Policy Number: 3.01 USDA Approval Date: September 7, 2022 State Effecitve Date: November 29, 2022

POLICY MANUAL

3. Clinic Operations.

3.01. Caseload Management

A. POLICY OVERVIEW:

Pennsylvania Women, Infants and Children (WIC) program shall manage Federal Food and Nutrition Services Administration funds to maximize program participation among eligible applicants and maintain a waiting list when funding is insufficient to serve all applicants.

B. DEFINITIONS:

<u>Caseload/Enrollment:</u> The number of individuals who are within a valid certification period and eligible to receive benefits.

Note: It is understood Local Agencies (LA)s may use caseload to mean workload which includes applicants applying for the program but are not enrolled. However, for the purposes of the State Agency (SA) and the reports run in the Management Information System (MIS), caseload and enrollment are interchangeable.

<u>Participation:</u> The number of enrolled women, infants and children within a reporting period who receive benefits. This includes fully breastfed infants and women partially breastfeeding an infant who are not eligible for food benefits.

<u>Participation Assignment:</u> The number of participants the SA assigns the LA to serve on a monthly basis.

<u>Target Population:</u> An estimated number of women, infants and children residing in Pennsylvania who may be income eligible for the program. Numbers are calculated using the most recent health and economic data available from the Department of Health, Bureau of Informatics and Information Technology, Division of Health Informatics.

C. POLICY:

- 1. The SA shall make participation assignments to LAs based upon availability of funds. These assignments may be adjusted monthly.
 - The LA shall manage its participation within the range specified in the LA's grant agreement.
 - b. The LA shall consider the following demographic items for targeting enrollment:
 - (1) Census data (age, income, racial-ethnic and other socio-economic factors);
 - (2) Natality statistics; and
 - (3) Neonatal and infant mortality statistics.
 - c. Evaluate the distribution of priorities (P&P 3.02, Program Eligibility) served each month in each clinic.
 - (1) Increase outreach efforts to reach higher priority levels when there is a decrease.
 - (2) When priority levels being served vary significantly, consider this fact along with need ranking and the percent of unserved when targeting enrollment.

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- d. Follow-up by phone, text or post card with participants who miss scheduled appointments. Follow-up should especially be directed to high priority women, infants and participants designated as "high-risk" by the LA. (7 CFR 246.7 (b)(5))
- 2. Waiting List: The SA will make a determination when a waiting list needs to be implemented.
 - a. Applicants who are placed on a waiting list shall be notified of that action within 20 calendar days of their request for benefits. At that time, such individuals shall also be notified in writing of their right to a fair hearing.
 - b. As openings become available to provide program benefits, individuals on the waiting list who have a valid Verification of Certification (VOC) shall be contacted and served first, regardless of category or priority. They should be contacted to receive service according to the date they requested benefits.
 - c. As clinic openings become available, applicants shall be given an appointment for eligibility determination in order of highest-ranking category by chronological date of request for benefits. Pregnant or breastfeeding women, infants, and children who are called, but are determined to be at a lower priority than the LA can currently enroll, shall be returned to the waiting list and recalled when those priorities can be served.
 - d. Waiting list documents shall be retained on file by the LA until the LA program review and fiscal audit for the time period are completed and closed.
 - e. No applicant who requests placement on the waiting list shall be denied inclusion.

Reference(s):

- 1. WIC Regulations: 7 CFR 246.7(f)(1).
- 2. WIC Regulations: 7 CFR 246.7 (e).
- 3. WIC Regulations: 7 CFR 246.7 (k)(3).
- 4. WIC Regulations: 7 CFR 246.16 (d)(1).
- 5. WIC Regulations: 7 CFR 246.7 (b)(5).
- 6. FNS Instruction 803-6 Certification: Waiting Lists.
- 7. Current State Agency Plan of Program Operation and Administration.

Policy Status:

- 1. This Policy supersedes P&P Number 3.01 dated, June 3, 2018.
- 2. This P&P supersedes P&P Number 1.16, dated March 16, 2004.
- 3. This P&P supersedes P&P Number 1.17, dated March 28, 2004.

