

Pennsylvania Women, Infants and Children (WIC) Policy and Procedure Manual Index

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
Section 1. General Administration					
1.00	Organization and Management	The PA WIC State Agency shall be comprised of the Department of Health's Bureau of Women, Infants and Children (WIC) and be responsible for the administration and oversight of program activities statewide.	<ul style="list-style-type: none"> • Organizational Structure • Division of Finance, Technology and Retail Store • Division of Quality Assurance and Program Integrity • Training Center and Mock Clinic • Division of Regional Territory Coordination • BIIT Positions 		
1.01	Program Management	PA WIC shall achieve program consistency, standardization and integrity through a formal system of communication, expenditure, staff competence, training, program monitoring and emergency planning to guide staff in the execution of their duties. The WIC State Agency Policy and Procedure Manual contains the policies and procedures of WIC. All local agencies and clinics shall follow the policies and procedures as written in this manual.	<ul style="list-style-type: none"> • Communication between SA, Grantees, vendors and contractors • Reporting Requirements • CPA Requirements • Grant and Program Monitoring • Vendor Management • Staff Training and Development • Breastfeeding Support in the Workplace • Disaster Response and Recovery 	<ol style="list-style-type: none"> 1. USDA Memo 95-067. 2. USDA Memo 96-035. 3. USDA Memo 96-042. 4. WIC Regulations: 7 CFR part 246.11. 5. WIC Regulations: 7 CFR Part 246.2 6. United States Department of Labor, Wage and Hour Division. "Fact Sheet #73: Break Time for Nursing Mothers under the FLSA." http://www.dol.gov/whd/regs/compliance/w/hdfs73.htm 7. United States Department of Labor, Occupational Health & Safety Administration. Standard Number 1910.1030 http://www.osha.gov/pls/oshaweb/owadispl.show_document?p_table=INTERPRETATIONS&p_id=20952 8. Pennsylvania Legislature: Freedom to Breastfeed Act, July 8, 2007, P.L. 90, No.28, Cl.35 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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				http://www.legis.state.pa.us/cfdocs/legis/PN/Public/btCheck.cfm?txtType=HTM&sessYr=2007&sessInd=0&billBdy=S&billTyp=B&billNbr=0034&pn=1252 9. United States Department of Health and Human Services, Office on Women's Health: Business Case for Breastfeeding tool kit. http://www.womenshealth.gov/breastfeeding/employer-solutions/business-case.html 10. P&P 1.10 – Civil Rights	
1.02	<u>Local Agency Qualification and Disqualification</u>	PA WIC shall periodically review the qualifications of authorized local agencies under its jurisdiction. This shall be achieved via review of current grantee performance and compliance history, review of contract/grant options, including a cost/benefit analysis of each, and pursuing the most viable option to serve and grow program participation following State procurement requirements.	<ul style="list-style-type: none"> • Service Delivery Analysis • LA Selection • LA Disqualification 	1.7 CFR Part 246.5 – Selection of Local Agencies 2. 7 CFR Part 246.18(a)(3)(i-iii) – Local Agency Appeals 3. Title 62 Pennsylvania Consolidated Statutes	
1.03	<u>Abuse and Fraud Prevention and Investigation</u>	The PA WIC Program (Program) shall strive to prevent program abuse and/or fraud, investigate expeditiously any such allegations made, and sanction any participant and/or staff with findings of substantiated abuse and/or fraud. Local agencies (LA) in conjunction with the State Agency (SA) are responsible for the detection and prevention of dual participation.	<ul style="list-style-type: none"> • Definitions (close friend, relative and Separation of Duties) • Abuse and/or Fraud Prevention • Complaint and Abuse/Fraud Investigation • FI Misuse Investigations • Sanctions and Disqualification Following Investigation • Appeal Procedures • LA Hearing Procedures • Dual Participation (Interstate and Intrastate Report) 	1. WIC Regulations: 7 CFR Parts 246. 2. 2, 246.7(l) 2. WIC Regulations: 7 CFR Part 246.8. 3. WIC Regulations: 7 CFR Part 246.9 4. USDA Memo dated August 19, 2016 5. Department of Health Information Circular, February 1993. 6. FNS 113, dated November 8, 2005. 7. 2. 28 Pa. Code §8.51-8.62.	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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1.04	Local Agency Monitoring	PA WIC requires State and Local Agency internal review procedures to monitor and evaluate grantee operation of the WIC Program.	<ul style="list-style-type: none"> • LA Internal Clinic Monitoring • Clinic No Show Monitoring • SA Monitoring (Retail Store Review, Clinic Nutrition Services Review, Clinic Administration Review and Fiscal Review) 	<ol style="list-style-type: none"> 1. WIC Regulations: 7 CFR Part 246.11(d) (2). 2. WIC Regulations: 7 CFR Part 246.19(b). (Federal Register, Vol. 59, No.148, March 31,1994) 3. WIC Regulation: 7 CFR Part 246.20. 4. OMB Circular A-133 5. M.D. 325.9 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
1.05	Redeemed/Lost/Stolen FI Monthly Report & 10% Random Sample of Voided FI's	USDA requires State Agencies to account for the disposition of all Food Instruments (FIs) and Cash Value Vouchers (CVVs). Each FI and CVV must be identified as validly redeemed, lost or stolen, expired, duplicate, voided, damaged, issued in error, unclaimed, returned unused or not matching issuance records. The Redeemed/ Voided, Lost or Stolen FI Monthly Report (attachment 1) lists those FIs and CVVs that have been identified on the MIS system as being both redeemed and voided. All such occurrences must be investigated and explained. In order to ensure that every effort has been made to reconcile all FIs and CVVs, local agencies must submit information to the State agency to ensure that all payments are allowable.		1. WIC Regulations: 7 CFR 246.12(q)	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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1.06	<u>Universal Precautions</u>	PA WIC shall require that all State and Local Agency (LA) personnel, including contracted and subcontracted employees, involved with blood testing participate in training, demonstrate proficiency in, and exercise universal precautions to prevent exposure to bloodborne pathogens. The Occupational Safety and Health Administration (OSHA) regulations related to Bloodborne Pathogens, 29 CFR, Subpart Z, 1910.1030 (dated 12/6/91, last updated 4/3/12) and Needlesticks and Other Sharps Injuries (29 CFR, Part 1910, dated 1/18/01) must be followed.	<ul style="list-style-type: none"> • Exposure Control Plan • Hepatitis B • Administrative Requirements • Clinical Requirements 	<ol style="list-style-type: none"> 1. Centers for Disease Control (CDC), Updated US Public Health Service Guidelines for the Management of Occupational Exposures to HBV, HCV, and HIV and Recommendations for Postexposure Prophylaxis. MMWR, June 29, 2001, Vol. 50 (RR11): 1-42. 2. Pennsylvania Department of Environmental Protection, Bureau of Waste Management, Post Office Box 69170, Harrisburg, Pennsylvania 17106-9170. 3. Selected EPA-registered Disinfectants: https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants 4. OSHA Regulations 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens; Final Rule. Federal Register, Vol. 56, No. 235, Friday December 6, 1991, Last Updated April 3, 2012: http://www.ecfr.gov/cgi-bin/textidx?SID=6a8639d0689ab3120f4389041765360b&mc=true&node=se29.6.1910_11030&rgn=div8 5. OSHA Regulations 20 CFR 1910, Occupational Exposure to Bloodborne Pathogens; Needlesticks and Other Sharps Injuries; Final Rule. Federal Register, Vol. 66, No. 12, Thursday January 18, 2001: https://www.osha.gov/pls/oshaweb/owadis 	

