to Attachment 7.64A for more information.

Attachments:

7.64A Bloodborne Pathogens Requirements

7.64B Safety Lancets

References:

1. 29 CFR 1910.1030 Bloodborne Pathogens

2. 42 CFR 493 Laboratory Requirements

3. COMAR 10.10.01-08, Medical Laboratories in Maryland

Revisions:

10/2011	Updated company contact information.
10/2014	Updated HemoCue contact information.
10/2015	Updated HemoCue contact information.

11/18/2019 Updated company information, moved critical pieces from original

Attachment A into policy; Renamed attachment C to A; updated

information in attachment B.

Bloodborne Pathogens Requirements

The State of Maryland Department of Health requires that all health department employees who handle blood follow the U.S. Occupational Safety and Health Administration (OSHA) regulations (29 CFR Part 1910.1030). Each local health department must have a written "Bloodborne Pathogens Plan" on file. WIC employees who handle blood are covered by these regulations. These regulations require, at a minimum:

- The provision of bloodborne pathogens training for new employees who handle blood and an annual refresher training to previously trained employees;
- Availability of the Hepatitis B vaccine;
- Personal protective equipment for employees, such as disposable gloves (varied sizes and latex-free);
- Restrictions for the area where the blood work is to be performed;
- Daily "housekeeping" of the area where blood work is performed;
- Location of and removal of infectious waste;
- Procedures to safely remove blood that contaminates surfaces such as countertops and floors; and
- A written Exposure Control Plan.

All employees who handle blood shall be familiar with the details of the Bloodborne Pathogens Plan. Local agencies that are not health departments or medical facilities shall consult with the State WIC Agency Nutrition Services Unit regarding the OSHA requirements. Forms for developing an Exposure Control Plan are available from the State Nutrition Services Unit.

Compliance with the Needlestick Safety and Prevention Act, an Amendment to the OSHA Bloodborne Pathogens regulations (29 CFR 1910)

- Adds the term "safer medical devices" to the list of engineering controls designed to reduce the risk of accidental needlesticks and includes in the definition, retractable needles.
- Requires employers to establish an ongoing process to identify, evaluate, and select effective safer
 medical devices (lancets) and to include staff who perform bloodwork in this process.
 For the purpose of the Bloodborne Pathogen standard, an "effective" safer medical device is a device
 that, based on "reasonable judgment," will make an exposure incident involving a contaminated sharp
 less likely to occur in the application in which it is used.
 - Records of the process and staff involved must be maintained by the employer.
 - Changes in technique may be required in the use of newer devices, so staff training, and support are necessary.
- Requires employers to amend their Exposure Control Plans on an annual basis or more frequently to reflect new technologies in safer medical devices.
- Requires employers to maintain a "sharps injury log" of percutaneous (under the skin) needlestick
 injuries to use as a tool to identify high risk areas and evaluate devices. The log must ensure the
 confidentiality of those employees with such injuries. The log must include the department or work area
 where the exposure incident occurred, the type and brand of device used, and an explanation of how
 the incident occurred.

Permanently Retractable Lancet - Examples

Lancet	Manufacturer	Features		
Pressure/Contact Activated		(Larger gauge = a thir	nner needle)	
BD Microtainer	Becton-Dickinson	Purple, low flow	1.5mm	30G
	201-847-6800	Pink, medium flow	1.8mm	21G
	www.bd.com			
SurgiLance	Medipurpose	SLN200	1.8mm	21G
	770-448-9493	SLN240	2.2mm	21G
	www.medipurpose.com			
Spring/Manual Activated				
Haemolance	Arkray USA	Low flow	1.4mm	21G
Plus Safety Lancets	800.818.8877	Normal flow	1.8mm	25G
	www.arkrayusa.com			
Unistick 3	www.owenmumford.com	Comfort, low flow	1.8mm	28G
		Normal, medium flow	1.8mm	23G

Attachment 7.64C is now 7.64A

Policy and Procedure Number: 7.65 Effective Date: October 1, 2007 Revised Date: September 25, 2018

SECTION:	LOCAL AGENCY OPERATIONS AND MANAGEMENT
SUBJECT:	Ordering Outreach, Certification, Nutrition Education, and Breastfeeding Support Materials

A. Policy

Local agencies shall order certification, nutrition education, and breastfeeding support materials through the Maryland WIC Distribution Center.

B. Procedure

1. Online Procedure:

- Each Local Agency Coordinator and those designated by the coordinator will have access to order materials. Only these individuals shall have online access to the MD WIC Distribution Center.
- b. The MD WIC Distribution Center is accessible from the Internet via the CORE IMS Enterprise Edition software.

To log onto the system, the user must enter *User Name* and *Password*. User name is the user's last name and first initial. User Passwords will be established / changed by the software administrator (Washington County Local Agency Coordinator).

- i. Click on *Shipping Orders*. Click on *Add Order*. Complete the mandatory fields:
 - 1. Company: This is your assigned Local Agency 4 digit code or "State" for state office or "Train" for Training Center.
 - 2. Ship to: This section will automatically pre-fill if you only have one shipping address. If your local agency ships to multiple clinics, you will need to select a shipping location from the drop down box.
 - 3. Owner: You MUST enter your Local Agency Code in this box again.
 - 4. Comment: Enter any notes the Distribution Center needs to read before your order is filled.
 - 5. Save this screen. You will not be able to proceed without saving the ship to information. As shipping order number will now be assigned to your order.

- ii. Click on Lines to order materials.
 - 1. Click on the "Plus Sign" to begin.
 - 2. A new pop-up will appear showing the inventory list
 - 3. Search for an item using the available search fields
 - a. Item Number
 - b. Item Description
 - 4. Click on the line for the item you want to order so that it is highlighted.
 - 5. Enter the quantity you want to order and then save the line.
 - 6. Repeat the above process to order additional items.
 - 7. Your order saves/updates with each line you add, there is no longer an overall "Save" for your order.
- iii. To locate and check on a previous order, click on *Shipping Orders* (main page).
 - 1. All shipping orders are listed under the Shipping Order tab found on the main screen.
 - 2. There are two options for searching for your order:
 - a. Use the search field at the top of the screen to search by Company Code or Shipping Order Number; or
 - b. Use the *Status* dropdown box to search by order status
 - Click on edit (CLOSED ORDERS ONLY) and you will see the completion date of your order. This is the date your order was shipped from the Distribution Center.

2. Manual Procedure

Users are expected to use the online procedure to order materials. Should the online system not be accessible, permission must be obtained to fax a paper request for materials.

- a. Contact the Washington County WIC Program Coordinator at 240-313-3336 to request permission to fax a paper request.
- b. Use Attachment 7.65A **WIC Manual Order Form** and fax to the MD WIC Distribution Center at 240-420-5262.

•	Sistillution denter at 240 420 0202.
Attachments: 7.65A	WIC Manual Order Form

Revisions:

- 10/10 Changed instruction to change password. Updated all attachments.
- 10/11 Updated Attachment 7.65D Breastfeeding Support Materials.
- 10/12 Updated Attachment 7.65D Breastfeeding Support Materials.
- 10/13 Consolidated Attachments 7.65A, B, C, and D into 7.65A
- 10/14 Changed access to CORE to those designated by LA Coordinator, instead of 2 per local agency.
- 09/18 Modified ordering instructions based on changes to CORE system. Updated 7.65A to reflect new clinic supplies.

WIC MANUAL ORDER FORM

- User MUST order materials online, EXCEPT when the online system is not accessible.
 Contact the Washington County WIC Program Coordinator at 240-313-3336 to obtain permission PRIOR to sending in a manual form.
- 3. FAX this form to the MD WIC Distribution Center at 301-714-2082

Local Agency Name:	Date of Request:
Mailing Address:	
Contact Person:	Phone Number:

BREASTFEEDING		QUANTITY
Breastfeeding Aids: Nurture III Medium (23-29mm) Flange 05/09 (1 package=2 flange)	B-18	
Breastfeeding Aids: Nurture III Large (29-35mm) Flange 05/09 (1 package=2 flange)	B-19	
Breastfeeding Aids: Nurture III Extra-Large (35+mm) Flange 05/09 (1 package=2 flange)	B-20	
Breastfeeding Aids: TheraShells Breast Shell 05/07 (1 box = 2 shells)	B-30	
Lactina Double Pump Kit 05/07 (each)	B-31	
Breastfeeding Aids: Lactina 27mm Flange -5/07 (1 box = 2 flange)	B-32	
Breastfeeding Aids: Lactina Flange Connector -5/07 (1 box = 2 connectors)	B-33	
Hygeia Enjoye Breastpump 08/16 (each)	B-35	
Breastfeeding Aids: Lactina 30mm (XLarge) Flange -5/07 (1 box = 2 flange)	B-34	
Breastfeeding Aids: Supplemental Nursing System (SNS) 05/07 (each)	B-36	
Breastfeeding Aids: STARTER Supplemental Nursing System 05/07 (each)	B-37	
Breastfeeding Aids: Lactina 36mm (XXLarge) Flange -10/07 (1 box = 2 flange)	B-39	
Ameda Hygienikit Milk Collection System (Hook-up Kit)	B-48	
Harmony Manual Breast Pump w/ 2 Breastshields 05/07 (each)	B-49	
Nurture III Pump Filters (1 bag - 50 pieces)	B-50	
Nurture III Double Collection Hook-up Kit with DVD 02/10 (each)	B-52	
Pump in Style Breast Pump 09/10 (each)	B-55	
Hygeia EnJoye Pump Hook-up Kit 12/16 (each)	B-57	
Breastfeeding Aids: Ameda Breast Flange XL/XXL 03/14 (1 box=2 XL inserts & 2 XXL Flanges)	B-60	
Breastfeeding Aids: Ameda Breast Flange LG/MED 03/14 (1 box=2 MED inserts & 2 LG Flanges)	B-61	
CERTIFICATION		QUANTITY
eWIC Authorized Foods List 01/17 (25 per pack)	C-06	
eWIC Authorized Foods List – Spanish 01/17 (25 per pack)	C-06A	
eWIC Benefit Card 01/17 (500 per pack)	C-08	
Plastic Bags for ID Folders 05/07 (100 per pack)	C-16	
Rights & Responsibilities for eWIC 02/17 (500 per pack)	C-19	
Rights & Responsibilities for eWIC 02/17 SPAN (500 per pack)	C-19A	
eWIC Instruction Brochure 01/17 (100 per pack)	C-70	
eWIC Instruction Brochure Spanish 01/17 (100 per pack)	C-70A	
eWIC ID Folder 01/17 (25 per pack)	C-71	
eWIC ID Folder Spanish 01/17 (25 per pack)	C71A	
CLINIC SUPPLIES	•	QUANTITY
Professional Towel 13x18 Teddy Bears with poly backing 07/17 (1box = 500)	CS-01	

Professional Towel 17x18 Plain with poly backing 07/17 (1box = 500)		
Gauze Sponge, 2x2 in, 10/12 (Pack=200)	CS-08	
Alcohol Towelettes 10/12 (Pack=200)	CS-09	
Surgilance Lancet Child Safety Needle 1.8mm (grey) 07/17 (1box = 100)	CS-20	
Surgilance Lancet Adult Safety Needle 2.2mm (orange) 07/17 (1box = 100)	CS-21	
Cangliance Earliest Addit Carety Needle 2:211111 (crange) 61711 (1868 = 186)	33 21	
Cavicide 1 Disinfectant Spray 24oz Bottle 07/17 (each)	CS-22	
Cavicide 1 Disinfectant Wipes 07/17 (1 container=160 wipes)	CS-23	
HB 201+ Cuvettes,4x50, 7/13 (4 vials per case)	CS-10	
Hemocue Cleaner 07/13 (5 swabs per pack)	CS-11	
Sharps Container – Auto Drop, 2.2 qt, 05/14 (each)	CS-12	
Sharps Container – Wall Mount, 5 qt, 05/14 (each)	CS-13	
Nitrile SMALL Disposable Gloves, Blue (Box=100)	CS-14	
Nitrile MEDIUM Disposable Gloves, Blue (Box=100)	CS-15	
Nitrile LARGE Disposable Gloves, Silver 10/12 (Box=200)	CS-13	
Nitrile LARGE Disposable Gloves, Silver 10/12 (Box=200) Nitrile X-LARGE Disposable Gloves, Silver 10/12 (Box=200)	CS-03	
Synthetic Vinyl Exam Gloves (Powder Free) SMALL Disposable Gloves, Clear 10/16 (Box=100)	CS-04 CS-17	
Synthetic Vinyl Exam Gloves (Powder Free) MEDIUM Disposable Gloves, Clear 10/16 (Box=100) Synthetic Vinyl Exam Gloves (Powder Free) MEDIUM Disposable Gloves, Clear 10/16 (Box=100)		
	CS-18	
Synthetic Vinyl Exam Gloves (Powder Free) LARGE Disposable Gloves, Clear 10/16 (Box=100)	CS-19	QUANTITY
NUTRITION Help Me Be Healthy 1 to 1 ½ yrs, 01/17 (50 per pack)	N-36	QUANTITY
Help Me Be Healthy 1 to 1 ½ yrs, 01/17 (50 per pack)	N-36 N-37	
	N-37	
Help Me Be Healthy 1 ½ to 2 yrs, 01/17 (50 per pack)		
Help Me Be Healthy 1 ½ to 2 yrs, Span 01/17 (25 per pack)	N-39	
Help Me Be Healthy 2 to 2 ½ yrs, 01/17 (50 per pack)	N-40	
Hala Ma De Harilla O to O 1/ vira On a co M 47/ (05 page 201)	N. 44	
Help Me Be Healthy 2 to 2 ½ yrs, Span 01/17 (25 per pack)	N-41	
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FOR MD WIC DISTRIBUTION CENTER ONLY	
Request Received:	
Request Filed:	_
Data Entered in system:	
Staff filling request:	

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.66 Effective Date: October 1, 2007 Revised Date: February 12, 2025

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: New Employee Training

A. Policy

The goals of employee training are to:

- Organize and standardize training for all local agency staff.
- Increase staff confidence and job satisfaction.
- Standardize services provided to WIC participants.
- Increase nutrition and breastfeeding knowledge and develop counseling skills.

Employees of the WIC Program shall complete all facets of new employee training within nine months from date of hire. The required training is dependent on the employee's classification in the management information system as follows:

Classification	Required Training						
	Becoming WIC Wise Manual	WIC Wise 1	WIC Wise 2	Grow & Glow 1	Grow & Glow 2	CPA	BFPC
Breastfeeding Peer Counselor	Ø						Ø
Local Agency Administrative	Ø						
Local Agency Administrative with eligibility determination roles	V	☑ (Days 1-2.5 only)					
CPPA	Ø	Ø	Ø	Ø	Ø		
CPA	\square	\square	Ø	Ø	Ø	Ø	
Local Agency Coordinator	Ø	V	Ø	V	V	V	

Employees who return to the WIC Program after a separation of employment from Maryland WIC of >6 months shall complete the appropriate portions of the Becoming WIC Wise (BWW) manual. Employees classified as a CPA, CPPA, or Local Agency Coordinator shall re-attend WIC Wise 1. Employees classified as a BFPC shall re-attend BFPC training.

Employees that receive a change in classification (i.e., a promotion) shall complete all training required for that classification.

Graduates of new employee training who perform certification duties shall demonstrate an array of competencies under the supervision of a local agency trainer. The local agency trainer shall be experienced and proficient in completing certifications as defined by:

- 10 or more years of service in the Program; or
- Completion of the new employee training curriculum and their own competency checklists.

Employees that do not achieve basic competencies during WIC Wise 1 will be required to attend a second session of WIC Wise 1. Employees who do not achieve basic competencies after a second session of WIC Wise 1 will need to be evaluated by state staff after 1 month of mentoring in their local agency.

During the training period, employees may perform certifications if closely supervised by the local agency. The local agency shall review the new employees' work in the management information system. A new employee who does not gain competency within 9 months of date of hire shall not be permitted to perform certifications.

B. Procedure

1. NEW EMPLOYEE TRAINING GUIDELINES

- a. Submission of the Staff Data Request Form (Attachment 7.42A) will register new employees to attend training.
- b. In the event of low enrollment for any scheduled training, that session will be postponed, and new employees will attend the next regularly scheduled session, based on the following criteria:
 - i. WIC Wise 1, WIC Wise 2, and CPA Training will be postponed if less than 4 employees are enrolled.
 - ii. Grow and Glow will be postponed if less than 8 employees are enrolled.

2. BECOMING WIC WISE MANUAL

- a. Local agencies will begin the process of new employee training using the procedures, guidelines and materials found in the BWW manual.
- b. Local agencies will send the signed Trainee Log from the BWW manual to the Training Center upon completion which shall be no later than the first day of their scheduled WIC Wise 1 training.

3. WIC WISE TRAINING

- a. WIC Wise 1 will be completed in 8 days over a 2-week period. WIC Wise 2 will be completed in a consecutive 5-day period.
- b. WIC Wise 1 will be offered 4 times per year; WIC Wise 2 will be offered 3 times per year. The WIC Wise series is required for all staff who perform, supervise, or evaluate certifications.
- c. Breastfeeding Peer Counselors and Administrative staff that *do not perform certification duties* are exempt from WIC Wise trainings. These staff shall complete the appropriate sections of the BWW manual with their local agency trainer. The signed Trainee Log from the BWW manual will be sent to the Training Center upon completion.
- d. New employees must attend WIC Wise 1 before attending WIC Wise 2. Staff must be available to attend the entire 13 days of training. Local agency staff in need of refresher training may also attend as space permits.
- e. WIC Wise training includes certification, nutrition, breastfeeding, and food package policies and procedures, management information system training, basic breastfeeding information, basic nutrition principles for prenatal, postpartum, infants, and children, baby behavior, counseling skills based on participant focused counseling principles, risk code and food package training.
- f. On the rare occasion that a new employee is unable to attend new employee training, they may be trained at the local agency. These employees must complete the equivalent of WIC Wise training. The Local Agency Coordinator shall contact the Training Center Coordinator for more information. State staff will evaluate these employees for competency levels. If competency levels are not demonstrated, the employee will be required to attend WIC Wise training.
- g. The maximum attendance for a WIC Wise 1 class is 16 trainees. Any WIC Wise 1 class that is over capacity by the deadline to register will have

applicants admitted in the following order of priority: new local agency employees, new temporary employees, employees returning to WIC after more than a six-month absence, employees who require retraining, new state staff, new MIS contractors, employees from MARO/USDA, other visitors.

4. CPA TRAINING

- a. Will be completed in a 2-day training that will be offered 3 times per year. Trainees shall be notified of any prerequisite training requirements one month prior to the scheduled training.
- New CPAs shall attend WIC Wise 1 before attending CPA training.
 Exceptions to this shall be discussed with the Training Center
 Coordinator
- c. CPA training includes policies and procedures on special formula issuance, breastfeeding risk codes, how to interpret the *Medications* and *Mother's Milk* reference when researching medication questions, high risk counseling, developing care plans and communicating with medical professionals.

GROW AND GLOW TRAINING

- a. Will be completed in a 2-day nonconsecutive training that will be offered 3 times per year. It is recommended that staff complete WIC Wise 1 and WIC Wise 2 before attending Grow and Glow training.
- b. Grow and Glow training includes prenatal breastfeeding assessment and education, counseling strategies, how to recognize appropriate position and latch, potential challenges breastfeeding participants may encounter, and equipment/breastfeeding aids. The trainings are designed to reinforce positive attitudes toward breastfeeding, motivate staff to create "breastfeeding friendly" clinic environments, provide staff with ways to recognize when intervention/support for breastfeeding may be needed and understand what staff can do to assist breastfeeding families, including making appropriate referrals when needed.

6. DEMONSTRATION OF COMPETENCY

 a. Competency is evaluated by measuring the trainee's ability to meet performance objectives, including both knowledge and skills.
 Competency checklists are required to rate the trainee's ability to meet skill objectives. Attachments 7.66 B through I shall be completed within 9 months of completion of WIC Wise 1 training. Trainees who do not gain competency within this time frame shall not be permitted to perform certifications. If competency has not been gained by 12 months post completion of WIC Wise 1 training the local agency shall contact the state training center for guidance.

Competency checklists are separated into four categories:

- i. Intake and Income Eligibility: the family information through cert action screens in the management information system
- ii. Nutrition Assessment: determining nutrition eligibility and counseling
- iii. Medical Assessment: performing and interpreting lab measurements
- iv. Miscellaneous
- b. The required competency checklists are dependent on the new employee's classification in the management information system as follows:

Required Competency Checklist	Employee Classification						
	CPPA	CPA	Coordinator	Administrative with eligibility roles			
Intake and Income (Attachment 7.66B - 3 total)	V	V	abla	Ø			
Nutrition Assessment (Attachments 7.66C-F - 10 total)	V	Ø	abla				
Medical Assessment (Attachment 7.66l - 4 total)	V	Ø					
Misc: General (Attachment 7.66G – 1 total)	V	V	Ø				
Misc: CPA (Attachment 7.66H – 1 total)		V					

Intake and Income Eligibility

The category of intake and income eligibility requires observations for:

- Adjunct income eligibility 1 observation required
- Non-adjunct income eligibility 2 observations required

Observations to complete the intake and income eligibility checklist requirements shall not be from the same household.

Nutrition Assessment

The category of nutrition assessment requires observations of 1 each for:

- PG. certification or recertification
- BE or BP, certification or recertification
- WPP, certification or recertification
- IBE or IBP, certification
- IFF, certification
- Any Infant 4-7 months, mid-certification
- C1, certification or recertification
- C1, mid-certification
- C2, certification or recertification
- C3 or C4, certification, recertification, or mid-certification

Observations to complete the nutrition assessment checklist requirements may be from the same household, as applicable.

Medical Assessment

The category of medical assessment requires observations of 1 each for:

- Infant (0-7 months)
- C1 or C2
- C3 or C4
- Woman

Observations to complete the medical assessment checklist requirements may be from the same household and can be the same participant as the nutrition assessment checklist, as applicable.