POLICY AND PROCEDURE MANUAL

- 1. GENERAL ADMINISTRATION.
- 1.16. Waiting List Management.

A. POLICY:

- 1. When a local agency has reached its maximum participation level, it must maintain a waiting list, by date of inquiry, of any individuals who visit the local agency during clinic office hours to request Program benefits.
- 2. The local agency may elect to accept requests for benefits by telephone and add names of such persons to the waiting list. Sections A.3 through A.7 below apply to telephone contacts as well as in-person visits from applicants. Permission to take telephone requests for service must be specifically granted by the State Agency.
- 3. The local agency shall maintain one waiting list per county. Maintaining waiting lists at any other level must be justified by the local agency and written permission must be granted by the State Agency.
- 4. The following information shall be obtained at the time the applicant requests benefits:
 - a. Date and time request was taken.
 - (1) This is the official application date.
 - (2) Recording time taken is optional.
 - b. Name.
 - c. Address.
 - d. Telephone number.
 - e. WIC type (P,B,N,I,C).
 - f. Birth date.
 - g. Expected delivery date (for pregnant woman) or actual delivery date (for breastfeeding and postpartum women).
 - h. Certification expiration date (for VOC card holder).

The Waiting List Form (see Attachment 1) should be used to record this information. At its option, the local agency may maintain its waiting list(s) in three sections, by grouping women, infants, and children on separate sheets.

- 5. All persons who ask to be placed on a waiting list, except for those who are categorically ineligible, shall be placed on the waiting list by the local agency.
- 6. Applicants who are placed on a waiting list shall be notified of that action within 20 days of their request for benefits. At that time, such individuals shall also be notified in writing of their right to a fair hearing using the language in Attachment 2.
- 7. Pre-certification of program applicants at the time of placement on the waiting list is discouraged. However, the local agency may elect to pre-certify applicants if doing so will significantly facilitate caseload management and expedite provision of benefits to applicants.

POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 1.16

Effective Date: March 16, 2004

GENERAL ADMINISTRATION.

1.16. Waiting List Management.

- 8. When the local agency determines that it will be unable to serve lower priority applicants during their period of eligibility, only applicants who are likely to be served or who have specifically requested waiting list placement, should be placed on a waiting list. The local agency must determine at which priority level services cannot be offered by analyzing clinic enrollment by type and priority, recertifications scheduled, and normal attrition rates.
- 9. When the waiting list becomes very long and cannot be eliminated through replacement of natural attrition, the local agency must move lower priority active participants to the waiting list in order to serve higher priority participants.
- 10. As openings become available to provide program benefits, individuals on the waiting list who have valid Verification of Certification (VOC) cards shall be contacted and served first, regardless of category or priority. They should be contacted to receive service according to the date they requested benefits.
- 11. When all persons with valid VOC cards have been served, the local agency shall contact applicants for a certification appointment in the following order by date of placement on the waiting list.
 - a. Pregnant women (P).
 - b. Infants (I).
 - c. Breastfeeding women (B).
 - d. Children (C).
 - e. Non-breastfeeding women age 18 or under at time of conception (N).
 - f. Non-breastfeeding women over 18 years of age at time of conception (N).
- 12. Waiting list documents shall be retained on file by the local agency until the local agency program review and fiscal audit for the time period are completed and closed.

B. PROCEDURE:

- 1. The local agency shall designate one staff member to act as coordinator for the agency's waiting list(s).
- 2. Applicants shall be placed on the local agency's waiting list in order of the date they request benefits.
- 3. At the time of placement on the waiting list, the local agency will inform the applicant of the following:
 - a. That the applicant's name has been placed on the waiting list and the reasons for the list.
 - b. That the applicant has the right to a fair hearing.
 - c. That the applicant's name will be removed from the waiting list if he/she becomes categorically ineligible before space on the program becomes available.