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				<p>p.show_document?p_table=FEDERAL_REGISTER&p_id=16265</p> <p>6. CDC Vaccine Information Statement – Hepatitis B Vaccine: http://www.cdc.gov/vaccines/hcp/vis/vis-statements/hep-b.pdf</p> <p>7. Hepatitis B FAQs for Health Professionals: http://www.cdc.gov/hepatitis/HBV/HBVfaq.htm</p> <p>8. Human Immunodeficiency Virus (HIV) in Healthcare Settings: http://www.cdc.gov/HAI/organisms/hiv/hiv.html</p>	
1.07	Confidentiality of Participant Records	The PA WIC Program shall respect and protect participant Protected Health Information (“PHI”) and WIC confidential information (collectively, hereinafter “information”) and release only the minimum information necessary to carry out the purposes of any legitimate request for release of information. In accordance with 7 C.F.R. §246.26 of the Federal WIC Regulations, confidential participant information is any information about an applicant or participant that individually identifies an applicant or participant and/or family member(s).	<ul style="list-style-type: none"> • Participant Information and Confidentiality Protections • Minimum Necessary Release of Information • Enforcement • Reporting Child Abuse to Child Protective Services 	<ol style="list-style-type: none"> 1. WIC Regulations: 7 CFR, Part 246.26(d). 2. PA Child Protective Services Law 23 PA. C.S.A. §§6301-6385. 3. 55 PA Code §§34901.1-3490.210. 4. FNS Instruction 800-1 dated March 30, 1990. 5. USDA Memo 93-040. 6. USDA Memo 94-070. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
1.08	Information System Management	The security and accuracy of the highly sensitive participant information maintained within the WIC Management Information System (MIS) must be ensured to comply with federal and Commonwealth regulations and safeguard the welfare of the program’s participants, and correlatively the integrity of the program. Therefore, state and local agency staff must account for the physical	<ul style="list-style-type: none"> • Equipment Management • Connection to Network (commonwealth-purchased equipment only) • Creating User IDs • Creating and Resetting Passwords • Password Protection Standards 	<ol style="list-style-type: none"> 1. P&P 3.03 Documentation of Expenses 2. Commonwealth of PA ITBSEC007 – Minimum Standards for User ID and Passwords 3. USDA/FNS Handbook 701, July 2001 4. WIC Regulations: 7 CFR Part 246. 5. WIC Regulations: 7 CFR Part 246.2. 6. USDA Memo dated July 15, 2004 SFP-04-088 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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		location and security of system-connected hardware, including desktop and laptop PCs, at all times. This involves adhering to guidelines for creating and maintaining user IDs and effective passwords and updating the system routinely. Proper procedures for capturing clinic staff and participant signatures must also be followed to adhere to regulations and protect against fraud.	<ul style="list-style-type: none"> Digitized Signatures 	7. Commonwealth of PA ITBSEC006 - Electronic Signature Policy	
1.09	Material Development and/or Requisitioning	The PA WIC State Agency shall review and approve all written and audiovisual materials developed by grantees to assure compliance with Federal and State rules, regulations, policy, procedure and guidance statements. Materials available from the State Agency shall be made available to grantee via requisition	<ul style="list-style-type: none"> Material Development (Logo, non-discrimination statement, Funding Statement, Credits, Evaluation) Printed Material Requirements Nutrition Materials Clearinghouse Stock Requisition 	<ol style="list-style-type: none"> WIC Regulations: 7 CFR Part 246.8. FNS Instruction 800-2, June 2, 1992. FNS Policy on Copyrights, July 1, 1980. Standard General Terms and Conditions. USDA Memo dated May 24, 2013. WIC Memo 13-077-1.00 November 18, 2013. Departmental Regulation (DR) 4300-003, Equal Opportunity Public Notification Policy, June 2, 2015. 	
1.10	Civil Rights	The State Agency (SA) and the Local agency (LA) shall adhere to all Civil Rights laws and regulations to ensure equal access to federally assisted programs regardless of a person's race, color, natural origin, age, sex or disability.	<ul style="list-style-type: none"> Civil Rights Training Non-discrimination statement Public Notification Americans with Disabilities Act Amendments Act Civil Rights Impact Analysis (CRIA) Civil Rights Questionnaire Civil Rights Complaints 	<ol style="list-style-type: none"> Title VI of the Civil Rights Act of 1964 Title IX of the Education Amendment of 1972 Sections 504 and 508 of the Rehabilitation Act of 1973 The Age of Discrimination Act of 1975 The Americans with Disabilities Act Amendments Act (ADAAA) of 2008 The Pennsylvania Human Relations Act of 1997 WIC Regulations: 7 CFR, Part 246.8 USDA Regulations: 7 CFR, Part 15 FNS Instruction 113-1 https://www.ascr.usda.gov/directives-and-regulations 	