Miscellaneous

The miscellaneous category competency checklists are:

- General 1 required for CPPA, CPA, and Coordinator
- CPA 1 required for CPAs only. The local agency trainer that observes this competency must also be either a CPA or the Local Agency Coordinator.
- d. The local agency shall submit, via mail or electronic submission, the completed competency checklists to the training center staff for review. Copies of these documents shall be kept on file at the local agency.
- e. The local agency Coordinator shall be notified in writing by the training center staff when the competency checklists have been reviewed and approved as accurate and complete.

7. RECORDS OF COMPLETION OF NEW EMPLOYEE TRAINING

a. The BWW Trainee Log and the completed competency checklists will be maintained at the Training Center in accordance with State record keeping guidelines.

Attachments:

7.66A	Instructions for Competency Checklists
7.66B	Competency Checklist – Income
7.66C	Competency Checklist – Pregnant
7.66D	Competency Checklist – Postpartum
7.66E	Competency Checklist – Infant
7.66F	Competency Checklist – Children
7.66G	Competency Checklist – General
7.66H	Competency Checklist – CPA
7.661	Competency Checklist – Medical Assessment

References:

- 1. 7 CFR 2.46.2
- 2. WIC Nutrition Services Standards, August 2013 Standard 5

Б : :	
Revisions:	
	Inserted information about the Annex training site
40/0000	including Attachment 7.66B
10/2009	B.1. C: changed "basic counseling skills" to
4.4/2.2.2.2	"counseling skills based on VENA principles
11/2009	Updated 7.66A to include directions from Southern
	Maryland to the Brooklyn Training Center
10/2010	In B.1.B. changed wording from "will be offered" to
	"is required", clarified who attends WIC WISE part 2
	and the sequencing of the training. Added nutrition
	and food package policies to B.1.c. Added B.1.e, i,
	and j. Reordered B.1.e-j
10/2011	Changes in the frequency of training; changed
	requirement to complete new employee training to
	six months from date of hire.
10/2012	Deleted 7.66B. Revised 7.66A for the new location.
	Corrected attachment reference in B.1.b. Added
	Grow and Glow in A and B.3. Reordered B.1.a-i.
	Added B.1.j, other minor language
	changes/clarifications
10/2013	Updated frequency and length of training for WIC
	WISE part 1, New CPA training and Grow and Glow

new employee training from 6 to 9 months. Added section on local agency role in new employee training. Moved language from policy 2.02 regarding having a CPA review the records of a new CPPA or CPA until competency checklists have been completed. 10/2014 Added language to clarify who is required to come to the various new employee trainings 11/2017 Clarified that staff separated from WIC for ≥6 months are required to repeat training. Updated some wording due to changes in trainings. 01/2018 Added section on demonstration of competency and competency checklist attachments A-H; removed directions to the training center from attachments: edited B.2.c to include peer counselors and clerical workers should complete the Becoming WIC Wise training manual; added definition of who is allowed to observe new employees for competency. 11/2019 Added B.1.e to include criteria on postponement of training; B.2.e changed "VENA" to "participant focused counseling; B.3.a edited to include a prerequisite requirement and reorganization of the CPA training schedule; B.5.b edited to clarify which participants (family vs. individual) can be observed for competency checklists. 11/2021 Reorganization of the CPA training schedule; remove PG (teen) checklist requirement; separate medical into its own checklist 10/2023 Clarified the due date for the BWW manual Trainee Log and CPA training requirement. 02/2025 Clarified whether adults and children over 1 need to remove socks for measurements in 7.661

training. Deleted references to the WBT modules. Clarified prerequisites to Grow and Glow and New CPA training. Changed length of time to complete

Instructions for Competency Checklists

- 1. The competency checklists are a tool to ensure competency of newly hired staff after they have attended new employee training.
- Complete the header for each competency checklist and double check for accuracy.
 Each checklist should also include the phone number and signature of the local agency trainer.
- 3. Participants observed to complete the intake and income eligibility checklist requirements shall not be from the same household.
- 4. Participants observed to complete the medical and nutrition assessment checklist requirements may be from the same household, as applicable.
- 5. The trainee should continue to be observed until competent in all areas. Any competency checklist with a check mark in the "No" column does <u>not</u> count toward the required number of checklists needed. If it is submitted to the Training Center marked "No", it will be returned to the Local Agency for recompletion. If the local agency trainer feels the trainee needs more practice, then they are not yet competent. The trainee should continue to be observed completing this function until they are deemed fully competent.
- 6. Do not mark "Yes" for functions that do not apply to the participant being certified, as this would be conflicting to the information in WOW. For example, do not mark Yes to counseling a participant on a low hemoglobin if their blood values were adequate.
- 7. Utilize the "Not Observed but Competent" column where appropriate. This column means that the local agency trainer feels that although the trainee was not directly observed the trainee is competent in that area. For example, the trainee is competent to counsel on low hemoglobin when appropriate.
- 8. Competency checklists are due within 9 months of completion of WIC Wise 1 training. Send the competency checklists to the Training Center for review once all are completed. The Local Agency shall keep a copy of the employee's competency checklists, if the Training Center staff has questions or there are items not checked, it will be helpful to have a copy of the completed checklists on hand so discrepancies can be resolved quickly.
- 9. Any questions can be directed to the Training Center.

Attachment 7.66A 11/30/2021 Page **1** of **1**

Competency Checklist – Intake and Income Eligibility WIC Staff _____ Date of Observation ____ Participant ID #____ Local Agency Trainer Complete 3 observations for: ☐ Adjunct Income - 1 required ☐ Non-Adjunct Income - 2 required **Not Observed** Additional Intake and Income Eligibility Yes No N/A **but Competent** Comments 1. Introduces self and puts applicant at ease. 2. Offers LEP applicant the use of the Language Line. 3. Explains the purpose of the WIC Program. 4. Explains the certification process. 5. Verifies and documents identity of applicant. 6. Verifies and documents residence of applicant. 7. Obtains or updates telephone number. 8. Obtains and documents the date of birth of the head of household. 9. Determines family size correctly. 10. Explains the role of (or updates) the proxy/designee. 11. Verifies and documents non-adjunct family income. 12. If applicant reports zero income, staff probes for additional details to understand economic situation. 13. Updates status for Temporary Cash Assistance, the Food Supplement Program, and Medical Assistance. Provides referral to programs if not currently participating per P&P 2.39. 14. Verifies and documents adjunctive eligibility. 15. Income information is updated even though adjunctive eligibility is verified and used as proof of income. 16. Offers applicant the opportunity to register to vote. 17. Updates applicant's voter registration status. 18. Verifies and documents proof of pregnancy. 19. Obtains or confirms race and ethnicity information of applicant. 20. "Amount of Breastfeeding" grid and all breastfeeding related questions are accurately completed.

Local Agency Trainer _	
	(Signature & Phone Number)

21. Issues eWIC card and offers the applicant an opportunity to PIN the eWIC card.

Competency Checklist - Pregnant - Nutrition Assessment

WIC Staff	Date of Observation	Participant ID #
Local Agency Trainer		

Complete one observation for: \square PG Cert or Recert

	Nutrition and Health Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
1.	Uses the Medical screen and Nutrition History to evaluate health conditions and eating practices.					
2.	Involves the participant in the session by asking openended questions, responding questions, and encourages sharing thoughts and ideas.					
3.	Probes and uses open-ended questions as needed to clarify responses before entering information in WOW.					
4.	Correctly identifies and interprets risk factors using the Medical screen and Nutrition History information.					
	Nutrition Education/Referrals/Food Package	Yes	No	N/A	Not Observed But Competent	Additional Comments
5.	Involves the participant in the discussion by using motivational interviewing skills.					
6.	Tailors information to the applicant's cultural, educational and economic needs.					
7.	Assists participant in understanding how food and lifestyle choices affect the infant's health over a lifetime.					
8.	Helps participant understand appropriate weight gain.					
9.	Assists participant in developing strategies to reduce pregnancy discomforts when identified.					
10.	Provides information about the dangers of substance abuse during pregnancy.					
11.	Provides a list of resources in the community for substance abuse counseling.					
12.	Promotes breastfeeding and reviews benefits and contraindications.					
13.	Assists participant (when appropriate) in setting a goal(s) to change an eating or lifestyle practice.					
14.	Explains food package contents; assists participant in understanding how WIC foods help meet nutrient needs of pregnancy.					
	Nutrition Education/Referrals/Food Package	Yes	No	N/A	Not Observed But Competent	Additional Comments
15.	Prescribes the most appropriate food package; tailors food package to participant's individual food choices and restrictions.					
16.	Provides educational materials relevant to the applicant's nutritional risk, category, and cultural, educational, and economic needs.					

Attachment 7.66C 11/30/2021 Page 1 of 2

Any issued incentive item corresponds with the Nutrition Education message.					
Records nutrition education content accurately in the Nutrition Education screen.					
If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39.					
Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39.					
Program Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
Explains the Rights and Responsibilities (R & R).					
Ensures that the R & R form is read and signed by the applicant.					
Accurately schedules a return appointment.					
Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining.					
Gives the participant the opportunity to ask questions.					
Issues eWIC card and offers the participant an opportunity to PIN the eWIC card.					
	Records nutrition education content accurately in the Nutrition Education screen. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information Explains the Rights and Responsibilities (R & R). Ensures that the R & R form is read and signed by the applicant. Accurately schedules a return appointment. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining. Gives the participant the opportunity to ask questions.	Records nutrition education content accurately in the Nutrition Education screen. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information Yes Explains the Rights and Responsibilities (R & R). Ensures that the R & R form is read and signed by the applicant. Accurately schedules a return appointment. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining. Gives the participant the opportunity to ask questions. Issues eWIC card and offers the participant an	Records nutrition education content accurately in the Nutrition Education screen. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information Yes No Explains the Rights and Responsibilities (R & R). Ensures that the R & R form is read and signed by the applicant. Accurately schedules a return appointment. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining. Gives the participant the opportunity to ask questions. Issues eWIC card and offers the participant an	Records nutrition education content accurately in the Nutrition Education screen. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information Yes No N/A Explains the Rights and Responsibilities (R & R). Ensures that the R & R form is read and signed by the applicant. Accurately schedules a return appointment. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining. Gives the participant the opportunity to ask questions.	Records nutrition education content accurately in the Nutrition Education screen. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information Yes No N/A Not Observed But Competent Explains the Rights and Responsibilities (R & R). Ensures that the R & R form is read and signed by the applicant. Accurately schedules a return appointment. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining. Gives the participant the opportunity to ask questions.

(Signature & Phone Number)

Local Agency Trainer _____

Attachment 7.66C 11/30/2021 Page 2 of 2

Competency Checklist – Postpartum – Nutrition Assessment

WIC Staff	Date of Observation	_ Participant ID #		
Local Agency Trainer				
Complete one observation each for:	☐ BE or BP Cert or Recert	□ WPP Cert or Recert		

	Nutrition and Health Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
1.	Uses the Medical screen and Nutrition History to evaluate health conditions and eating practices.					
2.	Involves the participant in the session by asking open-ended questions, responding to questions, and encourages sharing thoughts and ideas.					
3.	Probes and uses open-ended questions as needed to clarify responses before entering information in WOW.					
4.	Correctly identifies and interprets risk factors using the Medical screen and Nutrition History information.					
	Nutrition Education/Referrals/Food Package	Yes	No	N/A	Not Observed But Competent	Additional Comments
5.	. Involves the participant in the discussion by using motivational interviewing skills.					
6.	Tailors information to the applicant's cultural, educational and economic needs.					
7.	Assists participant in understanding how food and lifestyle choices affect health over a lifetime.					
8.	If breastfeeding, provides appropriate advice and support.					
9.	Uses visual aids effectively.					
10.	Provides exit counseling information on: immunizations & regular health care, eating right & being active, folic acid, avoiding drugs, alcohol & tobacco, encouraging breastfeeding.					
11.	Provides a list of resources in the community for substance abuse counseling.					
12.	Assists participant (when appropriate) in setting a goal(s) to change an eating or lifestyle practice.					
13.	Explains food package contents; assists participant in understanding how WIC foods help meet nutrient needs.					
14.	Prescribes the most appropriate food package; tailors food package to participant's individual food choices and restrictions.					
15.	Provides educational materials relevant to the applicant's nutritional risk, category, and cultural, educational, and economic needs.					
16.	Any issued incentive items correspond with the Nutrition Education message.					
17.	Records nutrition education content accurately in the Nutrition Education screen.					

Attachment 7.66D 11/30/2021 Page 1 of 2

Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. Program Information					
Program Information					
	Yes	No	N/A	Not Observed But Competent	Additional Comments
explains the Rights and Responsibilities (R & R).					
Ensures that the R & R form is read and signed by the applicant.					
accurately schedules a return appointment.					
ssues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining.					
Sives the participant the opportunity to ask questions.					
ssues eWIC card and offers the participant an opportunity to					
3	sues WIC benefits and explains how and where to shop. horoughly explains what is allowed to purchase in each food enefit type and how to determine what benefits are remaining. ives the participant the opportunity to ask questions.	sues WIC benefits and explains how and where to shop. horoughly explains what is allowed to purchase in each food enefit type and how to determine what benefits are remaining. ives the participant the opportunity to ask questions. sues eWIC card and offers the participant an opportunity to	sues WIC benefits and explains how and where to shop. horoughly explains what is allowed to purchase in each food enefit type and how to determine what benefits are remaining. ives the participant the opportunity to ask questions. sues eWIC card and offers the participant an opportunity to	sues WIC benefits and explains how and where to shop. horoughly explains what is allowed to purchase in each food enefit type and how to determine what benefits are remaining. ives the participant the opportunity to ask questions. sues eWIC card and offers the participant an opportunity to	sues WIC benefits and explains how and where to shop. horoughly explains what is allowed to purchase in each food enefit type and how to determine what benefits are remaining. ives the participant the opportunity to ask questions. sues eWIC card and offers the participant an opportunity to

Local Agency Trainer	
	(Signature & Phone Number)

Competency Checklist – Infant – Nutrition Assessment

WIC Staff	Date of Observation		_ Participant ID #
Local Agency Trainer			
Complete one observation each for:	☐ IBE or IBP Cert	☐ IFF Cert	☐ Infant 4-7 Months MCV

	Nutrition and Health Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
1.	Uses the Medical screen and Nutrition History to evaluate health conditions and feeding practices.					
2.	Assesses for breastfeeding questions and/or problems.					
3.	Involves the caregiver in the session by asking openended questions, responding to questions, and encouraging sharing of thoughts and ideas.					
4.	Probes and uses open-ended questions as needed to clarify responses before entering information in WOW.					
5.	Correctly identifies and interprets risk factors using the Medical screen and Nutrition History information.					
	Nutrition Education/Referrals/Food Package	Yes	No	N/A	Not Observed But Competent	Additional Comments
6.	Involves the caregiver in the discussion by using motivational interviewing skills.					
7.	Tailors information to the applicant/caregiver's cultural, educational and economic needs.					
8.	Assists caregiver in understanding the infant's hunger and fullness cues and developmental stage in relation to feeding.					
9.	Offers encouragement and support to continue to breastfeed.					
10.	Selects appropriate sections of the <i>Help me be healthy</i> pamphlet to discuss with the caregiver.					
11.	Provides appropriate anticipatory guidance.					
12.	Uses visual aids effectively.					
13.	Assists caregiver (when appropriate) in setting a goal(s) to change a feeding or lifestyle practice.					
14.	Explains food package contents; assists caregiver in understanding how WIC foods help meet nutrient needs of the infant.					
15.	Prescribes the most appropriate food package; tailors food package to participant's individual infant formula requirements.					

Attachment 7.66E 11/30/2021 Page 1 of 2

Nutrition Education/Referrals/Food Package:	Yes	No	N/A	Not Observed But Competent	Additional Comments
16. Provides educational materials relevant to the infant's nutritional risk, category, and cultural, educational, and economic needs.					
Any issued incentive items correspond with the Nutrition Education message.					
Records nutrition education content accurately in the Nutrition Education screen.					
19. If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39.					
20. Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39.					
Program Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
24. Explains the Dights and Despersibilities (D. 9. D.)					
21. Explains the Rights and Responsibilities (R & R).					
21. Explains the Rights and Responsibilities (R & R).22. Ensures that the R & R form is read and signed by the caregiver.					
22. Ensures that the R & R form is read and signed by the					
22. Ensures that the R & R form is read and signed by the caregiver.					
 22. Ensures that the R & R form is read and signed by the caregiver. 23. Accurately schedules a return appointment. 24. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what 					

Local Agency Trainer	
	(Signature & Phone Number)

Competency Checklist - Children - Nutrition Assessment WIC Staff _____ Date of Observation _____ Participant ID # _____ Local Agency Trainer _____ Complete one observation each for: ☐ C1 Cert or Recert ☐ C2 Cert or Recert ☐ C1 MCV ☐ C3 or C4 Cert or Recert or MCV **Not Observed** Additional N/A Yes No **Nutrition and Health Information But Competent** Comments evaluate health conditions and eating practices. ended questions, responding to questions, and

1. Uses the Medical screen and Nutrition History to 2. Involves the caregiver in the session by asking openencouraging sharing of thoughts and ideas. 3. Probes and uses open-ended questions as needed to clarify responses before entering information in WOW. 4. Correctly identifies and interprets risk factors using the Medical screen and Nutrition History information. 5. Involves the caregiver in the discussion by using motivational interviewing skills. 6. Tailors information to the applicant/caregiver's cultural. educational and economic needs. 7. Assists caregiver in understanding their role as teacher and role model for the child. 8. Assists caregiver in understanding how food and lifestyle choices affect the child's health over a lifetime. 9. Selects appropriate sections of the *Help me be Healthy* pamphlet to discuss with the caregiver. 10. Provides appropriate anticipatory guidance. **Not Observed** Additional Yes No N/A **Nutrition Education/Referrals/Food Package But Competent** Comments 11. Uses visual aids effectively. 12. Assists caregiver (when appropriate) in setting a goal(s) to change a feeding or lifestyle practice. 13. Explains food package contents; assists caregiver in understanding how WIC foods help meet nutrient needs of the child. 14. Prescribes the most appropriate food package; tailors food package to participant's individual food choices and restrictions. 15. Provides educational materials relevant to the child's nutritional risk, category, and cultural, educational, and economic needs.

Any issued incentive items correspond with the Nutrition Education message.					
17. Records nutrition education content accurately in the Nutrition Education screen.					
 If nutrition care counseling is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39. 					
 Provides appropriate referrals and documents them in the Client Referrals screen, per Policy 2.39. 					
Program Information	Yes	No	N/A	Not Observed But Competent	Additional Comments
20. Explains the Rights and Responsibilities (R & R).					
21. Ensures that the R & R form is read and signed by the caregiver.					
22. Accurately schedules a return appointment.					
23. Issues WIC benefits and explains how and where to shop. Thoroughly explains what is allowed to purchase in each food benefit type and how to determine what benefits are remaining.					
24. Gives the caregiver the opportunity to ask questions.					
25. Issues eWIC card and offers the caregiver an opportunity to PIN the eWIC card.					

Local Agency Trainer	
-	(Signature & Phone Number)

Attachment 7.66F 11/30/2021 Page 2 of 2

Competency Checklist - General

WIC	Staff Date of Comp	letion _		
Loca	l Agency Trainer			
Ma	nual Certification:	Yes	No	Comments:
1.	Can correctly complete a manual certification form, including documentation of identified risk factors.			
2.	Can explain Local Agency procedure for entering manual certifications into WOW and document retention procedure.			
3.	Can schedule the participant an appropriate follow-up appointment to issue an active eWIC card. Understands that inactive eWIC cards may not be issued.			
Her	moglobin Test Evaluation:	Yes	No	Comments:
4.	Can perform daily quality assurance procedures for performing the hemoglobin assessment.			
5.	Can explain how to clean a blood spill and procedure if accidentally exposed to blood.			
Fo	ster Certification:	Yes	No	Comments:
6.	Can appropriately document proof of income for a participant in foster care.			
7.	If transferring a participant in foster care, appropriately voids and reissues benefits to sync with new family.			
Cer	tification Miscellaneous:	Yes	No	Comments:
8.	Appropriately documents "no proof" and explains a short certification to participant.			
9.	Explains short certification process and schedules follow-up appointment appropriately and within time limitations.			
10	 Appropriately explains and documents an ineligibility notice and explains the fair hearing process to participant. 			
11	. Can properly issue and document VOC information for a participant to transfer out of state.			
12	. Appropriately explains the required documentation and process to accept a VOC transfer into Maryland WIC.			

Local Agency Trainer _____ (Signature & Phone Number)

Competency Checklist - Competent Professional Authority (CPA)

	WIC Staff	_ Date	of Cor	mpletio	n	
	Observing CPA/Coordinator name					
	One CPA Checklist is required: The participant special formula/nutritional.	shou	ld be	high ı	risk <u>and</u> receivinç	g a
	Participant ID	Parti	cipant	Categ	ory	
	Special Formula/Food Name		_ High	n Risk _		
	Procedure	Yes	No	N/A	Not Observed But Competent	Comments
1.	Obtains the required medical documentation as outlined in Policy and Procedure 3.02.					
2.	If necessary, clarifies formula prescription with health care provider, and documents appropriately in WOW.					
3.	Issues the appropriate form and quantity of special formula or WIC-eligible nutritional and documents accordingly per Policy & Procedure 3.02 or 3.03, respectively.					
4.	Explains to the participant any special requirements for use of special formula or food (such as mixing instructions, if applicable). Refers to Internal Guidance as needed.					
5.	Documents a care plan for a participant at high nutritional risk and meets documentation deadlines for contact as set in Policy & Procedure 5.03.					
6.	When necessary, accurately provides formula to a breastfed infant who is under one month old per Policy & Procedure 3.01 & 5.09.					
7.	Understands when it is appropriate to prescribe food packages tailored with food choices listed in Policy & Procedure 3.01.					