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- GENERAL ADMINISTRATION.
- 1.16. Waiting List Management.
 - d. Other community services and sources of food for which he/she may be eligible (e.g. Food Stamps, Aid to Families with Dependent Children, food pantries, etc.).
 - 4. If the local agency has participation openings available at a clinic site other than the one at which program benefits were requested, this should be offered to the applicant before placement on the waiting list.
 - 5. The local agency shall re-assess its waiting list(s) at least monthly to remove applicants who become categorically ineligible and to reclassify applicants who have changed category (such as infant to child).
 - a. Applicants who have been removed due to categorical ineligibility must be given written notice of the fact.
 - b. Applicants who have changed category while on the waiting list (such as infants who reach one year or pregnant women who have delivered) shall remain on the waiting list. The date shall remain the date of original placement on the waiting list.
 - c. If the waiting period for an applicant with a VOC card exceeds the term of the VOC card, the program applicant shall remain on the waiting list if he/she is categorically eligible. However, the status of the applicant shall be changed to P, B, N, I, C, and he/she shall be processed according to his/her date of placement on the waiting list.
 - 6. When the local agency moves lower priority active participants to the waiting list in order to serve higher priority persons:
 - a. Active participants shall be moved to the waiting list only at the end of a certification period.
 - b. Women who change from breastfeeding to post-partum non-breastfeeding shall be placed on the waiting list at the time they discontinue breastfeeding if they would become a Priority 6. No actual recertification is required, but a waiting list notice shall be provided.
 - c. Active participants shall be moved to the waiting list in reverse order of priority, that is all Priority 6, then all Priority 5, then all Priority 4, etc.
 - d. Recertification procedures shall be performed to determine that the participant is actually in a priority which is being moved to the waiting list.
 - e. Participants who are to be moved to a waiting list at the time of a certification visit must be given notice of that fact and also be informed in writing of their right to a fair hearing. (See Attachment 2)

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 - 7. Sub-categories may be applied when it is necessary to move a large number of participants to the waiting list. If sub-categories are applied, the following order shall be used:
 - a. All Priority 6 postpartum non-breastfeeding women.
 - b. All Priority 5 children over age 4, then over age 3, etc.
 - c. All Priority 4 breastfeeding women, then infants, then pregnant women.
 - d. All Priority 3 postpartum non-breastfeeding women.
 - e. All Priority 3 children age 4 1/2, then 4, then 3 1/2, then 3, etc.
 - 8. As clinic openings become available, applicants shall be given an appointment for eligibility determination in order of highest ranking category by chronological date of request for benefits as outlined in Section A-10 and A-11 above. Pregnant or breastfeeding women, infants, and children who are called, but are determined to be at a lower priority than the local agency can currently enroll, shall be returned to the waiting list and recalled when those priorities can be served. At its discretion, the local agency may choose to pre-certify these individuals if it appears that they could be served in the near future.
 - 9. Appropriate information shall be entered on the Waiting List Form (Attachment 1) regarding the processing of applicants from the list.
 - a. When an applicant is contacted to schedule an appointment for eligibility determination, the local agency must inform the applicant that failure to come for the appointment without good cause will result in the applicant's removal from the waiting list.
 - b. If an applicant does not keep the appointment or has failed to contact the local agency to schedule the appointment, the applicant shall be removed from the waiting list.
 - c. An applicant may contact the local agency after his/her name has been removed from the waiting list, and he/she may again request WIC benefits. In this case, the person shall be placed on the waiting list as a new applicant.

Attachment(s):

1. Waiting List Form. (Local Reproduction)

2a. Waiting List Notice. (Local Reproduction - English)

2b. Waiting List Notice. (Local Reproduction - Spanish)

Reference(s):

- 1. WIC Regulations: 7 CFR Part 246.7(f)(1).
- 2. FNS Instruction 803-6 (4-1-88).

Policy and Procedure Status:

1. This P&P supersedes P&P Number 1.16 dated July 1, 1993.

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