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1.11	Translation and Interpretation	The PA WIC Program requires local agencies (LA) to have procedures in place to serve Limited English Proficient (LEP) persons.	<ul style="list-style-type: none"> • Definitions (Protected Classes, LEP persons, Interpretation, Translation, Bilingual Staff, Reasonable Accommodation and Minor) • Title VI of the Civil Rights Act of 1964 • LEP Persons • Translation of Written Materials 	<ol style="list-style-type: none"> 1. USDA Guidance to Federal Financial Assistance 2. Title VI of the Civil Rights Act of 1964 3. Title IX of the Education Amendments of 1972 4. The Rehabilitation Act of 1973: Sections 504 and 508 5. The Americans with Disabilities Act of 1990 6. The Age Discrimination Act of 1975 7. U.S. Department of Homeland Security's (DHS) 2012 Language Access Plan 	
Section 2. Financial Management					
2.01	Local Agency Financial Management	Local agency (LA) grantees shall prepare and submit to the State Agency (SA) for review and approval a budget for administrative and program operation upon request. Expenditure of program funds shall be consistent with 2 CFR 200 (OMB Super circular) as well as the approved budget and constitute those costs necessary for fulfillment of PA WIC Program objectives and contract requirements.	<ul style="list-style-type: none"> • Budget Request • Budget Deviations • LA Cash Needs Request • Allowable Nutrition Services and Administration Expenditures • Specific Allowable Costs • Cost Allowable with SA Approval • Unallowable Costs • Financial Record Keeping 	1. OMB Super circular	
2.02	Cost Allowability for Travel, Incentive Items, Tuition Reimbursement and Renovations	The local agency (LA) shall be reimbursed for travel according to this policy and shall obtain State Agency (SA) approval prior to arranging any out of state travel, purchasing incentive items, granting staff approval to enroll in classes for reimbursement, or completing renovations through the grant agreement.	<ul style="list-style-type: none"> • Travel (General, Authorization to Travel, Cash Advances, Transportation, Lodging) • Travel (Subsistence, Luncheon or Dinner Meetings, Documentation) • Incentive Items • Tuition Reimbursement • Renovations 	1. Internal Revenue Code	