Observing CPA or Local Agency Coordinator	
	(Signature & Phone Number)

Attachment 7.66H 11/30/2021 Page 1 of 1

Competency Checklist – Medical Assessment

WIC Staff Date of Observation			١				_ Participant ID	#
Lo	cal Agency Trainer							
Co	omplete one observation each for:	Infant 0-7	7mos	1	□ C1 o	r C2	☐ C3 or C4	□ Woman
	Weight and Height Evaluation		Yes	No	N/A		Additional C	omments
1.	Introduces self and puts caregiver & child at ea	se.						
2.	Offers LEP participant the use of the Language	Line.						
3.	Explains the procedure and its purpose.							
4.	For a child <2 years of age; uses recumbent let board with a fixed headpiece and movable foot measure length. For an adult or a child ≥2 yea age; uses a stadiometer with attached headpie measure height.	piece to rs of						
5.	Asks participant/caregiver to remove shoes, so infants), excess clothing, and hair ornaments. I diaper is present, it should be a dry diaper.							
6.	With a recumbent length board child is on their head is held firmly against the headpiece and e point directly at the ceiling. Staff holds down boof the child, extends legs and moves foot piece against both heels.	eyes oth knees						
7.	With a stadiometer, applicant stands with heels buttocks, and shoulder blades against wall, known unbent, eyes straight ahead, feet slightly apart.	ees						
8.	Reads length/height measurement correctly to nearest 1/8 inch.	the						
9.	Uses an appropriate beam balance or digital so measure weight.	cale to						
10.	Zero-balances the scale prior to measurement. scale is zero balanced with disposable sheet. is in the middle of scale tray.							
11.	Reads weight measurement correctly to the ne ounce. For digital scale, converts fractions of p as needed.							
12.	Only uses anthropometric data from a health caprovider if taken within 60 days prior to the cert							
13.	Records measurements accurately on the Med Screen.	ical						
14.	Explains the child's growth pattern correctly usi growth chart.	ng the						
15.	Provides appropriate nutrition advice for this pair identified as an unhealthy weight.	articipant,						
16.	Accurately explains weight gain pattern and ex weight gain for a pregnant participant.	pected						

Hemoglobin Test Evaluation	Yes	No	N/A	Not Observed But Competent	Additional Comments
17. Appropriately determines which hemoglobin test is needed (standard vs. non-invasive).					
18. Explains the procedure.					
19. Wears disposable, appropriate-sized gloves during the standard hemoglobin procedure.					
20. Follows accepted Procedure 2.33A for Standard hemoglobin test, as applicable.					
21. Follows accepted Procedure 2.33B for Non-invasive hemoglobin test, as applicable.					
22. Washes/sanitizes hands after the standard hemoglobin test is performed.					
23. Accepts hemoglobin data from health care provider that complies with Policy and Procedure 2.33.					
24. Correctly identifies when a second test is required for quality assurance of the test value per Policy and Procedure 2.33.					
25. Records test result correctly on the Medical screen.					
26. Provides appropriate nutrition advice for this participant, if identified as having low hemoglobin.					
27. If nutrition care counseling and/or health care provider referral is needed, identifies and refers correctly on the Client Referrals screen, per Policy 2.39.					

Local Agency Trainer	
	(Signature & Phone Number)

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.67 Effective Date: October 1, 2007 Revised Date: October 1, 2016

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: WIC Temporary Staffing

A. Policy

Local agencies may request temporary staff (temps) to cover long or short term staff shortages.

B. Procedure

- Local agencies will contact the Training Center to request a temp. Every attempt will be made to provide qualified temporary staff to meet the staffing needs and requirements of local agencies.
- 2. All temporary staff are required to attend the next scheduled round of new employee trainings (WIC WISE parts 1 and 2, Grow and Glow parts 1 and 2 and new CPA training if applicable) after their date of hire. Local agencies are responsible for completing the trainer's checklists for temporary staff before they attend WIC WISE part 1.
- 3. The Training Center will cover the cost of the first 2 weeks of salary for temporary workers. Local agency budgets will be charged for the temp services after the first 2 weeks via a journal adjustment or invoice through the State WIC Office. See Policy and Procedure 6.04, Reimbursement for Costs of Temporary Staffing.
- 4. The Local Agency Coordinator or the Coordinator's designee will be responsible for signing the temp's timesheet and faxing it to the Training Center by the published deadline.
- 5. The original timesheet will remain on file at the local agency for audit purposes.
- 6. Temporary employees are not required to complete quarterly time studies unless specifically requested by the Local Agency.
- 7. Any concerns regarding performance or attendance should be forwarded to the staff at the Training Center.
- 8. Local agencies may contact the Training Center at any time to discuss requests for temporary staff.

Revisions:

10/2010	Added B. 1. Reordered B. 2-8
10/2012	Deleted B.7 and B.8 Deleted Attachment 7.67A. Added new B.7
10/2014	Due to changes in the training schedule, B.1-3 have been reworded
10/2016	Clarified that temp employees do not need to complete time studies

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.70 Effective Date: October 1, 2007 Revised Date: April 13, 2023

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Confidentiality and Release of Applicant and Participant Information

A. Policy

Confidential applicant and participant information is any information about an applicant or participant, whether it is obtained from the applicant or participant, another source, or generated as a result of a WIC application, certification, or participation, that individually identifies an applicant and/or family member(s). Applicant or participant information is confidential, regardless of the original source and exclusive of previously applicable confidentiality provided in accordance with other federal, state, or local law.

- 1. The local agency shall restrict the use and disclosure of confidential applicant and participant information to persons directly connected with the administration or enforcement of the WIC Program whom the state agency determines to have a need to know the information for WIC Program purposes. These persons may include, but are not limited to:
 - a. Personnel from its local agencies and other WIC state or local agencies;
 - b. Persons under contract with the state agency to perform research regarding the WIC Program;
 - c. Persons investigating or prosecuting WIC Program violations under federal, state, or local law; and
 - d. Representatives of the United State Department of Agriculture and the Comptroller General of the United States to inspect, audit, and copy. Any reports or other documents resulting from the examination of such records that are publicly released may not include confidential applicant or participant information.

2. Non-WIC Purposes

The local agency that wishes to disclose confidential applicant and participant information to public organizations to use in the administration of other programs that serve persons eligible for the WIC Program shall:

- a. Obtain prior approval from the state agency in accordance with the MDH Data Use policy 01.06.01;
- b. Notify the applicant or participant at the time of application or through subsequent notice that the MDH Secretary, or his designee, has authorized the use and disclosure of information about their participation in the WIC Program for non-WIC purposes. The statement must also indicate that such information will be used only by state and local WIC agencies and public organizations only in the administration of their

programs that serve persons eligible for the WIC Program; and

- c. Enter into a written agreement with the other public organization, The written agreement shall:
 - i. Specify that the receiving organization may use the confidential applicant and participant information only for:
 - Establishing the eligibility of WIC applicants or participants for the programs that the organization administers;
 - Conducting outreach to WIC applicants and participants for such programs;
 - Enhancing the health, education, or well-being of WIC applicants or participants who are currently enrolled in such programs, including the reporting of known or suspected child abuse or neglect that is not otherwise required by state law;
 - Streamlining administrative procedures in order to minimize burdens on staff, applicants, or participants in either the receiving program or the WIC Program; and/or
 - Assessing and evaluating the responsiveness of a state's health system to participants' health care needs and health care outcomes.
 - ii. Contain the receiving organization's assurance that it will not use the information for any other purpose or disclose the information to a third party.

3. Child Abuse and Neglect

Local agencies who are required by state law to report known or suspected child abuse or neglect shall disclose confidential applicant and participant information without the consent of the applicant or participant to the extent necessary to comply with such law.

4. Release Forms

Except in the cases of subpoenas or search warrants, (as described in #6. below) the local agency shall disclose confidential applicant and participant information to individuals or entities not listed in this section only if the affected applicant or participant signs a release form authorizing the disclosure and specifying the parties to which the information may be disclosed. The local agency must permit applicants and participants to refuse to sign the release form and must notify the applicants and participants that signing the form is not a condition of eligibility and refusing to sign the form will not affect the applicant's or participant's application or participation in the WIC Program. Release forms authorizing disclosure to private physicians or other health care providers may be included as part of the WIC application or certification process. All other requests

for applicants or participants to sign voluntary release forms must occur after the application and certification process is completed.

5. Access to Information by Applicants and Participants

The local agency shall provide applicants and participants access to all information they have provided to the WIC Program. In the case of an applicant or participant who is an infant or child, access may be provided to the caregiver of the infant or child, assuming that any issues regarding custody or guardianship have been settled. However, the local agency need not provide the applicant or participant (or caregiver of an infant or child) access to any other information in the file or record such as documentation of income provided by third parties and staff assessments of the participant's condition or behavior, unless required by federal, state, or local law or policy or unless the information supports a state or local agency decision being appealed.

6. Subpoenas and Search Warrants.

The local agency shall disclose confidential applicant or participant information pursuant to a valid subpoena or search warrant. Upon receiving the subpoena or search warrant, the local agency shall immediately notify the state agency by telephone and electronically transmit the subpoena or other documentation to the state agency. The state agency shall consult with legal counsel who will determine whether the information can be disclosed.

7. USDA and Comptroller General

The local agency shall provide the United States Department of Agriculture and the Comptroller General of the United States access to all WIC Program records, including confidential applicant and participant information.

8. WIC Applicant/Participant Request for Release of Information to a Third Party

An applicant/participant or the caregiver of an infant or child participant must submit a signed request to the local agency for the release of information to be sent to a specific third party or organization, i.e., a health care provider. Each local agency shall use the consent for release of information approved by their local health department or use the sample Consent for Release of Participant Information (Attachment 7.70A).

9. Release of Information to Other State WIC Agencies

The local agency shall release information to WIC agencies in other states for certification verification for the transfer of participants and/or to prevent and detect dual participation.

Local agency staff shall:

a. Provide information via telephone, secure electronic transfer, or mail as requested by the other state without a release signed by the WIC participant or the caregiver of an infant or child participant. Information provided will be limited to the information contained on a VOC.

- b. Document the name and contact information of the person requesting the information. Local agency staff may return a call to the requesting agency prior to releasing the information if there is any doubt that it is not a WIC agency.
- c. Request that any unused Maryland food instruments be destroyed or returned to the WIC agency.
- d. Terminate the WIC participant when such information is requested from another state agency.
- e. Upon detection of dual participation, terminate the participant from one of the WIC Programs.
- 10. Consent to Use Applicant/Participant Photograph in WIC Program Materials

The local agency staff shall have the applicant/participant or the caregiver of an infant or child participant sign the consent form (Attachment 7.70B) that will allow the WIC Program to produce, reproduce, display, advertise, loan, or otherwise distribute, any and all photographs, films, television productions or other media made by or for the WIC Program, in the public interest, without limitation or reservation.

B. Procedure

The local agency shall abide by the Policy listed above.

Reference: **•** 7 CFR 246.25(a)(4)

■ 7 CFR 246.26(d)

MDH Data Use Policy 01.06.01

Attachments:

7.70A Consent for Release of Participant Information

7.70B Media Consent Release

Revisions:

12/2012	Added B8-B10 and 7.70A & 7.70B
10/2015	Modified B10 and 7.70B from "any or all" to "any and all"
04/2023	Updated attachment B to new consent release from MDH; replaced DHMH with
	MDH; added reference to MDH policy 01.06.01

Revisions: 12/1/12 Added B8 – B10 and 7.70A & 7.70B.

10/1/15 Modified B10 and 7.70B from "any or all" to "any and all."

Maryland WIC Program Request for Release of Information

I hereby agree that theconcerning:	_ WIC Program may release information
Name:	WIC ID Number:
Name:	WIC ID Number:
Name:	WIC ID Number:
and send this information to:	
Name:	Organization:
Telephone:	Fax:
E-mail:	
Signed:(Participant/Authorized Repre	Date:sentative)
Print Name:	
Current Telephone Number:	
Local Agency Use:	
Information sent by:	Date:
Recorded in WOW on:	

Attachment 7.70A Page 1 of 1



MEDIA CONSENT RELEASE

Named Person:			
Minor Under Age 18 (check one):	Yes	No	
Project:			
I hereby give to the Maryland Departme copy, exhibit, distribute, or publish in pr including on the World Wide Web, this r Department of Health's activities, witho any compensation for the use of this me	rint, via digital platfor material to promote t out limitation or reser	ms, or via video/audio-recorded the above Project and the Maryl	productions, and
This is a full release of all claims whatsoe hereafter have against the State of Mary to any use that may be made by them or productions, or other media.	yland, Maryland Depa	artment of Health, or its employ	ees, in regard
I have read this entire document, undersconditions.	stand the contents, a	and I have willingly agreed to the	above
PLEASE SIGN ON THE APPROPRIATE LINE	Ε.		
Named Person's Signature and Email Ad	ldress		
Parent or Guardian Signature and Email	Address (if Named P	erson is a Minor Under Age 18)	
Witness	 Date		

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.80 Effective Date: March 3, 1992 Revised: February 5, 2019

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Local Agency Self Monitoring and Review

A. Policy

The local agency shall establish a self evaluation system to review and monitor their operations and those of associated clinics or contractors.

B. Procedure

- 1. The local agency shall review its operations periodically, and at least annually, to determine if local policies and procedures correspond to the Maryland State WIC Program Local Agency Policy and Procedure manual. At a minimum, this evaluation shall include:
 - a. A review of certification procedures
 - b. A sample record audit of at least one percent of participant records
- 2. A local agency may develop self-evaluation tools or use the tools developed by the State Agency (Attachments 7.80A, 7.80B). Tools developed by a local agency must include the minimum standards contained in the State-developed tools.
- 3. Records of self-evaluations shall be maintained by the local agency. Two years of review shall be submitted with Pre Management Evaluation Questionnaire during scheduled Management Evaluation.

Attachment(s):

7.80A Local Agency Certification Self Review Tool

7.80B Program Operation Self Review Tool

Reference:

Federal Regulations 7 CFR 246.19 (b) (6)

Revisions:

1/11 Updated Attachment 7.80A

6/17 Removed B.1.c. audit note needed with eWIC implementation. Updated

7.80A and 7.80B. Replaced references to checks with food instruments. Removed monitoring activities related to checks.

02/19 Revised B.3. to include two years of review shall be submitted with Pre Management Evaluation Questionnaire during scheduled Management Evaluation.

Local Agency Certification Self-Review Tool

Staff Person/Title:	Date:_				
Participant ID Number:		ry /	Age:		
Start Time: End Time: Reviewer					
Paguired partification information: Pata Councelor on who	thar tar	ماد ام	00 m	ploted appropriately	
Required certification information: Rate Counselor on whe			N/A		
Continuity of Care		1.4	IN/A	Comments	
Reviewed notes / alerts / goals from previous visit					
Establishing Rapport		1			
Staff Introduced self / clinic procedures explained					
Displayed understanding for other culture					
Focused on client when translator used					
Ensured Privacy (low voice – close door at client request)					
Offered help when needed (books, toys for child, room to BF etc)					
Used appropriate non-verbal communication					
Used respectful language					
Pre-Cert / Family / Participant Information (spelling, in	forma	tion	verif	ied and documented)	
Name, Phone number, Street/Mailing address, Birth date, Family size					
Income verified – Foster Care status documented if applicable					
Voter registration status, internet access status					
Proxy options explained / "Right to sign R&R" box "checked" if needed					
Proof of Identity					
Adjunct Eligibility					
Race / Ethnic Background / Asked about participation in other assistan	ice				
programs (was purpose of these questions explained)					
Proof of Pregnancy if applicable					
Mother's ID documented on infant screen if BF / completed BF intake					
Cert Action / Rights and Responsibilities					
Correct Category / Cert Reason / Cert Period assigned and explained					
Information on WIC Folder reviewed (if used by local agency)					
Immunization Screen updated – R&R signed at appropriate location					
R&R explained / Client given an opportunity to read – ask questions					
R&R signed correctly by certifier and participant					
Complaint and Fair Hearing Processes reviewed					
Food Prescription / Follow up Appointment / Benefit Is	ssuanc	е			
Appropriate schedule day / clinic confirmed					
Authorized Food List explained / clarified					
Food package assigned appropriate for category / preference					
Explain Shopping List/authorized foods					
Appropriate next appointment scheduled					
For new applicants – explain how to use eWIC card					
Assessment / Nutrition Education					
Height, weight, hemoglobin performed according to P&P					
Infection control procedures followed					
Lead Screening question asked – clarified response if needed					
Appropriate risk factors assigned					
High Risk Referral completed / procedure followed					

Attachment 7.80A Page 1 of 2

Skills checklist – Rate Counselor on a scale of 1-3 on how well each skill is performed Note: Staff is not expected to use every skill with every client – check only those that apply

1 = Needs practice 2 = Meets Objective 3 = Excelle	ent Job	1	2	3	Comments
Assessment / Nutrition Education (continued)					
Reviewed client's medical screen and health history information	– asked				
probing questions to clarify responses					
Avoided spending extensive time on irrelevant information					
Shared findings (Ht/Wt/Iron) in a non-judgmental manner					
Asked open-ended questions to explore client's concerns					
Listened actively and allowed for silence					
Asked about / validated clients concerns / met need					
Maintained focus on desired health (ie healthy pregnancy, activ	e family)				
Used Nutrition Basics info / visual aides to start and guide conve	ersation				
Identified and acknowledged clients strengths (positive behavio	rs)				
Attempted to foster discussion based on risk factors if nothing o	ffered by				
client - Provided simple, accurate nutrition message if client rec	eptive				
Limited number of nutrition messages given to client per session	n				
Tailored message based on client's age, gender, culture and fe	edback				
Provided handouts to reinforce nutrition message – topics of interest	pointed out				
(don't forget - iron, lead, breastfeeding, formula prep, tooth decay)					
Completed comprehensive assessment prior to providing nutrition ed	ucation				
Referrals / Setting Goals / Closure					
Referred clients to outside sources when needed (DSS, food ba					
Worked with client to identify problem behaviors and ideas for c	hange				
Summarized conversation					
Helped client set goal(s) that is specific & realistic for the family					
Documented goals / nutrition topics on the Nutrition Ed screen of	of WOW				
Restated goal and checked for understanding					
Expressed appreciation for clients time					
Was enthusiastic about following up at next visit					
Documented notes / alerts appropriately					
Follow up with staff member					
Parent's / Caregiver's Primary Concern:	Assigned F	Risk	Fact	ors:	
Nutrition Topics discussed:					
Suggestions / Feedback / Discussion					
Sample questions"Tell me about your rational for the Nutrition Education topics you discussed"					
"Tell me how you assessed the clients read	iness for ch	ange	9"		

Developed by Washington County WIC Program

Attachment 7.80A Page 2 of 2

Program Evaluation Sample Self-Review Tool

I. General Administration

Commu	<u>unication</u>
	Staff meetings held monthly
	Last staff meeting held
	Minutes kept Attendance recorded
	Opportunity is provided at the staff meeting to learn new skills, as well
	as discuss and/or resolving current issues.
	Follow up contacts are made with staff after new material is presented to
	ensure implementation.
	Local agency policies/procedures are consistent with the State Plan and
	Federal Regulations.
	There is a written plan for training staff that includes local and state
	policies and procedures.
	Staff telephone responses to callers are positive and complete.
Staff Sa	atisfaction_
	Staff given opportunity to express work related needs in staff meeting or
	private conference.
Client S	Satisfaction
	Routine survey of participant to identify WIC related problems.
	Participant problems are quickly resolved.
	Current unresolved issues are
Outroo	a h
<u>Outrea</u>	
	Continuing process throughout the year.
	Log of outreach contacts maintained.
	The most recent outreach effort was
Caselo	
	Caseload maintained within 5% of allotment.
Civil Ri	ghts
	Yearly civil rights training documented.
	Last civil rights training held
II.	Financial
	ntability
	Receipt of food instruments verified and entered into management
	information system.
	All food instruments accounted for and monthly inventory completed.

	All food instruments are stored in secure manner at all times.
	Data processing equipment kept free of dust, food and drink.
Record	Reeping Participant and financial records kept according to State policy. Fair hearing requests/actions filed and logged by year. Inventory of WIC owned property current.
Report	Second State
Budget	Monitored monthly to track expenditures. Time studies to support Nutrition Education expenditures completed quarterly. Last time study completed
III. 	Nutrition Education All WIC participants have opportunity for required contact 1 and contact 2. Education related to participant's risk. Professional and paraprofessionals given frequent opportunities to update their skills. The parent/caregiver of participants certified for one year receive four nutrition education contacts. High risk referral plan utilized. Participants or caregivers are provided education materials and/or referrals related to their needs. Risk code and food package assignment consistently meet standards. Nutrition Education plan is followed as designed.
Certific	Certification staff observed at least annually to verify that certification standards are met. (See Attachment 7.80A Local Agency Certification Self-Review Tool) Standards defined by Maryland paraprofessional training program are consistently met. Certification time frames meet State and federal standards.
IV.	Program Operation and Compliance
Vendor	Relations Informal vendor visits occur to foster communication and problem resolution. Vendors monitored regularly. Results of monitor visit maintained in log. Vendor problems resolved quickly. Current vendor problems that are not resolved are

	Ongoing random reviews of vendor files are conducted documented.	and
Benefit	it Utilization	
	Benefitsredeemed appropriately on monitoring visit.	
	Participant reported redemption problems resolved quic	kly.
Security	it <u>y</u>	
	Data Processing equipment is secured against theft and use.	d unauthorized
	Computer access is restricted to authorized personnel buse of passwords.	y appropriate
	Telephone numbers (for modems), passwords, security related items are restricted to authorized personnel.	keys and
	Backups of WIC data are performed on a regular basis safe, secure location.	and stored in a
	Logs are maintained to track the location and movement Processing equipment.	of Data
Comme	nents:	
_		
Coordina	nator: Date completed:_	·

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.81 Effective Date: October 1, 1990 Revised Date: July 31, 2023

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: State Monitoring and Review of Local Agency

A. Policy

The state agency shall conduct an evaluation of each local agency at least once every two years to determine compliance with the Local Agency Policies and Procedures. The evaluation shall include reviews of management, certification, nutrition education, participant services, civil rights compliance, accountability, financial management systems, food and delivery systems, Farmers' Market Nutrition Program (FMNP) and participant files.