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2.03	<u>Nutrition Education, Breastfeeding Promotion & Support, and Outreach Expenditure Requirements</u>	The local agency (LA) shall expend at least one sixth of administrative and program costs on nutrition education, 1% on outreach expenditures and a dollar amount to be determined by the State Agency (SA) on an annual basis on breastfeeding promotion and support. Each LA must itemize and report all nutrition education, breastfeeding promotion, and outreach expenditures. All expenditures and documentation to support allowable costs must be consistent with standards set forth under 2 CFR 200 and 7 CFR Part 246.	<ul style="list-style-type: none"> • Nutrition Education Expenditures • Breastfeeding Promotion Expenditures • Outreach Expenditures • Time Logs and Time Studies 	<ol style="list-style-type: none"> 1. WIC Regulation: 7 CFR Part 246.11, 246.14c.1 2. WIC Regulation: 7 CFR Parts 246.14, 246.24 and 246.25. 3. WIC Regulation: 2 CFR 200 4. WIC Regulation: 7 CFR Part 246 5. Public Law 101-147. 6. Current Pennsylvania Department of Health Contract. 7. P&P 2.05 Equipment Purchase, Inventory, and Disposition 	
2.04	<u>Audit of Local Agencies</u>	PA WIC shall require annual audit of all local agency grantees. Specific audit requirements for local agencies receiving WIC funding are dependent upon the nature of the local agency's organization. The local agency has the responsibility for determining if it is: (a) a governmental entity; (b) a non-governmental, nonprofit entity; (c) a nonprofit hospital not affiliated with either a governmental or an institution of higher education; or (d) a for profit entity. Specific audit requirements for WIC local agencies are prescribed by the U.S. Office of Management and Budget (OMB) 2 CFR 200, Subpart F, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and related Pennsylvania Management Directive 325.9, Processing Audits of Federal Pass-Through Funds.	<ul style="list-style-type: none"> • Annual Audit required of local agencies 	<ol style="list-style-type: none"> 1. WIC Regulation: 7 CFR 246.20. 2. 2 CFR 200, Subpart F 3. Management Directive 325.9 	

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2.05	Equipment Purchases, Inventory and Disposition	The Bureau of WIC shall have in place procedures to authorize, document and track equipment purchases, and dispositions made by Local Agencies and their sub-grantees. Equipment purchased with WIC funds shall be used exclusively for the WIC Program.	<ul style="list-style-type: none"> • Equipment Definition • Equipment Purchase (Budget, Bids, Approvals) • Equipment Reimbursement and Inventory • Lost Equipment • Stolen or Damaged Equipment • Equipment Disposition 	1. WIC Regulation: 7 CFR Parts 246.14, 246.24 and 246.25.	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
Section 3. Clinic Operations					
3.00	Clinic Operations	The PA WIC Program shall provide clinic services at locations and times convenient to those it serves, in coordination with other services, in a timely and efficient manner and in a healthy environment.	<ul style="list-style-type: none"> • Participant Service Locations (Service Areas and Local Agencies) • Clinic Sites (Selecting, Types and Requirements) • Coordination with other Social Service Agencies • Reception and Phone Conduct • Clinic Schedules • Voter Registration and Voter Registration Coordinator • Immunization Screening and Referral 	<ol style="list-style-type: none"> 1. SFP 01-111, Immunization Screening and Referral in WIC, August 31, 2001 2. Update on Immunization Issues, SFP 20-105, July 3, 2002. 3. FNS Instruction 800-1, March 3, 1990. 4. OMB Circular A-102, Attachment C and OMB 2 CFR, Part 215 5. WIC Regulations: 7 CFR Part 246.25(a). 6. P&P 1.08 Information System Management 7. USDA Memo 99-026. 8. Federal Register, November 18, 1998, page 63970. 	

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3.01	Caseload Management	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.	<ul style="list-style-type: none"> • Definitions (Caseload/Enrollment, Participation, Participation Assignment, Target Population) • Participation Assignments • Waiting List 	<ol style="list-style-type: none"> 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. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
3.02	Program Eligibility	The PA WIC Program shall require applicants to meet program eligibility criteria and achieve certification prior to enrollment and receipt of food benefits.	<ul style="list-style-type: none"> • Definitions (Adjunct Eligibility, Applicant, Certification, Family, Homeless Facility, Homeless Individual, Income, Institution, Migrant Farmworker, Net Income, Participant, Presumptive Eligibility, Temporary Low Income and Unemployed Person) • Categorical Eligibility and WIC Priority System • Definitions for determining family size • Priority System • Residency Requirement • Identity Requirements • Income Eligibility (Sources, Exclusions) • Utilizing Client Information System (CIS) • Enrollment 	<ol style="list-style-type: none"> 1. WIC Policy Memo #2013-3. 2. WIC Policy Memo #2010-2. 3. WIC Policy Memo #2003-3. 4. WIC Policy Memo #2017-3. 5. Federal WIC Regulations: 7 CFR § 246.2 and 246.7. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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			<ul style="list-style-type: none"> • Certification Periods • Notification of Ineligibility • Rights and Responsibilities • Eligibility of Aliens and Alien (Foreign) Students • Proxy Designation and Responsibilities 		
3.03	Nutrition and Risk Assessment	PA WIC shall, as part of the nutrition/health assessment, promote and employ a consistent method for hematological risk determination, dietary assessment, nutritional risk and anthropometric measurements.	<ul style="list-style-type: none"> • Hematological Test • Dietary Assessment • Nutrition Risk • Anthropometric Measurements 	<ol style="list-style-type: none"> 1. Food Frequencies, Maryland WIC Program. 2. Policy 5.02 – Breastfeeding Education and Peer Counseling Programs 3. Policy 7.03 – Food Package Tailoring 4. WIC Regulations: 7 CFR, Part 246.7(e)(1) i(B) and 246.7 (e)(m)(1)ii(A) 5. USDA Memo 92-169. 6. FNS Instruction 803-2, dated April 1, 1988. 7. Committee on Scientific Evaluation of WIC Nutrition Risk Criteria, Food and Nutrition Board, Institute of Medicine: WIC Nutrition Risk Criteria: A Scientific Assessment, 1996. 8. SFP WIC Policy Memorandum 98-9, Revision 10. 9. USDA Memo 99-069. 10. Final WIC Policy Memo 2011-5 WIC Nutrition Risk Criteria 11. Transmittal of New and Revised Nutrition Risk Criteria 12. CDC Growth Charts Training Modules: www.CDC.gov/growthcharts 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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				13. Nutrition During Pregnancy. Food and Nutrition Board, Institute of Medicine, National Academy of Science, 1990. 14. PA WIC Anthropometric Training Manual.	
3.04	Food Benefits	Food benefits shall be provided to the clients at the time of certification.	<ul style="list-style-type: none"> • Issuance of Food Instruments to Postpartum Women • Processing Standards for Applications • Verification of Certification (VOC) • Acceptance of VOC • Eligibility for Overseas program 	1. WIC Regulations: 7 CFR Part 246. 2. WIC Regulations: 7 CFR Part 246.7(e)(2)f. 3. SFP 01-076, dated May 17, 2001. 4. SFP 01-079, dated May 24, 2001.	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
3.05	Services to Special Populations	Persons residing in schools, maternity homes, temporary shelters, or any other residential facilities where meals are provided as part of the usual services are eligible to participate in the program if they meet program eligibility criteria. Such persons are eligible even though they may receive Supplemental Nutrition Assistance Program (SNAP) or other forms of food assistance.	<ul style="list-style-type: none"> • Definition of a Homeless Person 	1. USDA Memo 97-044. 2. Federal Register Vol. 54, December 14, 1989, p. 51289. 3. Federal Register Vol. 57, August 5, 1992, p. 34500. 4. WIC Regulations: 7CFR Part 246.2 and 346.7 (n).	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
3.15	Proof of Financial Need	To define "Proof of Financial Need" required by the WIC State Agency to justify a State Agency's request to expedite payment of a grantee's invoices.	<ul style="list-style-type: none"> • Definitions (Financial Need, Fiscal Responsibility, Proof of Financial Need) 		

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Section 4. Food Delivery System					
4.01	Retail Store Management	PA WIC shall employ a uniform statewide retail purchase system for all WIC foods, with the exception of special formulas, to assure competitive pricing and maximize WIC dollars.	<ul style="list-style-type: none"> • Food Delivery System • WIC Retail Store Selection Criteria • Authorization of New Retail Stores • Stale-dated food and formula requirements • Minimum Inventory Requirements • Training of WIC Retail Stores • Reauthorization of Existing Stores • Establishment of Price Requirements • WIC Maximum Allowable Prices and Price Adjustment System • Inadequate Participant Access (IPA) • Processing Probationary, Extended Probationary and Temporary Authorization • Changes in Availability or Location of WIC Authorized Stores • Disqualification or Denied Reauthorization and Appeals • Retail Store Conflict of Interest • WIC Vendor and SNAP Vendor Information Confidentiality • Retail Store Files, Content 	<ol style="list-style-type: none"> 1. PA WIC Regulations, Chapters 1101-1109 and 1113. 2. PA MIS System User Manual. 3. Local Agency Retail Store Forms Manual. a. WIC Retail Store Application Form. b. WIC Retail Store Selection Criteria Form. c. Determination of Participant Access Form. d. Minimum Inventory and Price Form. 4. WIC Regulations: 7CFR Part 246.12(g)(3). 5. WIC Retail Store Handbook 6. 7 CFR Ch.11 §246.12(t.) 7. 7 CFR Ch.11 §246.26 e. and f. 	<p style="color: red;">Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.</p>

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4.02	<u>Food Instrument Security and Distribution</u>	State Agency (SA) and Local Agency (LA) employees shall account for all food instruments (FIs). This shall include secure storage, appropriate preparation, authorized distribution, and destruction of voided FIs.	<p style="text-align: center;">and Management</p> <ul style="list-style-type: none"> • Security of Food Instruments and Identification Card • Mailing of Food Instruments • Management of Food Instruments • Food Instrument Void Codes • Reissuance of Food Instruments to Participants (Damaged, Destroyed, Stolen, Mailed, Lost) • Reissuance of Food Instruments to Retail Stores • Reissuance Procedure • Specific Situations (Pay Exactly Amount missing, bank rejected) • Reissuance requests for FIs issued by another LA 	<ol style="list-style-type: none"> 1. WIC Regulations: 7 CFR Part 246.12(l), (n), (r) (8). 2. Pennsylvania WIC Data User's Manual. 	<p style="color: red;">Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.</p>
4.03	<u>Retail Store Quality Assurance</u>	PA-WIC requires the State Agency and Local Agency staff to review the effectiveness of the WIC food delivery system and to monitor grantee operations of the WIC Program by conducting: a. Redeemed check sampling b. Investigations of Complaints c. Compliance Monitoring Reviews of Authorized Stores d. Local Agency Retail Store Management Reviews	<ul style="list-style-type: none"> • Redeemed Check Sampling • Complaint Procedure • Compliance Monitoring Review of Authorized Stores • Compliance Investigations • Inventory Audits • Routine Reviews • WIC Transaction Reviews • LA Retail Store 	<ol style="list-style-type: none"> 1. WIC Federal Regulation: 7 CFR Part 246.8. 2. WIC P&P 1.03, Civil Rights. 3. MIS Data System and Local Agency Retail Store Forms Manual a. Monitoring Review Form b. Minimum Inventory and Price Form c. Approved Exceptions to Minimum Inventory Requirements d. Determination of Participant Access Form e. WIC Transaction Review Report Form f. Inventory Audit Monitoring Form g. Local Agency Monitoring Review Confirmation 	<p style="color: red;">Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.</p>