B. Procedure

1. The State Office shall:

- a. Notify the local agency coordinator electronically of the management evaluation 60 calendar days prior to their scheduled management evaluation month. The notification shall include a questionnaire (Attachment 7.81A), Financial Documentation Requests, Inventory Workbook, Information Technology Inventory Sheet and request for local agency self-monitoring review documents from the last two years (Policy and Procedure 7.80).
 - The notification may include instructions for the local agency to send copies of reports and/or materials with the completed questionnaire.
- Contact the local agency coordinator and schedule dates and locations for on-site visits to the local agency WIC clinics and the administrative office.
- c. Utilize Management Evaluation Review Form Cycle 1 (Attachment 7.81B) or Management Evaluation Review Form Cycle 2 (Attachment 7.81C). Both forms evaluate each functional area of local agency operations but each form focuses on different aspects of local agency

- operations. The forms will be used in alternate local agency evaluations.
- d. Conduct an exit interview with the local agency coordinator to review any findings and observations made during the evaluation.
- e. Provide a written report to the administrative head of the local agency within 6 months of the initial management evaluation letter.
- f. Respond to the corrective action plan submitted by the local agency within 30 calendar days after receipt.
- g. Conduct, if necessary, a follow up review within 6 months after approval of the corrective action plan to ensure that corrective action measures are implemented.
- h. Provide written notification of closure of the review.

2. The Local Agency shall:

- a. Submit the completed questionnaire and any requested materials to the state agency 30 calendar days prior to the scheduled management evaluation month.
- b. Permit state agency evaluators to conduct on-site reviews of a minimum of 20 percent of the clinics in each local agency.
- c. Permit state agency evaluators to observe local agency staff determining an applicant's eligibility and providing Program benefits including secondary nutrition education.
- d. Locate any documents that the state agency evaluators need to review.
- e. Submit a corrective action plan, including implementation timeframes, within 60 days of receipt of the state agency report, when such report contains a finding of noncompliance.

Attachments:

- 7.81 A Pre Management Evaluation Questionnaire
- 7.81 B Management Evaluation Review Form Cycle 1
- 7.81 C Management Evaluation Review Form Cycle 2

Reference:

Revisions:

10/06 Attachment 7.81B- Revised Management Evaluation Forms

10/07 Attachments 7.81 A, B, C, and E

10/10 Attachment 7.81 A-number 5 removed reference to 'module' and changed to Competency Checklists.

Attachment 7.81B-number 38 added "reference materials available."

Attachment 7.81C-Changed to records value correctly removed reference to length/height/weight, number 38 added 'completed' incorporated area to list primary concern of participant, assigned risk factors, nutrition topics discussed and feedback section.

7.81E Removed references to Building on Basics, Nutrition Basics, Breastfeeding Basics and replaced with WIC WISE II, Competency Checklist completed, Grow & Glow, Nutritionists Meeting & Breastfeeding Meeting Attendance.

Revised Attachment 7.81G.

Added Attachments 7.81H trough N.

Added "including the Farmers' Market Nutrition Program (FMNP) policy and procedures." In section B.1.f.

Changed attachments in Section B.2.b to read "Attachments 7.81B-N." Added Reference 246.19(b)(1) - (4)

10/11 Revised Attachment C to delete digital scale, converts fractions of pounds correctly as needed, changed edges to both flat sides, reworded cleans work area and if blood spills occur following OSHA/MOSH guidelines, deleted uses WFP brochure and replaced with Uses Authorized Foods List at initial certification or as needed, added Peer Counselor Referral form completed by participant (if applicable), added provides breastfeeding support (if applicable), added using participant focused counseling, added initially certified and or as need, added nutrition and breastfeeding.

Attachment D - Added to title Breastfeeding, added in WOW to last statement on page 2.

Added Attachments P & Q

- 10/12 Revised Attachment 7.81G Financial Management.
- 10/14 Revised policy to reflect new review process; deleted all attachments, added new 7.81A, 7.81B and 7.81C.
- 1/18 Revised Attachment 7.81A, 7.81B and 7.81C to reflect eWIC policy changes.

- 02/19 Revised B.1.a. to include Financial Documentation Requests, Inventory Workbook, Information Technology Inventory Sheet and request for the most recent local agency self-monitoring review documents in local agency management evaluation notification. Revised B.1.e. to provide written report within 6 months of the initial management evaluation letter. Updated 7.81A, 7.81B and 7.81C to include clarifying language for monitoring of voiding and over-issuance of food benefits, monitoring of authorized vendors, ten required Civil Rights compliance areas, emergency procedure plan, separation of duties, and competency checklists.
- 08/21: Revised 7.81A to add 2.11 Maintain record of participants issued ineligibility/termination notices and documentation and 2.39 Updates all referral data in MIS at least annually. Policy 5.05 removed as this policy merged with policy 2.39.

Revised 7.81B and 7.81C to add 4.28, reminds participants that any unused formula should be returned and that it may not be sold or given away, added requirement to submit 4.16A Maryland Quarterly Vendor Monitoring Logs, added 6.00, any expenditure charged to a WIC grant must be traceable to source documentation and each WIC local agency must maintain an accounting system and separate records relating to the WIC grant which conform to all state and federal regulations as well as generally accepted accounting principles. Revised 7.81C to add submission of Attachment 8.00D Monthly FMNP Distribution Reporting Form.

Format change was made to 7.81A, 7.81B, and 7.81C.

07/23 Added Breastfeeding Services Questionnaire to 7.81A. Cost per item was updated to \$8.00 on page 30 of 7.81B and on page 31 of 7.81C (policy reference 6.05).

			Policy Met			
Unit	P&P#	Management Evaluation Question	Yes	No	N/A	Comments
Program Support	1.00	Provides documentation showing the State reviewed and				
		approved outreach materials developed by Local Agency staff.				
Program Support	1.10	Provides documentation showing consultation with local				
		Health Department or parent agency for guidance prior to				
		creating social media account(s).				
Program Support	1.10	Contacts the State Office prior to the establishment of account(s).				
Program Support	1.10	Establishes both an Account Administrator and Content				
		Moderator for social media account(s).				
Program Support	1.10A	Does not use private messaging between the local agency				
		account holder and the public.				
Nutrition	2.03	Maintains a list of the names, addresses, and telephone				
		numbers by date and by priority of all applicants who are wait				
		listed after they are certified.				
Nutrition	2.03	Contacts the individuals on the waiting list by priority and				
		date order, schedules appointments for those applicants who				
		telephoned and issues benefits to those who were certified and placed on the waiting list.				
Nutrition	2.11	Maintains a record of participants issued an				
Nutrition	2.11	ineligibility/termination notice and any associated	Ш			
		documentation of why they were ineligible.				
Nutrition	2.11	Documents participants who requested a Fair Hearing before				
Natrition	2.11	the date entered on Ineligibility Notice and continues to				
		provide WIC benefits until the Hearing officer reaches a				
		decision or the certification period expires, whichever occurs				
		first.				
Nutrition	2.18	Maintains files of the required documents for a period of 3				
		1/2 years.	_			
Nutrition	2.21	Determines and documents that the institutions such as a				
		homeless facility meets WIC requirements.				
Nutrition	2.21	Documents that homeless facilities are contacted every 6				
		months to ensure continued compliance and requests				
		homeless facility notify the local agency if it ceases to meet				
		any of these conditions.				

Nutrition	2.25	Provides regular, visible means for collecting voter registration applications.		
Nutrition	2.39	Updates all referral data in the MIS at least annually. Refers all applicants to mandatory programs. Provides a copy of Local Agency referral guide to State, if applicable.		
Nutrition	3.05	Inventories and tracks returned formula properly.		
Nutrition	3.05	Documents donated formula at least one-month prior to expiration to designated organizations.		
Vendor	4.05	Voids food benefits in the WIC information system using one of the pre-established void reasons.		
Vendor	4.10	Follows procedures to document the over-issuance of food benefits in the WIC information system by selecting appropriate over-issuance reason when reissuing benefits for the current issue month.		
Vendor	4.16	Conducts on-site monitoring visits to at least 10 percent of its authorized food vendors annually on a representative basis according to instructions in attachment 4.16B.		
Nutrition	5.02	Documents refusals of a participant or a participant's caregiver, to attend or participate in nutrition education in the participant's WOW record.		
Nutrition	5.02	Conducts and provides an annual assessment of participant views concerning the effectiveness of secondary nutrition education.		
Nutrition	5.03	Develops process for staff to routinely monitor the status of high risk participants.		
Breastfeeding	5.09	Designates Local Agency Breastfeeding Coordinator who is a CPA with breastfeeding expertise.		
Breastfeeding	5.09	Disseminates breastfeeding promotion information to and from the State Agency.		
Breastfeeding	5.09	Assists with training in breastfeeding promotion and support for local agency and local health department staff.		
Breastfeeding	5.09	Establishes and utilizes a referral system with other health professionals within the health department and community to provide support to breastfeeding women.		
Breastfeeding	5.11	Calls participant if Hospital-Grade Electric Pump is not returned in 1 month. If an extension is requested, documents		

		in participant's WOW record. Follows procedure if unable to		
Breastfeeding	5.11	reach participant by phone. Cleans returned breast pump motors and outer casing each		
breastreeding	3.11	time the motor is returned.		
Breastfeeding	5.11	Checks to assure each hospital-grade electric pump is functioning properly.		
Breastfeeding	5.12	Insures that staff members who give out breastfeeding aids are trained in their appropriate use and are able to effectively educate participants on the proper use of the breastfeeding aids.		
Breastfeeding	5.13	Designates peer counselor coordinator, if local agency has peer counselor program.		
Breastfeeding	5.13	Recruits and hires peer counselors based on job descriptions developed by the State Agency.		
Breastfeeding	5.13	Trains peer counselors using the Maryland WIC Peer Counselor Training Program prior to independent contact with WIC participants.		
Breastfeeding	5.13	Works outside of the local agency WIC clinic or business hours as requested by local agency for peer counselor programs.		
Breastfeeding	5.13	Partners with community resources to extend breastfeeding support beyond the WIC clinic. Peer counselor programs should also network with community lactation consultants.		
Breastfeeding	5.15	Meets with each employee within *two months after each employee completes Grow and Glow, Part 2, to discuss what breastfeeding support roles each sees the employee taking on. (Local Agency Breastfeeding Coordinator or her designee, the Breastfeeding Peer Counselor Coordinator or other staff IBCLC)		
Financial	7.00	Signs annual Civil Rights assurance agreement with condition of award.		
Program Support	7.00	Prints the appropriate nondiscrimination statement on all WIC-related materials that are disseminated to applicants, participants, outreach/referral contacts, and the general public (leaflets, brochures, bulletins, news media PSAs, application forms, nutrition education materials).		

Training Center	7.00	Reviews and monitors activities to ensure compliance with nondiscrimination laws and regulations and allows the State to do the same. Quickly resolves any areas of noncompliance.		
Program Support	7.00	Collects and reports racial and ethnic data.		
Training Center	7.02	Provides interpreter services free of charge to the participant.		
Financial	7.02	Submits annual LEP Report every SFY.		
Program Support	7.10	Develops a written emergency procedures plan.		
IT	7.41	Maintains a file of IRMA Policy Acknowledgement forms for all staff. Presents security awareness training and maintain appropriate documentation.		
Training Center/Nutrition	7.60	Ensures that CPPAs do not perform CPA duties.		
Nutrition	7.62	Installs, maintains, and checks for accuracy of equipment according to the manufacturer's specifications. Trains staff on the use and maintenance of the equipment (scales and stadiometer).		
Nutrition	7.64	Makes available protective gear such as aprons, lab coats and protective eyewear for staff that request it.		
Nutrition	7.64	Maintains a standing order to perform hemoglobin checks, a letter of permit exception and a current CLIA waiver		
Nutrition	7.64	Keeps a written copy of the LA infection control procedures in the clinic.		
Program Support	7.65	Has at least one, but no more than two, staff person(s) with access to online ordering.		
Training Center	7.66	Requires the review of the records for all certifications completed by a staff member who has not completed the paraprofessional/professional training.		
Program Support	7.70	Receives signed consent to use applicant/participant photos for WIC materials.		

Program Support	7.70	Receives signed consent to use applicant/participant letter, electronic mail, voice mail or other social media for WIC materials.		
Nutrition	7.80	Reviews operations at least annually including certification procedures and participant record audit.		
Nutrition	7.82	If separation of duties is not possible on an ongoing basis, completes record review of all non-exclusive breastfeeding infants and 20% of the remaining records within two weeks of certification.		
Nutrition	7.82	If local agency allows one person to perform all eligibility and certification functions, additional record reviews of 10% of each clinics certification records are conducted every 6 months.		

Breastfeeding Services Questionnaire

1.	Does the Local Agency have a Peer Counseling Program?
	i. Who supervises the peer counselors?
	ii. Who at your agency has received the USDA Loving Support in Peer Counselor Management Training? Give names and dates completed for each person.
2.	Do you conduct an annual assessment to determine:
	a. Needs regarding breastfeeding? \square Yes \square No
	b. Where gaps exist in breastfeeding services within your local agency and/or community and how they can be addressed?
	☐ Yes ☐ No
	c. Where improvements in your breastfeeding services are needed? \square Yes \square No
	Please explain what you are doing for any areas that you indicated 'yes'.

3.		er counselors addr	ess participan	ts' concerns	and needs outside of clinic hours, including how after-ho	ours
	referrals are made?					
	☐ Yes (attach policy)					
	□ No					
	☐ Not Applicable					
4.	Do you have opportunities for the following	staff to observe a	nd shadow de	signated bre	eastfeeding experts (DBEs) and experienced peer counsel	ors?
	a. Peer Counselors	☐ Yes	\square No	□ N/A	A	
	i. Who do they observe?	\square BFPCs	☐ BF Co	ordinator	☐ IBCLC/DBE	
	b. WIC non-PC staff		☐ Yes	\square No		
	i. Who do they observe?	☐ BFPCs	☐ BF Co	ordinator	☐ IBCLC/DBE	
5.	Do you routinely, through spot checks and/	or chart reviews:				
	a. Monitor Peer Counselors' work	☐ Yes	\square No	□ N/A	4	
	b. Monitor non-PC staff's Breastfeedi	ng advice	☐ Yes	\square No		
	c. Who does this monitoring?					
6.	Do you routinely observe newly trained sta	ff during contacts v	with participar	nts to provide	e guidance and affirmation?	
	a. Peer Counselors	☐ Yes	\square No	□ N/A	A	
	b. WIC non-PC staff		☐ Yes	\square No		
	c. Who does these observations?					
7.	Do you schedule routine meetings to discus	s case studies with	n Peer Counse	lors?		
	☐ Yes; Who conducts these meetings?	2				
	How often are these meetings held ☐ No N/A	ſ				
	□ NO N/A					
8.	Do you have a partnership with any non-W	C organizations or	groups to coll	laborate on s	supporting breastfeeding participants and improving	
	breastfeeding outcomes in your community	<i>ı</i> ?				
	☐ Yes; Explain:					
	_					
	□ No					
	□ N/A					

Audit Cycle: Cycle 1

On-Site

			Policy Met Select One		:	
Unit	P&P #	Management Evaluation Question	Yes	No	N/A	Comments
Program Support	1.00	Provides Outreach materials developed by Local Agency staff.				
Nutrition	2.02	Uses WOW information system or the manual certification form provided by the State agency to certify all applicants/participants.				
Nutrition	2.02	Advises the participant or the parent/legal guardian or designee of the participant's rights and responsibilities as outlined in Policy and Procedure 2.12 Participant's Rights and Responsibilities.				
Nutrition	2.02	Ensures that the staff, who verifies residency, income, identity and nutrition risk documents their review and approval of information provided by and/or obtained from the applicant to be certified as eligible for the WIC Program by entering their secure user login in the management information system or signing the manual certification form in the appropriate spaces.				
Nutrition	2.03	Explains why the applicant is being placed on the waiting list, the priority system, the operation of the waiting list and their right to a fair hearing. Advises client to contact the local agency should there be changes to the information collected to determine eligibility.				
Nutrition	2.04	Determines and documents applicant residency correctly.				
Nutrition	2.04	Uses the Confirmation of Residency form correctly.				

Nutrition	2.05	Determines income eligibility correctly.		
Nutrition	2.05	Documents proof of income correctly.		
Nutrition	2.05	Determines income for military personnel correctly per P&P 2.05E.		
Nutrition	2.05	Allows participants up to 30 days after certification to provide income documentation. If documentation is not provided by the end of the 30 day certification, the participant shall be terminated by the management information system. Participants may have their cert end date restored to the full certification period if documentation is provided before the 30 days has expired. Under no circumstances may a second, subsequent 30 day certification period be used if the applicant fails to provide the required documentation of income before the temporary certification period expires.		
Nutrition	2.05	Probes carefully asking the applicant who pays the rent and buys the food if an applicant claims to have no income. After verifying that the applicant does not have any income, collateral verification of their situation is required. Requests that the applicant complete the Collateral Verification Zero Income form attesting to the accuracy of the applicant's level of income.		
Nutrition	2.05	Allows VOC card to serve as documentation of income eligibility for transferring participants and for in-stream migrant farmworkers and their family members. If a VOC card reflects that a migrant farmworker's certification period		

		has expired, allows the VOC card to serve as income documentation if the VOC card reflects that an income determination was made within the past 12 months.		
Nutrition	2.05	Verifies an applicant's or a member of an applicant's family's current participation in Medical Assistance (Medical Care Programs) and Temporary Cash Assistance (TCA) and the Food Supplement Program (Independence cards).		
Nutrition	2.05	Documents proof and verification of adjunct eligibility.		
Nutrition	2.05	Documents foster child as family of one. Documents payments made by welfare agency or from any other source of care of the foster child as income for the foster child. Documents proof of adjunct eligibility from foster child if applicable.		
Nutrition	2.05	Documents income changes and method to assess income during a certification period.		
Nutrition	2.05	Re-evaluates the family income to determine if they are income eligible should they discontinue participating in one of the adjunct income eligible programs.		
Nutrition	2.05	Disqualifies all family members, if a participant is found to be income ineligible at a WIC appointment after their certification or recertification appointment based on the participant's adjunct income eligibility.		
Nutrition	2.06	Determines family size correctly.		
Nutrition	2.06	Documents family size increased by one or by the number of expected multiple births if the pregnant woman's family income exceeds the		

		Maryland Income Guidelines for the size of her family. In the case of multiple births, the pregnant woman must provide documentation of the number of multiple births from her doctor if her income eligibility is assessed using a family size increased by the number of expected multiple births.		
Nutrition	2.06	Counts an infant or child in the family size of the parent or caregiver with whom the infant or child resides.		
Nutrition	2.06	Counts an infant, child, or other family member who resides in a school or institution and the parent or caregiver continues to provide economic support.		
Nutrition	2.06	Counts foster child as family of one, if an infant or child is a foster child living with a family but remains the legal responsibility of a welfare or other agency.		
Nutrition	2.06	Counts an adopted child or any other person for whom a family member has accepted legal responsibility. That person is counted in the family size for that family if the person lives with the family or is in a school or institution paid by the family.		
Nutrition	2.06	Does not count a family providing shelter to a WIC applicant who is homeless in determining family size for the applicant.		
Nutrition	2.09	Issues food instrument to the applicant at the time of notification that they are eligible for the program.		
Nutrition	2.09	Advises ineligible applicant in writing within 10 to 20 calendar days of his status, the reason for the ineligibility, and his right to a fair hearing. Provides the applicant with the name, address and telephone number of emergency food assistance programs in the area.		

Nutrition	2.10	Explains appropriate certification period to applicant.		
Nutrition	2.10	Shortens or extends participant's certification period by not more than 30 days on a case-by-case basis if categorically eligible and sufficient appointment times to conduct a subsequent certification for a participant whose certification period was due to expire were not available.		
Nutrition	2.11	Documents that a person found ineligible for the Program at any time during the certification period was advised in writing 15 days before termination of eligibility of the reasons for ineligibility and of the right to a fair hearing.		
Nutrition	2.11	Reassesses a participant's income eligibility during the certification period if the local agency receives information indicating that the participant's household income had changed. However, such assessments are not required in cases where sufficient time does not exist to effect the change. Sufficient time means 90 days or less before the expiration of the certification period.		
Nutrition	2.11	Documents in alerts and files a copy if a Notice of a Fair Hearing form was used and given to the applicant/caregiver or designee.		
Nutrition	2.12	Provides applicant, legal guardians, or designees the opportunity to read or have read to them and electronically sign acknowledging acceptance of the Rights and Responsibilities. Provides a copy of the Participant Rights and Responsibilities.		
Nutrition	2.12	Completes the Residency & Income, Nutritional Information, and Nutritional Risk Eligible areas of the manual certification form.		