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			Management Reviews	Letter h. Local Agency Monitoring Violation Formal Warning Letter i. Local Agency WIC Transaction Review Letter j. Local Agency Transaction Review Formal Warning Letter 4. State Agency Retail Store Forms Manual a. Inventory audit invoice calculation form b. Inventory audit analysis form 5. WIC Regulations §1105.6 Monitoring 6. State Agency Forms Manual 7. Local Agency Forms Manual	
4.04	Training of WIC Retail Stores	The WIC program shall assure WIC authorized stores are educated in WIC Program Regulations and applicable policies and procedures to improve WIC program services and prevent program non-compliance.	<ul style="list-style-type: none"> • Initial Training • Annual WIC Retail Store Training • Written Notifications to Retail Store • Corrective Action Training • Store Requested Training • Audio/Visual Aids and Handouts 	1. PA WIC Regulations §1103.2, 1105.1, 1105.6, and 1107.1. 2. WIC Retail Store Handbook.	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
4.05	Special Formula Distribution System	1. The State Agency will establish, through Local Agency Agreement, a Distribution Center for special formulas identified in Policy and Procedure (P&P) Manual. 2. The Distribution Center staff will ship requested special formulas to either the Local Agency clinic or the participant's home as requested or required in the Procedures below. 3. The following formulas will be provided through approved retail grocery stores unless they are not available in a WIC approved store accessible to the participant: Alimentum 32 oz. RTU and 16 oz. Powder; Alimentum Advance 32 oz. RTU; Isomil DF 32 oz. RTU;	<ul style="list-style-type: none"> • Procedures Relating to Distribution Center Use • Distribution Center Orders • Special Formula Orders shipped to Participant Home • Special Formula Orders shipped to WIC Clinic • Damage/Breakage of Special Formula Delivered • Replacement of Special Formula for Reasons of 	1. P&P 7.07 and 7.08. 2. PA MIS System User Manual.	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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		<p>Nutramigen (all types); Nutramigen Lipil 13 oz. Concentrate and 16 oz. Powder; Pediasure 8 oz. RTU; Pediasure w/Fiber 8 oz. RTU; and Similac Neosure Advance 12.8 oz. Powder. If not available, the distribution center shall be used to supply the product.</p> <p>4. All formulas packaged in glass bottles (Enfamil Preme 24 w/Iron, Similac Special Care 24 w/Iron, etc.) and all Neocate products must be shipped to local agency clinic sites, not to participant's homes.</p> <p>5. Local Agency's will authorize special formulas for individual participants based on procedures in P&P 7.08 Special Formula. Only one month's special formula may be ordered from the Distribution Center at a time.</p> <p>6. Problems relating to Distribution Center operations or delivery of special formulas which cannot be addressed by Distribution Center staff, will be referred to the State Agency Authorization and Training Unit.</p> <p>7. Special formulas stocked in the Distribution Center will be secured within a locked storage room, the entrance to which is further secured within a locked building. Keys for access to these areas will be maintained by Distribution Center personnel only.</p>	<p>Change in Prescription</p> <ul style="list-style-type: none"> • Special Formula that is returned • Special Formula Shipped from one LA to another • Distribution Center Procedures • Distribution Center Process • Distribution Center Will Maintain Certain Information • SA Roles in the Distribution Center 		

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
Section 5. Nutrition Education					
5.01	Nutrition Education in the WIC Program	PA WIC shall make nutrition education available to all participants at no cost to promote healthy food and lifestyle choices.	<ul style="list-style-type: none"> • Definition of Nutrition Education • Nutrition Education Contacts and Documentation • Services for High Risk Participants • Staffing for Nutrition Education • Nutrition Education Coordinator • Nutritionist • Nutrition Aide • Nutrition Education Plans • Evaluation of Nutrition Education Materials • WIC and the Expanded Food Nutrition Education Program (EFNEP) 	<ol style="list-style-type: none"> 1. WIC Regulations: 7 CFR Part 246.11 2. Public Law 108-265, the Child Nutrition and WIC Reauthorization Act of 2004, June 30, 2004. 3. WIC Nutrition Services Standards, FNS, USDA, October 2001 4. Nutrition Education and Outreach Plan Guidance (current version) 5. WIC Regulations: 7CFR Part 246.11(a)(3) 6. Substance Use Prevention: Screening, Education, and Referral Resource Guide for Local Agencies. USDA-FNS, FNS 276 7. WIC Program Nutrition Education Guidance. January 2006 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

5.02	<p style="text-align: center;"><u>Breastfeeding Education and Peer Counseling Program</u></p>	<p>PA WIC shall provide breastfeeding education to encourage breastfeeding through a combination of promotional, educational and support activities.</p>	<ul style="list-style-type: none"> • Breastfeeding Promotion and Education • Positive Clinic Environment • Breastfeeding Screening, Assessment and Documentation • Breastfeeding Staffing • Breastfeeding Peer Counseling Programs • Breast Pump Purchase, Rental and Distribution • Purchase and Distribution of Breastfeeding Aids 	<ol style="list-style-type: none"> 1. Breastfeeding Promotion and Support - A How-to Guide for WIC Staff. 2. State Agency self-study breastfeeding modules: Series 1-3 3. Clinic Monitoring Tools for breastfeeding promotion and support. 4. State Agency Breastfeeding Plan Guidance. 5. NWA Position Paper: Breastfeeding Promotion and Support in the WIC Program. 6. AAP Policy Statement: Breastfeeding and the Use of Human Milk, 2005 7. The Surgeon General’s Call to Action to Support Breastfeeding, 2011 8. WIC Federal Regulations, Section 246.11. January 2011; 3921. USDA Memo 99-047 9. Grow Baby Grow Modules. WIC anthropometric manual 10. Assessing Growth of Breastfed Infants: MIS System reference materials. 11. Breastfeeding Promotion and Support: A How-to Guide for WIC Staff. 12. Using Loving Support to Manage Peer Counseling Programs: A training curriculum designed for management staff of the Special Supplemental Program for Women, Infants and Children (WIC), FNS and Best Start Social Marketing, July, 2004. 13. USDA Memo 99-145. 14. USDA Memo 00-013. 15. NAWD Position Paper: Guidelines for WIC Agencies Providing Breast Pumps. 16. State Agency Training Curriculum: “Expression and Storage of Breast Milk” 	
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Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
5.03	Exit Counseling Session for Women Participants	<p>1. The local agency shall offer an exit nutrition counseling session to all women "graduating" from the Program.</p> <p>2. The exit counseling session shall reinforce important health messages previously presented, with emphasis on: a. a well-balanced diet, b. folic acid intake, c. continued breastfeeding, d. children's immunizations, and e. the health risks of using alcohol, tobacco, and other drugs.</p> <p>3. The local agency shall provide each woman with the State Agency-developed exit counseling flyer or alternate brochure(s) covering the same topics.</p> <p>4. The local agency shall document in the participant's file that the exit counseling session was conducted, and the exit brochure given.</p>	<ul style="list-style-type: none"> • Important Health Messages 	<p>1. House Appropriations Committee Report accompanying Public Law 103-111, October 21, 1993.</p> <p>2. WIC Policy Memo #94-9</p> <p>3. Nutrition Services Standards, Standard, 8. A. 10.</p> <p>4. WIC brochure: "After You Deliver: Health Tips for Moms."</p>	<p>Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.</p>
Section 6. Outreach/ Referral					
6.01	Local Agency Outreach Activities	<p>PA WIC shall perform an on-going evaluation of program utilization and develop, coordinate and deploy outreach initiatives to enhance program participation and reduce or eliminate barriers to new and continued program participation.</p>	<ul style="list-style-type: none"> • Outreach Network Log • Target Groups for Outreach • Outreach Network • Outreach Activities • Outreach Announcements • Documentation • Outreach During Full Enrollment 	<p>1. WIC Regulations: 7 CFR Part 246.4(a)(7) 2. WIC Regulations: 7 CFR Part 246.4(b)</p>	