Nutrition	2.12	Signs form to signify who has completed each portion of the certification. If different persons complete the other areas, then those areas must contain a signature.		
Nutrition	2.13	Provides instructions on how to transfer to another local agency in the state when requested by participant.		
Nutrition	2.13	Transfers participants only when requested by the participant or parent or guardian.		
Nutrition	2.13	Follows in-state transfer procedures in the management information system.		
Nutrition	2.13	Updates family and participant data.		
Nutrition	2.13	Retrieves and destroys participant ID folder issued from the sending local agency and issues new ID folder (if used by the local agency).		
Nutrition	2.13	Issues benefits that are due to the participant(s).		
Nutrition	2.13	Schedules a follow up appointment.		
Nutrition	2.13	Issues VOC to all participants who state they may be moving during the certification period and to all migrants.		
Nutrition	2.13	Completes and signs the VOC according to instructions.		
Nutrition	2.13	Documents missing VOC in WOW and issues a new VOC.		
Nutrition	2.13	Enrolls the participant with a VOC if the local agency has a waiting list and can enroll some participants regardless of the participant(s) category. If the local agency has a waiting list,		

		tells the participant that they cannot be enrolled at this time but will be placed at the top of the list regardless of their category.		
Nutrition	2.13	Accepts all VOC and, if needed, contacts the original agency for missing or what appears to be altered information.		
Nutrition	2.13	Accepts all nutrition risk conditions from the other WIC program for the duration of the certification period for participant(s) with VOC.		
Nutrition	2.13	Retrieves and destroys the ID folder from the sending local agency and issues a new ID folder for participant(s) with VOC (if used by the local agency).		
Nutrition	2.13	Issues food instrument. Issues/prorates replacement benefits for the period in accordance with benefit issuance policy for participants with VOC.		
Nutrition	2.13	Conducts a new certification if the certification period stated on the VOC has expired.		
Nutrition	2.13	Follows the appropriate procedures for either the In-State Transfer or Out-of-State Transfer when accepting a VOC from a migrant.		
Nutrition	2.16	Sees all applicants physically for program services at the time of certification (unless a health care provider individually certifies that such action will be detrimental to the physical well being of the applicant).		
Nutrition	2.16	Arranges an alternate method of certification, the certification may be completed by using information provided by the health care provider as long as it meets the regulatory requirements of not being more than 60 days old for heights and weights and 90 days for bloodwork and is obtained while the applicant is in the same participant category.		

Nutrition	2.16	Stresses the positive long-term benefits of WIC nutrition services and encourages the participant to attend and participate in scheduled mid-certification appointment for nutrition assessment and education.		
Nutrition	2.16	Documents actions taken by the local agency that differed from the required certification/mid-certification procedures in the participant's record.		
Nutrition	2.17	Issues VOC to participants who are affiliated with military and who will be transferred overseas.		
Nutrition	2.17	Accepts valid WIC Overseas Program VOC.		
Nutrition	2.19	Explains format of Identification Folder (if used by local agency).		
Nutrition	2.19	Validates and stamps ID Folder with local agency/county code, the WIC symbol, and phone number (if used by local agency).		
Nutrition	2.19	Completes ID folder per Policy 2.19 (if used by local agency).		
Nutrition	2.20	Asks at the initial certification if the client would like to choose one or two persons designated as a proxy.		
Nutrition	2.20	Enters the name(s) of the proxy (ies), if requested, in participant's record.		
Nutrition	2.20	Asks the participant/parent or caregiver at the initial certification if they would like to authorize one or both of the proxies to serve as a designee and correctly enters proxy/designees information in the participant's record.		

Nutrition	2.20	Confirms participants WIC ID folder at class pick up (if applicable).		
Nutrition	2.20	Provides a participant/parent or caregiver the opportunity to change a proxy/designee.		
Nutrition	2.21	Identifies "homeless individual".		
Nutrition	2.21	Assures Confirmation of Residency form is completed.		
Nutrition	2.21	Assesses income eligibility as outlined in P & P 2.05 for homeless individual.		
Nutrition	2.21	Assesses nutritional risk as outlined in P & P 2.31 for homeless individual.		
Nutrition	2.21	Prescribes special food packages for the homeless.		
Nutrition	2.21	Provides specific education concerning the use and the storage of foods offered in addition to other topics.		
Nutrition	2.21	Refers homeless applicants and participants to appropriate health and human services agencies.		
Nutrition	2.23	Requires and documents that all applicants provide proof of identity using acceptable proof of an applicant's identity.		
Nutrition	2.23	Uses the Proof of Identity Affidavit Form as acceptable proof on income under specific circumstances which would include the homeless, victims of fire or theft, illegal aliens, or teenagers who were put out of their homes.		
Nutrition	2.23	Enters "No Proof" in the Proof of Identity field if an applicant does not provide proof of identity.		

Nutrition	2.24	Changes participant's category according to the established WOW procedures.		
Nutrition	2.24	Asks the applicant to provide proof of pregnancy, if pregnancy is not obvious per policy.		
Nutrition	2.25	Provides all individuals applying for WIC Program benefits or the parent/caregiver of individuals applying for WIC Program benefits an opportunity to register to vote at each certification and recertification visit. Provides assistance to other individuals who express an interest in registering to vote.		
Nutrition	2.25	Gives the individual the voter registration application and provides assistance to those individuals who would like help in completing the registration application.		
Nutrition	2.25	Asks the individual if he/she would like the WIC Office to mail the completed voter registration card to the local election board.		
Nutrition	2.27	Asks the parent, legal guardian or designee to bring a documented immunization record to the visit when scheduling a certification appointment for an infant or child under age 2. Explains that this is not required for application to the program but the information is important for the health assessment.		
Nutrition	2.27	Documents whether or not a documented immunization record was brought to the clinic and the dates DTaP immunizations were received on the WOW Immunization screen.		
Nutrition	2.27	Selects "illegible" from the dropdown under the "Special" column on the WOW Immunization screen when appropriate. Asks the caregiver to		

-		request that the health care provider clarify the dates.		
Nutrition	2.28	Asks the parent, caregiver, or designee if the child has had a blood test for lead and documents the response on the WOW medical screen.		
Nutrition	2.28	Explains importance of a blood test for lead and provides written information about lead poisoning.		
Nutrition	2.28	Encourages caregiver to ask about blood test for lead at the child's next health care appointment, if the response is "no" or "don't know".		
Nutrition	2.28	Documents blood lead test result, if known, on the WOW medical screen.		
Nutrition	2.31	Reviews risk factors assigned by WOW to ensure that they are correct. Removes and documents incorrect risk factors when appropriate. Re-enters assessment data related to incorrect risk factors if necessary.		
Nutrition	2.31	Identifies and documents all applicable risk factors on manual certification form when performing a manual certification.		
Nutrition	2.31	Assigns additional risk factors manually as appropriate.		
Nutrition	2.32	Measures weight of infants according to P&P 2.32A.		
Nutrition	2.32	Measures length of infants according to P&P 2.32A.		
Nutrition	2.32	Measures weight and height/length of women/children or obtains measurements from HCP within 60 days prior to date of visit.		

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Nutrition	2.32	Documents measurements provided by HCP as a comment on the medical screen in WOW and enters the date they were taken in the date field.		
Nutrition	2.32	Interprets data correctly using growth charts, prenatal weight gain grids, identified risk factors.		
Nutrition	2.33	Performs hemoglobin test at the time of certification.		
Nutrition	2.33	Obtains and documents results from HCP within 90 days of the certification date.		
Nutrition	2.33	Performs/obtains blood test according to the established schedule for each participant category and, for children, as appropriate based on the previous test result.		
Nutrition	2.33	Installs and maintains equipment according to manufacturer's specifications and provides staff training on the use and maintenance of the equipment.		
Nutrition	2.33	Considers relevant assessment information before deciding upon the intervention when the risk factor for Low Hemoglobin/Hematocrit is identified.		
Nutrition	2.34	Enters nutrition/health information correctly into WOW, answering all questions on the Medical and Nutrition History screens.		
Nutrition	2.34	Provides appropriate nutrition intervention based on identified risk factors and participant concerns.		
Nutrition	2.34	Obtains complete nutrition history for each participant using paper nutrition history forms during manual certifications.		

Nutrition	2.35	Explains the purpose of the WIC Program is to promote desirable health outcomes through nutrition education, breastfeeding support, special supplemental foods, and referrals during critical times of growth and development.		
Nutrition	2.35	Communicates with open dialogue and two-way communication.		
Nutrition	2.35	Prescribes the WIC foods for the individual participant to help meet recommended nutrient needs and explains WIC foods are not intended to supply all of the daily requirements.		
Nutrition	2.35	Reassesses each participant at the end of the certification period for eligibility.		
Nutrition	2.38	Certifies infants under age 6 months, children, and breastfeeding women for one year and schedules a Mid-Certification visit approximately halfway through the certification.		
Nutrition	2.38	Explains the positive long-term benefits of WIC nutrition services and encourages the participant to attend mid-certification appointments for nutrition assessment and education. If the participant does not attend the appointment, provides benefits and attempts to schedule follow up appointment to collect anthropometric data. If follow-up cannot be scheduled, sends note to head of household to schedule follow up appointment or to request referral data from health care provider.		
Nutrition	3.05	Stores formula in a secure, safe place.		

Nutrition	3.05	Assists in transitioning an infant on a non-contract standard formula to the contract brand.		
Nutrition	3.05	Follows correct procedure for issuance of special formulas when an applicant's WIC appointment is delayed because of schedule availability.		
Nutrition	3.05	Follows correct procedure for issuance of special formulas to a breastfeeding mother required to temporarily stop breastfeeding.		
Nutrition	3.05	Documents signed receipt of issued formula to participants.		
Nutrition	4.12	Uses the instructional material provided by the State as it is, or adapts the contents for use in informing participants, guardians, and designees on the proper use of food instrument.		
Nutrition	4.12	Includes a list of all authorized WIC vendors located within the local agency's region or state wide as an addendum to these instructions.		
Nutrition	4.12	Distributes, discusses and reviews the instructional material as well as the agency's complaint procedure with each participant, guardian, and designee at certification time, as required by the participant sanction policy, and at any time thereafter deemed necessary.		
Nutrition	4.23	Informs applicants, participants, parents, caretakers, or designees program rights and responsibilities.		
Nutrition	4.28	Reminds participants when food package changes are made that involve infant formula, that any unused formula should be returned and that it may not be sold or given away.		

Nutrition	4.30	Issues one active food instrument to a cardholder at the time of initial certification.		
Nutrition	4.30	Provides opportunity for cardholder to select a Personal Identification Number (PIN).		
Nutrition	4.30	Issues separate food instrument to each foster child.		
Nutrition	4.30	Replaces food instrument in clinic when allowed replacement reason listed in Policy 4.30 occurs.		
Nutrition	5.01	Provides first nutrition education contact at the time of certification to each WIC participant.		
Nutrition	5.01	The primary nutrition contact includes anticipatory guidance appropriate for the participant's category, age, and developmental stage.		
Nutrition	5.01	The primary nutrition contact is presented verbally as simple, positive, practical advice that builds upon the participant's own knowledge and skills.		
Nutrition	5.01	The primary nutrition contact includes referral(s) to health, social, and other community services, as appropriate.		
Nutrition	5.01	The primary contact is documented in the participant's WOW record in the Nutrition Education screen. Referrals made are documented on the Client Referrals screen.		
Nutrition	5.02	Secondary nutrition education is offered in conjunction with benefit issuance, as an individual or group session.		

Nutrition	5.02	Documents the secondary nutrition education contact in the participant's WOW record.		
Nutrition	5.02	Provides and documents a secondary contact for a participant who is issued WIC benefits during a certification appointment for another family member.		
Nutrition	5.02	The secondary contact is designed to assist the participant or caregiver in acquiring knowledge and skills related to food selection, purchase, storage, and preparation, infant or child feeding, and/or the adoption of physical activity and other heatlhful lifestyles practices and give consideration to the language and personal and cultural preferences of the individual.		
Nutrition	5.02	For breastfeeding infant or child, update the amount of breastfeeding in the participant's record, even if the same as previous visit.		
Nutrition	5.02	Documents refusal of a participant or a participant's parent, caregiver, or designee to attend or participate in nutrition education in the participant's WOW record.		
Nutrition	5.05	Provides and documents appropriate information about the dangers of drugs, alcohol, and tobacco at certification or recertification to pregnant, postpartum, and breastfeeding women. Documents counseling in the Nutrition Education screen, and the Client Referral screen in WOW.		
Nutrition	5.09	Offers a breastfeeding friendly atmosphere.		
Nutrition	5.09	Provides breastfeeding support.		
Nutrition	5.09	Recommends breastfeeding aids that are appropriate for the local agency's participants.		

Nutrition	5.11	Explains when to use the breast pump, how to use it effectively and safely, and how to clean it, when issuing. Explains where to call for assistance and provides a written phone number. Demonstrates assembly and disassembly and then asks the participant to demonstrate assembly and disassembly of the pump.		
Nutrition	5.11	Provides written instruction/literature provided by the product manufacturer, as applicable.		
Nutrition	5.11	Educates participant on the use of breast pump and follows up with participant within two business days, to provide additional instruction and answer any questions.		
Nutrition	5.11	Ensures Breast Pump Release of Liability or Hospital-Grade Electric Breast Pump Loaner Agreement and Release of Liability Form is signed per policy and retains on file.		
Breastfeeding	5.12	Ensures participants sign the Breastfeeding Aid Release of Liability form prior to receiving nursing supplementers and breast shells. Maintains signed form on file.		
Nutrition	5.12	Explains to participants when to use the breastfeeding aid provided, how to use it, and how to clean it.		
Nutrition	5.12	Provides instructions from the product manufacturer and nutrition education and handout literature, as applicable.		
Nutrition	5.12	Recommends that participants inform the infant's health care provider of their use of a nursing supplementer, and the mother's health care provider of her use of breast shells.		
Financial	6.02	Assigns an inventory label to all new purchases or acquired inventory over \$50.		

Financial	6.02	Maintains the inventory sheet properly (adding/deleting inventory).		
Nutrition	7.00	Materials and literature are available to meet the needs of non-English or limited English-speaking applicants/participants.		
Nutrition	7.00	Bi-lingual staff are available to meet the needs of the non-English or limited English-speaking applicants/participants. Each work station has information on how to contact the interpretative services' vendor.		
Nutrition	7.00	Prominently displays the nondiscrimination poster, And Justice For All, in the clinic.		
Nutrition	7.00	Asks the applicant their racial/ethnic category(ies).		
Nutrition	7.02	Prominently displays the Language Line Soluations ID Poster.		
IT	7.41	Secures all computer equipment and protects from water or other intrusive materials. Attends to all laptops while in an unsecured area.		
IT	7.41	Protects system access by logging out and/or using screensaver password when leaving computer for more than a brief period of time.		
Nutrition	7.62	Uses an infant length board suitable for table-top measurements. The board shall be sturdy, made of wood or plastic with an unpadded surface, contain a fixed (unmovable) headboard and a freely-sliding foot piece, and have an attached ruler that measures in 1/8 inch (recommended) or 1/16 inch increments to at least 39 inches.		

Nutrition	7.62	Uses a stadiometer (height board). The stadiometer may be wall-hung or free-standing and shall consist of a flat measuring ruler (against which the applicant's back is placed) with 1/8 inch(recommended) or 1/16 inch (recommended) or 1/16 inch increments and a freely-sliding head piece (set perpendicular to the ruler).		
Nutrition	7.62	Uses either a beam balance or electronic (digital) table-top infant scale or an electronic floor scale with a tare function for infants and children under 2 years of age. The scale shall measure to the nearest one ounce and allow unobstructed reading of the weight measurement.		
Nutrition	7.62	Uses a beam balance or electronic (digital) floor scale for women and children 2 years of age and older. The scale shall measure to the nearest 4 ounces, up to at least 440 pounds and shall allow unobstructed reading of the weight measurement.		
Nutrition	7.64	Uses an approved hemoglobin analyzer in clinic.		
Nutrition	7.64	Displays pictorial and/or clearly written guidelines for performing the hemoglobin screen and for universal precautions at the site.		
Nutrition	7.64	Dates open containers of microcuvettes and uses cuvettes within 90 days.		
Nutrition	7.64	Uses retractable lancets including sizes for young children and adults.		
Nutrition	7.64	Makes available appropriate-sized gloves for certifiers.		

Nutrition	7.64	Has adequate supplies of alcohol wipes or alcohol, gauze or other dry pads, and appropriate-sized bandages.		
Nutrition	7.64	Has a sink and soap for washing hands or has an acceptable, waterless antiseptic hand cleanser if sink is unavailable.		
Nutrition	7.64	Uses pucture-proof disposal containers for used needles and cuvettes and locates them safely for the protection of staff and participants.		
Nutrition	7.64	Uses biohazard-labeled containers for other infectious waste and locates them safely for the protection of staff and participants.		
Nutrition	7.64	Keeps work area clean and maintains it according to OSHA/MOSH housekeeping guidelines. Has approved cleaner or bleach solution.		
Nutrition	7.64	Follows a written blood borne pathogens procedure that complies with OSHA requirements.		
Nutrition	7.82	Performs the following duties by separate clinic staff members: income determination and determination of medical or nutrition risk.		
Nutrition	7.82	Scans proof of identity, residency and income into WIC information system when separation of duties is not possible.		
Nutrition	7.90	Treats all customers with courtesy and respect.		
Nutrition	7.90	Promptly answers all customers' questions with accurate, objective information.		
Nutrition	7.90	Responds to all customers' concerns and complaints.		

Audit Cycle: Cycle 1

Nutrition	8.00	Distributes the FMNP checks and provides nutrition education covering the benefits of fresh fruits and vegetables.		
Nutrition	8.00	Provides all participants with instructional materials for FMNP checks.		
Financial	8.00	Stores the unissued FMNP checks securely when they are not being distributed.		
Financial	8.00	Maintains the check registers in order by issued serial numbers for at least three years.		

Off-Site

				Policy Met Select One		
Unit	P&P #	Management Evaluation Question	Yes	No	N/A	Comments
Program Support	1.00	Targets the highest priority target groups with outreach plan.				
Program Support	1.00	Identifies and contacts organizations that have a significant WIC eligible population to facilitate referrals.				
Program Support	1.00	Submits the annual Outreach Plan covering the upcoming SFY by the required deadline.				
Program Support	1.10	Aligns Social Media account(s) content with the vision and mission of the WIC Program.				
Program Support	1.10	Assures posts focus on WIC related topics and provides proper credit to the source of information.				
Program Support	1.10A	Uses only one Facebook page.				
Program Support	1.10A	Assures that the Twitter avatar is consistent with the local agency Facebook page image.				
Program Support	1.10A	Takes all precautionary measures to ensure Twitter privacy.				

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Program Support	1.10A	Does not have a YouTube channel.		
Program Support	1.10A	Does not have a blog.		
Program Support	1.10A	Uses standardized responses between participants and the local agency page administrator.		
Program Support	1.10A	Monitors page routinely.		
Program Support	1.10A	Leaves content added by the State.		
Nutrition	3.02	Documents evaluation of need for the formula and authorizes its issuance.		
Nutrition	3.02	Ensures procedures are followed when issuing formula.		
Nutrition	3.03	Issues formula according to policy for children and women with special dietary needs.		
Nutrition	3.02 & 3.03	Documents all required information correctly in WOW on the participant's notes screen.		
Nutrition	3.06	Refers to Medical Assistance or REM for tube fed or REM eligible.		
Nutrition	3.06	Reviews exempt (special) formula requests for participants who receive Medical Assistance and processes according to policy.		
Vendor	4.01	Ensures that local agency employees are aware of the requirement to report possible conflicts of interest to include participation in the WIC Program, serving as a proxy of a WIC participant; employment at a WIC authorized vendor, and ownership of, or relationship to an owner of a WIC authorized store.		

Vendor	4.01	Ensures that local agency employees who are WIC participants or proxies of WIC participants or who have family members or relatives who are WIC participants do not certify themselves, or those for whom they serve as proxies.		
Vendor	4.01	Ensures that local agency employees who are WIC participants or proxies of WIC participants do not issue a food instrument to themselves, or to the participants for whom they serve as proxies.		
Vendor	4.01	Ensures that a local agency employee who is employed by, has ownership of, or is a family member or relative of an owner of a WIC authorized vendor is not responsible for routine monitoring of that vendor.		
Vendor	4.01	Obtains a signed WIC Employee Conflict of Interest Statement (Attachment 4.01A) annually and when an employee's status changes to warrant documentation of participation in the WIC Program, serving as a proxy of a WIC participant, employment at a WIC authorized vendor, and ownership of, or relationship to an owner of a WIC authorized store.		
Vendor	4.05	Voids food benefits in the WIC information system using one of the pre-established void reasons.		
Vendor	4.10	Follows procedures to document the over- issuance of food benefits in the WIC information system by selecting appropriate over-issuance reason when reissuing benefits for the current issue month.		
Vendor	4.16	Conducts on-site monitoring visits to at least 10 percent of its authorized food vendors		

		annually on a representative basis according to instructions in attachment 4.13B.		
Vendor	4.16	Monitors potential high-risk and high-risk vendors in accordance with Policy 4.17.		
Vendor	4.16	Submits to the State Agency 4.16A Maryland Quarterly Vendor Monitoring Log in January, April, July, and October regardless if any monitoring activities were conducted.		
Vendor	4.21	Conducts, documents and maintains documentation of vendor monitoring and training in accordance with Policies 4.15, 4.16 and 4.17.		
Vendor	4.21	Forwards copies of documentation of all vendor related contacts and activities to the State Agency in a timely manner.		
Vendor	4.23	Sanctions shall be based on the more serious infraction if more than one kind of infraction, actual or attempted.		
Vendor	4.23	Keeps all offenses under this policy active in the participant's WIC information system record for two years from the date of sanction. No sanction issued over two years prior to the current violation shall be considered in issuing a subsequent sanction.		
Vendor	4.23	Encourages vendors to lodge complaints against participants, parents, caretakers, or designees who violate or attempt to violate Program Procedures and Regulations.		
Vendor	4.23	Notifies the participant, parent, caretaker, or designee in writing of any alleged abuse.		
Vendor	4.23	Investigates and documents each alleged situation within 30 days of its occurrence.		

Vendor	4.23	Investigates within 30 days of receipt of anonymous tips of alleged participant, caretaker, or designee abuse. If the alleged abuse cannot be verified, a sanction cannot be imposed. In such cases, counseling may be the only appropriate option.		
Vendor	4.23	Exhausts all avenues for remedying the offense if the participant is an infant or a child. He/she should not be disqualified for the abuses of his/her parent, caretaker or designee.		
Vendor	4.23	Uses of the WIC information system generated Education and Warning letters to notify a participant, caretaker, or designee or applicant who is to receive a warning.		
Vendor	4.23	Sends a written advance notice of disqualification at any time during certification not less than 15 days before the disqualification, stating the reasons for this action and the participant's right to a fair hearing.		
Vendor	4.23	Continues to provide benefits to participants who appeal the disqualification within the 15-day advance adverse action notification period until the hearing official reaches a decision adverse to the participant, or the certification period expires, whichever occurs first.		
Vendor	4.23	Reports physical abuse incidents towards the vendor, clinic or agency staff, and/or property to the police.		
Vendor	4.23	Disqualifies the designee and issues a warning letter to the participant or the caretaker in cases of program abuse by a designee.		

Vendor	4.23	Allows a disqualified participant to reapply for Program benefits at the end of the disqualification period or when full restitution of any remittance due is made or a repayment schedule is agreed upon according to policy.		
Nutrition	5.02	Provides according to policy acceptable formats for delivering the secondary contact.		
Nutrition	5.03	Develops a written procedure to ensure that participants identified as at high nutritional risk receive a care plan.		
Nutrition	5.03	Documents counseling by the CPA according to policy.		
Nutrition	5.03	Documents refusal of high risk services by the participant, caregiver or designee.		
Nutrition	5.03	Documents in the Care Plan all appropriate and timely information provided to the participant regarding their high risk status according to policy.		
Nutrition	5.06	Develops and submits Nutrition/Breastfeeding Services Plan to the State Nutrition Services Unit according to guidelines in policy.		
Nutrition	5.06	Submits changes to Nutrition/Breastfeeding Services Plan according to recommendations provided from the State Office. Hard copy is kept at the State Office.		
Nutrition	5.08	Ensures contact is made with nutrition education specialist and/or breastfeeding coordinator to discuss development or procurement of items used with WIC participants.		

Nutrition	5.08	Follows policy in selecting appropriate materials are developed or purchased for WIC participants.		
Nutrition	5.08	Uses current USDA nondiscrimination statement on all developed publications as indicated.		
Nutrition	5.08	Makes copies of approved nutrition education or breastfeeding promotion materials available to the State WIC Office for LA sharing.		
Nutrition	5.08	Follows guidelines with regards to considering specific equipment prior to purchase.		
Nutrition	5.09	Attends quarterly Breastfeeding Coordinator Meetings.		
Breastfeeding	5.09	Sends all staff (except peer counselors) to WIC WISE 1, WIC WISE 2, and Grow and Glow (parts 1 and 2) as a part of their new employee breastfeeding training.		
Breastfeeding	5.09	Issues one can of formula powder per month from WIC for an infant less than 1 month old with appropriate documentation for a specific breastfeeding complication. All infants provided one can of infant formula powder during the first month of life must have a recommendation from either an IBCLC or physician and those with latch-on difficulty, poor suck, or feeding difficulty must be receiving f/u with a lactation consultant.		

Breastfeeding	5.11	Considers factors in determining whether to provide a manual breast pump or electric pump to a participant.		
Breastfeeding	5.11	Maintains logs (in participant's WOW record) to document who received and reason for receipt Hospital-Grade and Electric Breast Pumps.		
Breastfeeding	5.11	Maintains log (in participant's WOW record) to document when a breast pump is returned.		
Breastfeeding	5.12	Documents each issuance under BF Aids on the BF Support breastfeeding screen.		
Breastfeeding	5.12	Follows-up with participant to determine progress within two working days.		
Breastfeeding	5.13	Counsel WIC participants about normal breastfeeding issues. Peer counselors will follow the contact guidelines and protocols to determine frequency of contact with participants and issues to be discussed for specific concerns.		
Breastfeeding	5.13	Documents contacts per contact guidelines in Att. 5.13A by peer counselors and amount of breastfeeding using the WIC information system or, when not available, using a paper documentation form.		
Breastfeeding	5.13	Attends Breastfeeding Peer Counselors & Peer Counselor Coordinators Meetings four times a year.		
Breastfeeding	5.15	Updates Breastfeeding Support Roles Table throughout the year and submits with Nutrition/Breastfeeding Services Plan.		
Financial	6.00	Charges expenditures to a WIC grant with traceable documentation.		

Financial	6.00	Maintains an accounting system and separate records relating to the WIC grant which conform to all state and federal regulations as well as generally accepted accounting principles.		
Financial	6.01	Enters time studies in WOW. The reports are checked quarterly by Financial Unit. Any omissions or deficiencies are immediately addressed.		
Financial	6.01	Follows the definition of Standard and Non- Standard work schedules in completing the time studies.		
Financial	6.01	Abides by the frequency of time studies for their different categories of staff.		
Financial	6.01	Certifies that all data is complete and correct (staff person).		
Financial	6.01	Reviews and approves all data that was entered (supervisor).		
Financial	6.01	Completes the Salary Calculations Worksheet correctly.		
Financial	6.01	Uses the percentages calculated at the bottom of the Quarterly Time Study Percentages Report to allocate salary and fringe expenditures as well as expenditures in other appropriate line items.		
Financial	6.02	Obtains approval for all equipment purchases.		
Financial	6.02	Offers equipment purchased with WIC funds that is no longer needed to other programs according to the established priority.		

Reports broken equipment to the Financial				
Unit, updates attachment 6.02A and disposes of it according to the policies.				
Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft.				
Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit).				
Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site).				
Ensures purchased items have a WIC specific message that targets the potentially eligible population.				
Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials.				
Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00.				
Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic.				
Ensures all WIC personnel listed in the approved budget file appear on the payroll.				
Ensures all personnel charged to WIC on the agency payrolls completed a time study.				
	of it according to the policies. Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft. Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit). Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site). Ensures purchased items have a WIC specific message that targets the potentially eligible population. Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials. Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00. Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic. Ensures all WIC personnel listed in the approved budget file appear on the payroll. Ensures all personnel charged to WIC on the	of it according to the policies. Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft. Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit). Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site). Ensures purchased items have a WIC specific message that targets the potentially eligible population. Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials. Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00. Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic. Ensures all WIC personnel listed in the approved budget file appear on the payroll. Ensures all personnel charged to WIC on the	of it according to the policies. Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft. Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit). Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site). Ensures purchased items have a WIC specific message that targets the potentially eligible population. Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials. Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00. Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic. Ensures all WIC personnel listed in the approved budget file appear on the payroll. Ensures all personnel charged to WIC on the	of it according to the policies. Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft. Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit). Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site). Ensures purchased items have a WIC specific message that targets the potentially eligible population. Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials. Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00. Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic. Ensures all WIC personnel listed in the approved budget file appear on the payroll. Ensures all personnel charged to WIC on the

		with the Summary of Time Study Hours in the budget file.		
Financial	6.06	Documents the salary costs available for employees who split their time between WIC and another program on a regular schedule (only required to do time studies one month per quarter).		
Financial	6.06	Ensures the WIC Program is charged only for the hours worked for WIC and provides back-up documentation.		
Financial	6.06	Documents the salary costs available for employees who split their time between WIC and another program NOT on a regular schedule (daily time studies required all year).		
Financial	6.06	Ensures the backup documentation agree with the expenditures reported on quarterly report.		
Financial	6.08	Ensures a MBE or SBR was used whenever possible.		
Financial	6.08	Ensures all new equipment purchased and assigned an inventory number are listed on the Schedule of Equipment Costs (4542G) in the WIC Program Budget Package.		
Financial	6.08	Ensures a minimum of three bids were received when purchasing an item or service.		
Financial	6.08	Ensures records are maintained according to the Records Retention Schedule as stated in the Financial Management Policy and Procedure section 6.00.		
Financial	6.09	Ensures Vehicle Mileage Log (6.09A) is maintained.		

Financial	6.09	Documents all travel to conduct WIC Program business including site visited and miles traveled.		
Financial	6.09	Ensures vehicles are used only to conduct WIC Program business.		
Financial	6.09	Ensure employees show commute miles if they took the car home.		
Financial	6.09	Ensures that drivers who used privately owned vehicles for official WIC Program business are reimbursed in accordance with the DBM approved rate.		
Financial	6.09	Ensures one half the ordinary standard rate was used when appropriate.		
Financial	6.09	Ensures drivers are not reimbursed for commuting miles as well as commute miles while conducting WIC business leaving from and returning to their home.		
Financial	6.09	Ensures all drivers complete and submit a Vehicle Mileage Log with their request for reimbursement.		
Financial	6.10	Ensures official travel expenditures (transportation, lodging, and phone) are reimbursed in accordance with the regulations set forth by the Department of Budget and Management.		
Financial	6.10	Ensures meal allowances for employees while on travel are properly reimbursed at the rates established by DBM.		
Financial	6.10	Ensures registration receipts are submitted with reimbursement request.		
Training Center	7.00	Reviews Civil Rights Responsibilities policy at staff meetings every state fiscal year at a		

		minimum. Monitors staff to ensure adherence to policy. Quickly resolves any		
Training Center	7.00	non-compliance. Ensures access to clinic for disabled individuals.		
Training Center	7.00	Provides civil rights training.		
Training Center	7.00	Provides a copy of the sign in sheet, agenda, and outline of the civil rights presentation given.		
Training Center	7.01	Reports any complaints of discrimination in the past two years.		
Training Center	7.01	Submits the correct complaint form within established time frames.		
Training Center	7.21	Review caseload reports to determine if caseload is achieved.		
Training Center	7.21	Describes procedure to contact pregnant women who do not keep their appointment.		
IT	7.40	Only approved software is installed on WIC computers.		
IT	7.40	Maintains a record of software licenses.		
IT	7.40	Uses WIC computers for WIC/work related purposes only.		
IT	7.41	Submits Staff Data Sheets in a timely manner.		
IT	7.41	Assigns system access appropriately for users.		
Training Center	7.60/7.66	Insures all WIC CPPA's and new CPA's to attend New Employee Training within nine months from date of hire.		
Training Center	7.61	Attends the State WIC Conference as scheduled.		
WIC Director	7.61	Attends the monthly local agency coordinators' meeting (local agency coordinator or a designated representative).		

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Nutrition	7.61	Attends State sponsored trainings as scheduled.		
Program Support	7.65	Requests permission prior to placing manual orders.		
Program Support	7.65	Submits the proper order form for all manual orders.		
Training Center	7.66	Observes new CPA and CPPA and completes and signs competency checklists.		
Training Center	7.66	Provides Training Center with original competency checklists for review.		
Financial	7.66	Maintains original temp's timesheet for audit purposes.		
Training Center	7.67	Signs the temp's timesheet and faxes to the Training Center by the published deadline included with the confirmation.		
Training Center	7.67	Concerns regarding performance or attendance of temporary staff are forwarded to the staff at the Training Center.		
Training Center	7.67	Contacts the Training Center at any time to discuss requests for temporary staff.		
Program Support	7.70	Reports suspected cases of child abuse.		
Program Support	7.70	Receives signed request before releasing participant information.		
Program Support	7.70	Releases participant information to participants or the parents or guardian when requested.		
Program Support	7.70	Submits subpoenas to State WIC Office for approval.		
Program Support	7.70	Provides participant information to other State WIC agencies when requested.		

Program Support	7.80	Conducts annual reviews of its clinic operations.		
Program Support	7.80	Conducts annual reviews of its staff.		
Program Support	7.80	Conducts an annual sample record audit of at least one percent of participant records.		
Program Support	7.80	Uses the State supplied tool to monitor clinics and staff or uses a form including the minimum standards contained in the State developed tools.		
Program Support	7.82	Conducts review of certifications when separation of duties is not possible according to Policy 7.82.		
Program Support	7.90	Describes how the local agency instructs staff on the three key components of providing quality customer service.		
Program Support	7.90	Resolves all customers' needs with the fewest number of calls possible.		
Program Support	7.91	Documents that the local agency resolves customer complaints within two days of receipt of the complaint.		
Program Support	7.91	Conducts surveys in the clinics or offices (health department or non-profit health services) that allows a participant to provide anonymous comments.		
Vendor	8.00	Submits receipt form for FMNP checks to the State Department of Agriculture for the last calendar year.		
Vendor	8.00	Trains staff annually on the distribution of FMNP checks to the participants.		
Vendor	8.00	Provides instructions on how to use the FMNP checks to participant or designee.		
Vendor	8.00	Uses attachment 8.00D Monthly FMNP Distribution Reporting Form, to report the		

		total number of books of checks issued and the monthly totals of each category to the WIC Program FMNP Coordinator by the fifth business day of the following month.		
Vendor	8.00	Distributes the FMNP checks within the authorized time frame.		
Vendor	8.00	Reports lost or stolen FMNP checks following instructions on notifying the State Office on the required form.		

Audit Cycle: Cycle 2

On-Site

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Unit	P&P #	Management Evaluation Question	Yes	No	N/A	Comments
Program Support	1.00	Provides Outreach materials developed by Local Agency staff.				
Nutrition	2.02	Uses WOW information system or the manual certification form provided by the State agency to certify all applicants/participants.				
Nutrition	2.02	Advises the participant or the parent/legal guardian or designee of the participant's rights and responsibilities as outlined in Policy and Procedure 2.12 Participant's Rights and Responsibilities.				
Nutrition	2.02	Ensures that the staff, who verifies residency, income, identity and nutrition risk documents their review and approval of information provided by and/or obtained from the applicant to be certified as eligible for the WIC Program by entering their secure user login in the management information system or signing the manual certification form in the appropriate spaces.				
Nutrition	2.03	Explains why the applicant is being placed on the waiting list, the priority system, the operation of the waiting list and their right to a fair hearing. Advises client to contact the local agency should there be changes to the information collected to determine eligibility.				
Nutrition	2.04	Determines and documents applicant residency correctly.				
Nutrition	2.04	Uses the Confirmation of Residency form correctly.				

Nutrition	2.05	Determines income eligibility correctly.		
Nutrition	2.05	Documents proof of income correctly.		
Nutrition	2.05	Determines income for military personnel correctly per P&P 2.05E.		
Nutrition	2.05	Allows participants up to 30 days after certification to provide income documentation. If documentation is not provided by the end of the 30 day certification, the participant shall be terminated by the management information system. Participants may have their cert end date restored to the full certification period if documentation is provided before the 30 days has expired. Under no circumstances may a second, subsequent 30 day certification period be used if the applicant fails to provide the required documentation of income before the temporary certification period expires.		
Nutrition	2.05	Probes carefully asking the applicant who pays the rent and buys the food if an applicant claims to have no income. After verifying that the applicant does not have any income, collateral verification of their situation is required. Requests that the applicant complete the Collateral Verification Zero Income form attesting to the accuracy of the applicant's level of income.		
Nutrition	2.05	Allows VOC card to serve as documentation of income eligibility for transferring participants and for in-stream migrant farmworkers and their family members. If a VOC card reflects		

		that a migrant farmworker's certification period has expired, allows the VOC card to serve as income documentation if the VOC card reflects that an income determination was made within the past 12 months.		
Nutrition	2.05	Verifies an applicant's or a member of an applicant's family's current participation in Medical Assistance (Medical Care Programs) and Temporary Cash Assistance (TCA) and the Food Supplement Program (Independence cards).		
Nutrition	2.05	Documents proof and verification of adjunct eligibility.		
Nutrition	2.05	Documents foster child as family of one. Documents payments made by welfare agency or from any other source of care of the foster child as income for the foster child. Documents proof of adjunct eligibility from foster child if applicable.		
Nutrition	2.05	Documents income changes and method to assess income during a certification period.		
Nutrition	2.05	Re-evaluates the family income to determine if they are income eligible should they discontinue participating in one of the adjunct income eligible programs.		
Nutrition	2.05	Disqualifies all family members, if a participant is found to be income ineligible at a WIC appointment after their certification or recertification appointment based on the participant's adjunct income eligibility.		
Nutrition	2.06	Determines family size correctly.		
Nutrition	2.06	Documents family size increased by one or by the number of expected multiple births if the		

		pregnant woman's family income exceeds the Maryland Income Guidelines for the size of her family. In the case of multiple births, the pregnant woman must provide documentation of the number of multiple births from her doctor if her income eligibility is assessed using a family size increased by the number of expected multiple births.		
Nutrition	2.06	Counts an infant or child in the family size of the parent or caregiver with whom the infant or child resides.		
Nutrition	2.06	Counts an infant, child, or other family member who resides in a school or institution and the parent or caregiver continues to provide economic support.		
Nutrition	2.06	Counts foster child as family of one, if an infant or child is a foster child living with a family but remains the legal responsibility of a welfare or other agency.		
Nutrition	2.06	Counts an adopted child or any other person for whom a family member has accepted legal responsibility. That person is counted in the family size for that family if the person lives with the family or is in a school or institution paid by the family.		
Nutrition	2.06	Does not count a family providing shelter to a WIC applicant who is homeless in determining family size for the applicant.		
Nutrition	2.09	Issues food instrument to the applicant at the time of notification that they are eligible for the program.		
Nutrition	2.09	Advises ineligible applicant in writing within 10 to 20 calendar days of his status, the reason for the ineligibility, and his right to a fair hearing. Provides the applicant with the name, address and telephone number of		

		emergency food assistance programs in the area.		
Nutrition	2.10	Explains appropriate certification period to applicant.		
Nutrition	2.10	Shortens or extends participant's certification period by not more than 30 days on a case-by-case basis if categorically eligible and sufficient appointment times to conduct a subsequent certification for a participant whose certification period was due to expire were not available.		
Nutrition	2.11	Documents that a person found ineligible for the Program at any time during the certification period was advised in writing 15 days before termination of eligibility of the reasons for ineligibility and of the right to a fair hearing.		
Nutrition	2.11	Reassesses a participant's income eligibility during the certification period if the local agency receives information indicating that the participant's household income had changed. However, such assessments are not required in cases where sufficient time does not exist to effect the change. Sufficient time means 90 days or less before the expiration of the certification period.		
Nutrition	2.11	Documents in alerts and files a copy if a Notice of a Fair Hearing form was used and given to the applicant/caregiver or designee.		
Nutrition	2.12	Provides applicant, legal guardians, or designees the opportunity to read or have read to them and electronically sign acknowledging acceptance of the Rights and Responsibilities. Provides a copy of the Participant Rights and Responsibilities.		

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Nutrition	2.12	Completes the Residency & Income, Nutritional Information, and Nutritional Risk Eligible areas of the manual certification form.		
Nutrition	2.12	Signs form to signify who has completed each portion of the certification. If different persons complete the other areas, then those areas must contain a signature.		
Nutrition	2.13	Provides instructions on how to transfer to another local agency in the state when requested by participant.		
Nutrition	2.13	Transfers participants only when requested by the participant or parent or guardian.		
Nutrition	2.13	Follows in-state transfer procedures in the management information system.		
Nutrition	2.13	Updates family and participant data.		
Nutrition	2.13	Retrieves and destroys participant ID folder issued from the sending local agency and issues new ID folder (if used by the local agency).		
Nutrition	2.13	Issues benefits that are due to the participant(s).		
Nutrition	2.13	Schedules a follow up appointment.		
Nutrition	2.13	Issues VOC to all participants who state they may be moving during the certification period and to all migrants.		
Nutrition	2.13	Completes and signs the VOC according to instructions.		
Nutrition	2.13	Documents missing VOC in WOW and issues a new VOC.		