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6.02	Participant Referral System	PA WIC shall assure all program applicants/participants receive the State Agency developed "Community Services" brochure or a state approved local agency (LA) referral brochure that lists health-related and public assistance programs and, when appropriate, are referred to needed services.	<ul style="list-style-type: none"> Participants Assessed Needs Maintaining Documentation 	<ol style="list-style-type: none"> WIC Regulations: 7 CFR part 246.7(a)(b)(1)(2)(3). USDA Memo 97-044. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
6.03	Referral Agreements for Health Care Services	PA WIC shall provide access to appropriate health care services to all participants either by the direct provision of these services or by referral to providers of free or low-cost health care in the community. Health care services are defined as ongoing routine prenatal obstetrical and pediatric care, and include routine examinations, diagnosis and treatment.	<ul style="list-style-type: none"> Develop and Implement Procedures 	<ol style="list-style-type: none"> WIC Regulations: 7 CFR part 246.6(b)(5). 	
6.04	Outreach in Hospitals	PA WIC shall assure that potential program candidates receiving care as hospital inpatients and/or out-patients receive education about the benefits of WIC, as well as the opportunity for authorization and certification.		<ol style="list-style-type: none"> WIC Regulations: 7 CFR Part 246.6(f)(1)(2). 	
Section 7. Food Supplements					
7.01	Authorized Foods and Statewide Food List	The PA WIC State Agency shall review and approve foods for inclusion in the program and create a standard State food list that will be reviewed biennially and updated as appropriate.	<ul style="list-style-type: none"> SA Roles and Responsibilities LA Responsibilities 	<ol style="list-style-type: none"> WIC Regulations: 7 CFR part 246 Criteria for the Pennsylvania WIC Program Food List 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
7.02	Authorized Food Packages - Maximum Monthly Amounts	PA WIC shall prescribe authorized supplemental foods according to food packages established by USDA.	<ul style="list-style-type: none"> Supplemental Foods Packages Fully Breastfeeding Women 	<ol style="list-style-type: none"> WIC Regulations: 7 CFR parts 246.2 and 246.10(b)(c). USDA Memo 98-152. USDA Memo 95-139 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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7.03	Food Package Tailoring	PA WIC shall authorize Competent Professional Authorities (CPA's) to prescribe and tailor food packages to assure participants receive the maximum amount of allowable foods.	<ul style="list-style-type: none"> • The Model Food Prescription • Review Participants Food Prescriptions • Prescribing and Tailoring Food Package 	<ol style="list-style-type: none"> 1. Policy & Procedure 2.03 Competent Professional Authority 2. WIC Regulations: 7 CFR Part 246. 3. WIC Regulations, Federal Register Vol. 72, No. 234, December 6, 2007. 4. FNS Instruction 804-1, March 25, 1987. 5. USDA Memo 95-022. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
7.04	Infant Formula	PA WIC shall employ an infant formula rebate cost containment strategy to maximize program benefits to state participants. PA WIC shall not provide 1) non-contract infant formula or 2) low iron formulas. (Attachment 1 List of current PA Primary Infant, Alternate.).	<ul style="list-style-type: none"> • Definitions (Infant Formula, Exempt Formula, Contract Formula: Primary, Alternate and Transitional, Non-Contract Formula) • CPAs • Primary Infant Formula • Alternate Infant Formula • Prescriptions • Provide Ready-to-Feed Formula • Return Prescriptions for Non-Contract Formula 	<ol style="list-style-type: none"> 1. WIC Regulations: 7 CFR parts 246. 2. 2 and 246.10 2. Federal Food Drug and Cosmetic Act; Section 201 21 USC 321(z); Section 412, Section 350a (h)(1) 3. 3. Title 21 Code of Federal Regulations CFR 105.3(e) 4. 4. Committee on Nutrition, American Academy of Pediatrics: Iron Fortification of Infant Formulas (RE9865) Pediatrics 104: 1, 119-123, 1999. 5. 5. Committee on Nutrition, American Academy of Pediatrics: Pediatric Nutrition Handbook Ronald E. Kleinman, M.D., Ed. American Academy of Pediatrics, 2005. 6. 6. Centers for Disease Control and Prevention: Recommendations to Prevent and Control Iron Deficiency in the United States. MMWR. Volume 47: No. RR-3 1998. 7. 7. USDA Memo 95-138. 8. 8. USDA Policy Memo 2014-1A dated January 7, 2014 	

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7.05	<u>Issuance of Prorated Food Packages</u>	PA WIC shall issue prorated food packages when clinically indicated based on the timing of check pick-up and/or breastfeeding status.	<ul style="list-style-type: none"> • Prorated Food Packages 		Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.
7.06	<u>Formula Issuance for Breastfed Infants</u>	PA WIC shall provide supplementation to breastfed infants when clinically indicated due to questionable or inadequate intake, a breastfeeding/medical problem or who have begun receiving supplemental formula prior to their certification appointment.	<ul style="list-style-type: none"> • An Infant/Mother Feeding Assessment Screening • A Mother wants/needs to Supplement her infant 	1. Policy and Procedure 5.02	
7.07	<u>Formula Exchange</u>	PA WIC shall operate a Formula Exchange Register to recover formulas being exchanged and redistribute unopened and unexpired product to participants to control program waste.	<ul style="list-style-type: none"> • Documented Inventory • LA Clinic Manager Roles and Responsibilities • Returned Formula 		Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.

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7.08	Exempt Infant Formula and WIC - Eligible Nutritionals	PA WIC shall issue infant formula, exempt infant formula or WIC-eligible nutritionals to women, infant or child participants with a documented qualifying condition as noted in the definitions in section B below.	<ul style="list-style-type: none"> • Definitions (Exempt Infant Formula, Phenylketonuria (PKU), WIC Eligible Nutritionals) • Written Prescriptions • PKU Formula Issuance Procedure 	<ol style="list-style-type: none"> 1. WIC Regulation: 7 CFR part 246.10 [c], [e] (3) 2. FNS-268: WIC Eligible Formulas and Medical Foods or Products 3. FD&C Act Section 412, Section 350a(h)(1) 4. WIC Services to Eligible PKU Patients: Memorandum of Understanding Revised September 1994. 	Warning: This policy and procedure is currently in a state of transition and is being updated to support EBT, telehealth and other innovations resulting out of necessity to manage the pandemic.