Nutrition	2.13	Enrolls the participant with a VOC if the local agency has a waiting list and can enroll some participants regardless of the participant(s) category. If the local agency has a waiting list, tells the participant that they cannot be enrolled at this time but will be placed at the top of the list regardless of their category.		
Nutrition	2.13	Accepts all VOC and, if needed, contacts the original agency for missing or what appears to be altered information.		
Nutrition	2.13	Accepts all nutrition risk conditions from the other WIC program for the duration of the certification period for participant(s) with VOC.		
Nutrition	2.13	Retrieves and destroys the ID folder from the sending local agency and issues a new ID folder for participant(s) with VOC (if used by the local agency).		
Nutrition	2.13	Issues food instrument. Issues/prorates replacement benefits for the period in accordance with benefit issuance policy for participants with VOC.		
Nutrition	2.13	Conducts a new certification if the certification period stated on the VOC has expired.		
Nutrition	2.13	Follows the appropriate procedures for either the In-State Transfer or Out-of-State Transfer when accepting a VOC from a migrant.		
Nutrition	2.16	Sees all applicants physically for program services at the time of certification (unless a health care provider individually certifies that such action will be detrimental to the physical well being of the applicant).		
Nutrition	2.16	Arranges an alternate method of certification, the certification may be completed by using		

		information provided by the health care provider as long as it meets the regulatory requirements of not being more than 60 days old for heights and weights and 90 days for bloodwork and is obtained while the applicant is in the same participant category.		
Nutrition	2.16	Stresses the positive long-term benefits of WIC nutrition services and encourages the participant to attend and participate in scheduled mid-certification appointment for nutrition assessment and education.		
Nutrition	2.16	Documents actions taken by the local agency that differed from the required certification/mid-certification procedures in the participant's record.		
Nutrition	2.17	Issues VOC to participants who are affiliated with military and who will be transferred overseas.		
Nutrition	2.17	Accepts valid WIC Overseas Program VOC.		
Nutrition	2.19	Explains format of Identification Folder (if used by local agency).		
Nutrition	2.19	Validates and stamps ID Folder with local agency/county code, the WIC symbol, and phone number (if used by local agency).		
Nutrition	2.19	Completes ID folder per Policy 2.19 (if used by local agency).		
Nutrition	2.20	Asks at the initial certification if the client would like to choose one or two persons designated as a proxy.		
Nutrition	2.20	Enters the name(s) of the proxy (ies), if requested, in participant's record.		
Nutrition	2.20	Asks the participant/parent or caregiver at the initial certification if they would like to authorize one or both of the proxies to serve		

		as a designee and correctly enters proxy/designees information in the participant's record.		
Nutrition	2.20	Confirms participants WIC ID folder at class pick up (if applicable).		
Nutrition	2.20	Provides a participant/parent or caregiver the opportunity to change a proxy/designee.		
Nutrition	2.21	Identifies "homeless individual".		
Nutrition	2.21	Assures Confirmation of Residency form is completed.		
Nutrition	2.21	Assesses income eligibility as outlined in P & P 2.05 for homeless individual.		
Nutrition	2.21	Assesses nutritional risk as outlined in P & P 2.31 for homeless individual.		
Nutrition	2.21	Prescribes special food packages for the homeless.		
Nutrition	2.21	Provides specific education concerning the use and the storage of foods offered in addition to other topics.		
Nutrition	2.21	Refers homeless applicants and participants to appropriate health and human services agencies.		
Nutrition	2.23	Requires and documents that all applicants provide proof of identity using acceptable proof of an applicant's identity.		
Nutrition	2.23	Uses the Proof of Identity Affidavit Form as acceptable proof on income under specific		

		circumstances which would include the homeless, victims of fire or theft, illegal aliens, or teenagers who were put out of their homes.		
Nutrition	2.23	Enters "No Proof" in the Proof of Identity field if an applicant does not provide proof of identity.		
Nutrition	2.24	Changes participant's category according to the established WOW procedures.		
Nutrition	2.24	Asks the applicant to provide proof of pregnancy, if pregnancy is not obvious per policy.		
Nutrition	2.25	Provides all individuals applying for WIC Program benefits or the parent/caregiver of individuals applying for WIC Program benefits an opportunity to register to vote at each certification and recertification visit. Provides assistance to other individuals who express an interest in registering to vote.		
Nutrition	2.25	Gives the individual the voter registration application and provides assistance to those individuals who would like help in completing the registration application.		
Nutrition	2.25	Asks the individual if he/she would like the WIC Office to mail the completed voter registration card to the local election board.		
Nutrition	2.27	Asks the parent, legal guardian or designee to bring a documented immunization record to the visit when scheduling a certification appointment for an infant or child under age 2. Explains that this is not required for application to the program but the		

		information is important for the health		
		assessment.		
Nutrition	2.27	Documents whether or not a documented immunization record was brought to the clinic and the dates DTaP immunizations were received on the WOW Immunization screen.		
Nutrition	2.27	Selects "illegible" from the dropdown under the "Special" column on the WOW Immunization screen when appropriate. Asks the caregiver to request that the health care provider clarify the dates.		
Nutrition	2.28	Asks the parent, caregiver, or designee if the child has had a blood test for lead and documents the response on the WOW medical screen.		
Nutrition	2.28	Explains importance of a blood test for lead and provides written information about lead poisoning.		
Nutrition	2.28	Encourages caregiver to ask about blood test for lead at the child's next health care appointment, if the response is "no" or "don't know".		
Nutrition	2.28	Documents blood lead test result, if known, on the WOW medical screen.		
Nutrition	2.31	Reviews risk factors assigned by WOW to ensure that they are correct. Removes and documents incorrect risk factors when appropriate. Re-enters assessment data related to incorrect risk factors if necessary.		
Nutrition	2.31	Identifies and documents all applicable risk factors on manual certification form when performing a manual certification.		
Nutrition	2.31	Assigns additional risk factors manually as appropriate.		

Nutrition	2.32	Measures weight of infants according to P&P 2.32A.		
Nutrition	2.32	Measures length of infants according to P&P 2.32A.		
Nutrition	2.32	Measures weight and height/length of women/children or obtains measurements from HCP within 60 days prior to date of visit.		
Nutrition	2.32	Documents measurements provided by HCP as a comment on the medical screen in WOW and enters the date they were taken in the date field.		
Nutrition	2.32	Interprets data correctly using growth charts, prenatal weight gain grids, identified risk factors.		
Nutrition	2.33	Performs hemoglobin test at the time of certification.		
Nutrition	2.33	Obtains and documents results from HCP within 90 days of the certification date.		
Nutrition	2.33	Performs/obtains blood test according to the established schedule for each participant category and, for children, as appropriate based on the previous test result.		
Nutrition	2.33	Installs and maintains equipment according to manufacturer's specifications and provides staff training on the use and maintenance of the equipment.		
Nutrition	2.33	Considers relevant assessment information before deciding upon the intervention when the risk factor for Low Hemoglobin/Hematocrit is identified.		

Nutrition	2.34	Enters nutrition/health information correctly into WOW, answering all questions on the Medical and Nutrition History screens.		
Nutrition	2.34	Provides appropriate nutrition intervention based on identified risk factors and participant concerns.		
Nutrition	2.34	Obtains complete nutrition history for each participant using paper nutrition history forms during manual certifications.		
Nutrition	2.35	Explains the purpose of the WIC Program is to promote desirable health outcomes through nutrition education, breastfeeding support, special supplemental foods, and referrals during critical times of growth and development.		
Nutrition	2.35	Communicates with open dialogue and two-way communication.		
Nutrition	2.35	Prescribes the WIC foods for the individual participant to help meet recommended nutrient needs and explains WIC foods are not intended to supply all of the daily requirements.		
Nutrition	2.35	Reassesses each participant at the end of the certification period for eligibility.		
Nutrition	2.36	Informs the woman that she and her newborn infant may be able to be certified while she is in the hospital (where the local agency performs certifications).		
Nutrition	2.36	Provides outreach brochure to potentially WIC eligible women or current WIC participants who live outside the service area and encourages them to call appropriate local		

		agency for a certification appointment for hospital certifications.		
Nutrition	2.36	Follows all certification policies/procedures for hospital certifications.		
Nutrition	2.36	Identifies/documents all applicable nutrition risks. Dates for weight, height/length, and hemoglobin/hematocrit measurements are recorded as the date of the actual measurement for hospital certifications.		
Nutrition	2.36	Provides and documents nutrition education and breastfeeding support for each participant as appropriate to the participant's risks, needs, and interests identified and prioritized during the nutrition risk assessment for hospital certifications.		
Nutrition	2.36	Secures laptops and printers to a cart when transporting and using them in patient rooms. Stores them in a locked room in the hospital unless they are returned to the WIC clinic each day.		
Nutrition	2.36	Monitors hospital certifications as part of its self-monitoring system.		
Nutrition	2.38	Certifies infants under age 6 months, children, and breastfeeding women for one year and schedules a Mid-Certification visit approximately halfway through the certification.		
Nutrition	2.38	Explains the positive long-term benefits of WIC nutrition services and encourages the participant to attend mid-certification appointments for nutrition assessment and education. If the participant does not attend the appointment, provides benefits and attempts to schedule follow up appointment to collect anthropometric data. If follow-up cannot be scheduled, sends note to head of		

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		household to schedule follow up appointment or to request referral data from health care provider.		
Nutrition	3.05	Stores formula in a secure, safe place.		
Nutrition	3.05	Assists in transitioning an infant on a non-contract standard formula to the contract brand.		
Nutrition	3.05	Follows correct procedure for issuance of special formulas when an applicant's WIC appointment is delayed because of schedule availability.		
Nutrition	3.05	Follows correct procedure for issuance of special formulas to a breastfeeding mother required to temporarily stop breastfeeding.		
Nutrition	3.05	Documents signed receipt of issued formula to participants.		
Nutrition	4.12	Uses the instructional material provided by the State as it is, or adapts the contents for use in informing participants, guardians, and designees on the proper use of food instrument.		
Nutrition	4.12	Includes a list of all authorized WIC vendors located within the local agency's region or state wide as an addendum to these instructions.		
Nutrition	4.12	Distributes, discusses and reviews the instructional material as well as the agency's complaint procedure with each participant, guardian, and designee at certification time, as required by the participant sanction policy, and at any time thereafter deemed necessary.		

Nutrition	4.23	Informs applicants, participants, parents, caretakers, or designees program rights and responsibilities.		
Nutrition	4.28	Reminds participants when food package changes are made that involve infant formula, that any unused formula should be returned and that it may not be sold or given away.		
Nutrition	4.30	Issues one active food instrument to a cardholder at the time of initial certification.		
Nutrition	4.30	Provides opportunity for cardholder to select a Personal Identification Number (PIN).		
Nutrition	4.30	Issues separate food instrument to each foster child.		
Nutrition	4.30	Replaces food instrument in clinic when allowed replacement reason listed in Policy 4.30 occurs.		
Nutrition	5.01	Provides first nutrition education contact at the time of certification to each WIC participant.		
Nutrition	5.01	The primary nutrition contact includes anticipatory guidance appropriate for the participant's category, age, and developmental stage.		
Nutrition	5.01	The primary nutrition contact is presented verbally as simple, positive, practical advice that builds upon the participant's own knowledge and skills.		
Nutrition	5.01	The primary nutrition contact includes referral(s) to health, social, and other community services, as appropriate.		

Nutrition	5.01	The primary contact is documented in the participant's WOW record in the Nutrition Education screen. Referrals made are documented on the Client Referrals screen.		
Nutrition	5.02	Secondary nutrition education is offered in conjunction with benefit issuance, as an individual or group session.		
Nutrition	5.02	Documents the secondary nutrition education contact in the participant's WOW record.		
Nutrition	5.02	Provides and documents a secondary contact for a participant who is issued WIC benefits during a certification appointment for another family member.		
Nutrition	5.02	The secondary contact is designed to assist the participant or caregiver in acquiring knowledge and skills related to food selection, purchase, storage, and preparation, infant or child feeding, and/or the adoption of physical activity and other heatlhful lifestyles practices and give consideration to the language and personal and cultural preferences of the individual.		
Nutrition	5.02	For breastfeeding infant or child, update the amount of breastfeeding in the participant's record, even if the same as previous visit.		
Nutrition	5.02	Documents refusal of a participant or a participant's parent, caregiver, or designee to attend or participate in nutrition education in the participant's WOW record.		
Nutrition	5.05	Provides and documents appropriate information about the dangers of drugs, alcohol, and tobacco at certification or recertification to pregnant, postpartum, and breastfeeding women. Documents counseling		

		in the Nutrition Education screen, and the Client Referral screen in WOW.		
Nutrition	5.09	Offers a breastfeeding friendly atmosphere.		
Nutrition	5.09	Provides breastfeeding support.		
Nutrition	5.09	Recommends breastfeeding aids that are appropriate for the local agency's participants.		
Nutrition	5.11	Explains when to use the breast pump, how to use it effectively and safely, and how to clean it, when issuing. Explains where to call for assistance and provides a written phone number. Demonstrates assembly and disassembly and then asks the participant to demonstrate assembly and disassembly of the pump.		
Nutrition	5.11	Provides written instruction/literature provided by the product manufacturer, as applicable.		
Nutrition	5.11	Educates participant on the use of breast pump and follows up with participant within two business days, to provide additional instruction and answer any questions.		
Nutrition	5.11	Ensures Breast Pump Release of Liability or Hospital-Grade Electric Breast Pump Loaner Agreement and Release of Liability Form is signed per policy and retains on file.		
Breastfeeding	5.12	Ensures participants sign the Breastfeeding Aid Release of Liability form prior to receiving nursing supplementers and breast shells. Maintains signed form on file.		

Nutrition	5.12	Explains to participants when to use the breastfeeding aid provided, how to use it, and how to clean it.		
Nutrition	5.12	Provides instructions from the product manufacturer and nutrition education and handout literature, as applicable.		
Nutrition	5.12	Recommends that participants inform the infant's health care provider of their use of a nursing supplementer, and the mother's health care provider of her use of breast shells.		
Financial	6.02	Assigns an inventory label to all new purchases or acquired inventory over \$50.		
Financial	6.02	Maintains the inventory sheet properly (adding/deleting inventory).		
Nutrition	7.00	Materials and literature are available to meet the needs of non-English or limited English-speaking applicants/participants.		
Nutrition	7.00	Bi-lingual staff are available to meet the needs of the non-English or limited English-speaking applicants/participants. Each work station has information on how to contact the interpretative services' vendor.		
Nutrition	7.00	Prominently displays the nondiscrimination poster, And Justice For All, in the clinic.		
Nutrition	7.00	Asks the applicant their racial/ethnic category(ies).		
Nutrition	7.02	Prominently displays the Language Line Soluations ID Poster.		
IT	7.41	Secures all computer equipment and protects from water or other intrusive materials. Attends to all laptops while in an unsecured area.		

IT	7.41	Protects system access by logging out and/or using screensaver password when leaving computer for more than a brief period of time.		
Nutrition	7.62	Uses an infant length board suitable for table-top measurements. The board shall be sturdy, made of wood or plastic with an unpadded surface, contain a fixed (unmovable) headboard and a freely-sliding foot piece, and have an attached ruler that measures in 1/8 inch (recommended) or 1/16 inch increments to at least 39 inches.		
Nutrition	7.62	Uses a stadiometer (height board). The stadiometer may be wall-hung or free-standing and shall consist of a flat measuring ruler (against which the applicant's back is placed) with 1/8 inch(recommended) or 1/16 inch (recommended) or 1/16 inch increments and a freely-sliding head piece (set perpendicular to the ruler).		
Nutrition	7.62	Uses either a beam balance or electronic (digital) table-top infant scale or an electronic floor scale with a tare function for infants and children under 2 years of age. The scale shall measure to the nearest one ounce and allow unobstructed reading of the weight measurement.		
Nutrition	7.62	Uses a beam balance or electronic (digital) floor scale for women and children 2 years of age and older. The scale shall measure to the nearest 4 ounces, up to at least 440 pounds and shall allow unobstructed reading of the weight measurement.		

Nutrition	7.64	Uses an approved hemoglobin analyzer in clinic.		
Nutrition	7.64	Displays pictorial and/or clearly written guidelines for performing the hemoglobin screen and for universal precautions at the site.		
Nutrition	7.64	Dates open containers of microcuvettes and uses cuvettes within 90 days.		
Nutrition	7.64	Uses retractable lancets including sizes for young children and adults.		
Nutrition	7.64	Makes available appropriate-sized gloves for certifiers.		
Nutrition	7.64	Has adequate supplies of alcohol wipes or alcohol, gauze or other dry pads, and appropriate-sized bandages.		
Nutrition	7.64	Has a sink and soap for washing hands or has an acceptable, waterless antiseptic hand cleanser if sink is unavailable.		
Nutrition	7.64	Uses pucture-proof disposal containers for used needles and cuvettes and locates them safely for the protection of staff and participants.		
Nutrition	7.64	Uses biohazard-labeled containers for other infectious waste and locates them safely for the protection of staff and participants.		
Nutrition	7.64	Keeps work area clean and maintains it according to OSHA/MOSH housekeeping guidelines. Has approved cleaner or bleach solution.		
Nutrition	7.64	Follows a written blood borne pathogens procedure that complies with OSHA requirements.		

Nutrition	7.82	Performs the following duties by separate clinic staff members: income determination and determination of medical or nutrition risk.		
Nutrition	7.82	Scans proof of identity, residency and income into WIC information system when separation of duties is not possible.		
Nutrition	7.90	Treats all customers with courtesy and respect.		
Nutrition	7.90	Promptly answers all customers' questions with accurate, objective information.		
Nutrition	7.90	Responds to all customers' concerns and complaints.		
Nutrition	8.00	Distributes the FMNP checks and provides nutrition education covering the benefits of fresh fruits and vegetables.		
Nutrition	8.00	Provides all participants with instructional materials for FMNP checks.		
Nutrition	8.00	Stores the unissued FMNP checks securely when they are not being distributed.		
Nutrition	8.00	Maintains the check registers in order by issued serial numbers for at least three years.		

Audit Cycle: Cycle 2

Off-Site

				Policy Met Select One		
Unit	P&P #	Management Evaluation Question	Yes	No	N/A	Comments
Program Support	1.00	Targets the highest priority target groups with outreach plan.				
Program Support	1.00	Identifies and contacts organizations that have a significant WIC eligible population to facilitate referrals.				
Program Support	1.00	Submits the annual Outreach Plan covering the upcoming SFY by the required deadline.				
Program Support	1.10	Aligns Social Media account(s) content with the vision and mission of the WIC Program.				
Nutrition	1.00	Has a cooperative agreement with any local hospital, and if so, conducts outreach and certification at the hospital.				
Program Support	1.10	Assures posts focus on WIC related topics and provides proper credit to the source of information.				
Program Support	1.10	Keeps social media accounts separate from any other application(s).				
Program Support	1.10A	Uses only one Facebook page.				
Program Support	1.10A	Assures that the Twitter avatar is consistent with the local agency Facebook page image.				
Program Support	1.10A	Takes all precautionary measures to ensure Twitter privacy.				
Program Support	1.10A	Does not have a YouTube channel.				
Program Support	1.10A	Does not have a blog.				
Program Support	1.10A	Works with the State to co-administrate the Facebook account.				

-				
Program Support	1.10A	Takes all precautionary measures to ensure Facebook privacy.		
Program Support	1.10A	Provides orientation to volunteers regarding the importance of maintaining the confidential nature of participant information and assures that they sign a confidentiality statement.		
Nutrition	2.37	Provides orientation to volunteers regarding the importance of maintaining the confidential nature of participant information and assures that they sign a confidentiality statement.		
Nutrition	2.37	Volunteers are not permitted to drive local agency vehicles.		
Nutrition	2.37	Adheres to any additional policies/procedures pertaining to the use of volunteers required by the health department/agency.		
Nutrition	2.37	Provides orientation to dietetic interns regarding the importance of maintaining the confidential nature of participant information and assures that they sign a confidentiality statement. Does not permit dietetic interns to drive local agency vehicles. Assigns appropriate learning activities to dietetic interns. Assures that actual provision/performance of services by dietetic interns is supervised by a CPA who is present at the time the service is provided or performed.		

Nutrition	3.02	Documents evaluation of need for the formula and authorizes its issuance.		
Nutrition	3.02	Ensures procedures are followed when issuing formula.		
Nutrition	3.03	Issues formula according to policy for children and women with special dietary needs.		
Nutrition	3.02 & 3.03	Documents all required information correctly in WOW on the participant's notes screen.		
Nutrition	3.06	Refers to Medical Assistance or REM for tube fed or REM eligible.		
Nutrition	3.06	Reviews exempt (special) formula requests for participants who receive Medical Assistance and processes according to policy.		
Vendor	4.05	Voids food benefits in the WIC information system using one of the pre-established void reasons.		
Vendor	4.10	Follows procedures to document the over- issuance of food benefits in the WIC information system by selecting appropriate over-issuance reason when reissuing benefits for the current issue month.		
Vendor	4.13	Designates a Local Agency Liaison Staff Person who will be the Local Agency contact person during and after the vendor authorization process.		
Vendor	4.13	Provides an appropriate number of staff to assist the State Agency in the vendor authorization process.		

Vendor	4.13	Ensures that appropriate staff attends required training(s) on the vendor authorization process.		
Vendor	4.13	Conducts on-site reviews of applicant vendors, as required by the State Agency using the Retail Vendor On-Site Review Form as found in Attachment 4.13A. The completed on-site review forms shall be submitted to the State Agency.		
Vendor	4.13	Assists the State Agency in the vendor training process, as required.		
Vendor	4.22	Reviews the list of potential matches identified and, to the best of their ability, determine if the enrollee they are adding exists in the WIC information system, prior to saving the new record.		
Vendor	4.22	Reviews the dual participation section of the WIC information system not less than monthly for each clinic to detect and resolve possible dual participants.		
Vendor	4.22	Contacts the other agency to verify the enrollment and, if indicated, decides the course of action to be taken. Initiate the appropriate action as indicated in P&P 4.23.		
Vendor	4.23	Issues WIC information system generated Education, Warning, and or Disqualification Notices to participants in accordance with sanction procedures.		
Vendor	4.28	Monitors local newspapers or marketplaces to identify advertisements offering infant formula for sale.		
Vendor	4.28	Uses the management information system (MIS) to match the seller's name, phone number, email address, or any other		

		identifying fields to determine if the seller is a WIC participant.		
Vendor	4.28	Confirms that the seller is a WIC participant to the State Agency.		
Vendor	4.28	Contacts the participant to provide notification that he or she: may not sell or give away formula purchased with WIC benefits, must return to the WIC local agency any infant formula provided by WIC that they do not need or are not able to use and must immediately remove the advertisement from the application site(s). If applicable, will be sanctioned in accordance with Policy and Procedure 4.23.		
Vendor	4.28	Documents the contact with the participant in the participant's WIC information system notes.		
Nutrition	5.02	Provides according to policy acceptable formats for delivering the secondary contact.		
Nutrition	5.03	Develops a written procedure to ensure that participants identified as at high nutritional risk receive a care plan.		
Nutrition	5.03	Documents counseling by the CPA according to policy.		
Nutrition	5.03	Documents refusal of high risk services by the participant, caregiver or designee.		
Nutrition	5.03	Documents in the Care Plan all appropriate and timely information provided to the participant regarding their high risk status according to policy.		

Nutrition	5.06	Develops and submits Nutrition/Breastfeeding Services Plan to the State Nutrition Services Unit according to guidelines in policy.		
Nutrition	5.06	Submits changes to Nutrition/Breastfeeding Services Plan according to recommendations provided from the State Office. Hard copy is kept at the State Office.		
Nutrition	5.08	Ensures contact is made with nutrition education specialist and/or breastfeeding coordinator to discuss development or procurement of items used with WIC participants.		
Nutrition	5.08	Follows policy in selecting appropriate materials are developed or purchased for WIC participants.		
Nutrition	5.08	Uses current USDA nondiscrimination statement on all developed publications as indicated.		
Nutrition	5.08	Makes copies of approved nutrition education or breastfeeding promotion materials available to the State WIC Office for LA sharing.		
Nutrition	5.08	Follows guidelines with regards to considering specific equipment prior to purchase.		
Nutrition	5.09	Attends quarterly Breastfeeding Coordinator Meetings.		
Breastfeeding	5.09	Sends all staff (except peer counselors) to WIC WISE 1, WIC WISE 2, and Grow and		

		Glow (parts 1 and 2) as a part of their new employee breastfeeding training.		
Breastfeeding	5.09	Issues one can of formula powder per month from WIC for an infant less than 1 month old with appropriate documentation for a specific breastfeeding complication. All infants provided one can of infant formula powder during the first month of life must have a recommendation from either an IBCLC or physician and those with latch-on difficulty, poor suck, or feeding difficulty must be receiving follow-up with a lactation consultant.		
Breastfeeding	5.11	Considers factors in determining whether to provide a manual breast pump or electric pump to a participant.		
Breastfeeding	5.11	Maintains logs (in participant's WOW record) to document who received and reason for receipt Hospital-Grade and Electric Breast Pumps.		
Breastfeeding	5.11	Maintains log (in participant's WOW record) to document when a breast pump is returned.		
Breastfeeding	5.12	Documents each issuance under BF Aids on the BF Support breastfeeding screen.		
Breastfeeding	5.12	Follows-up with participant to determine progress within two working days.		
Breastfeeding	5.13	Counsel WIC participants about normal breastfeeding issues. Peer counselors will follow the contact guidelines and protocols to determine frequency of contact with participants and issues to be discussed for specific concerns.		

Breastfeeding	5.13	Documents contacts per contact guidelines in Att. 5.13A by peer counselors and amount of breastfeeding using the WIC information system or, when not available, using a paper documentation form.		
Breastfeeding	5.13	Attends Breastfeeding Peer Counselors & Peer Counselor Coordinators Meetings four times a year.		
Breastfeeding	5.15	Updates Breastfeeding Support Roles Table throughout the year and submits with Nutrition/Breastfeeding Services Plan.		
Financial	6.00	Charges expenditures to a WIC grant with traceable source documentation.		
Financial	6.00	Maintains an accounting system and separate records relating to the WIC grant which conform to all state and federal regulations as well as generally accepted accounting principles.		
Financial	6.01	Enters time studies in WOW. The reports are checked quarterly by Financial Unit. Any omissions or deficiencies are immediately addressed.		
Financial	6.01	Follows the definition of Standard and Non- Standard work schedules in completing the time studies.		
Financial	6.01	Abides by the frequency of time studies for their different categories of staff.		
Financial	6.01	Certifies that all data is complete and correct (staff person).		
Financial	6.01	Reviews and approves all data that was entered (supervisor).		
Financial	6.01	Completes the Salary Calculations Worksheet correctly.		

Financial	6.01	Uses the percentages calculated at the bottom of the Quarterly Time Study Percentages Report to allocate salary and fringe expenditures as well as expenditures in other appropriate line items.		
Financial	6.02	Obtains approval for all equipment purchases.		
Financial	6.02	Offers equipment purchased with WIC funds that is no longer needed to other programs according to the established priority.		
Financial	6.02	Reports broken equipment to the Financial Unit, updates attachment 6.02A and disposes of it according to the policies.		
Financial	6.02	Reports stolen equipment to the Financial Unit and updates attachment 6.02A according to the policies including a comment about theft.		
Financial	6.04	Reviews compliance to this policy when receiving reports for temporary staff assigned to the local agency (Financial Unit).		
Financial	6.05	Ensures items purchased for staff present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site).		
Financial	6.05	Ensures purchased items have a WIC specific message that targets the potentially eligible population.		
Financial	6.05	Ensures that purchased items contain the USDA nondiscrimination statement on publications or other printed materials.		
Financial	6.05	Ensures purchased items were at a reasonable and necessary cost with a total cost per item of less than \$8.00.		

Financial	6.05	Ensures items purchased for staff used when staff travel throughout the community and participate in various cooperative functions that target WIC population and not used primarily in the clinic.		
Financial	6.06	Ensures all WIC personnel listed in the approved budget file appear on the payroll.		
Financial	6.06	Ensures all personnel charged to WIC on the agency payrolls completed a time study.		
Financial	6.06	Ensures that daily backup documentation agree with the Summary of Time Study Hours in the budget file.		
Financial	6.06	Documents the salary costs available for employees who split their time between WIC and another program on a regular schedule (only required to do time studies one month per quarter).		
Financial	6.06	Ensures the WIC Program is charged only for the hours worked for WIC and provides back-up documentation.		
Financial	6.06	Documents the salary costs available for employees who split their time between WIC and another program NOT on a regular schedule (daily time studies required all year).		
Financial	6.06	Ensures the backup documentation agree with the expenditures reported on quarterly report.		
Financial	6.08	Ensures a MBE or SBR was used whenever possible.		
Financial	6.08	Ensures all new equipment purchased and assigned an inventory number are listed on		

		the Schedule of Equipment Costs (4542G) in the WIC Program Budget Package.		
Financial	6.08	Ensures a minimum of three bids were received when purchasing an item or service.		
Financial	6.08	Ensures records are maintained according to the Records Retention Schedule as stated in the Financial Management Policy and Procedure section 6.00.		
Financial	6.09	Ensures Vehicle Mileage Log (6.09A) is maintained.		
Financial	6.09	Documents all travel to conduct WIC Program business including site visited and miles traveled.		
Financial	6.09	Ensures vehicles are used only to conduct WIC Program business.		
Financial	6.09	Ensure employees show commute miles if they took the car home.		
Financial	6.09	Ensures that drivers who used privately owned vehicles for official WIC Program business are reimbursed in accordance with the DBM approved rate.		
Financial	6.09	Ensures one half the ordinary standard rate was used when appropriate.		
Financial	6.09	Ensures drivers are not reimbursed for commuting miles as well as commute miles while conducting WIC business leaving from and returning to their home.		
Financial	6.09	Ensures all drivers complete and submit a Vehicle Mileage Log with their request for reimbursement.		

Financial	6.10	Ensures official travel expenditures (transportation, lodging, and phone) are reimbursed in accordance with the regulations set forth by the Department of Budget and Management.		
Financial	6.10	Ensures meal allowances for employees while on travel are properly reimbursed at the rates established by DBM.		
Financial	6.10	Ensures registration receipts are submitted with reimbursement request.		
Training Center	7.00	Reviews Civil Rights Responsibilities policy at staff meetings every state fiscal year at a minimum. Monitors staff to ensure adherence to policy. Quickly resolves any non-compliance.		
Training Center	7.00	Ensures access to clinic for disabled individuals.		
Training Center	7.00	Provides civil rights training.		
Training Center	7.00	Provides a copy of the sign in sheet, agenda, and outline of the civil rights presentation given.		
Training Center	7.01	Reports any complaints of discrimination in the past two years.		
Training Center	7.01	Submits the correct complaint form within established time frames.		
Training Center	7.21	Review caseload reports to determine if caseload is achieved.		
Training Center	7.21	Describes procedure to contact pregnant women who do not keep their appointment.		
IT	7.40	Only approved software is installed on WIC computers.		
IT	7.40	Maintains a record of software licenses.		

IT	7.40	Uses WIC computers for WIC/work related purposes only.		
IT	7.41	Submits Staff Data Sheets in a timely manner.		
IT	7.41	Assigns system access appropriately for users.		
Training Center	7.60/7.66	Insures all WIC CPPA's and new CPA's to attend New Employee Training within nine months from date of hire.		
Training Center	7.61	Attends the State WIC Conference as scheduled.		
WIC Director	7.61	Attends the monthly local agency coordinators' meeting (local agency coordinator or a designated representative).		
Nutrition	7.61	Attends State sponsored trainings as scheduled.		
Training Center	7.66	Observes new CPA and CPPA and completes and signs competency checklists.		
Training Center	7.66	Provides Training Center with original competency checklists for review.		
Financial	7.66	Maintains original temp's timesheet for audit purposes.		
Program Support	7.70	Reports suspected cases of child abuse.		
Program Support	7.70	Receives signed request before releasing participant information.		
Program Support	7.70	Releases participant information to participants or the parents or guardian when requested.		
Program Support	7.70	Submits subpoenas to State WIC Office for approval.		

Program Support	7.70	Provides participant information to other State WIC agencies when requested.		
Program Support	7.80	Conducts annual reviews of its clinic operations.		
Program Support	7.80	Conducts annual reviews of its staff.		
Program Support	7.80	Conducts an annual sample record audit of at least one percent of participant records.		
Program Support	7.80	Uses the State supplied tool to monitor clinics and staff or uses a form including the minimum standards contained in the State developed tools.		
Program Support	7.82	Conducts review of certifications when separation of duties is not possible according to Policy 7.82.		
Program Support	7.90	Describes how the local agency instructs staff on the three key components of providing quality customer service.		
Program Support	7.90	Describes how the local agency is committed to providing good customer service.		
Program Support	7.90	Resolves all customers' needs with the fewest number of calls possible.		
Program Support	7.91	Documents that the local agency resolves customer complaints within two days of receipt of the complaint.		
Program Support	7.91	Conducts surveys in the clinics or offices (health department or non-profit health services) that allows a participant to provide anonymous comments.		
Vendor	8.00	Submits receipt form for FMNP checks to the State Department of Agriculture for the last calendar year.		

Vendor	8.00	Trains staff annually on the distribution of		
Vendor	8.00	FMNP checks to the participants. Provides instructions on how to use the		
		FMNP checks to participant or designee.		
Vendor	8.00	Uses attachment 8.00D Monthly FMNP Distribution Reporting Form, to report the		
		total number of books of checks issued and		
		the monthly totals of each category to the		
		WIC Program FMNP Coordinator by the fifth business day of the following month.		
Vendor	8.00	Distributes the FMNP checks within the		
		authorized time frame.		

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.82 Effective Date: October 1, 1994 Revised Date: January 26, 2018

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: Separation of Duties

A. Policy

Separation of duties during certification is required in order to have a strong internal control system at local agency clinic sites. The local agency shall ensure separation of duties in WIC clinics or monitoring of records in clinics where separation of duties is not practical.

WIC employees shall not certify themselves, close friends, or family members.

Separation of duties is not necessary during group or individual benefit issuance appointments.

B. Procedure

- Whenever possible, each of the following duties should be performed by a separate clinic staff member in order to ensure separation of duties:
 - a. Income determination or adjunct eligibility verified;
 - b. Determination of medical or nutrition risk.
- 2. When separation of duties is not possible on an ongoing basis:
 - a. Proof of identity, residency, and income shall be scanned into the record in the MIS. Photo identification used for proof of identity for an adult participant does not need to be scanned at each certification, if the identification is verified.
 - b. A record review of all non-exclusive breastfeeding infant participants (food packages that contain infant formula) and 20 percent of the remaining records shall be performed within two (2) weeks of the certification by an individual other than the certifier such as the Local Agency Coordinator or designee. Results of monitoring shall be recorded on Attachment 7.82A.

- c. An additional record review of 10 percent of each clinic's certification records must be conducted every six months by the WIC Program Director or designee, or a Local Agency Coordinator for clinics with multiple staff that allow one person to perform all eligibility and certification functions including issuing food benefits.
- d. Documentation of all reviews must be maintained on file at the local agency for review during management evaluations.

Attachments:

7.82A Separation of Duties Monitoring Form

References:

Policy & Procedure Number: 4.10 7 CFR 246.4 (a)(xii) FNS Policy Memo 2016-5

Revisions:

- 1. 8/04 Revised to change WOW to WIC information system.
- 2. 10/11 Changed Policy number from 4.07 to 4.09
- 3. 10/16 Added Attachments 4.09A and 4.09B. Monitoring shall be completed to 10 percent of records in single person clinics or hospitals where one staff member is available to certify and issue benefits.
- 4. 1/18 Changed Policy number from 4.09 to 7.82. Incorporated guidance included in FNS Policy Memo 2016-5.

Local Agency:	Clinic number		
Date:	Number of appointments	Number of reviews: IFF/IBP_	Other

Staff	Participant ID number	IFF or	No relationship to self/family member/friend	Proofs verified			Cert took place during normal clinic	Nutrition Risk	Notes
member	number	IBP	member/friend verified	ID	R	I	normal clinic hours? (Y/N)	Appropriate (Y/N)	

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.90 Effective Date: October 1, 2006 Revised Date: April 23, 2024

SECTION: CUSTOMER SERVICE

SUBJECT: Customer Service Guidelines

A. Policy

- 1. Each local agency shall implement a high quality standard of customer service delivery, exemplified by the following three key components:
 - a. Reliable points of entry;
 - b. Prompt response to customer calls, written correspondence, and requests for services; and
 - c. Front-line customer contacts handled with the highest level of professionalism and customer service.
- 2. Each local agency shall ensure that staff meets the following objectives of high quality customer service:
 - a. Treat all customers with courtesy and respect;
 - b. Promptly answer all customers' questions with accurate, objective information;
 - c. Resolve all customers' needs with the fewest number of calls possible;
 - d. Use language that all customers can easily understand; and
 - e. Promptly respond to all customers' concerns and complaints.
- 3. Each local agency is directly responsible for delivery of all customer service commitments. To better support the WIC staff, local agency management shall:
 - a. Involve staff in customer service improvement initiatives; and

b. Establish a customer-focused culture and infrastructure at all levels of management and internal support.

B. Procedure

- 1. The local agency shall ensure that at least one staff person is answering the main phone line during business hours. If, in extenuating circumstances or unexpected closures, a staff person is not available to answer calls, the local agency shall notify the state agency by email (mdh.wic@maryland.gov), and the main phone line outgoing voicemail message shall be updated notifying the caller of the interruption and timeframe.
- 2. Calls that are received while staff are with another caller should be notified that they will be placed on hold.
 - a. Either staff shall answer to inform the caller they will be placed on hold, or an automated message shall notify the caller that they will be answered in the order received.
 - b. Calls shall not be placed on hold for longer than 15 minutes. If the call cannot be answered within this time, staff should ask the caller for their information and have another staff member return the call immediately or within a specified timeframe.
- 3. Voicemails shall be checked daily, and calls shall be returned within two business days.

Attachments:	
References:	
Revisions: 04/2024	Added expected procedure regarding answering phones and voicemail.

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.91 Effective Date: October 1, 2006 Revised Date: March 14, 2024

SECTION: CUSTOMER SERVICE

SUBJECT: Customer Service Complaints

A. Policy

The local agency is responsible for receiving and responding to all customer comments complaints within two business days of receipt. The Local Agency Coordinator shall determine whether an oral or written response is necessary based on the situation.

B. Procedure

The local agency shall:

- 1. Resolve customer complaints, except those relating to civil rights discrimination (Policy and Procedure 7.01) at the initial point of contact or within two business days of receipt of the complaint. The state agency will become involved only after the chain of command has been followed at the local agency and there is no mutual resolution, or as referred by the Local Agency Coordinator.
 - a. If the state agency receives a complaint that the local agency was unreachable or unresponsive, they will notify the local agency by email. Local agency staff shall confirm receipt of the complaint and/or provide an update once the caller has been contacted within two business days.

2. Ensure that all local agency staff:

- Have the authority to resolve customer complaints at the initial point of contact or within two business days of the receipt of the complaint or
 - b. Know the chain of command to forward the complaint or complainant.
- 3. Have customer feedback forms/surveys readily available in the WIC clinic, health department, or health services building and in a conspicuous place for customers to provide anonymous comments.

Attachments:	
References:	
Revisions: 03/2024	Clarified expectations of local agency when the state agency forwards a complaint.

MARYLAND DEPARTMENT OF HEALTH WIC PROGRAM POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 7.92 Effective Date: March 14, 2024 Revised Date:

SECTION: LOCAL AGENCY OPERATIONS AND MANAGEMENT

SUBJECT: IT Software and Equipment Requirements

A. Policy

WIC local agencies are responsible for the procurement, installation, security, connection, maintenance, support, replacement, and surplus of information technology software, equipment, and network related items. This includes, but is not limited to, items such as desktops, laptops, printers, scanners, monitors, power supply, routers, switches, wireless access points, VPN, internet providers, network cables, and others to provide WIC services and ensure the local WIC agency runs securely and smoothly.

The local agency shall provide a secure and reliable connection to the internet. Internet speed and bandwidth shall be adequate to allow all local agency WIC employees to properly access the WIC management information system.

WIC computers (i.e., desktops (CPU box) and laptops) shall be replaced at a maximum of every four years and no sooner than every 3 years. While FNS does not have a specific written requirement for the number of years, they have recommended to Maryland WIC this replacement schedule as this is an industry best practice to keep equipment in good condition.

Monitors, Printers, Scanners, Software, and other related peripherals should be replaced/upgraded at the local agency discretion as needed. All computers shall always include up to date security and anti-virus software. Any software installed on the devices must follow Policy & Procedure 7.40 WOW Information Systems Usage.

This policy must be followed even if WIC funds are not used to purchase the computers.

B. Procedure

1. Procurement/Replacement

The local agency shall follow these requirements for procurement and/or replacement.

- a. Replace WIC desktops and laptops every 3(minimum) to 4(maximum) years.
 - i. The local agency shall share their computer replacement plan with the state agency for approval.
- b. Obtain approval for desktop and laptop specifications by the State WIC IT Chief prior to the procurement to ensure it meets the minimum requirements for WIC's management information system. Current mandatory minimum equipment specifications are:
 - 1. Manufacture support and warranty with next-business-day onsite support. Coverage years must match the local agency replacement plan of either 3 or 4 years.
 - 2. Coverage for accidents. Coverage years must match the local agency

- replacement plan of either 3 or 4 years.
- 3. Windows based computer, i.e. no MAC or Apple desktops/laptops.
- 4. Enough inputs for the peripherals needed for the user such as scanner, printer, monitor, card swipe reader, and keyboard/mouse.
- c. If using WIC funds to purchase, obtain approval from the Maryland WIC Finance Unit prior to purchase of sensitive equipment in accordance with Policy and Procedure 6.02 *Inventory* and 6.08 *Procurement*.
- d. Ensure computers purchased with WIC funds are used for WIC purposes only.
- e. Procure all IT equipment following Policy and Procedure 6.08 Procurement.
- f. Track all equipment purchased with WIC funds in accordance with Policy & Procedure 6.02 *Inventory*.

2. Network

The local agency shall follow these requirements for network and maintain high-speed internet access for each WIC clinic:

- a. Provide a secure and reliable network connection for WIC clinics.
- b. Provide the needed network/internet speed and bandwidth to ensure all local agency WIC employees can properly access the WIC management information system without issues.
- c. Install, maintain, replace, troubleshoot and repair of network service and equipment.
- d. Provide and maintain the connection for WIC desktops, laptops, and printers on the WIC clinics network.

3. Installation

The local agency is responsible for installation and setup of the WIC clinic desktops, laptops, and printers. Local agencies must ensure all equipment is functioning properly. The local agency shall also:

- a. Install, maintain, and replace all required software needed to use the Maryland WIC management information system or local agency tasks, such as, but not limited to, the following:
 - 1. Microsoft Office (version determined by local agency IT)
 - 2. Latest version of Adobe Reader (required for WOW to be set as default PDF application)
 - 3. Antivirus (software determined by local agency IT)
- b. Install, maintain, and replace, all required peripherals needed to use the Maryland WIC management information system or conduct local agency tasks, such as, but not limited to, the following:
 - i. Printers
 - ii. Keyboard and Mouse
 - iii. Monitors
 - iv. Signature Pads
 - v. Surge protectors or uninterrupted power supply (UPS) Required for all WIC desktops, laptops, and peripherals.
 - vi. Scanners (must be installed using a Twain Driver)
- c. Move desktops, laptops, printers, and any other IT equipment as necessary for the WIC clinic.

4. Security/Protection

The local agency is responsible for the security of the WIC clinic's desktops, laptops, printers, peripherals, software, and network. The local agency shall also:

a. Ensure WIC desktops, laptops, printers, and other IT equipment are not allowed

under any circumstance to be used for personal use.

- i. Do not open or download personal files and visit only work-related websites. Visiting certain websites and/or downloading certain files can contain viruses that can harm the computer,
- b. Ensure computers are updated with all Windows and browser security updates.
- c. Ensure computers have anti-virus software that is updated and patched daily.
- d. Lock laptops in a cabinet or in a limited access area when not in use.
- e. Report all security incidents to your local agency IT and state agency immediately.
- f. File a report to the State Police immediately If computer equipment is lost or stolen.
- g. Report theft or damage of computer equipment to the Maryland WIC Director, Deputy Director, and IT Chief within twenty-four hours via email.
- h. Protect IT equipment from theft, misplacement/loss, temperature extremes, precipitation, and dampness.
- i. Ensure laptops are always transported in their protective carrying cases and always secured.
- j. When traveling, desktops, laptops, printers, and other IT related items should not remain in an unattended vehicle overnight.
- k. Connect desktops, laptops, printers and other powered IT equipment to a surge protector or uninterrupted power supply (UPS) to protect against electrical spikes and to keep systems from shutting down prematurely.
- I. Practice good housekeeping with IT equipment. Encourage regular use of canned compressed gas on keyboards, printers, and intake/exhaust ports.
- m. Comply with Policies & Procedures 7.40 WOW Information Systems Usage and 7.41 for WOW Information Systems Security.

5. The State Agency Shall:

- a. Provide helpdesk support for Maryland WIC's management information system.
- b. Provide minimum specifications for computers when requested.
- c. Provide eWIC card swipe readers.
- d. Provide assistance or documentation to local agency IT with the management information system or associated peripherals for the management information system only, remotely over the phone and/or email.
- e. Not assist with other computer issues such as, but not limited to, issues with printers, operating systems, hardware, monitors, network, wireless, software, email accounts, user system/domain accounts and passwords, or anything else unrelated to the Maryland WIC's management information system.

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References:

- 1. 2 CFR 200.313
- 2. 2 CFR 200.313(d)(4)

Revisions: