

Pennsylvania Department of Health

Bureau of WIC State Plan

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Goals and Objectives for Functional Areas for FFY2020

I. Vendor and Farmer Management

1. Reauthorize 100% of all retail stores that are due for reauthorization.
2. Achieve 100% training of all WIC authorized stores.
3. Monitor competitive and maximum allowable pricing to assure cost containment.
4. Evaluate PA's vendor peer group selection to assure achievement of maximum cost containment.
5. Maintain MOU with the Health and Human Services Delivery Center (HHS DC) for the transmission of Retail Store Authorization Unit data from the current MIS (QuickWIC) system to the new MIS system (PENN).
6. Complete 100% of new store agreements, containing EBT language, prior to initial training and collect all agreements at initial training. All new stores will get a Vendor Assistant account prior to initial training.
7. Prepare to facilitate the EBT Retailer Enablement and Certification process for vendors and help prepare remaining vendors for related EBT activities.
8. Utilize established procedures to reimburse vendors for single-function EBT devices.
9. Terminate a Vendor Readiness Period for the EBT implementation.
10. Develop additional selection factors (e.g. use of GIS Mapping to identify transactions for participants that don't live in the vendor zip code) in MIS (PENN) to identify vendors for compliance investigation.
11. Conduct compliance investigations on 5% of the authorized vendors as of October 1, 2020.
12. Continue to provide the appropriate FNS office with notice of vendor disqualifications within 15 days after all vendor appeal options have been exhausted.

II. Nutrition Services

1. FFY20 BF Goal: To complete a needs assessment to evaluate how staff are conducting breastfeeding assessments using the PENN system over the past year.

The Local Agency Breastfeeding Coordinator or designee will develop a plan to monitor staff to see how they are doing with breastfeeding assessments using the PENN system and determine need for additional trainings, changes in staffing or clinic flow, or recommendations for enhancements based on findings.

2. FFY20 NE Goal: To evaluate how staff are doing with conducting WIC assessments in PENN and determine needs to help improve their confidence, competency and/or efficiency. During FFY20, the Nutrition Education Coordinator (NEC) or designee will evaluate how staff are doing with assessment in PENN and begin to develop a plan to address problems and concerns.
3. Research opportunities to integrate a tele-health model into nutrition services and develop a framework for acceptable phased implementation by interested local agency providers.

III. Management Information System (MIS)

1. Expand on the successes of SAS implementation and utilization to include reporting and tracking regarding transitioning to a new Management Information System (PENN).
2. Continue the development of the SAS dashboard for use by state and local agency users after eWIC state wide implementation.
3. Continue to gather and enter PA-WIC authorized vendor banking information into PENN in anticipation for eWIC implementation (rollout). Monitor and enter changes in banking information as necessary.
4. Work closely with PA-WICs Information Technology associates on the deployment of the new tablet for the Local Agency Retail Store Coordinators and the vendor related forms located on the tablet for authorization, reauthorization and monitoring purposes.
5. Evaluate workload associated with the Electronic Benefits Transfer (EBT) System and determine full time equivalents required to perform related tasks.
6. Continue to maintain the Authorized Product List (APL) for WIC allowable foods for purchase by PA-WIC participants. Continue to be in direct communication with WIC authorized stores who submit Universal Product Codes (UPC's) for items they feel should be on the APL (approve or deny those items after consulting with the Nutrition section).

IV. Organization and Management

1. Maintain 90% compliance of mandatory training completion among all Bureau staff.
2. Update "to-be" business process to reflect changes required by EBT and streamline work for efficiency.

3. Continue to grow and evaluate field office functions of the Greensburg and Reading offices as appropriate.
4. Continue to evaluate and implement “span of control” as appropriate.

V. Nutrition Services and Administration (NSA) Expenditures

1. Continue SAS to monitor NSA, Food, OAF and National Office expenditures closely to ensure grants are fully utilized and reported accurately and timely to USDA/FNS.

VI. Food Funds Management

1. Continue the use of SAS with our food fund reconciliation to better manage food funds.

VII. Caseload Management

1. Continue to use SAS participation monitoring to provide better projections and work toward fully automating participation assignments.

VIII. Certification, Eligibility & Coordination of Services

1. Increase participation by utilizing MOU with DHHS for sharing adjunctive eligibility data.
2. Establish a framework for integrating tele-health into existing service models to mitigate participant travel and time barriers.

IX. Food Delivery and Food Instrument (FI) Accountability and Control

1. Continue to utilize PA’s overcharge recovery system to prevent food package cost increases by limiting the cost of foods to the established maximum allowable prices. This eliminates the need to limit the variety or selection of WIC allowable foods to maintain cost neutrality.

X. Monitoring and Audits

1. Complete retail store management reviews at 12 local agencies.
2. Complete program reviews at 12 local agencies.
3. Complete fiscal management reviews at 24 local agencies.

XI. Civil Rights

1. Continue to utilize the standard nondiscrimination statement as appropriate.

- **Electronic benefit transfer (EBT) and/or EBT implementation.** If the State agency has not yet implemented EBT statewide, it must reference its *current* Advance Planning Document.

Within FFY2019, PA will complete User Acceptance Testing, Pilot Go-Live and Evaluation, and implementation in four of the five regions after Pilot. Below are the key milestones based on the IAPDU submitted in March 2018:

- User Acceptance Testing
 - EBT-Focused UAT: June 11 – July 13, 2018
 - State Agency UAT: July 30 – August 17, 2018
 - Local Agency UAT: September 24 – December 7, 2018
- Pilot Go-Live: February 18, 2019
- Region 1 Go-Live: July 15, 2019
- Region 2 Go-Live: August 5, 2019
- Region 3 Go-Live: September 3, 2019
- Region 4 Go-Live: September 30, 2019
- Region 5 Go-Live: October 28, 2019

FFY 2020 State Plan - Outreach and Public Meetings Report

Statewide Outreach Goal and Objectives for FFY 2019 and FFY 2020 are as follows:

FFY 2019 Statewide Goal: Maintain Caseload through the Implementation of eWIC and the PENN System

The 24 local agencies shall complete the required Objective 1 and select at least one more objective from the list below. The State Agency will continue to support the National WIC Association (NWA) Recruitment and Retention Campaign for the next three years.

Required Objective 1: By May 31, 2019, promote eWIC to current participants six months before your region rollout.

Objective 2: By July 31, 2019, promote eWIC to stakeholders and community partners so they can support and help you promote eWIC to families they serve.

Objective 3: By July 31, 2019, the local agency will enhance their partnership with the local OB-GYNs, hospital clinics and pediatricians.

Objective 4: By March 31, 2019, review clinic flow to maximize the number of participant slots available before rollout in your region.

Objective 5: By July 31, 2019, the local WIC agency will collaborate with Early Head Start/Head Start, Healthy Start, Nurse Family Partnership or other home visiting programs.

FFY 2020 Statewide Goal: Increase Caseload after the eWIC Rollout

The 24 local agencies shall complete the required Objective 1 and select at least one more objective from the list below.

Required Objective 1: By May 31, 2020, the local agency will market the eWIC program to new and former participants.

Objective 2: By May 31, 2020, the local agency will market the eWIC program to community partners and stakeholders.

Objective 3: By May 31, 2020, the local agency will promote eWIC through media advertising (radio, TV, online, press releases, bus, etc.).

Objective 4: By May 31, 2020, conduct a needs assessment to evaluate the current clinic flow to determine if the clinics are maximizing appointment slots after implementation.

The evaluation of the statewide goal to maintain caseload through the implementation of eWIC and the PENN system during FFY 2019 is on-going. After a successful pilot, Pennsylvania will start their roll-out of eWIC in the first region of the state on July 15, 2019 and will have implemented eWIC statewide by the end of October 2019. Pennsylvania had an increase in participation during the months of March, April and May 2019 and is currently serving a little over 200,000 participants. The statewide goal is to continue increasing caseload during FFY 2020 after the completed roll-out of eWIC.

Pennsylvania continues to participate in the National WIC Association (NWA) Retention and Awareness Campaign. NWA completed a preliminary report regarding their Retention Campaign from 2016 to 2018, which included facts about some of the reasons for a decline in WIC participation nationwide. 1. Declining birth rates – PA birth rate has dropped 42 percent since 2007. 2. Decreased unemployment – PA unemployment dropped .30 percent in the last year. 3. Federal attacks on immigrants’ use of health and nutrition programs – This has affected Pennsylvania on a smaller scale than other states. Pennsylvania has not had as great a decline as some other states and ranks seventh in participation among the 90 WIC State Agencies.

In FFY 2019, the State Agency is preparing a media plan to support each region after a successful roll-out of eWIC by promoting eWIC in the counties through TV, radio and outdoor advertising. The advertising will be aired regionally from August FFY 2019 through April FFY 2020 as we strive to reach our goal of increasing participation statewide after the roll-out of eWIC.

In FFY 2019, the State Agency Division of Regional Territory Coordination has also enhanced outreach in their regions by reaching out to local municipalities and township government offices to promote WIC in the local communities. Some offices have requested WIC brochures to be available for walk-ins, while over 80 offices have posted WIC ads at no charge on their websites and in their newsletters. This initiative has reached out to over 240 offices so far and is helping to reach and educate people who may qualify for WIC and don’t know it.

In 2019, the local agencies worked on objectives to promote eWIC to participants, stakeholders and community partners and some local agencies took on the task of reviewing clinic flow to maximize the number of participant slots available before roll-out in their region. All the agencies continued collaborating with Head Start (HS) and Early Head Start (EHS) programs, medical health care providers and many community and social service agencies. They have participated in many local community events and health fairs to increase the awareness of WIC and to recruit eligible families.

All the local agencies will continue to promote the value of WIC to other partners through community outreach, local exhibit opportunities, press releases, newspaper ads and other types of media. In FFY 2020, the local agencies will evaluate their objectives for FFY 2019/2020 and submit their completed outreach plans starting July 1, 2020 through September 15, 2020.

The State Agency will continue to provide a WIC liaison to be a resource exhibitor or attendee at statewide conferences, summits and meetings throughout FFY 2020.

The conferences and meetings attended as a WIC exhibitor or attendee during FFY 2019 are as follows (approximate attendance is included):

- The Center for Schools and Communities - Statewide Family Support Conference - 225+
- The Center for Schools and Communities - 2019 Extra Learning Opportunities Conference – 350+
- Pennsylvania Department of Agriculture - Farm City Day - 1,200+
- Pennsylvania Association of School Nurses and Practitioners - 250+
- Annual Gaudenzia Women and Children’s Conference - 400+
- 2019 Pennsylvania Public and Community Health Annual Conference - 240+
- 2019 Migrant Education Program and English as a Second Language Conference - 300+
- 2019 Education Leading to Employment and Career Training (ELECT) Statewide Conference - 170+
- PA Workforce Development Association 35th Annual Employment Training and Education Conference - 1,000+
- Pennsylvania Medical Home Initiative Conference
- Nurse Family Partnership Training Conference - 250+
- Keystone 10 Initiative - 2nd Annual Breastfeeding Summit - Provided WIC materials
- Mental Health and Wellness Conference - 275+
- PA Nutrition Education Network Annual Conference - 300+
- Annual Early Childhood Education Summit - 1,000+
- The Center for Schools and Communities - Homeless Conference - 250+
- The Center for Schools and Communities – PA Safe Kids Conference - 200+
- Pennsylvania Farm Show - Almost 5,000 children
- Pennsylvania Opioid Symposium - 150+
- Pennsylvania Refugee Health Consultation - 175+
- OCDEL Home Visiting and Family Support Stakeholder Meetings - 50+

As opportunities arise, the State Agency will pursue other conferences and continue providing our outreach materials (brochures, posters, WIC folders, etc.) to other professionals serving potential WIC families. To improve access to WIC for the migrant and immigrant populations, we completed the translation of outreach and other pertinent WIC materials into other languages and uploaded the materials to pawic.com. They include Arabic, Chinese, Vietnamese, Swahili, Somali, Burmese, Napoli, Russian and Spanish.

In 2019, Pennsylvania WIC continued to collaborate with Nurse Family Partnership, PA Home Visiting programs, PA Education for Children and Youth Experiencing Homelessness, Early Learning Resource Centers, Child and Adult Care Food Program providers, Migrant Education, Center for Schools and Communities and Department of Education, Agriculture and Human Services. Pennsylvania WIC also participated in the 103rd Annual Farm Show where almost 5,000 children had the opportunity to participate in games focused on healthy food and beverages as well as increasing physical activity. The Farm Show was an excellent venue to promote WIC to families and other community programs.

The State Agency conducted eleven public meetings in 2019 to receive comments and recommendations for the State Plan and the WIC Program in general.

The meetings were held from 10:00 a.m. to 3:00 p.m. as follows:

- May 1, 2019, Home Nursing Agency, 206 West Plank Drive, Altoona, PA 16602
- May 1, 2019, Maternal and Family Health Services, Inc., 15 Public Square, Suite 600, Wilkes-Barre, PA 18701
- May 1, 2019, South Central Community Action Program, Inc., 533 South Main St., Chambersburg, PA 17201
- May 2, 2019, Chester County Government Services Building, 601 Westtown Road, Room 250, West Chester, PA 19380
- May 2, 2019, UNFHCC Erie County WIC Program, 1720 Holland St., Erie, PA 16507
- May 7, 2019, Southwestern Pennsylvania Human Services, Inc., 300 Chamber Plaza, Charleroi, PA 15022
- May 21, 2019, Bradford Area Public Library, 67 Washington St., Bradford, PA 16701
- May 21, 2019, NORTH, Inc. Philadelphia WIC Office, 1300 W. Lehigh Ave., Suite 104, Philadelphia, PA 19132
- May 22, 2019, WIC of Beaver County, 140 Beaver Valley Mall, Rt. 18, Monaca, PA 15061
- May 23, 2019, Hamilton Health Center, 110 S. 17th St., Harrisburg, PA 17104
- May 30, 2019, Community Progress Council, Inc., 130 Market St., York, PA 17401

The Department of Health published a sunshine notice of the public meetings in the Pennsylvania Bulletin, the official government publication of the Commonwealth. The meeting notice was placed on the Pennsylvania WIC and Department of Health WIC websites and in the following newspapers: *Altoona Mirror*, *Bradford Era*, *The Public Opinion*, *The Daily Local*, *Philadelphia Inquirer*, *Post-Gazette*, *Citizens' Voice*, *Tribune Review*, *Patriot News* and *The Erie Times*. In addition to these announcements and advertisements, approximately 2,025 notices were mailed or emailed to various health and human service agencies across the Commonwealth inviting individuals wishing to comment on the WIC Program to do so in person at the public meeting or by submitting written comments to the state agency by May 31, 2019. Agencies contacted included community organizations, Head Start and other home visiting programs, social service programs, professional organizations and health care providers.

The State Agency issued a memorandum to the local agencies, which outlined approaches to use to involve WIC participants and health professionals in the public meeting process. Local agencies were requested to post notices of the public meeting at clinic sites during the months of April and May 2019 and they also gave participants the opportunity to provide written comments.

I. VENDOR AND FARMER MANAGEMENT

(Please indicate) **State Agency:** Pennsylvania for FY 2020

Vendor and farmer/farmers' market management includes all those activities associated with selecting, authorizing, training, monitoring, and investigating the State agency's vendor and farmer/farmers' market population for the purpose of reducing fraud and abuse in the WIC Program food delivery system.

A. Vendor Selection and Authorization – 7 CFR 246.4(a)(14)(i), (ii), and (iii): identify the types of food delivery systems used in the State's jurisdiction, describe, if used, the State agency's limiting criteria, describe the State agency's selection criteria and attach a sample vendor agreement. Describe, if applicable, the supervision and instruction the State agency provides to local agencies to which vendor agreement signing has been delegated.

B. Vendor Training – 7 CFR 246.4(a)(14)(xi): describe State and local agency procedures for training WIC Program vendors and farmers/farmers' markets and for documenting all relevant training.

C. High-Risk Vendor Identification Systems – 7 CFR 246.12(j)(3): describe the policies and procedures for identifying and monitoring high-risk vendors through the use of vendor peer groups, food instrument and cash-value voucher (CVV)/ cash value benefit (CVB) redemption screening, analysis of overcharging and other violations, the use of price lists, tracking complaints, or other means. *This section may be submitted separately because it is no longer a State Plan requirement but must still be approved by FNS.*

D. Routine Monitoring – 7 CFR 246.4(a)(14)(iv): describe the criteria used to select vendors for routine monitoring as well as the methods and scope of on-site routine monitoring activities. Include any relevant information about the State agency's plans for improvement in the coming year.

E. Compliance Investigations – 7 CFR 246.4(a)(14)(iv): describe the investigative practices and procedures used to conduct both compliance buys and inventory audits for the purpose of detecting, tracking, and documenting vendor noncompliance with program requirements.

F. Administrative Review of State Agency Actions – 7 CFR 246.4(a)(14)(iii): describe the procedures for conducting both full and abbreviated administrative reviews.

G. Coordination with the Supplemental Nutrition Assistance Program (SNAP) – 7 CFR 246.4(a)(14)(ii),(a)(14)(iv), and 246.12(h)(3)(xxv): describe the methods and procedures used to coordinate the monitoring and sharing of information on vendors who participate in both the WIC Program and SNAP.

H. Staff Training on Vendor Management – 7 CFR 246.4(a)(14)(iii), (a)(14)(iv), and (a)(14)(xi): describe the distribution of responsibilities and activities of those individuals at both the State and local levels who are involved in vendor management activities. If applicable, describe the supervision and instruction the State agency provides to local agencies to which vendor management activities have been delegated.

I. Farmer/Farmers' Market Authorization – 7 CFR 246.4(a)(14)(iii), (a)(14)(xi), and 246.12(v): if the State agency authorizes farmers/farmers' markets to accept CVVs/CVBs, describe the authorization process.

J. Farmer/Farmers' Market Agreements – 7 CFR 246.4(a)(14)(iii), (a)(14)(xi), and 246.12(v): if the State agency authorizes farmers/farmers' markets to accept CVVs/CVBs, describe the State agency's agreement with the farmers/farmers' markets and attach a sample farmer/farmers' market agreement.

I. VENDOR AND FARMER MANAGEMENT

K. Farmer/Farmers' Market Training – 7 CFR 246.4(a)(14)(iii), (a)(14)(xi), and 246.12(v): if the State agency authorizes farmers/farmers' markets to accept CVVs/CVBs, describe the training provided to the authorized farmers/farmers markets.

L. Farmer/Farmers' Market Monitoring – 7 CFR 246.4(a)(14)(iii), (a)(14)(xi), and 246.12(v): if the State agency authorizes farmers/farmers markets to accept CVVs/CVBs, describe the criteria used for selecting farmers/farmers markets for routine monitoring as well as the method(s) and scope of on-site monitoring of the farmers/farmers markets.

M. Farmer /Farmers' Market Sanctions, Claims, and Appeals – 7 CFR 246.4(a)(14)(iii), (a)(14)(xi), and 246.12(v): if the State agency authorizes farmers/farmers markets to accept CVVs/CVBs, describe the farmer/farmers' market sanctions, claims, and appeals and attach a copy of the farmer/farmers' market sanction schedule (which should be included in the farmer/farmers' market agreement as well).

N. Participant Access - 7 CFR 246.4(a)(15); 246.12(b), (g)(1), (g)(9): provide information about the State agency's definition of participant access.

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

1. Number and Distribution of Authorized Vendors

a. Does the State agency use limiting criteria to limit the number of vendors it authorizes?

- Yes No

b. If yes, check and specify the type(s) of criteria used (e.g. vendor/participant ratio of 1/100 per county):

- Vendor/participant ratio (specify): _____
- Vendors/local agency or clinic ratio (specify): _____
- Vendors/local service area or county ratio (specify): _____
- Vendors/geographic area (e.g., number per mile, city block, zip code) (specify): _____
- Vendor/State agency staff ratio (specify): _____
- Statewide cap on the number of vendors (specify): _____
- Other (specify): _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

Selection Criteria, 28 PA Code Chapter 1103.4 and P&P 4.01, Retail Store Management.

2. Vendor Application Periods

a. The State agency considers applications, check all that apply::

- On an on-going basis
- Annually in (month) for a new agreement that begins (month) (day)
- Every two years (specify month): (month)
- Every three years (specify month): (month)
- Any time there is a participant access need
- The State agency is currently under a:
 - Federal Moratorium (specify time frame): _____
 - State agency-imposed deferral of application processing (specify time-frame and conditions): _____
- Other (specify): _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

28 PA Code Chapter 1103.1 (B)(3) and P&P 4.01, Retail Store Management.

3. Vendor Selection and Authorization

a. The vendor selection criteria used to select vendors for program authorization include:

Required criteria:

- EBT capable as defined in 7 CFR 246.12(aa)(4)(ii)
- A competitive price criterion based on:
 - Vendor applicant price lists
 - WIC redemption data
 - A State agency standard drawn from a price survey
 - A standard drawn from another source (specify): _____
 - Other (specify): _____

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

- A minimum variety and quantity of supplemental foods criterion that is:
 - Statewide
 - Peer group specific
 - A requirement to obtain infant formula only from sources included in the State agency's list of State licensed infant formula wholesalers, distributors, and retailers and manufacturers registered with the U.S. Food and Drug Administration
- A business integrity criterion that includes:
 - No history, during the past six years, among the vendor's owners, officers, or managers of criminal convictions or civil judgments for activities listed in 7 CFR 246.12(g)(3)(ii)
 - No history of other business-related criminal convictions or civil judgments
 - Other (specify): _____
 - Lack of a current SNAP disqualification or civil money penalty for hardship per 7 CFR 246.12(g)(3)(iii)

Optional criteria:

- A requirement to stock a full range of foods in addition to WIC supplemental foods
- A location necessary to ensure adequate participant access
- Redemption of a minimum number/volume of food instruments and CVVs/CVBs
- Satisfactory compliance with previous vendor agreement
- Certification by an approved State or local health department
- Proof of authorization as a SNAP retailer, including SNAP authorization number
- Hours of operation which meet State agency criteria (specify): 8 hours a day, 6 days a week
- Lack of previous WIC sanctions
- Other criteria (specify):
Store must be located in PA, be a full-time grocery store in a permanent location, be clean, have foods properly stored and may not have stale dated allowable foods on the sales floor. Store may not qualify, or expect to qualify, as an above 50% store. Store must meet the minimum inventory technology requirement set by the Department. Stores outside of the state are only considered for authorization if not authorizing the store would result in Inadequate Participant Access per §1103.7.

- Not applicable (explain):

b. Explain how the State agency develops and uses the competitive price criteria identified in item 3a to select vendors for authorization.

(1) Does the State agency exempt from competitive price criteria pharmacies that provide only exempt infant formula or WIC-eligible medical foods to participants?

- Yes No

(2) Did the State agency exempt non-profit WIC vendors (other than health or human services agencies that provide food under contract with the State agency) from competitive price criteria?

- Yes No

c. When does the State agency assess vendors for above-50-percent status?

- At authorization
- 6 months after authorization
- Annually

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

Other (specify): At Reauthorization. The State Agency also assesses vendors for above 50- percent status at any point to ensure compliance.

d. How does the State agency assess vendors for above-50-percent status? Check all that apply:

- Use the WIC-6 in The Integrity Profile (TIP System)
- Collect food sales documentation from the vendor
- Collect food sales documentation from another agency (specify): _____
- Other (specify): _____

e. Does the State agency authorize vendors that derive more than 50 percent of their annual food sales from WIC transactions (i.e., above-50-percent vendors)?

Yes No **If "No," please proceed to item 3f.**
If "Yes," please respond to the following:

(1) How many above-50-percent vendors are currently authorized? (include all above-50-percent vendors, not just WIC-only vendors)

(2) Does the State agency allow above-50-percent vendors to provide incentive items?

Yes No **If "No," please proceed to item 3f.**
If "Yes," please respond to the following:

Describe the approval process or attach a copy of the relevant application form. Description (or list the Appendix citation here):

(3) Does the State agency provide above-50-percent vendors with a list of pre-approved incentive items?

Yes; please provide list No

(4) Does the State agency provide above-50-percent vendors with a list of prohibited incentive items?

Yes; please provide list No

f. Does the State agency ensure vendors (regular and above-50-percent) do not treat WIC participants differently by offering them incentive items that are not offered to non-WIC customers? (7 CFR 246.12(h)(3) (iii) and WIC Policy Memorandum 2014-3 *Vendor Management: Incentive Items, Vendor Discounts and Coupons*)

Yes; please explain: No; please explain:

Regular vendors are trained that offering incentives to WIC participants is not allowed. PA WIC does not authorize above 50% vendors.

g. On-site pre-authorization visits are conducted to verify information received during the application process:

by SA by LA by Other

| | | | |
|--------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | For vendors at initial authorization |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | For all vendors at authorization/reauthorization |

h. Does the State agency verify the status of vendor applicants' SNAP retailer authorizations via STARS?

Yes No

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

28 PA Code Chapter 1103.1(b)(7) indicates PA WIC will deny the application if the selection criteria is not met. 28 PA Code Chapter 1103.4(10) indicates that the store may not be currently disqualified from participation in the Food Stamp Program or have been assessed a civil money penalty in lieu of a disqualification from the Food Stamp Program that, had it been imposed, would not yet have expired. and 1105.03 PA WIC does not authorize above 50 - percent vendors.

4. Vendor Peer Groups

If the State agency does not have a vendor peer group system, please attach a copy of the most recent exemption request and approval letters and proceed to item 4e.

a. Are vendors assigned to peer groups for selection/authorization?

Yes No

b. Are vendors assigned to peer groups for reimbursement purposes?

Yes No

c. Peer groups are based on the following (check all that apply):

- WIC sales volume
 - Gross food sales volume
 - Number of cash registers
 - Square footage of store
 - Type of store
 - Location of store
 - Local agency service areas Zip codes
 - City, county, or regional divisions Unique economic location (e.g., rural island, single metro area)
 - Urban/suburban/rural Other (specify): _____
 - Other (specify): Structure.
-

d. Using the chart on the next page, describe the peer groupings (e.g., supermarkets, medium and small grocery stores, convenience stores, etc.) that the State agency plans to use during the upcoming fiscal year. For State agencies with more than seven peer groupings, please attach a chart containing this Peer Group Description and list the Appendix citation here:

I - Appendix A – Vendor Peer Groups Table

e. Has the State agency received approval for an exemption from the vendor peer group system requirement (7 CFR 246.12(g)(4)(v))?

Yes; date FNS approved exemption: _____ No

(1) If yes, the State agency's exemption was based on the latest available data for the current fiscal year (which covers the period from _____ to _____), and the State agency:

Does not have any above-50-percent vendors; data source: _____

Paid above-50-percent vendors _____ percent of the total annual WIC redemptions to date; data source: _____

(2) If the State agency does not use a vendor peer group system, describe the State agency's alternative system for comparing the prices of new vendor applicants and currently authorized vendors and selecting for authorization or reauthorization vendors that offer the program the most competitive prices.

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

DESCRIPTION OF VENDOR PEER GROUP SYSTEM

| Vendor Peer Groups | | | | |
|--------------------|---|---------------------------------|-----------------------|-------------------|
| Peer Group No. (1) | Description (e.g., supermarkets, chain stores, pharmacies) (2) | Number of Vendors in Peer Group | | |
| | | Regular Vendors (3) | Above-50% Vendors (4) | Total Vendors (5) |
| 1 | Population Ranges: 500,000 - 999,999. Geography: Metro Market Edge. Square Footage: 20,000- 999,999 sq/ft | 706 | 0 | |
| 2 | Population Ranges: 250,000 - 499,999. Geography: Urban. Square Footage: 10,000 - 19,999 sq/ft | 116 | 0 | |
| 3 | Population Ranges: 125,000 - 249,999. Geography: Slightly Urban. Square Footage: 5000-9999 sq/ft | 122 | 0 | |
| 4 | Population Ranges: 70,000 - 124,999. Geography: Slightly Urban. Square Footage: 1000 - 4999 sq/ft | 104 | 0 | |
| 5 | Population Ranges: 0- 69,999. Geography: Remote Rural. Square Footage: 0 - 999 sq/ft | 289 | 0 | |
| 6 | N/A | | | |
| 7 | | | | |

Instructions:

Column 1 – Assign a sequential number to each peer group.

Column 2 – Describe the vendors in the peer group; include all factors and definitions checked in question 4c. (e.g., urban = counties with >10,000 residents OR suburban = counties with >10,000 residents OR rural = counties with <10,000 residents)

Column 3 – Insert the number of authorized vendors that are regular vendors.

Column 4 – If the State agency authorizes above-50-percent vendors, insert the number of above-50-percent vendors currently authorized.

Column 5 – Insert the total number of authorized vendors. This number should be the sum of columns 3 and 4, since the State agency authorizes vendors as being either a regular vendor or an above-50-percent vendor.

Column 6 – For each peer group that contains above-50-percent vendors, insert the number of the peer group that contains comparable vendors. If a comparable vendor peer group is the peer group that the State agency uses to derive the competitive price criteria and the price levels that it applies to the above-50-percent vendors. If above-50-percent vendors are placed in a peer group with regular vendors, the number in column 1 should be the same as that in column 6. If above-50-percent vendors are in separate peer groups, then the number in column 1 should be different from that in column 6.

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

f. At least every three years the State agency must assess the effectiveness of its peer group system and competitive price criteria to enhance system performance (7 CFR 246.12(g)(4)(ii)(C)).

The State agency makes this assessment—

- Annually Every three years
 Biennially Other (please specify): _____

What procedures does the State agency have in place to assess the effectiveness of its peer group system and competitive price criteria to enhance system performance?

I - Appendix B – Assessing Peer Group Effectiveness

Provide date of most recent FNS approval: Unresolved

5. Semiannual Shelf Price Collection

a. Has the State agency received approval for an exemption from the shelf price collection requirement under 7 CFR 246.12(g)(4)(ii)(B):

- Yes; date FNS approved exemption: _____ No

If yes, please attach a copy of the most recent exemption request and approval letter(s).

6. Vendor Agreements

a. The following reflect the State agency's vendor agreement practices; check all that apply:

- All vendors have a written agreement with the State agency
- A standard vendor agreement is used statewide
- Vendor agreements are subject to the State's procurement procedures
- Vendor agreements/handbooks are subject to the State's Administrative Procedures Act
- A nonstandard vendor agreement is used for:
 - Military commissaries
 - Pharmacies that only provide exempt infant formula and/or WIC-eligible medical foods
 - All pharmacies
 - Home food delivery contractors
 - Mobile stores
 - Other (specify): _____
- Vendors are authorized for a period of 3 year(s)
- Vendors are authorized/reauthorized under renewable agreements, provided no vendor violations occurred during the previous vendor agreement period
- All vendors are provided at least 15 days advance written notice of the expiration of the vendor agreement
- Chain stores sign a master agreement that includes multiple locations
- Chain stores sign an agreement for each store location
- All authorized WIC vendors are compliant with the regulatory split tender requirement at 246.12(f)(4).
- Other (specify): _____

b. In addition to the requirements in 7 CFR 246.12(h)(3)-(h)(6), the vendor agreement includes:

- Periodic submission of vendor price lists. If so, specify frequency: _____

I. VENDOR MANAGEMENT

A. Vendor Selection and Authorization

- Maintenance of records in addition to the required inventory records. If so, specify types of records:

- Submission of food instruments and CVVs/CVBs within a shorter timeframe than required by program regulations.
If so, specify timeframe: _____
- Redemption of a minimum number/volume of food instruments and CVVs/CVBs
- Minimum hours of operation
- Other (specify all): _____

c. The State agency delegates the signing of vendor agreements to its local agencies:

- Yes No

If yes, provide a description of the supervision and instruction provided to local agencies to ensure the uniformity and quality of this activity.

Please attach a copy of the Vendor Agreement or provide the appropriate Procedure Manual reference below.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I - Appendix A - Vendor Peer Groups Table and I - Appendix C - WIC Retail Store Agreement

I. VENDOR MANAGEMENT

B. Vendor Training

1. Vendor Training - General

a. Annual vendor training covers the following content (check all that apply):

- Purpose of the WIC Program
- Supplemental foods authorized by the State agency
- Minimum varieties and quantities of supplemental foods that must be stocked
- Obtaining infant formula only from sources included in the State agency's list of State licensed infant formula wholesalers, distributors, and retailers, and manufacturers registered with the U.S. Food and Drug Administration
- Procedures for obtaining prior State agency approval to provide incentive items to WIC participants
- Procedures for transacting and redeeming food instruments and cash - value vouchers
- Vendor sanction system
- Vendor complaint process
- Claims procedures
- Changes in program requirements since the last training
- Recordkeeping requirements
- Replacement food instruments and cash-value vouchers
- Participant complaints
- Vendor requests for technical assistance
- Reauthorization
- Reporting changes of ownership, location, or cessation of operations
- Procedures for appeal/administrative review
- Training employees
- WIC/SNAP sanction reciprocity and information sharing
- Other (specify): _____

If any topics listed above are not included in the annual vendor training, explain why.

Regarding incentives, regular vendors are trained that offering incentives to WIC participants is not allowed.

b. Vendors or vendor representatives receive training on the following occasions and/or through the following materials (check all that apply):

- On-site (in-store) meetings/conferences
 - Off-site meetings/conferences
 - During routine monitoring visits (e.g., educational buys)
 - When specialized technical assistance is requested
 - Written materials (e.g., newsletters)
 - Audiotapes or videotapes
 - Teleconference, video conference, or webinars
 - Vendor hotline
 - State or local agency website
 - Other (specify): Initial and Annual Training; retail store meetings
-

I. VENDOR MANAGEMENT

B. Vendor Training

c. Vendors or vendor representatives receive *interactive* training as follows (check all applicable responses):

- At or before initial authorization
- At least once every three years
- Annually or more frequently than once every three years

d. The following method(s) are used to evaluate the effectiveness of vendor training (check all that apply):

- Evaluation forms provided with training materials
- Pre-tests and/or post-tests regarding vendor policies, procedures, and practices
- Statistical indicators, such as a reduction in food instrument/cash-value voucher/cash-value benefit errors
- Educational buys
- Record reviews
- Informal feedback from vendors and/or participants
- Vendor advisory councils
- None
- Other (specify): It is up to LA to prepare evaluations, pre- tests/post-tests regarding vendor policies, procedures and practices to evaluate the effectiveness of vendor training.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.04, Training of WIC Retail Stores

2. Delegation of Vendor Training

a. The State agency delegates its vendor training to:

- Its local agencies
- A contractor; specify: _____
- A vendor association/representative; specify: _____
- Other (specify): _____
- None (the State agency conducts all vendor training)

b. Indicate the frequency with which the State agency performed the following activities during the past fiscal year:

| <u>Times/ FY</u> | <u>Activity</u> |
|--------------------------|---|
| <u>1</u> | Provided comprehensive training materials to delegated trainers |
| <u>1</u> | Provided instruction on vendor training techniques to delegated trainers |
| <u>5</u> | Monitored performance of delegated trainers to ensure the uniformity and quality of vendor training |
| <input type="checkbox"/> | Not applicable |
| <input type="checkbox"/> | Other (specify): _____ |

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.04, Training of WIC Retail Stores

I. VENDOR MANAGEMENT

B. Vendor Training

3. Documents for and Documentation of Vendor Training

a. The State agency or the entity to which it delegates vendor training documents the content of and vendor participation in annual vendor training:

Yes No

b. Vendors or vendor representatives are required to sign an acknowledgment of training when they have received the following types of training (check all that apply):

Interactive training Annual training
 Educational buys Monitoring visits
 Remedial training Other (specify): Initial Training

c. The State agency produces a Vendor Handbook:

Yes No

If yes, provide the link to the Vendor Handbook or the citation:

<https://wic.health.state.pa.us/vendorassistant/Secured/Documentation/WIC%20Retail%20Store%20Handbook.pdf>

d. The State agency provides online or web based training:

Yes No

If yes, provide the link to the training: _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I - Appendix D - WIC Retail Store Handbook

I. VENDOR MANAGEMENT
C. High-Risk Identification Systems

1. Vendor Complaints

a. The State agency has a formal system for receiving complaints about vendors:

- No; please explain: _____
- Yes, complaints are received through the following:
 - A toll-free number handled by State agency staff
 - A standard complaint form which the complainant sends to:
 - State agency
 - Local agency or clinic
 - Online system; include link here: _____
 - Other (specify): SA accepts phone and written complaints. All complaints are entered into the MIS system and investigated. _____

b. The State agency has a formal system for receiving complaints from vendors:

- No; please explain: _____
- Yes, complaints are received through the following:
 - A toll-free number handled by State agency staff
 - A standard complaint form which the complainant sends to:
 - State agency
 - Local agency or clinic
 - Online system; include link here: _____
 - Other (specify): _____

c. The State agency logs and responds to all complaints:

- Yes, please explain: When a complaint about a vendor is received, the Local agency's Retail Store Coordinator logs the complaint into Vendor Management in MIS. The Retail Store Coordinator follows up with the vendor and responds to all complaints _____
- No; please explain: _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

2. Identifying High-Risk Vendors

a. What criteria does the State agency use to identify high-risk vendors: (* = mandatory)

- Low-variance* Complaints against vendors
- High-mean value* Other (specify all): _____
- New vendor

b. Identify the frequency for generating high-risk vendor reports:

- Monthly Annually
- Quarterly No set schedule
- Semiannually Other (specify): _____

c. Identify the type(s) of food instruments/cash-value vouchers/cash-value benefits used in the high-risk vendor analysis. (Check all that apply):

- A full monthly food package for a:

I. VENDOR MANAGEMENT

C. High-Risk Identification Systems

- Woman Infant Child Other (specify): _____
- Standard food instrument type with multiple food items (e.g., milk, cheese, and cereal)
- Standard food instrument type with a single food item
- Constructed food instrument (State agencies with nonstandard food instruments)
- CVVs/CVBs
- Other (specify): eWIC card

d. To perform the high-risk vendor analysis, the State agency's system aggregates a vendor's redemptions over the following time period:

- 1 month 2 months 3 months 4 months 5 months 6 months
- Other (specify): _____

e. Vendor redemption patterns are generally compared to:

- Applicable peer group patterns All vendors' patterns Statewide
- Other (specify): _____

Provide additional information about your MIS, detailing how the State agency conducts the high-risk vendor analysis and how the State agency ranks vendors when more than 5% of authorized vendors are high risk. Include the name of the file is and which system is used to produce it.

P&P 4.03SP, Retail Store Quality Assurance

I. VENDOR MANAGEMENT

D. Routine Monitoring

1. Routine Monitoring Visits

a. Routine monitoring visits are conducted by:

State agency staff Local agency staff Other (specify): _____

b. Identify the activities performed during a routine monitoring visit; check all that apply:

Check the vendor's inventory of supplemental foods and/or inventory records to determine if the vendor meets the State agency's requirements for the minimum variety and quantity of supplemental foods

Check the vendor's inventory of non-supplemental foods and/or inventory records to provide information on whether the vendor is an above-50-percent vendor

Determine whether the vendor accepts forms of payment other than WIC food instruments, such as cash, personal checks, and credit cards, to provide information on whether the vendor is an above-50-percent vendor

Check the vendor's invoices of infant formula to ensure that the infant formula is obtained only from the State agency's list of infant formula manufacturers registered with the Food and Drug Administration, and infant formula wholesalers, distributors, and retailers licensed under State law

If the vendor is an above-50-percent vendor, check its stock of incentive items to ensure that such items have been approved by the State agency

Obtain the vendor's shelf prices and/or validate the vendor's price list

Review food instruments in the vendor's possession for vendor violations

Compare food instruments in the vendor's possession with shelf prices to test for vendor overcharges

Review use of shelf tags and signage

Review expiration dates on supplemental foods

Compare prices of supplemental foods with similar items not approved as supplemental

Observe food instrument transactions and CVV/CVB

IF EBT, verify if that vendor has appropriate terminals in required number of lanes per 7 CFR 246.12(z)(2).

Conduct an educational buy

Interview manager and/or employees

Review employee training procedures

Conduct annual vendor training or provide vendor with annual training materials

Examine the sanitary conditions of the store

Assures that vendor is compliant with the split tender requirement

Other (specify all): _____

c. Generally, routine monitoring visits are conducted on each vendor (check all that apply):

Annually Twice a year As needed (specify) Other (specify) 5% of vendors are reviewed annually

d. The following procedures are used in determining whether a vendor is selected for a routine monitoring visit (check all that apply):

Random selection Complaints

Periodic/scheduled training Other (specify): _____

Periodic/scheduled review

e. What percent of vendors received monitoring visits during the past fiscal year?

Less than 5 percent; explain reason: _____

I. VENDOR MANAGEMENT

D. Routine Monitoring

5 percent

More than 5 percent (specify): So far in FY20, 11 vendors have received monitoring visits.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.03SP, Retail Store Quality Assurance

I. VENDOR MANAGEMENT

E. Compliance Investigations

1. Investigative Practices

a. The State agency conducts (check all that apply):

- Compliance buys (a covert, on-site investigation in which a representative of the Program poses as a participant, parent or caretaker of an infant or child participant, or proxy; transacts one or more food instruments or CVVs/ CVBs; and does not reveal during the visit that he or she is a Program representative.)
- Inventory audits (the examination of food invoices or other proofs of purchase to determine whether a vendor has purchased sufficient quantities of supplemental foods to provide participants the quantities specified on food instruments redeemed by the vendor during a given period of time.)
- Other (specify): _____

b. The following factors are used to determine which vendors are selected for a compliance investigation (check all that apply):

- Vendor is identified by the high-risk vendor identification criteria
- Random selection
- Geographical considerations
- Volume of WIC redemptions
- Participant complaints
- Other (specify): USDA Request

c. The State agency uses standard procedures for conducting and documenting compliance buys and inventory audits:

- Yes If yes, please provide the guidelines in the Vendor Management Appendix or Cite the Procedure Manual reference: P&P 4.03SP, Retail Store Quality Assurance
- No; specify: _____

d. The results of compliance investigations are used to assess the effectiveness of the State agency's high-risk vendor identification criteria:

- Yes No

If yes, check the items below that describe how the results of compliance investigations are used to assess the effectiveness of high-risk vendor identification criteria:

- The State agency compares data on the prevalence of vendor violations detected among high-risk versus non-high-risk vendors.
- The State agency discards a high-risk vendor identification criterion if compliance investigations of high-risk vendors identified by the criterion result in no vendor violations after _____ months
- Investigative procedures and training are reevaluated if compliance investigations of high-risk vendors result in the detection of no vendor violations.
- Other (specify): _____

e. How many vendors were authorized as of October 1 of the past fiscal year?

In April 2020 there were 1417 stores. This may not be an accurate number due to transition from QW to PENN.

How many compliance investigations of vendors were completed during the past fiscal year?

- Compliance Investigations: 27
- Inventory Audits: 50

How many vendors that received compliance investigations were high-risk during the past fiscal year?

- Compliance Investigations: 27
- Inventory Audits: 50

I. VENDOR MANAGEMENT

E. Compliance Investigations

Did the State agency give priority to high-risk vendors (up to the five percent minimum) in conducting compliance investigations during the past fiscal year?

Yes No; explain reason: _____

How many of all vendors were high-risk during the past fiscal year?

QuickWIC does not have accurate data due to transition to the new MIS system.

(The State agency is required by § 246.12(j)(4)(i) to conduct compliance investigations of at least 5 percent of its vendors authorized as of October 1 of each fiscal year, including all high risk vendors up to the 5 percent maximum.)

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I - Appendix E - Authorized Vendors

2. Compliance Buys

a. The State agency conducts the following types of compliance buys:

- Trafficking buys (exchanging food instruments for cash/cash-value vouchers/cash-value benefits and short buys)
- Safe buys (transacting food instruments for all food items listed to see if the vendor will overcharge)
- Short buys (transacting food instruments for fewer food items than those listed to see if the vendor will charge for food items not received)
- Major substitution buys (exchanging food instruments for non-food items or unauthorized food items that are not similar to those listed)
- Minor substitution buys (exchanging food instruments for unauthorized food items that are similar to those listed)
- Other (specify): _____

b. Does the State agency tailor compliance buys to vendors' risk type?

- Yes; explain: _____
- No; explain: All compliance buy investigations are conducted in the same manner no matter the risk criteria

c. Compliance buys are usually conducted by:

- WIC State agency staff
- WIC local agency staff
- State investigators
- Investigators retained on a contract basis (e.g., Pinkerton, Wells Fargo)
- Interns, neighborhood residents, or program participants employed by WIC
- Another WIC State agency
- Other (specify): _____

d. Who is responsible for ensuring the proper execution of and follow-up on compliance buys?

- WIC State agency vendor manager
- WIC local agency manager
- State investigators
- Contractor
- Another WIC State agency
- Other (specify): _____

I. VENDOR MANAGEMENT

E. Compliance Investigations

e. If no vendor violations are detected, how many compliance buys does the State agency conduct before closing a compliance investigation?

Two Other (specify): _____

f. If the State agency conducts a standard number of compliance buys per compliance investigation, what is the basis for the prescribed number of buys?

- State law or regulation
- State agency policy or procedure
- Level of evidence necessary to impose vendor sanctions
- Legal counsel's advice
- Other (specify): _____

g. Is the vendor provided written notification of a violation requiring a pattern of violations in order to sanction the vendor, prior to documenting another violation of the same kind, unless the State agency determines that such notice would compromise the investigation and documents this in the vendor's file?

Yes No

If no, is the determination that the written notification would compromise the investigation documented in the vendor's file?

Yes; if a standard form is used, please attach and cite below.

No; please explain:

h. Does the State agency have a clear, actionable definition of "pattern of violations" approved by its General Counsel/Administrative Officer? Yes No

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.03SP, Retail Store Quality Assurance

3. Estimate the cost for conducting compliance buys, excluding expenses related to the vendor appeals/administrative review process:

\$ _____ Cost per compliance buy

Unknown

Not applicable

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual:

4. Inventory Audits (If inventory audits are not performed, go to Question 5)

a. The following factors are used to determine which vendors selected for compliance investigations will receive inventory audits rather than/or in addition to compliance buys:

Vendor has highest risk based on State agency's high-risk identification criteria

Suspicion of vendor exchanging cash for food instruments (trafficking)

Inconclusive compliance buy results

Complaints

Other (specify): USDA Referrals

b. The State agency conducts the following types of inventory audits:

I. VENDOR MANAGEMENT

E. Compliance Investigations

- On-site inventory audits
- State agency inventory audits (vendor sends records to State agency)
- Local agency inventory audits (vendor sends records to local agency)
- Other (specify): _____

c. Inventory audits are conducted by (check all that apply):

- WIC State agency staff
- WIC local agency staff
- State investigators
- Investigators retained on a contract basis (e.g., Pinkerton's, Wells Fargo)
- Other (specify): _____

d. Identify the amount of, or period of time covered by, the receipts that are examined during an inventory audit:

Two months' worth of receipts

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.03SP, Retail Store Quality Assurance

5. Compliance Buy/Inventory Audit Tracking System(s)

a. The State agency has a means of recording and tracking staff person hours devoted to investigation activities:

- Yes; please describe: _____
- No

b. The State agency has an automated system for tracking investigations that monitors the progress and status of each compliance investigation:

- Yes; please describe: Tracking in new MIS system (PENN).
- No

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

P&P 4.03SP, Retail Store Quality Assurance

I. VENDOR MANAGEMENT

F. Administrative Review of State Agency Actions

1. Types of Administrative Reviews

The State agency conducts the following types of administrative reviews of vendor appeals for the adverse actions listed below. (Check all that apply):

| Informal Desk Reviews | Abbreviated Admin. Reviews | Full Admin. Reviews | |
|--------------------------|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Denial due to competitive price selection criterion |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Denial due to minimum stocking selection criterion |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Denial due to business integrity or current SNAP DQ or CMP |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Denial based on limiting criteria |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Denial due to State agency selection criteria |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Denial due to application outside timeframe |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Application of above-50-percent criteria |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | DQ for WIC violations |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | DQ for SNAP CMP |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other WIC sanctions, e.g., fine or CMP |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Denial based on circumvention of sanction |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Application of peer group criteria |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Termination due to ownership change |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Termination due to location change |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Termination due to ceasing operations |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Termination for other causes |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | DQ for trafficking/illegal sales conviction |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | DQ/CMP due to another State agency's mandatory sanction |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | CMP based on SNAP DQ |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Denial based on no SNAP authorization |

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

2. Administrative Review Procedures

a. The State agency has a law or regulation governing WIC administrative reviews:

Yes; please indicate: 28 PA Code Chapter 1113 Store Appeals

No

If the State agency does have such a law or regulation, this includes:

State agency Administrative Procedures Act State agency health department regulation

State agency law pertaining to WIC only State agency WIC regulation

State agency health department law Other (specify): _____

I. VENDOR MANAGEMENT

F. Administrative Review of State Agency Actions

b. At which level do administrative reviews of WIC vendor appeals take place:

- WIC local agency State health department or Tribal
 WIC State agency Other (specify): _____

c. Administrative reviews are conducted by:

- Hearing officers
 Administrative law judges
 Other (specify): _____

d. The following procedures are followed for administrative reviews:

| Abbreviated Admin. Reviews | Full Admin. Reviews | |
|----------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to examine evidence prior to review |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to reschedule review date |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to present its case |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to be represented by counsel |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to present witnesses |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to cross-examine witnesses |
| <input type="checkbox"/> | <input type="checkbox"/> | opportunity for investigators to testify behind a screen or via other non-identifying method |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Presence of a court reporter or stenographer |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | An impartial decision-maker, whose decision is based solely on whether the State agency correctly applied Federal and State statutes, regulations, policies, procedures |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | A written decision within 90 days from request for review |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other (specify): <u>Interpreter services as requested by vendor.</u> |

e. Check the party(ies) below who may present the State agency case during a full administrative review:

- WIC staff person assigned to case
 WIC State agency Vendor Manager
 WIC State Agency Director
 Legal counsel (State Attorney General or General Counsel's office)
 Legal counsel (paid by WIC Program funds)
 Other (specify all): Local Agency Staff

Please attach and/or reference in the Additional Detail area below the location of the State agency's administrative review procedures.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

28 PA Code Chapter 1113.1 Store Appeals

I. VENDOR MANAGEMENT

G. Coordination with SNAP

1. WIC/SNAP Information Sharing

a. An information sharing agreement between the WIC State agency and SNAP is in effect, per FNS Instruction 906-1 or other FNS guidance, and is maintained at the State agency:

Yes No

If yes, an updated list of authorized vendors is sent to the appropriate FNS SNAP Retailer Operations Division office:

Once a year

Regularly, at intervals of less than one year (specify): _____

Periodically, as changes occur

Upon request

Other (specify): _____

b. State agency compliance investigators coordinate their activities with their SNAP counterparts:

Yes No

c. State statute, regulations, or procedures restrict the disclosure of WIC vendor and SNAP retailer information to those permitted under 7 CFR 246.26(e) and (f):

Yes (specify): P&P 4.01SP, Retail Store Management

No

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I. VENDOR MANAGEMENT

H. Staff Training

1. Check below the routine formal training available to State and local level staff in vendor management practices:

| State | Local | Other (contractor) | |
|---|-------------------------------------|--------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vendor selection and authorization |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vendor training |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Routine monitoring |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Compliance investigations |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Inventory audits |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Corrective actions and sanctions |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Criminal investigations |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Vendor appeals/administrative reviews |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Federal and/or State WIC regulations |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Prevention of vendor fraud and abuse |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | WIC/SNAP information sharing and handling of confidential WIC vendor data |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | High-risk vendor identification |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vendor management information system |
| <input type="checkbox"/> Not applicable | | | |
| <input type="checkbox"/> Other (specify): _____ | | | |

2. State agency staff meets with vendor representatives as part of a vendor advisory council or other vendor stakeholder group:

- Monthly
- Quarterly
- Other frequency: At least twice per year
- No vendor advisory council

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

PA Regs Title 28, Part VIII, 1101.3 Administration (b)

3. Reporting vendor information to TIP:

a. How does the State agency submit vendor information to The Integrity Profile?

- Manually (one vendor at a time)
- Upload text file
- Upload XML Schema

b. Describe how the State agency ensures that this information is accurate:

Staff review the columns prior to submission each year.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):

I. VENDOR MANAGEMENT

I. Farmer/Farmers' Market Authorization

STATE AGENCY DOES NOT AUTHORIZE FARMERS/FARMERS' MARKETS TO ACCEPT CVVs/CVBs;
SECTIONS J-M DO NOT APPLY

1. Does the State agency delegate any tasks related to the management of the Farmers or Farmers' Markets to another entity?

No

Yes (specify what tasks and to whom): FMNP is administered in total by the PA Dept of Agriculture

2. The State agency authorizes farmers/farmers' markets to accept CVVs based on:

Authorization by the WIC Farmers' Market Nutrition Program (FMNP)

Selection criteria established separately from FMNP

3. If the State agency does not authorize farmers/farmers' markets based on FMNP authorization, the selection criteria include (describe):

4. The State agency considers applications:

On an on-going basis Every three years

Annually Every two years

Other (specify): _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):
and/or FMNP State Plan (Citation):

I. VENDOR MANAGEMENT

J. Farmer/Farmers' Market Agreements

1. Agreement periods are for:

- One year Three years
- Two years Other (specify): _____

2. Agreements are:

- A modified version of the vendor agreement
- Combined with the FMNP agreement
- Unique to the authorization of farmers to transact CVVs/CVBs

3. The following reflect the State agency's farmer/farmers' market agreement practices:

- All farmers/farmers' markets have a written agreement with the State agency
- A standard farmer/farmers' market agreement is used statewide
- Agreements are subject to the State's procurement procedures
- Agreements/handbooks are subject to the State's Administrative Procedures Act
- Farmers/farmers' markets are authorized/reauthorized under renewable agreements, provided no farmer/farmers' market violations occurred during the previous agreement period
- All farmers/farmers' markets are provided at least 15 days advance written notice of the expiration of the agreement
- All farmers/farmers' markets are provided a schedule of sanctions, either in or attached to the farmer/farmers' market agreement, or as a citation to State regulations
- Other (specify): _____

4. Agreement provisions include:

- Assure that the CVV/CVB is redeemed only for eligible fruits and vegetables as defined by the State agency
- Provide eligible fruits and vegetables at the current price or less than the current price charged to other customers
- Accept the CVVs/CVBs within the dates of their validity and submit CVVs for payment within the allowable time period established by the State agency
- Redeem the CVV/CVB in accordance with a procedure established by the State agency
- Accept training on CVV/CVB procedures and provide training to any employees with CVV/CVB responsibilities on such procedures
- Agree to be monitored for compliance with program requirements, including both overt and covert monitoring
- Be accountable for actions of employees in the provision of authorized foods and related activities
- Pay the State agency for any CVV/CVB transacted in violation of this agreement
- Offer WIC participants, parent or caretakers of child participants or proxies the same courtesies as other customers
- Neither the State agency nor the farmer has an obligation to renew the agreement.
- Other (specify): _____

I. VENDOR MANAGEMENT

J. Farmer/Farmers' Market Agreements

5. The farmer/farmers markets agreement reflects that the farmer/farmers' market must not:

- Collect sales tax on CVV/CVB purchases
- Seek restitution from WIC participants, parent or caretakers of child participants or proxies for CVVs/CVBs not paid or partially paid by the State agency
- Issue cash change for purchases that are in an amount less than the value of the CVV/CVB
- Other (specify): _____

Please attach a copy of the Farmer/Farmers' Market Agreement or provide the appropriate Procedure Manual reference below.

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation):
and/or FMNP State Plan (Citation):**

I. VENDOR MANAGEMENT

K. Farmer/Farmers' Market Training

1. Farmer/farmers' market training includes:

- Eligible fruits and vegetables
- Procedures for transacting and redeeming CVVs/CVBs
- Agreement provisions
- Sanctions and Appeals
- Other (specify): _____

2. Interactive farmer/farmers' market training (e.g., face-to-face, video conference, web cam) is conducted:

- At or before initial authorization
- At least every three years following initial authorization
- Other (specify): _____

3. Non-interactive farmer/farmers' market training (e.g., via hard copy mail, email, online) is conducted:

- Annually following authorization
- Changes in procedures
- Other (specify): _____

4. The State agency delegates training to:

- Local agency (specify): _____
- Contractor (specify): _____
- Farmer representative (specify): _____
- Other (specify): _____

5. If the State agency delegates training, briefly describe the State agency's supervision of such training:

6. The State agency produces a Farmer/farmers markets Training Handbook:

- Yes No

If yes, provide the citation: _____

7. The State agency provides online or web based training:

- Yes No

If yes, provide the link to the training or citation: _____

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation) and/or FMNP State Plan (Citation):

I. VENDOR MANAGEMENT

L. Farmer Monitoring

1. **Farmers/farmers' markets are included in the :**

- FMNP Sample of farmers/farmers markets for monitoring WIC sample of vendors for monitoring

2. **Monitoring includes:**

- covert methods, such as compliance buys overt methods, such as routine monitoring

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation): and/or FMNP State Plan (Citation):

I. VENDOR MANAGEMENT

M. Farmer/Farmers' Market Sanctions, Claims and Appeals

1. Farmer/farmers' market violations may result in; check all that apply:

- Disqualification
- Denial of payment or demand for refund due to improperly redeemed CVVs/CVBs (Claims)
- Prosecution under Federal, State, or local law regarding fraud or other illegal activity
- Monetary sanctions such as civil money penalties and fines

2. Farmers/farmers' markets may administratively appeal:

- Disqualification
- Denial of application
- Other sanction (specify): _____

3. Farmers/farmers' markets may not administratively appeal:

- Expiration of an agreement
- Claims
- Other (specify): _____

Please attach and/or reference the location of the State agency's administrative review procedures.

ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (Citation) and/or FMNP State Plan (Citation):

I. VENDOR MANAGEMENT

N. Participant Access

1. **Please provide the State agency definition for participant access. Include full criteria, including geography, density, and any other parameters in your response.**

PA Code 28 Section 1103.7

2. **Does the State agency assess all vendor applications not meeting selection criteria for participant access?**

Yes No

- a. **If yes, describe below paste or attach and provide a citation of the procedures used for assessing vendor applications for participant access. Provide sufficient details so steps can be followed and criteria applied to a specific vendor**

PA Code 28 Section 1103.7, P&P 4.01SP, Retail Store Management

II. NUTRITION SERVICES

(Please indicate) State Agency: Pennsylvania for FY 2020

Nutrition services include the full range of activities performed by a variety of staff to operate a WIC Program such as, participant screening and assessment, nutrition education and counseling, breastfeeding promotion and support and health promotion, food package prescriptions, and health care referrals. WIC State agencies should refer to the WIC Nutrition Service Standards, available WIC Works Resource System at <http://wicworks.nal.usda.gov/> for recommended criteria and best practices to incorporate activities that are consistent with providing quality nutrition services and revitalizing quality nutrition services (RQNS).

A. Nutrition Education-246.4(a)(9); 246.11(a)(1-3)(c)(1,3-7): describe the nutrition education goals and action plan and the provisions for providing nutrition education contacts and materials to all participants including the special nutrition education needs of migrant farmworkers and their families, Native Americans, and homeless persons. Also describe methods to be used to provide drug and other harmful substance abuse prevention information. Establish standards for breastfeeding promotion and support including development and/or maintenance of a peer counselor program consistent with WIC Breastfeeding Model Components for Peer Counseling.

B. Food Package Design-246.10: describe the procedures for determining which foods should be authorized and how the food package should be nutritionally tailored and by whom, and plans for substitutions or eliminations to WIC food package. In addition to regulations at 246.10, State agencies should refer to the Food Package Guidance Handbook and Frequently Asked Questions available on the FNS Partnerweb.

C. Staff Training-246.11(c)(2): describe the training and technical assistance provided to WIC professional and paraprofessional personnel who provide nutrition education, and breastfeeding promotion/education to participants.

II. NUTRITION SERVICES

A. Nutrition Education

1. Nutrition Education Plans (§246.11)

- a. **The State agency develops and coordinates the nutrition education component with consideration of local agency plans, needs, and available nutrition education resources. (§246.11(c)(1))**

Yes No

- b. **The State agency monitors local agency activities to ensure compliance with provisions set forth in paragraphs §246.11(c)(7), (d), and (e) of this section. (§246.11(c)(5))**

Yes No

- c. **The local agency develops an annual nutrition education plan that is consistent with the State's nutrition education component of Program operations. (§246.11(d)(2))**

Yes No

- d. **(i). The State agency requires that local agency nutrition education include:**

A needs assessment

Goals and objectives for participants

Evaluation/follow-up

Other (list): _____

- (ii). The State agency monitors local agency progress toward meeting nutrition education goals, nutrition education action plans, and objectives via:**

Quarterly or annually written reports

Year-end summary report

Annual local agency reviews

Other (specify): _____

- e. **State policies reflect the definition of "nutrition education" as defined in §246.2 and in the Child Nutrition Act. The definition is "Nutrition education means individual and group sessions and the provision of materials that are designed to improve health status and achieve positive change in dietary and physical activity habits, and that emphasize the relationship between nutrition, physical activity, and health, all in keeping with the personal and cultural preferences of the individual."**

Yes No

ADDITIONAL DETAIL: Nutrition Services Supporting Documentation:

P&P 5.01, Nutrition Education in the WIC Program has been updated with this definition.

2. Annual Assessment of Participant Views on Nutrition Education and Breastfeeding Promotion and Support

- a. **Is an annual Assessment of Participant Views on Nutrition Education and Breastfeeding Promotion and Support conducted:**

Yes No

II. NUTRITION SERVICES

A. Nutrition Education

b. Check below the method(s) used in the past fiscal year to assess participant views on nutrition education and breastfeeding promotion and support provided by WIC:

- State-developed questionnaire issued by local agencies
- Locally-developed questionnaires (need approval by SA: Yes No)
- State-developed questionnaire issued by State agency
- Focus groups
- Other (specify): _____

c. Results of participant views are:

- Used in the development of the State Plan
- Used in the development of local agency nutrition education plans and breastfeeding promotion and support plans
- Other (specify): _____

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

II - Appendix A - 2019 Nutrition Education Survey results

3. Nutrition Education Contacts (§246.11(a)(1-3): (1) Nutrition education shall be considered a benefit of the program, and shall be made available at no cost to the participant. Nutrition education shall be designed to be easily understood by participants, and it shall bear a practical relationship to participant nutritional needs, household situations, and cultural preferences including information on how to select food for themselves and their families. Nutrition education shall be thoroughly integrated into participant health care plans, the delivery of supplemental foods, and other Program operations. (2) Nutrition education is made available to all participants. Nutrition education may be provided through the local agencies directly, or through other agencies. At the time of certification, the local agency shall stress the positive, long term benefits of nutrition education and encourage the participant to attend and participate in nutrition education activities. However, individual participants shall not be denied supplemental foods for failure to attend or participate in nutrition education activities. (3) The State agency shall ensure that local agencies provide drug and other harmful substance abuse information to all pregnant, postpartum, and breastfeeding women and to parents or caretakers of infants and children participants. Drug and other harmful substance abuse information may also be provided to pregnant, postpartum, and breastfeeding women and to parents or caretakers of infants and children participating in local agency services other than the Program.

a. The State agency assures that each local agency offers adult participants, parents, or caretakers of infant and child participants, and whenever possible, the child participants themselves at least two (≥2) nutrition education contacts per 6 month certification period, and quarterly nutrition education contacts to participants certified in excess of 6 months, to ensure adequate nutrition education in accordance with §246.11(e) via:

- Local agency addresses in annual nutrition education plan
- State nutrition staff monitoring annually during local agency reviews
- Local agency providing periodic reports to State agency
- Other (specify): _____

II. NUTRITION SERVICES

A. Nutrition Education

b. The State agency has developed minimum nutrition education standards for the following participant categories:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Pregnant women | <input checked="" type="checkbox"/> Breastfeeding women |
| <input checked="" type="checkbox"/> Postpartum women | <input checked="" type="checkbox"/> Infants |
| <input checked="" type="checkbox"/> Children | <input checked="" type="checkbox"/> High-risk participants |

The minimum nutrition education standards address:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Number of contacts | |
| <input checked="" type="checkbox"/> Protocols | <input checked="" type="checkbox"/> Documentation |
| <input checked="" type="checkbox"/> Breastfeeding promotion and support | <input checked="" type="checkbox"/> Referrals |
| <input checked="" type="checkbox"/> Information on substance abuse prevention | <input checked="" type="checkbox"/> Care plans |
| <input checked="" type="checkbox"/> Counseling methods/teaching strategies | <input checked="" type="checkbox"/> Exit counseling |
| <input checked="" type="checkbox"/> Content (WIC appropriate topics) | |
| <input checked="" type="checkbox"/> Nutrition topics relevant to participant assessment | |
| <input checked="" type="checkbox"/> Appropriate use of educational reinforcements (videos, brochures, posters, etc.) | |

c. The State agency allows the following nutrition education delivery methods:

- Face-to-face, individually or group
- Online/Internet
- Telephone
- Food demonstration
- A delivery method performed by other agencies, i.e., EFNEP
- Other (specify): Some local agencies have kiosks in their clinics.

d. The State agency ensures that nutrition risk data is used in providing appropriate nutrition education by:

- Individual nutrition education contacts tailored to the participant's needs.
- Group nutrition education contacts relevant to the participant's needs (please explain how appropriate group nutrition classes are identified and offered to the participant.)
- Other (specify): _____

e. An individual care plan is provided based on:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Nutritional risk | <input checked="" type="checkbox"/> CPA discretion |
| <input type="checkbox"/> Priority level | <input checked="" type="checkbox"/> Participant request |
| <input type="checkbox"/> Healthcare provider's prescription | <input checked="" type="checkbox"/> Other: Care plans are required for all participants at Certification, Health Evaluation (mid-cert) and Recertification appointments. Our new system will also allow care plans to be updated during Benefit Pickup appointments. |

II. NUTRITION SERVICES

A. Nutrition Education

f. Individual care plans developed include the following components:

| Must Include | May Include | |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Individualized food package |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Identification of nutrition-related problems |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Nutrition education and breastfeeding support |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | A plan for follow-up |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Referrals |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Timeframes for completing care plan |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Documentation of completing care plan |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | A practical relationship to a participant's nutritional needs, household situations, and cultural preferences including information on how to select food for themselves and their families |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other (specify): A participant-centered goal with appropriate follow up. The new system will guide staff to complete a care plan using a modified SOAP format and at least one goal is a required field. |

g. Check the following individuals allowed to provide general or high-risk nutrition education:

| General Nutrition Education | High-risk Nutrition Contact | |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Paraprofessionals (non B.S. degree with formal WIC training by SA or LA) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Licensed Practical Nurses |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Registered Nurses |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | B.S. in Home Economics |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | B.S. in the field of Human Nutrition |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Registered Dietitian or M.S. in Nutrition (or related field) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Dietetic Technician (2-year program completed) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other (specify): Physicians, RNs, Physician Asst's and individuals with BS in Home Economics are considered non-nutritionist CPAs in our state and can carry out HR contacts, but must have their plans reviewed and countersigned by a Nutritionist. |

h. The State agency allows adult participants to receive nutrition education by proxy.

- No
- Yes (If yes, check the applicable conditions below):
- Proxy is spouse/significant other
 - Proxy is parent of adolescent prenatal participant
 - Proxy is neighbor
 - Only for certain priorities (specify): _____
 - Other (specify): _____

II. NUTRITION SERVICES

A. Nutrition Education

i. The State agency allows parents/guardians of infant and child participants to receive nutrition education by proxy.

No

Yes (If yes, check the applicable conditions below):

Proxy is grandparent or legal guardian of infant or child participant

Proxy is neighbor

Only for certain priorities (specify): _____

Other (specify): _____

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 5.01, Nutrition Education in the WIC Program

4. Nutrition Education Materials (§246.11(c)(1,3,4,6,7): The State agency shall (1) develop and coordinate the nutrition education component of Program operations with consideration of local agency plans, needs, and available nutrition education resources; (3) identify or develop resources and educational materials for use in local agencies, including breastfeeding promotion and instruction materials, taking reasonable steps to include materials in languages other than English in areas where a significant number or proportion of the population needs the information in a language other than English; (4) develop and implement procedures to ensure that nutrition education is offered to all adult participants and to parents/caregivers of infant or child participants, as well as child participants whenever possible; (6) establish standards for participant contacts that ensure adequate nutrition education in accordance with paragraph 246.11(e); and (7) establish standards for breastfeeding promotion and support, including a positive breastfeeding supportive clinic environment, a local agency breastfeeding coordinator, breastfeeding promotion, and support for new staff.

a. The State agency shares material with the Child and Adult Care Food Program (CACFP) at no cost:

Yes No

If applicable, list other agencies:

A written material sharing agreement exists between the relevant agencies

Yes No

II. NUTRITION SERVICES

A. Nutrition Education

b. The State agency recommends and/or makes available nutrition education materials for the following topics:

| | English | Spanish | Other languages (specify): |
|---|-------------------------------------|-------------------------------------|--|
| General nutrition | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Arabic, Nepali, Burmese, Swahili, Russian, |
| Specific nutrition-related conditions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Vietnamese and Chinese are also available |
| Maternal nutrition | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | for all checked materials. |
| Infant nutrition | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Child nutrition | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Nutritional needs of homeless | <input type="checkbox"/> | <input type="checkbox"/> | |
| Nutritional needs of migrant farmworkers & their families | <input type="checkbox"/> | <input type="checkbox"/> | |
| Nutritional needs of Native Americans | <input type="checkbox"/> | <input type="checkbox"/> | |
| Nutritional needs of Teenage prenatal women | <input type="checkbox"/> | <input type="checkbox"/> | |
| Breastfeeding promotion and support (including troubleshooting problems) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Danger of harmful substances (alcohol, tobacco and other drugs), as well as secondhand smoke during pregnancy and breastfeeding | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | |
| Food Safety | <input type="checkbox"/> | <input type="checkbox"/> | |
| Physical activity | <input type="checkbox"/> | <input type="checkbox"/> | |
| Other: | | | |
| | <input type="checkbox"/> | <input type="checkbox"/> | |
| | <input type="checkbox"/> | <input type="checkbox"/> | |
| | <input type="checkbox"/> | <input type="checkbox"/> | |

Attach a listing of the nutrition education resources available from the State agency or other sources for use by local agencies or specify the location in the Procedure Manual and reference below.

c. The State agency follows written procedures to ensure that nutrition education materials recommended/made available are appropriate in terms of the following:

Content Reading level/language Graphic design Cultural relevance

Other: _____

d. Locally-developed nutrition education materials must be approved by State agency prior to use.

Yes No

If no, State agency requires local agency to follow a standardized format for evaluating nutrition education materials.

Yes No

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 1.09 Material Development and Requisitioning, 5.01 Nutrition Education in the WIC Program & 5.02 Breastfeeding (BF) Education and Peer Counseling (PC) Programs.

II. NUTRITION SERVICES

A. Nutrition Education

5. Nutrition Education Needs of Special Populations

The State agency tailors its nutrition education efforts to address the specific needs of migrant farmworkers (M), homeless individuals (H), substance-abusing individuals (S), and/or breastfeeding women (B) through (check all that apply):

M H S B

- Providing nutrition education materials appropriate to this population and language needs
- Providing nutrition curriculum or care guidelines specific to this population
- Requiring local agencies who serve this population to address its special needs in local agency nutrition education plans
- Arranging for special training of local agency personnel who work with this population
- Distributing resource materials related to this population
- Encouraging WIC local agencies to network with one another
- Coordinating at the State and local levels with agencies who serve this population
- Other (specify): _____

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 3.05, Services to Special Populations and P&P 5.02, BF Education and PC Programs

6. Breastfeeding Promotion and Support Plan

a. The State agency coordinates with local agencies to develop a breastfeeding promotion plan that contains the following elements (check all that apply):

- Activities such as development of breastfeeding coalitions, task forces, or forums to address breastfeeding promotion and support issues
- Identification of breastfeeding promotion and support materials
- Procurement of breastfeeding aids which support the initiation and continuation of breastfeeding (e.g., breast pumps) supplemental nursing systems, etc.
- Training for State/local agency staff
- Designating roles and responsibilities of staff
- Evaluation of breastfeeding promotion and support activities
- Other (specify): _____

II. NUTRITION SERVICES

A. Nutrition Education

b. The State agency has established minimum protocols for breastfeeding promotion and support which include the following (check all that apply):

- A policy that creates a positive clinic environment which endorses breastfeeding as the preferred method of infant feeding
- A requirement that each local agency designate a local agency staff person to coordinate breastfeeding promotion and support activities
- A requirement that each local agency incorporate task-appropriate breastfeeding promotion and support training into orientation programs for new staff involved in direct contact with WIC clients
- A plan to ensure that women have access to breastfeeding promotion and support activities during the prenatal and postpartum periods
- Participant breastfeeding assessment
- Food package prescription and tailoring based on breastfeeding and nutrition assessment
- Data collection (at State and local level)
- Referral criteria
- Peer counseling
- Other (specify): _____
- Other (specify): _____

7. Breastfeeding Peer Counseling

a. The State Agency coordinates with local agencies to request WIC Breastfeeding Peer Counseling (BFPC) funds to develop and/or maintain a peer counselor program?

- Yes No

If yes, the State agency has submitted a request for the following.

- Full amount available BFPC funds.
- Specific amount of available BFPC funds \$ _____ (Not to exceed the full amount available.)

b. Attach a copy of an updated line item budget, with written narrative, demonstrating how peer counseling funds are being used for approved peer counseling activities. Include the citation for attachment here:

II - Appendix B - State Plan BFPC Narrative and Budget

c. Please provide the approximate number of WIC peer counselors in your State: 44 _____

d. Please provide the number of local agencies designated by the State agency to receive funds to operate peer counseling programs.

14 _____

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 5.02, BF Education and PC Programs

e. The State agency coordinates with local agencies to develop a breastfeeding peer counseling program that contains the following components (see [WIC Breastfeeding Model Components for Peer Counseling](#)):

f. Definition of peer counselor defined as follows: paraprofessional recruited and hired from target population; available to WIC clients outside usual clinic hours and outside the WIC clinic

- Yes No

II. NUTRITION SERVICES

A. Nutrition Education

g. Designated breastfeeding peer counseling program managers/coordinators at State and/or local level

Yes No

h. Defined job parameters and job descriptions for breastfeeding peer counselors

Yes No

If yes, the job parameters for peer counselors (check all that apply):

Define settings for peer counseling service delivery (check all that apply):

Home (peer counselor makes telephone calls from home)

Participant's home (peer counselor makes home visits)

Clinic

Hospital

Define frequency of client contacts

Define procedures for making referrals

Define scope of practice of peer counselor

i. Adequate compensation and reimbursement of breastfeeding peer counselors

Yes No

j. Training of State and local staff (managers, Designated Breastfeeding Expert, Peer Counselors, others) through FNS-developed training curriculum

Yes No

k. Training of WIC clinic staff about the role of the WIC peer counselor

Yes No

l. Establishment of standardized breastfeeding peer counseling program policies and procedures (check all that apply):

Timing and frequency of contacts

Documentation of client contacts

Referral protocols

Confidentiality

Use of social media

Other, (specify): _____

m. Adequate supervision and monitoring of breastfeeding peer counselors through (check all that apply):

Regular, systematic contact with peer counselor

Regular, systematic review of peer counselor contact logs

Regular, systematic review of peer counselor contact documentation

Spot checks

Observation

Other, (specify): _____

II. NUTRITION SERVICES

A. Nutrition Education

n. Participation in community partnerships to enhance the effectiveness of breastfeeding peer counseling programs (check all that apply):

- Breastfeeding coalitions
- Businesses
- Community organizations
- Cooperative extension
- La Leche League
- Hospitals
- Home visiting programs
- Private Healthcare clinics
- Other, (specify): _____

o. Adequate support of peer counselors by providing the following (check all that apply):

- Timely access to WIC-designated breastfeeding experts for referrals outside peer counselors' scope of practice
- Mentoring of newly trained peer counselors in early months of job
- Regular contact with supervisor
- Participation in clinic staff meetings as part of WIC team
- Opportunities to meet regularly with other peer counselors
- Other, (specify): _____

p. Provision of training and continuing education of peer counselors (check all that apply):

- Standardized training using FNS-developed curriculum
- Ongoing training at regularly scheduled meetings
- Home study
- Opportunities to "shadow" or observe lactation experts and other peer counselors
- Training/experience to become senior level peer counselors, WIC-Designated Breastfeeding Expert, etc.)
- Other, (specify): Some BFPCs have attended CLC training. Currently, all BFPCs receive the same State developed training required of all WIC staff (but this may change with the new curriculum).

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 5.02, BF Education and PC Programs.

II. NUTRITION SERVICES

B. Food Package Design

1. Authorized WIC-Eligible Foods

- a. Include a copy of the current State-authorized food list and the individual food package design for each category in the Appendix or cite Procedure Manual reference:
- b. The State agency considers the following when making decisions about authorizing WIC-eligible foods other than WIC formulas:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Federal regulatory requirements | <input checked="" type="checkbox"/> Nutritional value |
| <input checked="" type="checkbox"/> Participant acceptance | <input checked="" type="checkbox"/> Cost |
| <input checked="" type="checkbox"/> Statewide availability | <input checked="" type="checkbox"/> Participant/client request |
| <input checked="" type="checkbox"/> Healthcare provider request | <input type="checkbox"/> Other (specify): _____ |

- c. The State agency utilizes additional State nutritional criteria for authorizing foods for the State WIC food list, in addition to the minimum Federal regulatory requirements.

- Yes No

If yes, describe actual values or criteria identified by the State. Enter "n/a" if not applicable.
(i.e. artificial sweeteners, artificial color/flavor, low-sodium, etc.):

No non-nutritive sweeteners or sugar alcohols, no organic (except produce or categories with few options), no red salmon or brisling sardines, and no added ingredients in juice except Vit D and Ca.

- d. The State agency provides the maximum amount of all authorized foods allowed in accordance with the Federal WIC regulations at section 246.10 for each of the seven WIC Food Packages (I-VII).

Yes No

- | | | |
|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pregnant women/Partially (Mostly) Breastfeeding |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Fully Breastfeeding women |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Postpartum, non-breastfeeding women |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Infants 0-5 months |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Infants 6-11 months |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Children |

e. WIC Formulas:

(1) The State agency establishes policies regarding the issuance of primary contract, contract, and non-contract brand infant formula.

- Yes No

(2) The State agency requires medical documentation for contract infant formula (other than the primary contract formula).

- Yes No

(3) The State agency requires medical documentation for non-contract infant formula.

- Yes No

(4) The State agency requires medical documentation for exempt infant formula/ WIC eligible nutritionals.

- Yes No

(5) State agency authorizes local agencies to issue a non-contract brand infant formula that meets the requirements of Table 4 in 246.10(e)(12) without medical documentation in order to meet religious eating patterns:

- Yes No

II. NUTRITION SERVICES

B. Food Package Design

(6) The State agency coordinates with medical payors and other programs that provide or reimburse for exempt infant formulas and WIC-eligible nutritionals per Section 246.10(e)(3)(vi).

Yes No

If yes, describe the State agency reimbursement and/or referral system used for this coordination. Include a description of the monitoring/tracking tools in place to ensure program integrity.

If no, has the State agency met the requirement to annually contact their State Medicaid counterparts regarding the payment of WIC-eligible exempt infant formulas and medical foods to mutual program participants per WIC Policy Memo #2015-7?

Yes No

Please attach and provide the citation for any existing written agreement between the State agency and the State Medicaid office as well as local government agencies or private agencies in regards to payment of WIC-eligible exempt infant formulas and medical foods.

MA indicates that they cannot reimburse the cost of any product that is not distributed by their providers.

f. Rounding:

(1) Does the State agency issue infant formula according to the specific rounding methodology per Section 246.10(h)(1)?

Yes No

If answered NO, skip question 2

(2) If the State agency implemented the rounding option for issuing infant formula, are there established written policies in place?

Yes No

(3) Does the State agency issue infant foods according to the specific rounding methodology per Section 246.10(h)(2)?

Yes No

(4) If the State agency implemented the rounding option for issuing infant foods, are there established written policies in place?

Yes No

g. Is infant formula issued in the 1st month to partially breastfed infants?

Yes No

h. State policies & materials reflect the definition of "supplemental foods" as defined §246.2 and in the Child Nutrition Act.

Yes No

i. Does the State agency only allow issuance of reduce fat (2%) milk to children ≥ 24 months of age and women with certain conditions, including but not limited to, underweight and maternal weight loss during pregnancy, in accordance with Footnote 7 of Table 2 in 246.10(e)(10)?

Yes No

j. Does the State agency allow issuance of fat-reduced milks to 1-year-old children for whom overweight or obesity is a concern, in accordance with Footnote 7 of Table 2 in 246.10(e)(10)?

Yes No

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

The State is evaluating the feasibility of offering formula in the 1st month to partially breastfed infants with the new MIS. P&P 7.02, Authorized Food Packages Maximum Monthly Amounts; II - Appendix C - Food List; II - Appendix D - Food List Criteria

II. NUTRITION SERVICES

B. Food Package Design

2. Individual Nutrition Tailoring

a. The State agency allows individual nutrition tailoring of food packages only in accordance with 246.10(c).

Yes No

b. The State agency provides a special individually tailored package for:

Homeless individuals and those with limited cooking facilities

Residents of institutions

Other (specify): Packages are automatically prorated at Full, 2/3 or 1/3 quantities depending on the date of issuance of benefits.

ADDITIONAL DETAIL: Please attach copies of all food packages that are tailored, Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 7.03, Food Package Tailoring; II - Appendix E - Model Food Packages in PENN

c. The State agency develops written individual nutrition tailoring policies and supportive science-based nutrition rationale based on the following participant characteristics:

Does not develop individual nutrition tailoring policies

Develops based on (check all that apply):

Nutrition risk/nutrition and breastfeeding assessment

Participant preference

Household condition

Other (specify): _____

d. The State agency allows local agencies to develop specific individual tailoring guidelines.

Yes No

If yes, check those of the following methods used by the State agency to review or approve local agency tailoring guidelines:

Local agencies are required to submit individual tailoring guidelines for State approval

Local agency individual tailoring guidelines are monitored annually during local agency reviews

Agency reviews

Other (specify): _____

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 7.03, Food Package Tailoring

3. Prescribing Packages

a. Individuals allowed to prescribe food packages:

| | Standard food package | Individually-tailored food package |
|------------------------|-------------------------------------|-------------------------------------|
| CPA | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other (specify): _____ | <input type="checkbox"/> | <input type="checkbox"/> |

ADDITIONAL DETAIL: Provide a copy of the actual foods included in the homeless and institution packages in the Appendix or cite Procedure Manual. Attach copies of all food packages that are tailored. Nutrition Services Appendix and/or Procedure Manual. (citation):

P&P 7.03, Food Package Tailoring; II - Appendix E - Model Food Packages in PENN

II. NUTRITION SERVICES

C. Staff Training

The State agency provides or sponsors the following training for WIC competent professional authorities:

| | <u>Professionals</u> | | <u>Paraprofessionals</u> (may or may not be CPAs in some States) | |
|---|-------------------------------------|-------------------------------------|---|-------------------------------------|
| | Regularly | As Needed | Regularly | As Needed |
| General nutrition education methodology | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| State certification policies/procedures | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Anthropometric measurements | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Blood work procedures | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Nutrition counseling techniques | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Breastfeeding promotion/support | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Dietary assessment techniques | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Prescribing & tailoring food packages | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Referral protocol | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Maternal, infant, and child nutrition | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Cultural competencies | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Customer service | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Immunization Screening/referral | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Care Plan Development | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| VENA staff competency training | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Substance abuse prevention | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other (specify): | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <u>Guided Goal Setting</u> | | | | |

ADDITIONAL DETAIL: Nutrition Services Appendix and/or Procedure Manual (citation):

P&P 1.01, Program Management. In the past year we gained access through the Dept of Health to a Learning Management System (LMS) called TRAIN and are working on establishing protocols and trainings that will be completed by all WIC staff using this system.

III. MANAGEMENT INFORMATION SYSTEM (MIS)

(Please indicate) **State Agency:** Pennsylvania for FY 2020

This section, Management Information System (MIS), involves the planning, documentation, security/confidentiality and production of the necessary reports relating to program operations through the utilization of automated data processing services at the State and local level.

A. System Planning and Operation – 246.4(a)(11)(iv): Describe the procedures for planning, approving and monitoring Automated Data Processing (ADP) goods and services, and any interaction with other statewide ADP operations which may take place, including system costs for services and security.

B. Participant Characteristics Minimum Data Set (MDS) – 246.4(a)(11)(i): All State agencies currently collect all required Minimum Data Set items. Please confirm that your State agency will continue to do so. For the Supplemental Data Set (SDS), which varies by the capacity of State systems, please describe the data items which are reported electronically regarding participant characteristics and whether these items are currently being collected or if there are plans to collect them in the future.

C. WIC Systems Functional Requirements Checklist – 246.4(a)(8); (9); (11); (12); (13); (14); (15); and (18): Describe those functions which are currently incorporated into the MIS or which are planned to be incorporated in the future.

III. MANAGEMENT INFORMATION SYSTEM (MIS)
A. System Planning and Operation (Online and Offline)

1. ADP System Planning

a. The WIC State agency is included in the following comprehensive Statewide ADP plan(s):

- Title IVa (TANF)
- Title V (MCH)
- Title XIX (Medicaid)
- Supplemental Nutrition Assistance Program (SNAP)
- Other (specify): _____
- No

If no, please provide a copy of the WIC State agency's ADP utilization plan.

b. The State agency has written procedures for monitoring and approving local agency requests for ADP goods and services. If yes, please provide a copy of written procedures.

- Yes No

ADDITIONAL DETAIL: Management Information System Appendix and/or Procedure Manual (cite):
 III - Appendix A - WIC Health and Human Services Delivery Center (HSDC) Inter Bureau Letter of Agreement (IBLA) FY 2020; III - Appendix B - 5-year HW-SW plan 2019-2023; P&P 1.08, Information System Management

2. System Documentation

a. The State system is fully documented in accordance with (check all that apply):

- USDA/FNS Advance Planning Document Handbook No. 901
- USDA/FNS ADP Security Guide
- Other (specify): Commonwealth Information Technology Policies

b. The State agency maintains overall system documentation (check all that apply):

- A general design
- User's manual
- Method for updating documentation for system changes/modifications
- A detailed design
- Maintenance manual

Note: These documents are NOT required for FNS review or submission with the State plans, but should be available if requested.

ADDITIONAL DETAIL: Management Information System Appendix and/or Procedure Manual (cite):

3. Automated Data Processing Services

a. Indicate below whether the following ADP functions, if applicable, are performed by State agency staff or are contracted to an outside firm.

| Function | Performed SA Staff | Performed LA Staff | Contracted to Outside Firm (specify company name): |
|----------------------------|-------------------------------------|-------------------------------------|---|
| Data entry | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | _____ |
| Food instrument production | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | _____ |

III. MANAGEMENT INFORMATION SYSTEM (MIS)

A. System Planning and Operation (Online and Offline)

| | | | |
|-------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Management reports/EBT | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Solutran (EBT Processor) |
| Feasibility study | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| ADP development | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| ADP system hardware operation | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| Custom software development | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| Custom software maintenance | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| Printing forms/FIs | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | _____ |
| Backup computer facility | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| Other (specify): | | | |
| _____ | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| _____ | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| _____ | <input type="checkbox"/> | <input type="checkbox"/> | _____ |

b. The State agency has a blanket purchase agreement in effect (check all that apply). Please provide a copy of agreement.

- Equipment Services Software

c. The State agency has methods in place for ensuring that the cost of equipment or services used by WIC and other programs are equitably prorated among funding sources. Please provide policy of method used.

- Yes No

d. The State agency periodically reviews system costs billing.

- Yes No

e. The State agency acquires banking services through:

- Competitive bids among banks within the State
 Competitive bids among in-State and out-of-State banks
 Use of State agency designated bank
 Other: _____

f. The State agency acquires EBT services through:

- Competitive bids among EBT processors
 State agency IT services
 State hosted EBT services
 Other: _____

ADDITIONAL DETAIL: Management Information System Appendix and/or Procedure Manual (cite):

III - Appendix A - WIC HHSDC IBLA FFY2020; P&P 1.08, Information System Management

4. System Security/Data Confidentiality

a. To ensure that data files and computer programs are protected, the State agency ensures that (check all that apply):

- There is a separate organizational area/individual to control access to electronic storage media.
 Access to WIC Program data files is controlled through password access or similar control.
 Operational personnel are limited to only those jobs for which they are responsible.

III. MANAGEMENT INFORMATION SYSTEM (MIS)

A. System Planning and Operation (Online and Offline)

- Passwords are protected.
- Passwords are changed periodically.
- The system access procedures are audited at least once a year. Please provide a copy of access procedures.
- Procedures are implemented for timely removing passwords, ID's etc. when personnel leave.
- Biennial security reviews are performed by Office of Administration. Please provide a written summary of the most current biennial security review
- Periodic risk assessments are performed by Commonwealth policy/security Assessment Tool (CA2)
- Other (specify): _____

b. To ensure that disaster contingency plans (e.g., file storage, backup hardware, and software procedures) are sufficient to allow the management information and benefit delivery systems to recover and continue processing after fire, flood or similar disaster, the State agency ensures that (check all that apply):

- Backup copies of files and program are stored off-site in a secure location. Please provide address of location.
Iron Mountain, 36 Great Valley Parkway, Malvern, PA 19355
- Backup copies are kept up-to-date.
- There is an agreement with another processing unit with compatible hardware to provide services in an emergency. Please provide copy of agreement.
- A contingency plan is in place in the event of service interruption. Please provide a copy of contingency plan.
- A recent test of the WIC system or mock disaster recovery operation has been conducted at the backup facility. Please provide a written summary of the conducted test.
- Other (specify): Traditional database replication

ADDITIONAL DETAIL: Management Information System Appendix and/or Procedure Manual (cite):

III - Appendix C - Health and Human Services Delivery Center COOP Plan

5. Description of MIS changes that occurred in the past year:

A full transition from QuickWIC to PENN is occurring from January 2019 - TBD. Clinic Services will be fully transitioned by October 2019 with vendor management tasks still occurring in both systems. Typical maintenance and support is still occurring as usual. For example, letter and form changes, reporting issues, audit request changes.

Typical maintenance and support for any changes is ongoing. For example, letter and form changes, reporting issues, audit request changes.

6. Description of MIS changes planned for the upcoming year:

A Transition Plan will be developed to fully move from the QuickWIC system to the PENN system. There will also be typical ongoing maintenance and support and anticipated work to help transition to the new MIS System.

Typical ongoing maintenance and support and anticipated work to help transition to a new MIS System.

III. MANAGEMENT INFORMATION SYSTEM (MIS)

B. Participant Characteristics Minimum Data Set

The Participant Characteristics (PC) Minimum Data Set (MFDS) contains data items which are reported to FNS electronically by State agencies in April in even numbered years on all or a State-representative sample of participants. The MDS has required data items which must be collected and reported. The Supplemental Data Set (SDS) is comprised of data items which State agencies have agreed are desirable to collect and report at the national level. Please check MDS or SDS data items the State agency currently collects in its Information Systems and those MDS or SDS data items it is planning to collect within the next two years.

State Agency IS Collects:

- State Agency ID.** A unique number that permits linkage to the WIC State agency where the participant was certified.
- Local Agency ID.** A unique number that permits linkage to the local agency where the participant was certified as eligible for WIC benefits.
or
- Service Site ID.** A unique number that permits linkage to the service site where certified. Either local agency ID or service site ID may be reported according to the level the State Agency feels appropriate. At a minimum, State agencies must provide agency names and addresses for each ID provided on their files.
- Case ID.** A unique record number for each participant which maintains individual privacy at the national level. (This may not be the case number used in the State agency's MIS for the individual.) Participant or Case IDs for each participant should continue to maintain individual privacy at the national level.
- Client Date of Birth.** Month, day and year of participant's birth reported in MMDDYYYY format.
- Client Race/Ethnicity.** The classification of the participant into one of the five (5) racial/ethnic categories: For race: American Indian or Alaskan Native; Asian; Black or African American; Native Hawaiian or Other Pacific Islander; and White. For ethnicity: Hispanic or Latino; Not Hispanic or Latino.
- Certification Category.** The category---one of five (5) possible categories---under which a person is certified as eligible for WIC benefits: pregnant woman; breastfeeding woman; postpartum woman (not breastfeeding); infant (under 12 months); or child (12-59 months).
- Expected Date of Delivery or Weeks Gestation.** For pregnant women, the projected date of delivery (MMDDYYYY format) or the number of weeks since the last menstrual period as determined at WIC Program certification.
- Date of Certification.** The date the person was declared eligible for the most current WIC Program certification. Month, day, and year should be reported in MMDDYYYY format.
- Sex.** For infants and children, male or female.
- Priority Level.** Participant priority level for WIC Program certification.
- Participation in TANF, SNAP, Medicaid.** The participant's reported participation in each of these programs at the time of the most recent WIC Program certification.
- Migrant Status.** Participant migrant status according to the federal WIC Program definition of a migrant farm worker (currently counted in the FNS 798 report).

III. MANAGEMENT INFORMATION SYSTEM (MIS)

B. Participant Characteristics Minimum Data Set

- Number in Family/Household or Economic Unit.** The number of persons in the family/household or economic unit upon which WIC income eligibility was based. A self-declared number in the family/household or economic unit may be reported for participants whose income was not required to be determined as part of the WIC certification process. These participants include adjunctively income-eligible participants (due to TANF, SNAP, or Medicaid participation) and those participants deemed income eligible under optional procedures available to the State Agency in Federal WIC Regulations, Section 246.7(d)(2)(vi-viii) (means-tested programs identified by the State for automatic WIC Program income eligibility, income eligibility of Indian and in-stream migrant farmworker applicants).

III. MANAGEMENT INFORMATION SYSTEM (MIS)

B. Participant Characteristics Minimum Data Set

- Family/Household or Economic Unit Income.** For persons for whom income is determined during the certification process, the income amount that was determined to qualify them for the WIC Program during the most recent certification. For descriptive purposes only, for participants whose income was not required to be determined as part of the WIC Program certification process, the self-reported income at the time of certification. These participants include adjunctively income-eligible participants and those persons deemed eligible under optional procedures available to the State Agency in Federal WIC Regulations, Section 246.7(d)(2)(vi-viii). Zero should not be used to indicate income values that are missing or not available. Zero should indicate only an actual value of zero.
- Nutrition Risk(s) Present at Certification.** Up to 10 highest priority nutritional risks present at the WIC Program certification
- Hemoglobin or Hematocrit.** That value for the measure of iron status that applies to the WIC Program certification. It is assumed that the measure was collected at the time of certification or within ninety (90) days of the certification date.
- Date of Blood Measurement.** The date of the blood measurement that was used during the most recent WIC Program certification in MMDDYYYY format.
- Weight.** The participant's weight measured according to the CDC nutrition surveillance program standards [nearest one-quarter (1/4) pound]. If weight is not collected in pounds and quarter pounds, weight may be reported in grams.
- Height.** The participant's height (or length) measured according to the CDC nutrition surveillance program standards [nearest one-eighth (1/8) inch]. If height is not collected in inches and 1/8 inches, height may be reported in centimeters.
- Date of Height and Weight Measure.** The date of the height and weight measures that were used during the most recent WIC Program certification in MMDDYYYY format.
- Currently Breastfed.** Information is needed for all infant participants ages six through thirteen months, whether or not the infant is currently receiving breastmilk.
- Ever Breastfed.** Information is needed for all infant participants ages six through thirteen months, whether or not the infant was ever breastfed.
- Length of Time Breastfed.** For infants ages six through thirteen months, the number of weeks the infant received breastmilk.
- Date Breastfeeding Data Collected.** For infants ages six through thirteen months, the date on which breastfeeding status was reported in MMDDYYYY format.
- Food Packages.** The food package code(s) for the WIC food package or for all food instruments prescribed for the participant during the month.

III. MANAGEMENT INFORMATION SYSTEM (MIS)

B. Participant Characteristics Minimum Data Set

OPTIONAL:

Supplemental Data Set

| State Agency IS Collects | State Agency IS Plans to Collect | |
|-------------------------------------|----------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Date of First WIC Certification. Date the participant was first certified for the WIC Program in MMDDYYYY format. For pregnant, breastfeeding and postpartum women, this applies to the current/most recent pregnancy and not to prior pregnancies. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Educational Level. For pregnant, breastfeeding and postpartum women, the highest grade or year of school completed. For infants and children, the highest grade or year of school completed by mother or primary caretaker. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Number in Family/Household on WIC. The number of people in the participant's family/household receiving WIC benefits. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Date Previous Pregnancy Ended. For pregnant women, the date previous pregnancy ended in MMDDYYYY format. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Total Number of Pregnancies. For pregnant women, the total number of times the woman has been pregnant, including this pregnancy, all live births and any pregnancies resulting in miscarriage, abortion or stillbirth. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Total Number of Live Births. For pregnant women, the total number of babies born alive to this woman, including those who may have died shortly after birth. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pre-pregnancy Weight. For pregnant women only, the participant's weight immediately prior to pregnancy. Pre-pregnancy weight may be reported either in pounds and ounces or in grams. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Participant's Weight Gain During Pregnancy. For breastfeeding and postpartum women, the participant's weight gain during pregnancy as taken immediately at or prior to delivery. Weight gain during pregnancy may be reported in either pounds and ounces or in grams. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Birth Weight. For infants and children, the participant's weight at birth measured according to the CDC nutrition surveillance program standards (lbs/ounces). Birth weight may be reported in either pounds or ounces, or in grams. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Birth Length. For infants and children, the participant's length measured according to the CDC nutrition surveillance program standards (1/8 inches). Birth length may be reported in either inches and eighth inches or in centimeters. |
| <input type="checkbox"/> | <input type="checkbox"/> | Participation in the Food Distribution Program on Indian Reservations. The participant's reported participation in this program . |

III. MANAGEMENT INFORMATION SYSTEM (MIS)

C. WIC Systems Functional Requirements Checklist

The following checklists were taken from the WIC Functional Requirements Document (FRED) which is provided as guidance to State agencies on functions they should consider incorporating into their Information Systems. Please check those functions/capabilities which the State agency system currently performs or plans to perform within the next two years.

| State Agency System Performs | State Agency System Planned | Automated Core Function/Capabilities |
|-------------------------------------|-----------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1. Calculates the date certification is due to expire. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2. Assigns the participant a nutritional risk code and assigns a priority level. (CPA confirms the code is correct.) |
| <input type="checkbox"/> | <input type="checkbox"/> | 2a. Assigns one risk code. |
| <input type="checkbox"/> | <input type="checkbox"/> | 2b. Assigns up to 3 risk codes. |
| <input type="checkbox"/> | <input type="checkbox"/> | 2c. Assigns up to 6 risk codes. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2d. Assigns more than 6 risk codes. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 3. Calculates the applicant's household income and flags individuals whose income exceeds program standards. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 3a. Converts incremental income (weekly, monthly) to an annual figure. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4. Associates family members. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 5. Statewide data is maintained to facilitate families transferring within the State. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 6. Transfers certification data to the central computer facility electronically either in real time or batch mode. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 7. Captures or documents the nutrition education provided each participant as well as the topics covered. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8. Uses table-driven food packages. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8a. Uses standard pre-defined food packages. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8b. Enables easy food package tailoring. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8c. Performs edits to prevent over-issuance during food package creation. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 9. Enables food instruments to be issued when the participant is present for pick-up, i.e., on-demand. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 10. Captures or documents the name of the programs to which the participant was referred. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 11. Performs food instrument reconciliation. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 12. Produces standard Dual Participation Report. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 13. Produces standard Integrity Profile (TIP) Report. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 14. Produces standard Rebate Billing Report. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 15. Produces standard Participation Report. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 16. Produces Participant Characteristics Datasets. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 17. Captures basic transaction data by vendor. |

III. MANAGEMENT INFORMATION SYSTEM (MIS)

C. WIC Systems Functional Requirements Checklist

| State Agency System Performs | State Agency System Planned | Automated Core Function/Capabilities |
|-------------------------------------|-----------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 18. Flags high-risk vendors through peer group analysis of redemption data. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 18a. Identifies vendors with high average food instrument redemptions. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 18b. Identifies vendors with a narrow variation in redemptions. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 19. Assigns a maximum value for each food instrument type (paper) or each item/UPC (EBT). |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 19a. Receives data about the amount a vendor requests for each food instrument (paper) or item/UPC (EBT) redeemed. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 20. Captures source of income. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 21. Has the capability of annualizing household income occurring at more than one frequency. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 22. Performs automated dietary assessment. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 23. Has automated growth charts. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 24. Has point of certification data entry, i.e., a personal computer at each "station" within the clinic. |
| <input type="checkbox"/> | <input type="checkbox"/> | 25. Allows for ad hoc reporting. |

IV. ORGANIZATION AND MANAGEMENT

(Please indicate) **State Agency:** Pennsylvania for FY 2020

Organization and management involves the procedures for the documentation of staff time at the State level devoted to the various WIC functions, the evaluation and selection of local agencies, the documentation of local agency staffing standards and data, as well as disaster planning.

A. State Staffing – 246.3(e), 246.4(a)(4) and (24): describe the information relating to State level staff requirements and utilization as it relates to WIC Program functions and how the State agency will provide a drug-free workplace.

B. Evaluation and Selection of Local Agencies - 246.4(a)(5)(i) and (7) and 246.5: describe the procedures and criteria utilized in the selection and authorization of local agencies.

C. Local Agency Staffing - 246.4(a)(4): describe the State staffing standards which apply to the selection of local agency staff and the means used by the State agency to track and analyze local level staffing data.

D. Disaster Planning - describe the disaster plans to be implemented in the event of a disaster.

IV. ORGANIZATION AND MANAGEMENT

A. State Staffing

1. State Level Staff

a. Record below the current total full-time equivalent staff (FTEs) available for each position listed or attach equivalent information in Appendix _____ of this section:

| <u>Position</u> | <u>FTE WIC</u> | <u>FTE In-kind</u> | <u>Total FTE</u> |
|----------------------------------|----------------|--------------------|------------------|
| Director | 1 | | 1 |
| Nutritionist | 4.55 | | 4.55 |
| Vendor Specialist | 7.1 | | 7.1 |
| Program Specialist | 9.05 | | 9.05 |
| Financial Specialist | 8.15 | | 8.15 |
| Breastfeeding Coordinator | 1 | | 1 |
| (MIS/EBT) Specialist | 8.35 | | 8.35 |
| Intern | 2.15 | | 2.15 |
| Other (specify): <u>Training</u> | 1.75 | | 1.75 |
| <u>Outreach</u> | 1.6 | | 1.6 |
| <u>Administrative</u> | 5 | | 5 |

b. The State agency has a WIC organizational chart showing all positions, titles, and staff names.

Yes No

If yes, please attach and/or reference the location of the State agency's WIC organization chart:
 IV - Appendix A - Bureau of WIC Organizational Chart

c. If available, please attach and/or reference the location of the overall organizational chart that identifies the WIC Program's relationship within the State Health Department or Indian Tribal Organization:

IV - Appendix B - Department of Health Organizational Chart

d. The State agency has updated position descriptions for each of the above positions.

Yes No

If yes, please attach and/or reference the location of the position descriptions:

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

P&P 1.00, Organization and Management

IV. ORGANIZATION AND MANAGEMENT

A. State Staffing

2. Estimate below the average percent of State staff time devoted to fulfilling the following functions:

| <u>Function</u> | <u>Percent of Total Staff Time</u> |
|--|------------------------------------|
| Certification, including nutrition risk determination | 1 |
| Breastfeeding training/promotion and support | 1 |
| Nutrition education | 2 |
| Monitoring of local agencies | 18 |
| Fiscal reporting | 16 |
| Food delivery system management | 1 |
| Vendor management, including vendor training | 15 |
| Staff training and continuing education | 6 |
| (MIS/EBT) system development and maintenance | 17 |
| Civil rights | 1 |
| Coordination with and referrals to other assistance programs and social service agencies | 2 |
| Other (specify): <u>General</u> | 20 |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| Total | 100 |

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):
P&P 1.00, Organization and Management

3. Drug-Free Workplace

a. The State agency has a plan that will enable them to achieve a drug-free workplace.

Yes No

b. Please attach and/or reference the location of a description of the State agency's plans to provide and maintain a drug-free workplace in Appendix of this section.

IV - Appendix C - Management Directive 505.25 Amended Substance Abuse in the Workplace

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

IV. ORGANIZATION AND MANAGEMENT

B. Evaluation and Selection of Local Agencies

Does not apply because the State agency has only one location. (PROCEED TO NEXT SECTION)

1. Local Agencies Authorized

 24 Number of local agencies authorized to provide WIC services last year

 24 Number of local agencies planned to provide WIC services this year

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

P&P 1.00, Organization and Management

2. The State agency accepts applications from potential local agencies:

- Annually Biennially
 On an on-going basis Other (specify) As need arises
-

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

P&P 1.02SP, Local Agency Selection and Disqualification

3. Existing local agencies must reapply and compete with new applicant agencies for authorization:

- Annually Biennially
 Not applicable Other (specify) _____
-

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

4. Selection Criteria

a. The State agency uses the following criteria in selecting local agencies in new service areas and/or in reviewing applications from existing service areas:

| New Service Areas | Existing Service Areas | |
|----------------------------------|---------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Coordination with other health care providers |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Projected cost of operations/ability to operate with available funds |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Location/participant accessibility |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Financial integrity/solvency |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Relative need in the area |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Range and quality of services |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | History of performance in other programs |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Ability to serve projected caseload |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Non-smoking facility |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Americans with Disabilities Act (ADA) compliance |
| <input type="checkbox"/> | <input type="checkbox"/> | Other factors: _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Other factors: _____ |

IV. ORGANIZATION AND MANAGEMENT

B. Evaluation and Selection of Local Agencies

b. The State agency conducts studies (provide date of most recent study: _____) of the cost-effectiveness of local agency operations that examine:

- Location and distribution of local agencies in proportion to participants/potential eligibles
- Clinic procedures to optimize participant access/service (Patient Flow Analysis, etc.)
- Staff-to-participant ratios and related staffing analyses
- Comparative analyses of local agency/clinic costs
- Other

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

P&P 1.02SP, Local Agency Selection and Disqualification

5. The State agency enters into a formal written agreement or contract with each local agency.

- Yes (state duration): One Year No

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

6. The State agency has established statewide fair hearing procedures for local agency appeals.

- Yes, attach local agency fair hearing procedures or specify the location in the Procedure Manual and reference below:
- No
- Not Applicable

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

P&P 1.03, Abuse and Fraud Prevention and Investigation

7. The State agency maintains a listing of clinic sites that includes the following information. If available, please attach and/or reference the location of the listing: Appendix E - Active Clinic Report

- Location
- Type of site (e.g., hospital, health department, community action program)
- Service area
- Hours of operation
- Days of operation
- Health services provided on-site
- Social services provided on-site
- Participation
- Other (specify): _____

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

IV - Appendix D - Active Clinic Report

IV. ORGANIZATION AND MANAGEMENT

C. Local Agency Staffing

Does not apply because the State agency has only one location. (PROCEED TO NEXT SECTION)

1. Staffing Standards

a. The State agency prescribes local agency staffing standards that include:

- Credentials
- Staffing levels
 - Staff-to-participant ratio standards
 - Time spent on WIC functions
 - Other (specify): _____
- Functions of CPAs
- Paraprofessional requirements
- Separation of duties to ensure no conflicts of interest
- Other (specify): Nutrition Education, Breastfeeding, & Outreach Coordinator Staffing requirements as well as BFPC Supervisor requirement for agencies who receive Peer Counseling funds. _____
- Not applicable

b. The State agency has a plan for ensuring that local agency credentials are in line with the Nutrition Services Standards.

Yes No

c. The State agency maintains copies of local agency CPA position descriptions, classified in terms of Nutrition Services Standards, i.e., federal requirements, recommended criteria, best practices.

Yes No

d. Local agencies follow staffing standards established by unions or local governmental authorities.

Yes No

If yes, how many of the total local agencies are currently authorized by unions or local governmental authorities? There are 6 local agencies authorized by unions or local government authority.

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

CPA Authorizations are done at the state level for all local agency staff. Local Agency position descriptions are not maintained at the State Agency, but the State determines qualifications for who can function as a CPA. P&P 1.01 Program Management.

2. Local Level Staffing Data

a. The State agency gathers and analyzes data to determine staff-to-participant ratios (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> For each clinic/local agency | <input checked="" type="checkbox"/> By function |
| <input type="checkbox"/> At regular intervals | <input type="checkbox"/> Program management |
| <input type="checkbox"/> Monthly | <input type="checkbox"/> Food delivery |
| <input type="checkbox"/> Quarterly | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Annually | <input type="checkbox"/> Nutrition education |
| <input type="checkbox"/> Breastfeeding promotion and support | <input checked="" type="checkbox"/> Other (specify): This has not been done since Altarum last collected data in 2011. _____ |
| | <input type="checkbox"/> Other (specify): _____ |

IV. ORGANIZATION AND MANAGEMENT

C. Local Agency Staffing

b. Results of analyses are reported back to local agencies.

- No
- Yes, in a single report comparing all local agencies
- Yes, in a local agency-specific report (no comparative data)

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Any time we have reported participant to staff ratio data it has been done in a single report.

3. Local Agency Breastfeeding Staffing Requirement

- a. 24 Number of local agencies with a designated a staff person to coordinate breastfeeding promotion and support activities.
- b. The State agency maintains approved copies of local agency Breastfeeding Coordinator and Peer Counselor position descriptions as outlined in the FNS-developed curriculum.
- Yes No
- c. 14 Number of local agencies with breastfeeding peer counselors

IV. ORGANIZATION AND MANAGEMENT

D. Disaster Plan

1. State agency has developed a WIC disaster plan.

Yes No

2. The WIC disaster plan is part of a broader Health Department or other State agency disaster plan.

Yes, what agency(ies): Department of Health

No

3. The State agency shares the disaster plan with its local agencies and clinics?

Yes No

4. The Disaster Plan addresses:

Procedures to assess the extent of a disaster and report findings

MIS alternate procedures

Access to program records

Emergency authorization of vendors

Certification and food issuance sites and procedures

Back up computer systems

Food package adjustments

Back up filing systems

Food delivery systems to include

Staffing arrangements

electronic benefits transfer

Use of mobile equipment, clinics

Publication notification of variance in program operations

Management Information System (IS) Recovery

Other (describe) _____

5. The State agency requires local agencies/clinics to have individual disaster plans.

Yes No

If yes, such plans are reviewed for compliance and consistency with the State agency disaster plan.

Yes No

6. The State agency has a designated staff person to coordinate disaster planning.

Yes No

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

(Please indicate) **State Agency:** Pennsylvania for FY 2020

NSA expenditures involve the process of allocating, documenting and monitoring the distribution of administrative funds to local agencies, including the monitoring of nutrition education costs, and State and local agency direct/indirect costs.

A. Funds Allocation-246.4(a)(13): describe the policies and procedures used to allocate administrative funds to local agencies, including start-up funds, and conversion of food funds to NSA funds.

B. Local Agency Budgets/Expenditure Plans-246.4(a)(2): describe the policies and procedures for preparing and submitting local agency budgets and expenditure plans and the services that are entirely supported by WIC Program funds.

C. State and Local Agency Access to Funds-246.4(a)(13): describe the procedures and method(s) of distribution/reimbursement of NSA funds to local agencies.

D. Reporting and Reviewing of State and Local Agency Expenditures-246.4(a)(11)(iv); (12); and (13): describe the policies and procedures used to report, monitor, and review State and local agencies' expenditures, including the documentation of staff time, local agency report forms, on-site reviews of local agencies' NSA expenditures, and in-kind contributions.

E. Nutrition Education Costs-246.4(a)(9) and 246.14(c)(1): describe the plans and procedures used to meet the nutrition education expenditure requirements, including monitoring activities, local agency reports, and assurances that the special nutrition education needs of migrant farmworkers and their families, Indians, and homeless persons are met.

F. Indirect Costs-246.4(a)(12): describe the policies and procedures used to document and monitor indirect cost rates and services at the State and local level.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

A. Funds Allocation

1. Allocation Process

a. The State agency has established and provided written procedures to local agencies describing the process for allocation of NSA funds among local agencies.

- Yes No Not applicable, State agency does not have separate local agencies.
(Proceed to A. 2. Conversion of Food Funds to NSA Funds)

b. Local agencies were involved in developing these procedures via:

- Task force/committee of selected local agencies
 Comment on proposals made available to all local agencies
 Other (describe): Local agencies do not have regular input, however, when changes are made local agency input is solicited.

c. The State agency allocates NSA funds to local agencies through the use of:

- A negotiated budget Flat cost per participant Statewide
 Formula (variable) Other method (describe): Renewal amounts are based on Executive Office decision related to the percent increase and/or decrease in participation rates of the Local Agencies.

d. The allocation procedure takes the following factors into account (check all that apply):

- Staffing needs
 Number of participants
 Population density
 Cost-containment initiatives
 Availability of administrative support from other sources
 Other (specify): Caseload Management, Unspent funds from previous fiscal years

e. The State agency methodology for funds allocations to local agencies includes a mechanism for reallocation.

- Yes
 Monthly Quarterly Semiannually Other (specify): When funds are available for distribution a Subsequently Available Funds (SAF) amendment can be done to the local agency grant. Additionally, the state agency will monitor spending and if a local agency is not on track to spend at least 97% of their grant, the state agency will reallocate elsewhere. We call this process recovery and re-allocation.

No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 3.01, LA Budgets, V - Appendix A - Agreement Boiler Plate, Paragraph VIII and IX

2. Conversion of Food Funds to NSA Funds

a. The State agency converts food funds to NSA funds:

- Based on a plan submitted to FNS to reduce average food costs per participant and to increase participation above the FNS-projected level for the State agency.
 The State agency achieves, through acceptable measures, increases in participation in excess of the FNS-project level for the State agency.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

A. Funds Allocation

Describe measures used to increase participation:

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

7 CFR 246.16

3. The State's Fiscal Year runs from 07/01/2019 to 06/30/2020

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

B. Local Agency Budgets/Expenditures Plans

1. Local Agency Budgets/Expenditure Plans

- Not applicable, State agency does not have separate local agencies.
(Proceed to C. State and Local Agency Access to Funds.)

a. The State agency requires its local agencies to prepare and submit administrative budgets.

- Yes No

If yes, the State agency requires that local agency budgets include the same cost categories as those used for State-level budget preparation.

- Yes No

b. Local agencies' budgets are broken out by (check all that apply):

Line items

- | | |
|---|--|
| <input type="checkbox"/> Accounting | <input type="checkbox"/> Maintenance and repair |
| <input type="checkbox"/> ADP services | <input type="checkbox"/> Materials and supplies |
| <input type="checkbox"/> Breastfeeding aids | <input type="checkbox"/> Memberships, subscriptions, and professional activities |
| <input type="checkbox"/> Capital expenditures | <input type="checkbox"/> Printing and reproduction |
| <input type="checkbox"/> Clinic/lab services | <input type="checkbox"/> Training and education |
| <input type="checkbox"/> Communications | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Employee salaries | <input type="checkbox"/> Travel |
| <input type="checkbox"/> Employee fringe benefits | |
| <input type="checkbox"/> Lease or rental of space | <input checked="" type="checkbox"/> Other (specify): <u>Personnel Services, Consultant/Subcontract Services, Patient Services, Supplies/Equipment, Travel, Other Costs</u> |

Functions

- | | |
|--|---|
| <input type="checkbox"/> General administration/ program management | <input type="checkbox"/> Breastfeeding promotion/support (e.g., breastfeeding aids) |
| <input type="checkbox"/> Food delivery | <input type="checkbox"/> Client services |
| <input type="checkbox"/> Certification | |
| <input type="checkbox"/> Nutrition education | <input type="checkbox"/> Other (specify): _____ |

c. The State agency has an established formal process for local agencies to follow when requesting amendments or modifications to their budgets.

- Yes No

d. In order to prepare the federally required WIC administrative budget, the State agency:

- Uses local agency budgets or prior year expenditures
- Reports under an ongoing system to collect this data
- Extracts or consolidates data reported under other State or local agency systems to group costs under the federal line items and functions
- Other (describe): _____

(State WIC administrative budgets are not submitted to FNS, but are used by State agencies as a management tool and may be reviewed by FNS.)

ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation):

P&P 2.01, Local Agency Financial Management, P&P 2.02, Cost Allowability for Travel, Incentive Items, Tuition Reimbursement and Renovations, P&P 2.03, Nutrition Education, Breastfeeding Promotion & Support, and Outreach

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

B. Local Agency Budgets/Expenditures Plans

Expenditure Requirements, P&P 2.04, Audit of Local Agencies, and P&P 2.05, Equipment Purchases, Inventory and Disposition

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

C. State and Local Agency Access to Funds

1. The State Agency manages its NSA Grant on a/an:

Cash basis Accrual basis

Other (specify): _____

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 2.01, Local Agency Financial Management

2. Reimbursement/Provision of Funds to Local Agencies

a. The State agency provides local agencies with funds in advance.

Yes (state conditions): Grantee may elect to receive reimbursement based on a cash needs request. The Grantee may make one cash needs request per Federal fiscal year (October 1 through June 30). Upon Execution of this Grant Agreement, the Grantee may submit a Cash Needs Request Form. This request may not exceed one-sixth of the original total Grant Agreement each year of the Grant Agreement. This payment must be used by the Grantee as working capital solely for the purposes of the Grant Agreement. This payment is payable October 1 of each Federal Fiscal year, or if this Grant is approved after October 1, on the approval date of the agreement.

No

Not Applicable (Proceed to next section.)

If yes, advances must be reconciled to incoming claims. Local agency claims are submitted:

Monthly Quarterly

b. In order to qualify for payment, an expenditure must be (check all that apply):

At or below the level of its approved budget line item

Supported by appropriate documentation (e.g., check or receipt)

A reasonable and necessary expense for WIC

Other (specify): Received appropriate approvals for select items: out of state travel (state approval) computer purchases, equipment purchases over \$5,000 (state approval), equipment purchases over \$25,000 (state and USDA approval) and renovations over \$5,000 (state and USDA approval).

c. If an expenditure exceeds the budget provided for that particular line item, the State agency requires the local agency to (check all that apply):

Submit a supplemental request

Provide a justification for exceeding the budget line item

Make an offsetting adjustment to another line item in its budget

Request approval of a budget modification

Other (explain): If the Grantee is moving more than 20% of the total grant amount between line items, they must request and receive approval for a formal budget revision. If the Grantee is moving less than 20% of the total grant between line items, they are not required to request a formal budget revision, unless they are moving funds into a previously unfunded line item or removing all funding from a line item.

d. Local agencies receive payment via:

Electronic funds transfer State treasury check/warrant

Other (specify): _____

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

C. State and Local Agency Access to Funds

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

Grant Agreement (payment provisions); Budget Summary, P&P 2.01 Local Agency Financial Management, 2.02 Cost Allowability for Travel, Incentive Items, Tuition Reimbursement and Renovations and P&P 2.03 SP, Nutrition Education, Breastfeeding Promotion and Support, and Outreach Expenditure Requirements.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

1. Documentation of Staff Time

- a. How does the State agency determine the percentage of staff time devoted to WIC tasks to document allowable staff costs under the WIC Program (check all that apply):

At SA At LA

- | | | |
|-------------------------------------|-------------------------------------|------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | 100 percent reporting |
| <input type="checkbox"/> | <input type="checkbox"/> | Random moment sampling |
| <input type="checkbox"/> | <input type="checkbox"/> | Periodic time studies: |
| <input type="checkbox"/> | <input type="checkbox"/> | 1 week/month |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 1 month/quarter |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): _____ |

- b. The State agency last evaluated its time documentation protocol on (specify date). 08/11/2015
If available, please attach a copy of the protocol to this section or cite Procedure Manual reference.

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

New employee handbook

2. Please indicate below the services that are entirely supported by WIC funds:

- Anthropometric measurements
 - Nutrition counseling/education
 - Breastfeeding promotion/support
 - Immunization status assessments
 - Referrals to health and/or social services
 - Hematological assessments
 - Other (specify): Quality Assurance
-

ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation):

Grant Agreement

3. Local Agency Report Forms

- a. The State agency specifies standard forms and/or procedures for local agencies to use in reporting monthly local-level expenditures.

Yes No Not Applicable (Proceed to next section)

- b. Local agencies' budgets are broken out by (check all that apply):

- Not applicable
- Line items
 - Accounting
 - ADP services
 - Breastfeeding aids
 - Capital expenditures
 - Clinic/lab services
 - Communications
 - Maintenance and repair
 - Materials and supplies
 - Memberships, subscriptions, and professional activities
 - Printing and reproduction
 - Training and education
 - Transportation

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

- Employee salaries Travel
 Employee fringe benefits Other (specify): Same as B.1.b response.
 Lease or rental of space

- Functions
- | | |
|--|---|
| <input type="checkbox"/> General administration/ program management | <input type="checkbox"/> Breastfeeding promotion/support (e.g., breastfeeding aids) |
| <input type="checkbox"/> Food delivery | <input type="checkbox"/> Client services |
| <input type="checkbox"/> Certification | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Nutrition education | _____ |
- Other** (specify): _____

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):
P&P 2.01, Local Agency Financial Management

4. On-Site Review of Local Agencies' Administrative Expenditures

a. The State agency conducts on-site reviews of local agency administrative expenditures:

- Annually Every two years Every three years
 Other (specify): _____

The review is conducted by:

- WIC State agency staff
 State Department of Health fiscal or audit staff
 CPA or audit firm
 Other (specify): _____

b. The State agency utilizes a standard format/guide to review local agencies' NSA expenditures.

- Yes No

If yes, the standard review guide includes the following procedures (check all that apply):

- Verification of at least one monthly billing/claim/expenditure report against source
 Documents
 Tracking written approval of procurements
 Requesting records of ordering, receipt, billing, and payment
 Determination that costs were necessary, reasonable and appropriate
 Determination that costs were properly allocated among WIC and other programs
 Determination that personnel costs charged to WIC were appropriate
 Determination that local agencies' indirect costs were appropriately charged
 Other (specify): _____

c. If available, please attach a copy of the State agency's NSA expenditure review guide.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

D. Reporting and Reviewing of State and Local Agency Expenditures

d. The State agency notifies local agencies of findings and establishes claims for unallowable costs, as appropriate.

Yes No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

Grant Agreement (payment provisions); Budget Summary, P&P 2.01 Local Agency Financial Management, 2.02 Cost Allowability for Travel, Incentive Items, Tuition Reimbursement and Renovations and P&P 2.03 SP, Nutrition Education, Breastfeeding Promotion and Support, and Outreach Expenditure Requirements.

5. The State agency requires local agencies to document the sources and values of in-kind contributions.

Yes No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

Grant Agreement (payment provisions)

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

E. Nutrition Education Costs

1. The State agency documents that it meets its nutrition education and breastfeeding promotion expenditure requirements per 7 CFR 246.14(c)(1) via:

- Activity reports Time studies Itemizing expenditures
 Other (specify): Local agencies send information to the State agency using the NE and BF expense report.

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 2.01, Local Agency Financial Management; Nutrition Education, Breastfeeding Promotion & Support, and Outreach Expenditure Requirements

2. The State agency monitors expenditures for the following activities related to breastfeeding promotion and support at the State and/or local level (check all that apply):

| | At SA | At LA |
|--|-------------------------------------|-------------------------------------|
| Breastfeeding promotion coordinator's salary | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Written educational materials | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Participant education/counseling | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Staff training | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Breastfeeding promotion activities | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Direct support costs | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Breastfeeding aids and equipment (e.g., breast pumps purchased with NSA funds) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other | <input type="checkbox"/> | <input type="checkbox"/> |

(If other, specify): _____

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 2.03 Nutrition Education, Breastfeeding Promotion & Support, and Outreach Expenditure Requirements

3. In the event that the State agency uses funds from other sources in meeting minimum expenditure requirements for nutrition education (NE) and breastfeeding promotion and support (BFPS), please provide below the source of these funds, the amount, and the method the State agency will use to document the use of these NE and BFPS funds. (Federal WIC food funds used to purchase/rent breast pumps, and expenditures from breastfeeding peer counseling funds, cannot be counted toward the nutrition education and breastfeeding expenditure requirement.)

- Does not apply. (Proceed to E. 4. Local agencies report nutrition education and breastfeeding promotion and support costs.)

| Source | Amount |
|--------|--------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

Method(s):

- Activity reports Time studies Itemizing expenditures
 Other (specify): _____

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 2.03 Nutrition Education, Breastfeeding Promotion & Support, and Outreach Expenditure Requirements

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

E. Nutrition Education Costs

4. Local agencies report nutrition education and breastfeeding promotion and support costs:

When they report routine NSA costs Does not apply

Through a different system (specify): Annually through grant closeout

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

P&P 2.03 Nutrition Education, Breastfeeding Promotion & Support, and Outreach Expenditure Requirements

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

F. State and Local Agency Indirect Costs

1. Indirect Cost Rate and Services

a. Please list below indirect cost/cost allocation agreements in which the State agency is included:

State and Local Government Rate Agreement

b. The State agency's indirect cost rate(s) is 8.60 (%) and is based on:

Salaries Direct costs for administration Both

Other (specify): _____

c. Please cite the effective date of the State agency's current negotiated agreement and/or cost allocation plan for indirect costs: 07/01/2018 .

d. The State agency receives the following types of services under the indirect cost rate agreement(s):

- | | |
|--|--|
| <input type="checkbox"/> Budgeting/accounting | <input type="checkbox"/> Personnel/payroll |
| <input type="checkbox"/> ADP | <input type="checkbox"/> Space usage/maintenance |
| <input type="checkbox"/> Communication/phone/mail | <input type="checkbox"/> Central supply |
| <input type="checkbox"/> Legal services | <input type="checkbox"/> Procurement/contracting |
| <input type="checkbox"/> Printing/publication | <input type="checkbox"/> Audit services |
| <input type="checkbox"/> Equipment usage/maintenance | <input checked="" type="checkbox"/> Other (specify): <u>Department</u> |

e. The State agency allows local agencies to report indirect costs.

Yes No Not Applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

V - Appendix B - 2018-2019 Rate Agreement

2. Review of Indirect Cost Documentation

a. The State agency and local agencies ensure that services received and paid for through indirect costs benefit WIC and are not also charged directly to WIC by comparing direct charges by line item to a listing of services paid by funds collected through the application of the indirect cost rate:

Done for State agency level indirect costs (frequency): Completed quarterly by Budget Office

Done for local agency level indirect costs (frequency): Monthly and at Fiscal reviews

Not done at either level.

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

F. State and Local Agency Indirect Costs

- b. State and local agency WIC management have access to and review the following documents as applicable to ensure that indirect cost services are not also charged directly to WIC (check all that apply):

| | At SA | At LA |
|---|-------------------------------------|-------------------------------------|
| Indirect cost agreements/plans | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| The accounting mechanism used to ensure the propriety of indirect cost charges | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| A copy of the cost allocation plan | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| A list of all services paid from indirect costs | <input type="checkbox"/> | <input type="checkbox"/> |
| Other documentation related to the establishment and charging of indirect costs | <input type="checkbox"/> | <input type="checkbox"/> |
| Not applicable | <input type="checkbox"/> | <input type="checkbox"/> |

- c. When the State agency reviews the local agencies' indirect cost rate agreements, the review includes (check all that apply):

- Required submission of indirect cost agreement by the local agency to the State agency
 - Assessment of how the rate or method is applied (correct time period, percentage, and base)
 - Verification that the State agency had previously approved the local agency to negotiate such an agreement
 - Post-review or audit to ensure the rate was applied correctly
 - Other documentation related to the establishment and charging of indirect costs (list):
-
- Not applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

V - Appendix B - 2018-2019 Rate Agreement

VI. FOOD FUNDS MANAGEMENT

(Please indicate) **State Agency:** Pennsylvania for FY 2020

Food funds management involves monitoring cost containment measures and procedures related to infant formula and other authorized food items, the monitoring and management of State agency funding sources, and the accurate reporting of participation figures.

A. Cost Containment Measures - 246.4(a)(14)(xi): describe the policies and procedures used to implement cost containment measures as they relate to infant formula contracts, their approval and the processing of infant formula and/or other rebates, and food package cost containment practices.

B. Funds Monitoring/798 Reporting - 246.4(a)(2); (a)(12); and (a)(14): describe the State agency's funding sources, how food obligations are calculated to allow for inflation, rebate cash management, and monthly closeout monitoring activities.

C. Participation Reporting - 246.4(a)(11): describe the methods used to accurately document and monitor participation at the State and local level, and methods for monitoring changes in participation by priority.

VI. FOOD FUNDS MANAGEMENT

A. Cost Containment Measures

1. The State agency seeks FNS approval related to infant formula cost containment measures (check one):

- For a waiver of the requirement for a single-supplier competitive system. State agency must complete a cost comparison projecting food cost savings in the single-supplier competitive system based on the lowest monthly net price or highest monthly rebate [as required in Section 246.16a(d)(2)(i) through (d)(2)(iii) and savings under an alternative cost containment system, Section 246.16a(d)(2)(B)]
- To issue an infant formula bid solicitation that evaluates bids by highest rebate. A State agency must demonstrate to FNS' satisfaction that the weighted average retail prices for different brands of infant formula in the State vary by 5% or less [as required in Section 246.16a(c)(5)(iii)].
- Not applicable

Please attach in the Appendix supporting documentation for requests for FNS approval.

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

2. Cost Containment Contracts for Infant Formula

a. The State agency acquires infant formula through (check all that apply):

- Home food delivery system
- Direct distribution food delivery system
- Retail food delivery system
- Other (specify): Specific Exempt Infant Formulas and WIC-Eligible Nutritionals are issued through our Special Formula Distribution Center, operated by CAP-Lancaster on behalf of the PA DOH.

b. The State agency has a rebate contract/agreement for infant formula.

- Yes
If yes, attach contract in Appendix
- No
If no, check which applies:
- Granted waiver
- ITO with participation under 1,000 as of April.
(Proceed to question A. 4. Cost Containment for Other Foods.)

c. For a single-supplier system or multi-supplier: Date contract/agreement: 08/28/2018

| Manufacturer | Original Term Began | Original Term Expires | Extension Options |
|---------------------------|---------------------|-----------------------|-------------------|
| Abbott Laboratories, Inc. | 10/01/2018 | 09/30/2023 | |
| | | | |
| | | | |

***If contract expires during the fiscal year see sections 3 and 4**

VI. FOOD FUNDS MANAGEMENT

A. Cost Containment Measures

- d. **Current fiscal year rebates and current net price per unit paid (note the price should reflect current prices rather than original contract prices and rebate amounts):**

My rebate price sheet is available and attached as Appendix _____
(Proceed to A. 3. Infant Formula Issuance.)

| Primary Contract Infant Formula | | | | |
|---------------------------------------|--------------|-------------|----------------|---------------|
| Product/Unit Size | Manufacturer | Rebate/Unit | Net price/Unit | % WS Discount |
| Liquid Concentrate | | | | |
| Milk-Based | Abbott | \$5.450 | \$(0.760) | 116.205% |
| Soy-based* | Abbott | \$5.845 | \$(0.815) | 116.205% |
| Powder | | | | |
| Milk-based | Abbott | \$16.760 | \$15.890 | 105.48% |
| Soy-based* | Abbott | \$18.094 | \$17.190 | 105.26% |
| Ready to Feed | | | | |
| Milk-Based | Abbott | \$5.250 | \$1.430 | 78.593% |
| Soy-based* | Abbott | \$6.228 | \$1.162 | 84.270% |
| Exempt Formula (If applicable) | | | | |

*If uncoupled/separate contracts for milk- and soy-based infant formula.

3. Infant Formula Issuance.

- a. **Does the State agency issue the Primary Contract Infant Formula as the first choice of issuance (by physical form), with all other infant formulas issued as an alternative? (Section 246.16a(c)(8) & 246.10(e)(1)(iii))**

Yes No

- b. **The percent of infants receiving each type of formula is estimated at:**

| | |
|----------------------------------|---------------|
| Contract | <u>86.82%</u> |
| Non-contract | |
| Exempt infant formula | <u>13.17%</u> |
| Non-exempt infant formula | <u>0%</u> |

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

4. Cost Containment for Other Foods

- a. **Rebates are also obtained on other WIC foods.**

Yes (specify foods and attach contract in Appendix):

No

- b. **The State agency intends to pursue rebates on other authorized foods.**

Yes (specify):

No

- c. **To contain food costs, the State agency has limited authorized foods/container sizes/types, etc.**

Yes (If yes, note such limitations on the following table)

No

VI. FOOD FUNDS MANAGEMENT

A. Cost Containment Measures

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

VI - Appendix A - Cost Containment Measures Table

VI. FOOD FUNDS MANAGEMENT

A. Cost Containment Measures

| | Specific brands are designated/ Disallowed | Only certain container sizes are allowed | Allowable types are limited | Other |
|---|---|--|-----------------------------|-------|
| Exempt formula for women, infants & children | | | | |
| Infant cereal | | | | |
| Infant Fruit/Veg/Meat | | | | |
| Whole fresh fluid milk | | | | |
| Lowfat fresh fluid milk | | | | |
| Skim fresh fluid milk | | | | |
| Fresh milks (e.g., Lactaid, cultured buttermilk, goat milk) (specify): | | | | |
| Shelf-stable milk (e.g., evaporated milk, UHT, whole/low fat/nonfat dry milk) | | | | |
| Cheese | | | | |
| Yogurt | | | | |
| Soy-based beverage | | | | |
| Tofu | | | | |
| Fresh eggs | | | | |
| Dried egg mix | | | | |
| Hot cereal | | | | |
| Cold cereal | | | | |
| Single strength fruit/vegetable juice | | | | |
| Concentrated fruit/vegetable juice | | | | |
| Whole wheat bread | | | | |
| Other whole grains | | | | |
| Peanut butter | | | | |
| Dry beans/peas | | | | |
| Canned Fish | | | | |
| Canned beans/peas | | | | |

VI. FOOD FUNDS MANAGEMENT

B. Funds Monitoring/798 Reporting

1. The State agency has procedures to assure that the requirements are met regarding the nonprocurement of food in bulk lots, supplies, equipment and other services from entities that have been debarred or suspended.

Yes No

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

https://www.oa.pa.gov/Policies/eo/Documents/1990_3.pdf

2. Food Cost Obligations

- a. The State agency calculates food obligations based on the following data (check one):

- Number of expected participants and average food cost per participant
- Number of expected participants by category (e.g., pregnant woman, infant, etc.) and average food cost per participant category
- Number of expected redemptions by food instrument type and cash-value voucher type and average value per food instrument type and cash-value voucher type
- Other (specify): Based on participation and costs for current and past three years, and reported on the monthly 798 report.
-

- b. The State agency estimates the impact of inflation on food costs through the use of the following inflation escalators:

- Inflation factor used in Federal funding formula
- State-generated estimates of inflation based on State market basket of foods
- Best guess by food item based on economic reports or other sources
- Other (specify): Projections based on costs for current and past three years.
-

- c. The State agency ADP system automatically produces a monthly obligation amount

- Yes
- No, data are pulled from various sources and an estimated amount is calculated manually or with a PC spreadsheet
- Other (specify): _____
-

- d. The State agency system (in-house or contracted) provides the following data on food instrument and cash-value voucher redemptions at specific (daily, weekly, monthly, as needed) frequencies (check all that apply and provide frequency):

| <u>Frequency</u> | <u>Data</u> |
|------------------|--|
| <u>Monthly</u> | <input checked="" type="checkbox"/> Food instruments and cash-value vouchers paid for issue month |
| | <input type="checkbox"/> Food instruments and cash-value vouchers outstanding for issue month |
| <u>As needed</u> | <input checked="" type="checkbox"/> Food instruments and cash-value vouchers that have expired |
| <u>As needed</u> | <input checked="" type="checkbox"/> Food instruments and cash-value vouchers that are void/unclaimed |

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

798 PA WIC Instructions

VI. FOOD FUNDS MANAGEMENT

B. Funds Monitoring/798 Reporting

3. Rebate Cash Management

- a. The State agency has a billing system in place that ensures rebate invoices for all authorized food, including infant formula, under competitive bidding, provide a reasonable estimate, or actual count of the number of units purchased by participants during WIC transactions (Section 246.16a(k)).

Actual count of units purchased

Estimate of units purchased (attach methodology)

Other (describe): _____

- b. The State agency uses a food instrument that enables it to identify the type and brand of infant formula redeemed.

Yes, for all formula types, brands, and physical forms

Yes, for exempt infant formulas

No

- c. The invoice to the formula manufacturer is issued by:

The WIC unit

The State agency fiscal unit

Other (specify): _____

- d. Monthly invoices are submitted with supporting data.

Yes No

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

VI - Appendix B - Infant Formula Contract 67006

4. Closeout of Report Month Outlays

- a. The State agency allows the food vendor (and farmer if any) the following number of days to submit food instruments and cash-value vouchers for payment (provide the number of days):

45 Days from the participant's first valid date

- b. The State agency is generally able to close out a report month completely within:

90 days

120 days

Other (specify number of days): _____

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

PA Code 1105.3. Terms and conditions of participation

5. Indicate the method used to reimburse vendors (and farmers if any) for redeemed food instruments and cash-value vouchers or other services and specify the entity responsible for making payment:

State WIC **State FM** **Other (Specify)**

 _____ By check directly to vendor or farmer

 _____ By check directly to vendor's or farmer's bank

 _____ By electronic transfer to vendor's or farmer's bank

 _____ Other (specify): _____

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

P&P 4.01 Retail Store Management

VI. FOOD FUNDS MANAGEMENT

C. Participation Reporting

1. Participation Counting

- a. **The State agency counts an enrollee who received at least one food instrument/food package (or who received no food instrument/food package, but was either a fully-breastfed infant of a participating breastfeeding woman or a woman partially breastfeeding a participating 6 to 12 month old infant) as a participant during:**

The calendar month

The computer system cycle month

Other (specify): _____

- b. **The State agency receives participation counts from:**

The State agency computer system based on the number of persons issued food or food instruments (manual and automated food instruments), the number of fully-breastfed infants who receive no food or food instruments, but are breastfed by participating breastfeeding women, and the number of women who receive no food or food instruments, but are partially breastfeeding a participating 6 to 12 month old infant.

Counts reported from local agencies based on issuance records

Other (specify): _____

- c. **If State funds are present, the State agency differentiates between Federal-supported and State-supported participants by:**

Special code on food instrument

Special areas of State designated as State-supported areas

Pro rata allocation based on proportion of Federal to State funds spent

Other (specify): No state funds are available

- d. **When local agencies are chronically late in furnishing food instrument and/or certification data needed for participation counts, the State agency:**

Sends warnings

Applies financial sanctions

Requires manual reporting

Other (specify): N/A

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

3.01. Caseload Management

VI. FOOD FUNDS MANAGEMENT

C. Participation Reporting

2. Participation by Priority

a. Priority level is a critical data field in the State agency's computer system.

Yes No

b. The State computer system automatically assigns priority level based on the enrollee's nutritional risk condition.

Yes No

c. The State agency's computer system revises the priority level determination when a participant changes category (e.g., infant becomes child and receives a child's food package).

Yes No

d. The State agency has an "unknown" priority category for VOC transfers where priority is unknown.

Yes No

3. Participation by Local Agency

The State agency's computer system supports its requirement to report participation data by local agency to measure breastfeeding performance.

Yes No

ADDITIONAL DETAIL: Food Funds Management Appendix and/or Procedure Manual (citation):

3.01. Caseload Management

VII. CASELOAD MANAGEMENT

(Please indicate) **State Agency:** Pennsylvania for FY 2020

Caseload management involves identifying the target population and special populations within it, implementing strategies to enroll the potential population and utilizing caseload effectively to reach the desired populations. Describe the procedures in place to implement these strategies.

A. No-Show Rate - 246.4(a)(11)(i): describe the procedures used by the State agency to monitor potential and current participants' utilization of program services.

B. Allocation of Caseload - 246.4(a)(5)(i) and (13): describe how the State agency assigns and manages local agency caseload allocations.

C. Caseload Monitoring - 246.4(a)(5)(i): describe the information and procedures used by the State agency to monitor caseload.

D. Benefit Targeting - 246.4(a)(5)(i); (6), (7), (19), (20), (21), and (22): describe the plans and procedures for ensuring that WIC benefits reach the highest risk participants and persons in special need such as migrants, homeless, and institutionalized persons; pregnant women in their early months of pregnancy; and applicants who are employed or who reside in rural areas.

E. Outreach Policies and Procedures - 246.4(a)(5)(i)-(ii); (6), (7), (19), and (20): describe the types of outreach materials used, where these materials are directed, special agreements with other service organizations and how special populations are addressed. Also, provide data on unserved and underserved areas.

F. Waiting List Management - 246.4(a)(11)(i); 246.7(f)(1)(2): describe the policies and procedures used for processing applicants.

VII. CASELOAD MANAGEMENT

A. No-Show Rate

1. Policies and Procedures for Missed Certification Appointments and Food Instrument/Cash Value Voucher Pick-Up (No-Shows)

a. The State agency has specific policies and procedures to ensure follow-up of no-shows for (check all that apply):

- Initial certification for any potential participant
- Subsequent certifications for high-risk participants
- Subsequent certification for any current participant
- Food instrument/cash value voucher pick-up
- Food instrument/cash value voucher/cash value benefit non-redemption
- State agency has no specific policies and procedures for no-show follow-up

b. The local agency or State agency, when the SA has no separate local agencies, attempts to contact each pregnant woman who misses her first appointment to apply for participation in the Program in order to reschedule the appointment. Such procedures include (check all that apply):

- At the time of initial contact, the local agency obtains the pregnant woman's mailing and/or email address and telephone number
- If the applicant misses her first certification appointment, an attempt is made to contact her by:
 - Telephone
 - Mail
 - Email
 - Text
- If contact is established, she is offered an additional certification appointment.
- If she cannot be reached, the local agency follows-up with a request for the applicant to contact the local agency for a second appointment by sending her a:
 - Postcard
 - Letter
 - Email
 - Text
- A second appointment is provided upon request from the applicant.

2. Monitoring No-Show Rates

a. The State agency has (check all that apply):

- Standards defining acceptable no-show rates
 - Policies and procedures designed to assist local agencies to improve no-show rates; Please attach
 - Sanctions that may be applied to local agencies that have chronically unacceptable no-show rates; Please attach
 - Provides regular feedback to local agencies concerning no-show rates
 - Reports to address appropriate follow-up of no-shows
- No specific policies or procedures concerning local agency no-show rates

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 1.04, Local Agency Monitoring

VII. CASELOAD MANAGEMENT

A. No-Show Rate

b. As a matter of standard procedure, the State agency monitors no-show rates through (check all that apply):

- State agency does not monitor local agency no-show rates
- Local agency reviews
- Automated reports
- Local agency reports on no-show rates
- Other (specify): _____

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 1.04, Local Agency Monitoring

VII. CASELOAD MANAGEMENT

B. Allocation of Caseload

DOES NOT APPLY (EXPLAIN WHY AND PROCEED TO NEXT SECTION)

1. The State agency considers the following factors in its initial allocation of caseload to local agencies (check all that apply):

- Percent of target population served by local agency's service area
- Analysis of no-show, void, non-redemption rates by local agencies
- Participation by priority and category
- Special population pockets
- Waiting lists
- Staffing/ability of local agencies to serve caseload
- Prior year caseload
- Food package costs per person
- Special projects
- Other (identify): Number of eligible participants currently served by each local agency.

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

2. The State agency has a written procedure for allocation of caseload to local agencies.

- Yes No

If yes, attach written procedure in the Caseload Management Appendix or specify location in the Procedure Manual below.

If no, what guidelines does the State agency use for caseload allocation? (Describe in Caseload Management Appendix)

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 3.01, Caseload Management

VII. CASELOAD MANAGEMENT

B. Allocation of Caseload

3. The State agency has a procedure in place to ensure that current/prior year caseload levels are maintained.

Yes No

If No, explain why not:

4. If it appears that during the course of the program year all funds will not be spent, the State agency may reallocate caseload on the basis of the following factors (check all that apply):

The State agency does not reallocate caseload mid-year

Same basis as for initial allocation of caseload

Local agency participation levels

Local agency high priority participation

Waiting lists

Successful special projects

Other (specify): Local agencies may request additional caseload. If warranted and if funding is available, the request is granted.

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P3.01; Caseload Management

5. The State agency has written procedures for local agencies to follow in situations of overspending:

Yes No

If a written procedure is available, provide in the Caseload Management Appendix or specify location in the Procedure Manual below.

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 3.01, Caseload Management

VII. CASELOAD MANAGEMENT

C. Caseload Monitoring

1. The State agency's caseload monitoring process includes the review of the following data (check all that apply):

- | | |
|--|---|
| <input checked="" type="checkbox"/> Participation levels/rates | <input type="checkbox"/> High-risk participant levels/rates |
| <input type="checkbox"/> No-show rates | <input type="checkbox"/> Food costs per participant |
| <input type="checkbox"/> Food costs by area | <input type="checkbox"/> Other (specify): _____ |

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

2. The State agency uses the following methods to monitor the above areas (check all that apply):

- Manual reports submitted by local agencies
- MIS-generated reports (If utilized please attach a description of each report and how they are used)
- On-site reviews
- Other (specify): _____

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

3. Local agency caseload utilization, by any method, is reviewed by the State agency at least:

- Monthly
- Quarterly
- Other (specify): _____
- Not applicable

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

VII. CASELOAD MANAGEMENT

D. Benefit Targeting

1. Development and Monitoring of State Agency Targeting Plans

a. The State agency has a plan to inform the following classes of individuals of the availability of program benefits (check all that apply):

- Pregnant women, with special emphasis on pregnant women in the early months of pregnancy
- High-risk postpartum women (e.g., teenagers)
- Parents/Caregivers of Priority I & II infants
- Migrants
- Homeless persons/families
- Incarcerated pregnant women
- Institutionalized persons
- Other (specify): Addicted population, refugee/immigrant and those residing in rural areas

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

b. The local agency or State agency, when the SA has no separate local agencies, contacts the following organizations to provide WIC Program information to eligible infants and children:

- Foster care agencies
- Protective service agencies
- Child welfare authorities
- Other (specify): Head Start, Early Head Start, Nurse Family Partnership and other Home Visiting Programs, Food Banks, Domestic Relations, County Assistance Offices, HBP Providers, hospitals, physicians, Early Learning Resource Centers and other community agencies

c. The State agency ensures that benefits are targeted to those at greatest risk by limiting the use of regression as a nutrition risk criterion to only once after a certification period.

- Yes No

d. In addition to, or in lieu of, State-developed plans, the State agency encourages/permits local agencies to develop their own targeting plans.

- Yes No Not Applicable

e. If yes, the State agency assures the appropriateness/quality of local agency targeting plans by:

- Requiring local agencies to submit plans for State agency approval
- Review plans during local agency reviews
- Other (specify): _____

f. The State agency monitors benefit targeting through (check all that apply):

- Automated reports developed by State agency
- Manual reports submitted by local agencies
- Local agency reviews
- Other (specify): _____

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

VII - Appendix A - Target Population and Priority Tables, P&P 3.01 Caseload Management, P&P 6.01 Local Agency Outreach Activities

VII. CASELOAD MANAGEMENT
D. Benefit Targeting

VII. CASELOAD MANAGEMENT

E. Outreach Policies and Procedures

1. Outreach Policies, Procedures and Materials

a. To administer outreach activities, the State agency (check all that apply):

- Issues a standard set of outreach materials for use by all local agencies
 - Requires local agencies to develop outreach plans
 - Reviews outreach plans developed by local agencies
 - Reviews and approves any outreach materials developed by local agencies
 - Utilizes broadcast media for outreach activities
 - Other (specify): Resource exhibitor promoting WIC at statewide and regional events
-

b. Availability of Program benefits is publicly announced at least annually via:

State Agency

Local Agency

- | | | |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Newspapers |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Radio |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Posters |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Letters |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Brochures/pamphlets |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Television |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Social Media (Twitter, Facebook, etc.) |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Other (specify): <u>Online, bus and outdoor advertising</u> |
-

c. Outreach materials are available in the following languages (check all that apply):

- English
 - Spanish
 - Vietnamese
 - Tribal Language(s)
 - Other (specify): Arabic, Burmese, Chinese, Nepali, Russian, Somali and Swahili
-

d. Outreach materials are distributed to (check all that apply):

- Health and medical organizations
 - Hospitals and clinics
 - Welfare and unemployment offices or social service agencies
 - Migrant farmworker organizations
 - Indian and tribal organizations
 - Homeless organizations
 - Faith-based and community organizations in low-income areas
 - Shelters for victims of domestic violence
 - Other (specify): Head Start and Early Head Start Programs, Nurse Family Partnership and other home visiting programs, food banks and pantries, etc.
-

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 6.01, Local Agency Outreach Activities

VII. CASELOAD MANAGEMENT
E. Outreach Policies and Procedures

VII. CASELOAD MANAGEMENT

E. Outreach Policies and Procedures

When an ITO State agency operates as both the State and local agency "All" should be checked.

2. Accessibility to Special Populations

a. The State agency requires [all, some, none] local agencies to implement the following to meet the special needs of employed applicants/participants.

| All | Some | None | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Early morning/evening clinic hours by appointment |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Early morning/evening clinic hours, walk-in basis |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Weekend hours, by appointment |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Weekend hours, walk-in basis |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Priority appointment scheduling during regular clinic operations |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Food instrument/cash value voucher mailing procedures specifically designed for working participants |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Expedited clinic procedures for working participants |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Evening/weekend nutrition education classes |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): Local agencies shall work to accomodate the special needs of employed participants. |

b. The State agency requires/authorizes [all, some, none] local agencies to implement the following to meet the special needs of rural participants (check all that apply):

| All | Some | None | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Special clinic hours to accommodate travel time to clinic sites |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Use of mobile clinics to rural areas |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Food instrument/cash value voucher mailing procedures specifically designed for rural participants |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Special appointment/scheduling procedures for rural participants who do not have access to public transportation |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Special food instrument/cash value voucher issuance cycles for rural participants (check one): <input type="checkbox"/> 2 months issuance, <input checked="" type="checkbox"/> 3 months issuance |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): Mailing of FIs due to system failure, staffing emergencies or inclement weather, but must be authorized by the State Agency. |

c. The State agency requires/authorizes [all, some, none] local agencies to implement the following to meet the special needs of migrant families (check all that apply):

| All | Some | None | |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Formal coordination with rural/migrant health centers |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Special outreach activities aimed at migrants |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Special clinic hours/locations to service migrant populations |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Expedited appointment procedures to accommodate migrant families |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Special food instrument/cash value voucher issuance cycles for migrant families (check one): <input type="checkbox"/> 2 months issuance <input checked="" type="checkbox"/> 3 months issuance |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): _____ |

d. The State agency has in place formal agreements with one or more contiguous States to facilitate service continuity to migrants (exclusive of normal verification of certification procedures):

VII. CASELOAD MANAGEMENT

E. Outreach Policies and Procedures

Yes (If yes, please identify the State agencies with whom formal agreements exist): _____ No

VII. CASELOAD MANAGEMENT

E. Outreach Policies and Procedures

e. The State agency requires [all, some, none] local agencies to implement the following proceedings to facilitate service to homeless families/individuals (check all that apply):

| All | Some | None | |
|-------------------------------------|--------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Provide homeless applicants with a list of shelters/facilities that fulfill WIC Program requirements |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Undertake regular and ongoing outreach to homeless individuals |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Routinely monitors facilities serving homeless participants to ensure WIC foods are not subsumed into commercial food service |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Implement formal agreement with other service providers to facilitate referrals of homeless families/individuals |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Secure a written statement from the facility attesting to compliance with the requisite conditions for WIC services in a homeless facility |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Establish, to the extent practicable, plans to ensure that the three conditions in 246.7(n)(1)(i) regarding homeless facilities are met |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): _____ |

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

3. Unserved Geographical Areas

a. State agency's definition of an unserved geographic area (specify):

An unserved geographic area is where there is an inadequate provision of WIC services within the counties of Pennsylvania, based on the income target population.

b. Please list unserved geographic areas or attach a list to appendix:

No current unserved areas (check if applicable)

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

4. Underserved Geographic Areas

a. State agency's definition of an underserved geographic area and a discussion of how the State prioritizes areas in descending order (specify):

The State Agency has no specific definition of underserved areas. A report is generated annually by our Bureau of Health Stats using Census estimates, which establishes target population estimates. Percent of target population served is tracked manually by local agency and county based on our participation reports. Comparison among areas can then be made on this basis.

No current underserved areas (check if applicable)

b. The State agency has a list on file of served and/or unserved geographic areas including the number of potential eligibles, the priority level currently being served, and the level of participation.

Yes No

c. The names and addresses of all local agencies found in the last FNS-648 Report, reflect all local agencies currently in operation

Yes No, an update list is provided in the Appendix N/A, State agency has no local agencies

VII. CASELOAD MANAGEMENT

E. Outreach Policies and Procedures

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

VII - Appendix A - Target Population and Priority Tables

5. The State agency has a plan to:

- Inform nonparticipating local agencies of the Program and the availability of technical assistance in implementation
- Encourage potential local agencies to implement or expand operations in the neediest one-third of all areas unserved or partially served
- The State agency does not have local agencies and does not plan to have local agencies. Explanation of how underserved and/or partially served areas are addressed is below.

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation) AND/OR SA/ITO explanation of how the State agency without local agencies addresses underserved or partially served areas:

VII. CASELOAD MANAGEMENT

F. Waiting List Management

Waiting List Management and Procedures

1. **The State agency has specific policies/procedures for the establishment and maintenance of waiting lists, which are used by all local agencies.**
 Yes No
2. **Waiting list procedures are uniform throughout the State.**
 Yes No, but State agency approves all exceptions
 No, local variation allowed without State agency approval
3. **The State agency routinely monitors waiting lists.**
 Yes No No. for the current Fiscal Year, the State agency does not have a waiting list.
4. **The State agency requires/allows subprioritization of waiting lists by (check all that apply):**
 No subprioritization permitted Income
 Nutrition risk Age
 Point system
 Special target populations (specify): _____
 Other (specify): _____
5. **The State agency requires pre-screening for certification of individuals prior to placement on waiting lists.**
 Yes
 No, only categorical eligibility established
 No, only categorical and income eligibility established
 No, local agency variation
 Other (specify): It is discouraged, however, it is allowed if it facilitates caseload management and expedites provision of benefits to the participants

6. **Waiting lists are maintained:**
 Manually
 Automated system linked to State agency's central system
 Automated system, stand alone at some/all local agencies
7. **Telephone requests for placement on the waiting list are accepted.**
 Yes No
8. **The State agency requires all local agencies to maintain waiting lists (telephone and/or pre-certification) with the following information (check all that apply):**
 Name
 Address
 Phone number(s)
 Date placed on waiting list
 Category
 Priority
 Nutritional risk

VII. CASELOAD MANAGEMENT

F. Waiting List Management

- Income eligibility status
 - Method of application
 - Date applicant notified of placement on the waiting list
 - Other (specify): Date of birth, date of delivery, VOC expiration date, method and date of waiting list notification and disposition. Refer to P&P 3.01, Caseload Management
-

9. The State agency requires local agencies to provide information on other food assistance programs to applicants who are placed on a waiting list. If the State agency has no locals, it provides the information.

- Yes No

ADDITIONAL DETAIL: Caseload Management Appendix and/or Procedure Manual (citation):

P&P 3.01, Caseload Management

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

(Please indicate) **State Agency:** Pennsylvania for FY 2020

The review of certification, eligibility and coordination of services involves the process of determining and documenting participant eligibility (income eligibility as well as nutritional risk determination, standards and criteria), and the coordination of certification activities with other health services.

- A. Eligibility Determination and Documentation - 246.7(c)(1); 2(1); 246.7(d)(1); (2)(v)(B):** describe the policies and procedures for determining and documenting eligibility including the application process, residency requirements, identity requirements, documented physical presence or valid exception; proof of categorical eligibility, income limits, income eligibility documentation, determination of special populations and a definition of and policy toward the economic unit.
- B. Nutrition Risk Determination, Documentation, and Priority Assignment - 246.4(a)(11)(i):** describe the policies and procedures for determining and documenting nutritional risk and priority assignments. Include a copy of the nutritional risk criteria the State agency plans to use with the appropriate documentation.
- C. Health Care Agreements, Referrals, and Coordination - 246.4(a)(6); (7); (8) and (19):** describe the procedures for coordinating agreements and services with other health care providers at the State and local agency level including procedures to ensure that benefits are provided to persons with special needs.
- D. Processing Standards - 246.4(a)(11)(i); 246.7(f)(2):** describe the State agency's processing procedures to ensure that the required standards and timelines are met.
- E. Certification Periods - 246.4(a)(11)(i); 246.7(g):** describe the policies and procedures used to establish certification periods for participants and the autonomy (if applicable) granted to local agencies in determining eligibility time periods.
- F. Transfer of Certification - 246.4(a)(6); (11)(i); and 246.7(k):** describe the State agency's procedures for the transfer of certification and VOC cards ensuring that vital participant and program information is included.
- G. Dual Participation, Participant Rights and Responsibilities, Fair Hearing Procedures, and Sanction System - 246.4(a)(11)(i); (16); (17) and (18); 246.7(h); 246.7(i)(10); 246.7(j); 246.7(l):** describe the procedures used to detect and prevent dual participation at the State and local level, the procedures for ensuring participants are notified of their rights and responsibilities, and the procedures regarding participant fair hearings and sanction system .

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

1. Application Process

- a. The State agency requires all local agencies to use a standardized application process for all persons applying for the WIC Program

Yes No

- b. The State agency shares State wide or at local agency (check one), a common income application or certification form with (check all that apply):

No other benefit programs Medicaid
 TANF SNAP
 MCH Other reduced price health care program(s)
 Other (specify): _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):
P&P 3.02SP, Program Eligibility

2. Residency, Identity and Physical Presence Requirements

- a. The State agency requires documentation of residency

Yes
 Signed statement that documentation of residency information is not available and why (e.g. homeless, theft, fire)
 No (Specify why, e.g., ITOs and Alaska natives who are exempt from this requirement):

- b. The State agency has special residency policies and procedures for how the following special categories should be treated (check all that apply):

Homeless applicants Institutionalized applicants
 Migrants Indian Tribal Organizations
 None Other (specify): 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

- c. The State agency requires proof of identity from each applicant at certification

Yes
 No (If no, why not?):

- d. The State agency has reciprocal agreements concerning residency with other States

Yes; list states: West Virginia, Maryland, Delaware, Washington D.C., New Jersey, Ohio, Virginia, NY and Seneca Nation Indian Tribe Organization

No

Describe any reciprocal agreements:

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

e. The State agency requires physical presence of the applicant or a valid exception to be documented:

- Yes except for the following condition(s):
- Applicant or parent/caretaker is an individual with disabilities which prevent him/her from being physically present at the WIC clinic (e.g., medical equipment, bed-rest, or serious illness exacerbated by coming in to clinic).
 - Applicant is an infant or child receiving documented ongoing health care from any health care provider, including the local agency; being physically present would pose an unreasonable barrier; and the infant or child was present at his/her initial WIC certification.
 - Applicant is an infant under 8 weeks of age who cannot be present at the time of certification (for a reason determined appropriate by the local agency) and for whom all necessary certification information is provided.
 - Applicant is an infant or child who was present at his/her initial certification; was present at certification within the one-year period of the most recent determination; and is under the care of one or more working parent, or more primary working caretakers whose working status presents a barrier to bringing the infant or child in to the WIC clinic.

f. The State agency uses a shortened (up to 30 days) certification for applicants that have one qualifying nutrition risk and are able to present at least two of the three required documents (identification, residency, and income) during a certification appointment.

- Yes No

3. The State agency requires applicants to submit proof of categorical eligibility for (check all that apply):

- All pregnant women Pregnant women not visibly pregnant
 Postpartum women Children
 Infants Other (specify): Breastfeeding mothers up to one year past termination of pregnancy

4. Income Limits for Eligibility

a. The State agency gross income limit for income eligibility is 185% of the federal income guidelines

- Yes, with no local agency exceptions
 Yes, with local agency variation
 No, with no local agency exceptions
(specify State maximum percent of poverty: _____ %)
 No, with local agency variation
(specify State maximum percent of poverty: _____ %)

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

b. The State agency implements income eligibility guidelines concurrently with Medicaid

- Yes No

ADDITIONAL DETAIL: Please attach a copy of the income guidelines in the Appendix or the appropriate citation in the Procedure Manual. Certification and Eligibility Appendix and/or Procedure Manual (citation):

Appendix A – FY 2020 Income Guidelines

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

c. The State agency requires documentation of an applicant's, or certain family members' eligibility to receive benefits in the following means-tested programs that confer adjunctive income eligibility for WIC, as set forth in 246.7(d)(2)(vi):

| | <u>Poverty Level</u> |
|--|----------------------|
| <input checked="" type="checkbox"/> TANF (specify State "percent of poverty") | <u>185.00</u> % |
| <input type="checkbox"/> SNAP | |
| <input checked="" type="checkbox"/> Medicaid (specify State "percent of poverty" for each) | |
| <input checked="" type="checkbox"/> Pregnant women and infants | <u>185.00</u> % |
| <input checked="" type="checkbox"/> Children | <u>133.00</u> % |
| <input checked="" type="checkbox"/> Other categorically eligible women | <u>250.00</u> % |

d. The State agency uses documented eligibility for/participation in other means-tested programs to establish automatic WIC income eligibility (check all that apply and the poverty levels used for each):

| | <u>Poverty Level</u> |
|---|----------------------|
| <input type="checkbox"/> Free or Reduced-Price School Lunch | _____ % |
| <input type="checkbox"/> SSI | _____ % |
| <input type="checkbox"/> Other State-provided health insurance (specify State "percent of poverty" maximum _____ %) | _____ % |
| <input type="checkbox"/> FDPIR | _____ % |
| <input checked="" type="checkbox"/> Other (specify): <u>N/A</u> | |

e. **Individuals are required to document that they or a family member are certified as eligible to receive TANF, Medicaid, or SNAP benefits or, under the State option, certified as eligible to receive benefits in State-administered programs by providing:**

- Program ID card (only if it includes dates of eligibility) or notice of current eligibility
- Documentation of participation in State-administered programs (and such programs require documentation of income and have income guidelines at or below WIC's income guideline of 185% of poverty).
(Program[s]: Enrollment in Medicaid and SNAP)

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

5. Income Eligibility Documentation

a. **For WIC applicants whose income eligibility is not based on adjunctive or automatic income eligibility in another means-tested program, the State requires (check all that apply):**

- Documentation of income information
- Signed statement that documentation of income information is not available and why
- Notation in the participant record if the applicant declares no income and why
- Other (specify): _____

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

b. Exceptions to income documentation are made for the following:

- The necessary information is not available
 - The income documentation presents an unreasonable barrier to participation as determined by the State agency
 - Those applicants with no income
 - Those applicants who work for cash
 - Other (specify): For above situations, the applicant is required to sign and date a State Agency developed Affirmation form
-

c. If the applicant does not supply the necessary documentation at the certification appointment, local agencies are generally instructed to do one of the following:

- Certification process is terminated and no food instruments/cash-value vouchers are provided; appointment rescheduled
 - Temporary certification (not to exceed 30 days) is completed and food instruments are provided. However, if applicant does not provide documentation within 30 days, the certification expires and a new eligibility determination must be conducted.
 - Other (specify): _____
-

d. The State agency requires State-wide, or at local agency (check one), the verification of applicant income information, if determined necessary.

- No
 - Yes (check all sources required, as appropriate):
 - Employer
 - Public assistance offices
 - State employment offices (wage match, unemployment)
 - Social Security Administration
 - School districts/offices
 - Collateral contacts
 - Other (specify): Self-employment; pension/retirement; worker's compensation; income from estates/trusts or rental income; alimony/child support; contributions; student financial assistance; net royalties
-

e. The State agency has specific policies that define actions to be taken for mid-certification changes in participant income circumstances.

- Yes; Please specify No

f. The State agency allows documentation of alternate income procedures for Indian or Indian Health Service (IHS) operated local agencies.

- Yes No Not Applicable

g. The State agency has specific policy that addresses income from benefits provided by a State-administered programs.

- Yes No

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

- h. The State agency has specific policy to ensure that certain types of income, such as combat pay or FSSA payments for households that include service members, are excluded from consideration in the WIC income eligibility determination, as provided by law and regulation.

Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

6. In determining an applicant's income eligibility for WIC, the State agency excludes basic allowance for housing received by military services personnel residing off military installations and in privatized housing, whether on- or off-base.

Yes, State-wide No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

7. The State agency excludes cost-of-living allowances for military personnel on duty outside of the contiguous 48 States (OCONUS COLA) from applicant income for purposes of WIC income determination

Yes, State-wide No

8. In determining an applicant's income eligibility for WIC, the State agency excludes payments given to deployed military service members. These payments are in accordance with Chapter 5 of Title 37 of the U.S.C.

Yes, State-wide No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

9. In determining an applicant's income eligibility for WIC, the State agency calculates multiple income sources received by an applicant's household at different frequencies in accordance with WIC Policy Memo 2011-7, and compares the sum to the established WIC IEGs.

Yes, State-wide No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

10. The State agency defines the economic unit in accordance with WIC Policy Memo 2013-3.

Yes No (if no, why not):

Provide the definition of an economic unit used by the State agency in the Appendix or the appropriate citation in the Procedure Manual.

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

A. Eligibility, Determination, and Documentation

11. The State agency has specific policies or lists examples concerning the determination of the economic unit for (check all that apply):

- Foster children
- Divorced/legally separated parents; step parents
- Absentee spouse (military hardship tours, etc.)
- Cohabitation
- Institutionalized applicants (including incarcerated applicants)
- Homeless applicants
- Minors ("emancipated" minors)
- Separate economic units under the same roof
- Striker/unemployed
- Students away at school
- Self-employed applicants
- Other (specify): _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

12. Mid-Certification Disqualification

a. The State agency ensures that local agencies are required to stipulate that an individual is not automatically disqualified mid-certification due to the fact that she/he no longer participates in one or more of the Programs for which they were originally determined adjunctively/automatically income eligible.

- Yes No

b. WIC regulations specify that when income eligibility is reassessed mid-certification, State/local agencies are required to reevaluate the programs for which the individual could be determined adjunctively/automatically income eligible. If the individual cannot qualify based on eligibility for one of these programs, eligibility must be determined based on WIC income guidelines and disqualification made only after all of these options are exhausted. The State ensures its policy and procedures comply with this requirement:

- Yes No

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

B. Nutrition Risk Determination, Documentation and Priority Assignment

1. Nutrition Risk Determination and Documentation

a. Professionals authorized by the State agency as Competent Professional Authorities (CPAs) to determine nutritional risk include (check all that apply):

| <u>Qualification</u> | <u>Can certify for:</u> | |
|-----------------------------------|-------------------------------------|-------------------------------------|
| | <u>Priorities I-III</u> | <u>All Priorities</u> |
| RD or Master's Level Nutritionist | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Bachelor's Level Nutritionist | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Physician | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Physician Assistant | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Registered Nurse | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Licensed Practical Nurse | <input type="checkbox"/> | <input type="checkbox"/> |
| Home Economist | <input type="checkbox"/> | <input type="checkbox"/> |
| Paraprofessional | <input type="checkbox"/> | <input type="checkbox"/> |
| Other (Specify): _____ | <input type="checkbox"/> | <input type="checkbox"/> |
| Other (Specify): _____ | <input type="checkbox"/> | <input type="checkbox"/> |

b. The State agency authorizes local agencies to (check all that apply):

- Conduct Anthropometric and Hematological measurements
- Use medical referral data for Anthropometric and Hematological measurements
- Conduct measurements only when medical referral data are unavailable

c. The State agency uses only FNS-approved nutrition risk criteria, as referenced in Policy Memorandum #2011-5, WIC Nutrition Risk Criteria, and transmittal memorandum (dated June 13, 2018) that list the revised risk criteria requiring implementation by 10/1/2019, published on the FNS PartnerWeb, to document nutrition risk.

- Yes No

Please append a copy of the revised nutrition risk criteria in its entirety to this State Plan.

d. The State agency modifies nutrition risk criteria such that criteria definitions are more restrictive than nationally established definitions.

- Yes (list criteria): _____
- No

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

B. Nutrition Risk Determination, Documentation and Priority Assignment

e. Hematological risk determination:

The State agency requires (check one of the following):

- Bloodwork data to be collected at the time of certification (Statewide).
- Bloodwork data to be collected within 90 days of certification, so long as the participant is determined to have at least one qualifying nutritional risk at the time of certification (Statewide), and the State has implemented procedures to ensure receipt of data.

The State agency ensures that hematological assessment data are current and reflective of participant status, to include a bloodwork periodicity schedule that conforms to the requirements as described in 246.7(e)(1)(ii)(B).

- Yes No

The State agency allows local agencies the option of obtaining bloodwork on children ages 2-5 annually if prior certification results were normal.

- Yes No

f. Anthropometric risk determination:

The State agency allows (check one):

- Anthropometric data for certification to be no older than 60 days (Statewide)
- A shorter (less than 60 days) limit on age of anthropometric data for certification

g. Nutrition assessment:

(i) Local agencies are required to perform a complete nutrition assessment (as described in the *Value Enhanced Nutrition Assessment [VENA] Guidance*) for all participants.

- Yes No (explain):

(ii) Local agencies are required to perform a mid-certification nutrition assessment (as described in the *Guidance for Providing Quality Nutrition Services during Extended Certification Periods*) for all participants with an extended certification period.

- Yes Not Applicable: (The State Agency does not utilize the extended certification option for any participant category)

(iii) The State agency policy requires that nutrition assessment intake information be collected on a State agency mandated form or Management Information System (MIS).

- Yes No

If yes, attach mandated forms (or MIS screen shots) or specify location in the procedure manual and reference below.

If no, the State agency assures quality of nutrition assessment by:

- Requiring local agencies to submit forms for approval
- Annually monitoring the locally developed forms during local agency reviews
- Other (specify): _____

(iv) Dietary assessment is based on professionally recognized guidelines (e.g., Dietary Guidelines for Americans, My Plate Food Guide, American Academy of Pediatrics)

- Yes (specify): USDA messaging is the priority, but we refer to Dietary Guidelines for American, MyPlate, AAP, USDA Infant Feeding Guide, USDA Breastfeeding Policy & Guidance.

- No (explain): _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (cite):

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

B. Nutrition Risk Determination, Documentation and Priority Assignment

P&P 3.03, Nutrition and Risk Assessment

2. Documentation

a. The State agency requires documentation in the applicant's case file for all nutrition risk criteria used to establish WIC eligibility (check one) (as described in FNS Policy Memorandum #2008-4, WIC Nutrition Services Documentation):

Yes, supported by a written "exceptions" policy (e.g., policies to direct clinic staff in situations in which documentation is unavailable)

Yes, with CPA discretion when to waive documentation requirement (no written policy)

No (explain): _____

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

B. Nutrition Risk Determination, Documentation and Priority Assignment

b. As a matter of policy, the State agency requires the documentation of nutritional risk criteria on a participant's certification form in the following manner:

- All identified risk criteria are recorded
- A set number of criteria _____ is recorded (maximum number is 10 criteria)
- Local agency personnel decide how many and which criteria are recorded
- Other (specify): _____

3. Priority Assignments

a. Participants certified for regression

- Remain in the same priority in which they were previously assigned
- Are assigned to Priority VII, regardless of their initial priority at first certification
- Other (specify): _____

b. The State agency requires verification for all nutrition risk criteria that require a physician's diagnosis.

- Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (cite):

P&P 3.03, Nutrition and Risk Assessment

c. Participants may be certified for regression (check all that apply):

- A single six-month period
- One time following a certification period
- No policy, local agency discretion

d. High risk postpartum women are assigned to the following priority:

- Priority III
- Priority IV
- Priority V
- Priority VI

e. Participants certified solely due to homelessness/migrancy are assigned to the following priority:

| | IV | V | VI | VII |
|---------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Pregnant Women | <input checked="" type="checkbox"/> | | | <input type="checkbox"/> |
| Breastfeeding Women | <input checked="" type="checkbox"/> | | | <input type="checkbox"/> |
| Postpartum Women | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Infants | <input checked="" type="checkbox"/> | | | <input type="checkbox"/> |
| Children | | <input checked="" type="checkbox"/> | | <input type="checkbox"/> |

f. Attach a copy of any nutrition risk criteria that will be added, modified or deleted during the coming fiscal year. For each criterion, indicate:

- Applicable participant category
- Applicable priority level(s)
- Whether a physician's diagnosis is required
- SA code number which conforms to list of codes provided by USDA for Participant Characteristics data collection

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

C. Health Care Agreements, Referrals, and Coordination

1. State Agency Referral Agreements and Coordination of Services

a. The State agency has written formal agreements that permit the sharing of participant information with the following programs/providers (indicate whether information is shared manually (M) or through ADP (A) by placing either an M or A in front of the appropriate service):

- | | |
|---|---|
| <input checked="" type="checkbox"/> A SNAP | <input type="checkbox"/> Rural/migrant health centers |
| <input checked="" type="checkbox"/> A TANF | <input type="checkbox"/> Hospitals |
| <input checked="" type="checkbox"/> A Medicaid | <input type="checkbox"/> Childhood immunization |
| <input type="checkbox"/> SSI | <input checked="" type="checkbox"/> A Immunization registries |
| <input type="checkbox"/> EPSDT | <input type="checkbox"/> Well-child programs |
| <input type="checkbox"/> MCH programs | <input type="checkbox"/> Child protective services |
| <input type="checkbox"/> Children with special health care needs program(s) | <input type="checkbox"/> Children's health insurance |
| <input type="checkbox"/> Family planning | <input type="checkbox"/> Private physicians |
| | <input type="checkbox"/> IHS facilities |
| <input checked="" type="checkbox"/> M other (specify): PRAMS | |

b. Formal agreements for coordination of services include:

- Responsibilities of each party
- Assurance that information is used only for program eligibility and/or outreach
- Assurance that information will not be shared with a third party

c. The State agency requires local agencies to coordinate services with, and/or develop referral systems for, the following (check all that apply):

- | | |
|---|--|
| <input checked="" type="checkbox"/> SNAP | <input checked="" type="checkbox"/> Children with special health care needs |
| <input checked="" type="checkbox"/> TANF | <input checked="" type="checkbox"/> Schools |
| <input checked="" type="checkbox"/> SSI | <input checked="" type="checkbox"/> EFNEP |
| <input checked="" type="checkbox"/> Medicaid | <input checked="" type="checkbox"/> Other food assistance program (TEFAP, FDPIR, CSFP, etc.) |
| <input checked="" type="checkbox"/> CHIP | <input checked="" type="checkbox"/> Breastfeeding promotion |
| <input type="checkbox"/> IHS facilities | <input checked="" type="checkbox"/> Child protective services |
| <input checked="" type="checkbox"/> MCH (clinics/facilities) | <input checked="" type="checkbox"/> Head Start |
| <input type="checkbox"/> EPSDT | <input checked="" type="checkbox"/> Early Head Start |
| <input checked="" type="checkbox"/> Family planning | <input checked="" type="checkbox"/> Healthy Start |
| <input checked="" type="checkbox"/> Prenatal care | <input checked="" type="checkbox"/> Substance abuse programs |
| <input checked="" type="checkbox"/> Postnatal care | <input checked="" type="checkbox"/> Child abuse counseling |
| <input checked="" type="checkbox"/> Immunization | <input checked="" type="checkbox"/> Foster care agencies |
| <input checked="" type="checkbox"/> Dental services | <input checked="" type="checkbox"/> Homeless facilities |
| <input checked="" type="checkbox"/> Private physicians | <input checked="" type="checkbox"/> Mental health services |
| <input checked="" type="checkbox"/> Hospitals | <input checked="" type="checkbox"/> Rural/migrant health centers |
| <input checked="" type="checkbox"/> Well-child programs | |
| <input checked="" type="checkbox"/> Other (specify): Lead Testing | |

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):
P&P 6.02SP, Participant Referral System and P&P 6.03SP Referral Agreements for Health Care Services

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

C. Health Care Agreements, Referrals, and Coordination

2. Local Agency Referral Procedures

a. The State agency ensures that local agencies make available to all adults applying or re-applying for the WIC Program for themselves or on behalf of others the following types of information:

- State Medicaid Program, including presumptive eligibility determinations, where available
- Child support services
- SNAP
- Substance abuse counseling/treatment programs
- TANF, including presumptive eligibility determinations, where available
- Other State-funded medical insurance programs (specify): _____
- Other nutrition services (specify): _____
- EPSDT Program
- Children's Health Insurance program(s)
- Other (specify): Immunizations and Lead Testing

b. The referral methods used by local agencies to other health and social service programs include (check all that apply and indicate the primary method of referral using the checkbox on the right):

- | | Primary |
|--|---------------------------------------|
| <input checked="" type="checkbox"/> State agency-developed referral forms | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Local agency-developed referral form | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Telephone call to referring agency | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Verbal referral to participants | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Automated client/participant information exchange | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Written literature on referral programs | <input type="checkbox"/> |
| <input type="checkbox"/> Follow-ups by staff to monitor | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Maintain a list of local resources for drug and other harmful substance abuse | <input type="checkbox"/> |
| <input type="checkbox"/> Counseling | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Other (specify): <u>Needs are determined during the Nutrition Assessment process to ensure individualized tutorial by need</u> | ? <input checked="" type="checkbox"/> |

c. Methods used by other health and social service programs to refer clients to the WIC Program include (check all that apply and indicate the primary method of referral using the checkbox on the right):

- | | Primary |
|--|-------------------------------------|
| <input checked="" type="checkbox"/> WIC Program referral form | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> Health/social program referral form | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Telephone call | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Verbal referral | <input type="checkbox"/> |
| <input type="checkbox"/> Automated client/participant information exchange | <input type="checkbox"/> |
| <input type="checkbox"/> Written literature on the WIC Program | <input type="checkbox"/> |
| <input type="checkbox"/> Other (specify): _____ | <input type="checkbox"/> |

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

C. Health Care Agreements, Referrals, and Coordination

d. The State agency has a system in place to monitor the extent to which WIC participants are using other health or social services (check all that apply):

Yes (check): Medicaid TANF MCH SNAP

Yes, other (specify): CHIP, Immunizations and Lead Testing

No

e. The State agency requires local agencies to monitor referrals to determine the extent of health or social services utilization in addition to State monitoring systems.

Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.00SP, Clinic Operations, P&P 6.01SP, Local Agency Outreach Activities and P&P 6.02SP Participant Referral System

f. In order to facilitate referrals to the Medicaid Program, the State agency provides each local agency a chart showing the maximum income limits, according to family size, applicable to pregnant women, infants, and children up to age 5 under the Medicaid Program.

Yes No

g. The State agency assures that each local agency operating the Program within a hospital, and/or that has a cooperative arrangement with a hospital, advises potentially eligible individuals that receive inpatient or outpatient prenatal, maternity, or postpartum services, or that accompany a child under the age of 5 who receives well-child services, of the availability of program services.

Yes No

h. The State agency ensures that, to the extent possible, local agencies provide an opportunity for individuals who may be eligible to be certified within the hospital for participation in WIC.

Yes No

i. The State agency ensures that when WIC is at maximum caseload, local agencies make referrals to:

Food banks

Food pantries

Soup kitchens or other emergency meal providers

SNAP

The Emergency Food Assistance Program

Food Distribution Program on Indian Reservations

Other (specify): _____

j. The State agency ensures that when WIC is at maximum caseload, local agencies notify the State agency of any waiting lists established.

Yes No

k. The State agency ensures that when WIC is at maximum caseload, the State agency notifies FNS of any waiting lists established.

Yes No

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

C. Health Care Agreements, Referrals, and Coordination

I. The State agency ensures that when the WIC participant's family has immediate needs for food beyond what WIC might provide, local agencies make referrals to:

- Food banks
- Food pantries
- Soup kitchens
- SNAP
- The Emergency Food Assistance Program
- Food Distribution Program on Indian Reservations
- Other (specify): _____

m. Immunization Screening and Referral

The State agency assures that each local agency is meeting the requirements of WIC Policy Memorandum #2001-7, August 30, 2001: Immunization Screening and Referral, as follows:

- Screening children under the age of two using a documented immunization history:
 - Using the minimum screening protocol; or
 - Using a more comprehensive means, (specify): _____
- Using another program or entity to screen and refer WIC children using a documented immunization history; (specify): _____ ; **or**
- Implementing the minimum screening protocol is unnecessary because immunization coverage rates of WIC children by 24 months are 90% or greater; **or**
- The State agency has been unable to formalize a coordination agreement with the State Immunization Program. Provide explanation of extenuating circumstances: _____

The State agency's policy and procedure manual has been updated to include the above immunization screening and referral protocol.

- Yes No

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

D. Processing Standards

1. Notification Standards

a. The State agency defines special nutritional risk applicants who are to be notified of their eligibility within 10 days of the date of the first request (at the local agency) for program benefits as the following (check all that apply):

- Pregnant women eligible as Priority I High-risk infants (optional)
- Migrant farmworkers/family members Homeless (optional)
- Optional; please specify: Infants under six months of age

b. The State agency requires local agencies to follow special policies and procedures to ensure timely certification of:

- Rural applicants Employed applicants
- No special policies/procedures

c. The State agency's policy allows it to authorize an extension of the notification period up to 15 days for special nutritional risk applicants when local agencies provide a written request with justification.

- Yes No

d. Policies and procedures are in place to assure all other applicants are notified of eligibility within 20 days of first request (at the local agency) for program benefits.

- Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.04SP, Food Benefits

2. Processing Standards

a. Processing standards begin when the applicant (check all that apply):

- Telephones the local agencies to request benefits
- Visits the local agency in person
- Makes a written request for benefits

b. The State agency requires the local agency to have a monitoring system in place to ensure processing standards are being met for all categories of applicants.

- Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.04SP, Food Benefits

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

E. Certification Periods

1. Certification Period Standards

- a. (i) The State agency authorizes local agencies to certify infants under six months of age for a period extending up to the first birthday provided the quality and accessibility of health care services are not diminished (known as "extended certification"):
- Yes, at all local agencies
 - Yes, at selected local agencies
 - No
- (ii) The State agency authorizes local agencies to certify children for a period of up to one year provided that participant children receive required health and nutrition services:
- Yes, at all local agencies
 - Yes, at selected local agencies
 - No
- (iii) The State agency authorizes local agencies to certify breastfeeding mothers for a period extending up to the infant's first birthday or until breastfeeding is discontinued (whichever comes first), provided that there will be no decrease in health and nutrition services that the participant would otherwise receive during a shorter certification period:
- Yes, at all local agencies
 - Yes, at selected local agencies
 - No
- (iv) The State agency ensures that health care and nutrition services are not diminished for participants certified for longer than six months:
- No
 - Yes (describe): Mid-cert appointment (referred to as a Health Evaluation appointment) is required for all WIC types with a one-year certification period

b. Extended certification is an option for the following (check all that apply):

- Priority I infants
- Priority II infants
- Priority IV infants
- Priority III Children
- Priority V Children
- Priority I Breastfeeding Women
- Priority IV Breastfeeding Women

c. The State agency authorizes local agencies to shorten or extend the certification period up to 30 days in certain circumstances.

- Yes (If yes, provide citation indicating circumstances): No
In cases where there is difficulty in appointment scheduling
-

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

2. The State agency authorizes local agencies to disqualify an individual in the middle of a certification period for the following reasons (check all that apply):

- Participant volunteers the information that they are over income
 - Participant abuse
 - Family member found income ineligible at recertification
 - Failure to pick up food instruments/cash-value vouchers for 3 consecutive issuances
 - Other (specify): _____
-

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

E. Certification Periods

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

F. Transfer of Certification

1. Procedures for Transfer of Certification and Verification of Certification (VOC) Cards

- a. The State agency has procedures in place that are used by all local agencies for transfers of certification within the State agency (intra-State), between State agencies (inter-State), and to the WIC Overseas Program (WICO):

| Intra-State | Inter-State | WIC Overseas | |
|-------------------------------------|-------------------------------------|-------------------------------------|-----|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Yes |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No |

- b. A participant ID card/folder is provided which also serves as a VOC card:

Yes No

- c. The State agency requires all local agencies to use a standardized Verification of Certification card:

Yes No

- d. Verification of Certification Cards are issued to the following (check all that apply):

- All participants
 Migrants
 Homeless
 Participants relocating during certification period
 Persons affiliated with the military who are transferred overseas
 Other (specify): _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.04SP, Food Benefits

2. The State agency requires all local agencies to include the following information on the Verification of Certification card (check all that apply):

- Name of participant
 Date certification performed
 Date income eligibility last determined
 Nutritional risk condition of the participant
 Date certification period expires
 Signature/printed or typed name of certifying local agency official
 Name/address/phone number of certifying local agency
 Identification number or some other means of accountability
 Migrant status (non-resident)
 Other (specify): Anthropometrics, blood work and date of last FIs issued

3. The State agency requires all local agencies to accept as valid all VOC cards from both the domestic WIC Program and the WIC Overseas Program that contain the following essential elements:

- Participant name
 Name and address of the certifying agency
 Date the current certification period expires

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

F. Transfer of Certification

4. The State agency honors the one year certification period for transferring participants (infants, children, and breastfeeding women) even if it certifies participants every six months.

Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 3.04SP, Food Benefits

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

G. Dual Participation, Rights and Responsibilities, Fair Hearings, Sanctions

1. Dual Participation

a. The State agency has written procedures to prevent and detect dual participation within each local agency and between local agencies:

- Yes (Please attach any descriptions of policy in Appendix or cite appropriate section(s) of the Procedure Manual): P&P 1.03SP, Abuse and Fraud Prevention and Investigation
- No

b. The State agency has a written agreement with the Indian State agency(ies) or other geographic State agencies in close proximity for the detection and prevention of dual participation (attach a copy of each applicable agreement or provide a citation of where a copy is located):

- Yes No Not applicable

c. The State agency has established procedures to handle participants found in violation due to dual participation:

- Yes (Please attach any descriptions of policy in Appendix or cite appropriate section(s) of the Procedure Manual): P&P 1.03SP, Abuse and Fraud Prevention and Investigation
- No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 1.03SP, Abuse and Fraud Prevention and Investigation

2. Participant Rights and Responsibilities

a. The State agency has uniform notification procedures that are used by all local agencies statewide:

- Yes No

b. The State agency requires all local agencies to inform applicant/participant of his/her rights and responsibilities in written form, and must be read by or to the applicant, parent, or caretaker:

- Yes No

c. The State agency has implemented a policy of disqualifying participants for not picking up food instruments:

- Yes No Not applicable

If yes, the policy is communicated to participants in the participant rights and responsibilities materials:

- Yes No Not applicable

d. The State agency has implemented a policy to specifically inform participants that they are not allowed to sell WIC food benefits, including online:

- Yes No; explain: _____

e. The State agency has policies and procedures to identify attempted sales of WIC food benefits in their WIC State Plan:

- Yes No; explain: _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 1.03SP, Abuse and Fraud Prevention and Investigation

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES
G. Dual Participation, Rights and Responsibilities, Fair Hearings, Sanctions

f. The State agency has developed special notification policies and procedures for the following:

- Applicant/participant who cannot read
- Applicant/participant who speaks in a language other than English
- Homeless
- Migrants
- Persons with disabilities
- Other (specify): _____

g. The State agency requires all local agencies to provide notification of participant rights and responsibilities in the following situations:

- Eligibility at each certification
- Ineligibility at initial certification
- Mid-certification disqualification
- Expiration of a certification period
- Waiting list status
- Other (specify): _____

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):
P&P 3.02SP, Program Eligibility

3. Fair Hearing and Sanction System

a. The State has a law or regulation governing participant appeals:

- Yes No

b. The State agency has established statewide fair hearing procedures:

- Yes; attach fair hearing procedures for participants or specify the location in the Procedure Manual and reference in additional detail section below.
- No

c. State or local agency actions against participants include (check all that apply):

- Reclaiming the value of improperly received benefits
- Disqualification from the program for up to one year
- Suspension from the program mid-certification
- Other (specify): _____

d. Appeal hearings are held at:

- WIC State agency parent agency
- Other State agency or hearing board (specify): _____
- Local WIC agency
- Other (specify): Mutually agreed upon location conducted by an impartial official

VIII. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES

G. Dual Participation, Rights and Responsibilities, Fair Hearings, Sanctions

e. Statewide fair hearing procedures include (check all that apply):

- Request for hearing
- Local agency responsibilities
- Denial or dismissal of request
- Continuation of benefits
- Rules of procedure
- Responsibilities of hearing official
- Fair hearing decision
- Other (specify): _____
- Judicial review

f. State agency procedures require written notification for (check all that apply):

- Appeal rights
- Request for hearing
- Denial or dismissal of request
- Notice of hearing
- Termination within certification period
- Fair hearing decision
- Judicial review
- Other (specify): Participants can express their request for a fair hearing verbally or in writing _____

g. The State agency has established timeframes to govern each step of the hearing process:

- Yes No

h. The State agency requires all local agencies to document any notification/correspondence in the participant's file:

- Yes No

i. The State agency has a written sanction policy for participants:

- Yes (If yes, provide appropriate citation below)
- No

j. The State agency has established procedures which determine the type and levels of sanctions to be applied against participants:

- Yes No

ADDITIONAL DETAIL: Certification and Eligibility Appendix and/or Procedure Manual (citation):

P&P 1.03SP, Abuse and Fraud Prevention and Investigation

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

(Please indicate) State Agency: Pennsylvania for FY 2020

Food delivery and food instrument (FI) (*Food instrument* means a voucher, check, electronic benefits transfer card (EBT), coupon or other document which is used by a participant to obtain supplemental foods) accountability and control involve the production, issuance, redemption, and monitoring of automated and manual food instruments through retail systems and the delivery of WIC Program foods by non-retail methods, i.e., home delivery and direct distribution.

Retail Food Delivery Systems

A. Food Instrument Control Overview - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), and (a)(14)(xii): describe the policies and procedures used by the State agency in producing, monitoring and accounting for the use of food instruments.

B. Food Instrument Pick-up and Transaction - 246.4(a)(11)(iii) and (a)(14)(vi): describe the State agency's procedures for issuing food instruments to participants, including procedures for verification, prorating food packages, training and proxy policies.

C. Food Instrument Redemption and Disposition - 246.4(a)(14)(vi): describe the procedures used to reconcile food instruments as either issued or voided, and as either redeemed or unredeemed, and redeemed food instruments as either validly issued, lost/stolen/damaged, expired, duplicate, or not matching issuance records.

D. Manual Food Instruments - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi) and (a)(14)(ix): describe the procedures for issuing and accounting for manual food instruments, including the procedures for documentation and disposition.

E. Special Food Instrument Issuance Accommodations - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), (a)(14)(ix), (a)(14)(xiv) and (a)(21): describe alternatives to participant food instrument pick-up for issuance (e.g., mail or electronic issuance) and how the integrity of program services and fiscal accountability is ensured.

F. Vendor Cost Containment System Certification - 246.4(a)(14)(xv), 246.12(g)(4)(vi): describe the competitive pricing and reimbursement methods that the State agency will implement to ensure that average payments per food instrument to above-50-percent vendors do not exceed average payments per food instrument to comparable regular vendors.

Non-Retail Food Delivery Systems

G. Home Food Delivery Systems - 246.4(a)(11)(iii), 246.4(a)(14)(i), (a)(14)(vi), (a)(14)(vii) and (a)(14)(xii): describe how the State agency's home delivery system operates including but not limited to the types of authorized home food delivery contractors, the frequency of deliveries, and the procedures for documenting deliveries and ensuring safe food delivery of WIC foods, if applicable.

H. Direct Distribution Food Delivery Systems - 246.4(a)(11)(iii), (a)(14)(i), and (a)(14)(vi), (a)(14)(vii), and (a)(14)(xii): describe the methodology and procedures used in the direct distribution of supplemental foods, including types of foods distributed, warehouse and distribution centers, the verification process, and assurance of food safety, as applicable.

Electronic Benefit Transfer (EBT) Implementation and Management

I. Electronic Benefit Transfer (EBT): 246.4(a)(1), (a)(14)(xix), (a)(14)(xx), (a)(19), 246.12(h)(3), (w)-(bb): describe the policies and procedures the State agency is using to implement and operate EBT

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

A. Food Delivery and Food Instrument Control Overview

1. Food Instruments - General

a. The State agency uses the following types of FIs (check all that apply):

- Automated-point of certification
 - Manual-individual prescription
 - Pre-printed manual-standard prescription
 - Automated-central generation
 - EBT
 - Other (specify): The last region will rollout 10/28/19. Paper FIs will be issued potentially through January 2020. Responses provided will be for the eWIC processes.
-

b. The State agency conducts FI inventories (Place an S=[State agency] or L=[Local agency] under the appropriate column to designate primary responsibility):

- | Automated - EBT Cards | Physical - Paper FIs |
|---|--|
| <input type="checkbox"/> Daily/perpetually | <input type="checkbox"/> Daily |
| <input checked="" type="checkbox"/> Other (specify): <u>Monthly</u> | <input type="checkbox"/> Weekly |
| | <input type="checkbox"/> Monthly |
| | <input checked="" type="checkbox"/> Other (specify): <u>No inventory-blank</u> |

c. The FI contains/allows for the following information (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Not applicable | <input type="checkbox"/> Local agency identifier |
| <input type="checkbox"/> Participant WIC ID number | <input type="checkbox"/> Vendor/farmer endorsement |
| <input type="checkbox"/> Countersignature for participant/proxy | <input checked="" type="checkbox"/> Authorized supplemental foods |
| <input checked="" type="checkbox"/> First date of use | <input checked="" type="checkbox"/> Last date of use |
| <input type="checkbox"/> Redemption period | <input type="checkbox"/> Serial number |
| <input type="checkbox"/> Purchase price | <input type="checkbox"/> Signature space |

Provide a facsimile of FI in Appendix or cite Procedure Manual:

P&P 4.02, Food Instrument Security and Distribution

d. The EBT system allows for the following (check all that apply):

- A unique and sequential number benefit issuance identifier
- Each EBT purchase is matched to an authorized vendor, farmer, or farmers' market prior to authorizing payment per 7 CFR 246.12(x)(3)
- System contains authorized supplemental foods
- System contains first and last dates of use for electronic benefits

e. The State agency provides a toll-free number for participant/vendor/farmer inquiries on:

- Paper Food Instrument Cash-value voucher EBT Card/Sleeve None

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

2. Food Instrument Accountability

a. FIs are delivered to local agencies by:

- State agency staff Local agency staff

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

A. Food Delivery and Food Instrument Control Overview

- US Postal Service On-demand printing
- Contracted service (e.g., UPS, Purolator, etc.)
- Other (specify): _____

b. FIs (blank stock and preprinted ready for issuance) are delivered to the local agency (check all that apply):

Blank

- Not applicable
- Weekly
- Twice a month
- Once a month
- Once every two months
- Other (specify): as needed

Preprinted

- Not applicable
- Weekly
- Twice a month
- Once a month
- Once every two months
- Other (specify): _____

c. The State agency uses the following procedures to ensure that unclaimed FIs are not being used fraudulently (check all that apply):

- Signatures on the documentation of receipt are compared for similarities in writing style implying one person signed for multiple participants
- Local agencies conduct an initial review to void food instruments for participants known to have been terminated from the Program
- Inventories of food instruments are not conducted by the same local agency staff responsible for issuing/voiding food instruments
- Procedures are in place to ensure the proper disposal of unused/duplicate/voided FIs
- Other (specify): Inventory controls are embedded in the MIS. Cards are issued to individual staff except for satellite sites, and cards are assigned in the system to specific satellite clinics.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

Draft eWIC Inventory policy

3. The State agency has established food delivery procedures in cases of natural disaster and emergencies for the following (check all that apply):

- Manual Issuance Automated issuance
- Mailing Home food delivery
- Direct distribution Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02SP, Food Instrument Security and Distribution

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

B. Food Instrument Pick-up

1. Food Instrument Pick-Up Policy and Procedures

a. Food instruments are issued by (check all that apply):

| | All Locals | Most Locals | Some Locals |
|-------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Local agency director | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Local agency nutritionist | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Local agency paraprofessional | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Clerical staff | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other (specify): _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

b. The State agency utilizes a participant identification card:

Yes Yes, with photo No

If yes, issuance is controlled numerically and each card is accounted for:

Yes No

c. The State agency requires the following proof of receipt when issuing automated food instruments:

- Participant/parent/caretaker/proxy signature block on register confirming receipt
- Carbon copy of food instrument
- Local agency staff initials
- Date of food instrument pick-up
- Stub with participant signature or initials
- Other (specify): Physical ID will be required with the implementation of eWIC for benefit pickup

d. The State agency has a policy to prorate food packages for the following:

- Late FI pick-up Certification due to expire within 30 days
- Mid-month certification Other (specify): PENN offers automatic proration for Full, 2/3 and 1/3 packages, depending on the date of benefit issuance

e. The State agency requires local agency staff to provide each new participant/parent/caretaker/proxy with training in (check all that apply):

- Authorized vendors/farmers Selecting WIC-approved foods
- FI transaction procedures Signature on FIs
- Use of proxy Reporting problems/requesting assistance
- Participant violations (i.e. selling or offering to sell WIC benefits)
- Other (specify): Training on use and care of eWIC cards

f. The State agency requires local agency staff to provide participants with a list of authorized vendors/farmers/farmers' markets:

Yes No

g. The State agency permits a participant to transact food instruments with any authorized vendor or farmer/farmers' market in the State:

Yes No

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

Authorized retail stores are identified in the WICShopper App that participants can download and use. P&P 4.02SP, FI Security and Distribution and P&P 7.05SP, Issuance of Prorated Packages

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

B. Food Instrument Pick-up

2. The State agency's proxy policy includes the following:

- Limits the number of participants a single proxy may sign for, except that a proxy may pick up FIs for all homeless WIC participants in a facility
 - Limits proxy to a specified number of FI pick-ups
 - Limits proxy to a minimum age
 - Limits proxy assignment to local WIC staff
 - Other (specify): None of the above
-

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 3.02SP, Program Eligibility

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

1. Food Instrument Disposition Procedures

a. The State agency system assures 100% disposition of all issued FIs

Yes No

If no, specify the circumstances that prevent 100% disposition:

b. Local agencies are supplied with a report on the final disposition of its FIs:

Yes (specify period): _____ No

c. The State agency monitors each local agency's:

Number of manual FIs utilized

Number of unclaimed FIs

Number of voided FIs

Number of redeemed FIs with no issuance record

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution; new inventory policy has been established for accountability of eWIC cards. In this question, we are defining voided FIs as hot-carded eWIC cards.

2. Unclaimed, Voided, Prorated FIs

a. The State agency requires local agencies to return "unclaimed/not picked up" FIs:

Not applicable Daily Weekly Monthly

Other (specify): _____

b. The State agency requires local agencies to return "voided" FIs:

Not applicable Daily Weekly Monthly

Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

3. Lost/Stolen/Damaged Food Instruments

a. The State agency requires local agencies to report lost/stolen/damaged FIs to (check all that apply):

State agency Police department State agency's banking institution

EBT Coordinator

Other (specify): eWIC card must be hot-carded in PENN as soon as LA staff are made aware of the loss

b. Replacement/duplicate FIs Issuance

(1) Replacement/duplicate FIs are issued when FIs are reported lost:

No

Depends on the circumstances

Yes (If FIs are reissued, it is done):

Immediately

Following notification of State agency/bank agency

After a 5 day waiting period (specify number of days)

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

(2) Replacement/duplicate FIs are issued when FIs are reported stolen:

- No
- Depends on the circumstances
- Yes (If FIs are reissued, it is done):
 - Immediately
 - Following notification of State agency/bank agency
 - After a 5 day waiting period (specify number of days)

(3) Replacement/duplicate FIs are issued when FIs are reported damaged:

- No
- Depends on the circumstances
- Yes (If FIs are reissued, it is done):
 - Immediately
 - Following notification of State agency/bank agency
 - After a 5 day waiting period (specify number of days)

c. Is a police report required before replacement benefits are issued when reported stolen?

- Yes
- No

d. The State agency or its banking institution takes the following action after it is notified by the local agency of lost/stolen/damaged FIs (check all that apply):

- Stops payment on the lost/stolen/damaged FIs
- Notifies vendor or farmer
- Other (specify): Lost or stolen FIs are recorded in the MIS system. Hot card list file is generated by PENN & sent to processor for download by vendors

Please provide a copy/citation of the State agency's policy and procedures that ensure that lost/stolen FIs cannot be redeemed OR lost/stolen/damaged EBT cards will be replaced and associated benefits transferred (7 CFR 246.4(a)(14)(xix)).

P&P 4.02, Food Instrument Security and Distribution

e. The local agency documents in the participant's file that replacement FIs were issued:

- Yes No

f. If it is established that lost/stolen/damaged FIs are transacted by the participant who reported them lost/stolen/damaged, the following actions are taken:

- A claim for cash repayment is issued to participant
- Participant is disqualified; specify the period of time: _____
- Participant receives a warning
- Other (specify): _____

g. If lost/stolen/damaged FIs are transacted by someone other than the participant, the following actions are taken, check all that apply:

- Reported to police for investigation
- State agency or local agency does an investigation

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

State agency or local agency notifies the participant

Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

h. The State agency monitors the level of reported lost/stolen/damaged FIs by local agency:

Yes No

4. Food Instrument Redemption Screening (7 CFR 246.12(k)(1))

a. Describe in detail how the State agency sets maximum allowable reimbursement levels for for payment of food instruments (including whether the State agency uses vendors' shelf prices to set maximum reimbursement levels and how reimbursement levels are linked to competitive price criteria). If the State agency sets maximum allowable reimbursement levels differently for above-50-percent vendors and regular vendors, please explain the different methods used.

P&P 4.01, Retail Store Management (B.)(5)(f) and (B.)(6). PA WIC does not authorized above-50-percent vendors

(1) The State agency establishes maximum allowable reimbursement levels for:

(a) Each peer group Yes No

(b) Each food instrument or food category Yes No

(c) Other (please specify): Individual UPC level Yes No

(2) The State agency establishes maximum allowable reimbursement levels using:

(a) Standard deviations Yes No

If yes, specify the standard deviation number and explain how the State agency determined the standard deviation it used is appropriate:

(b) A percentage above the average redemption amount Yes No

If yes, specify the percentage and explain how the State agency determined that this percentage is appropriate.

EBT Processor will be updating pricing, currently set at 20% above average for each peer group

(c) Other (please specify): _____ Yes No

(3) The maximum allowable reimbursement levels include a factor to reflect:

Yes No Wholesale price fluctuations; explain:
Manual override of calculated pricing can be done in SOAR at the State Agency's discretion.

Yes No Inflation; explain:
Pricing determination is based on actual transaction prices and evaluated weekly

Yes No Other (please specify): _____

b. The State agency screens FI through a pre-edit (before payment) or post-edit (after payment) process to detect the following:

| Not Applicable | Pre-Edit Screen | Post-Edit Screen | |
|-------------------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Purchase price exceeds price limitations (FI only) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Purchase price missing |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Altered purchase price |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vendor/farmer identification missing |

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

- | | | | |
|-------------------------------------|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Invalid/counterfeit vendor/farmer identification |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Transacted before specified period |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Transacted after specified period |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Redeemed after specified period |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Altered dates |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Missing signature |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Mismatched signature |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Altered signature |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other (specify): Invalid PIN entries |

c. When the payment amount on a food instrument exceeds the maximum allowable reimbursement amount, what action does the State agency take?

- Reimburses the vendor for amounts up to the maximum allowable reimbursement amount
- Reimburses the vendor at the peer group average
- Rejects the food instrument, but allow the vendor to resubmit
- Rejects the food instrument without allowing the vendor to resubmit
- Other (please specify): _____

d. Where pre-edit screens are used, the proportion of FIs reviewed includes:

- All FIs Percentage of FI (_____ %)
- Other (please specify): _____

e. The edit system(s) that use(s) maximum allowable reimbursement levels to screen for vendor overcharges rejects food instruments based on:

- | Pre-Edit | Post-Edit | |
|-------------------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Not To Exceed or Maximum Prices |
| <input type="checkbox"/> | <input type="checkbox"/> | Percentage above average (_____ %) |
| <input type="checkbox"/> | <input type="checkbox"/> | Amount above average (\$ _____) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other (specify): Transactions are authorized to be processed, but vendor is reimbursed only up to the maximum allowed. |

f. The following actions are used to control against unauthorized stores redeeming FIs:

- Provide up-to-date list of authorized vendors to participants at certification and/or FI issuance
- Recover vendor/farmer/farmers' market stamp when vendor/farmer/farmers' market is no longer authorized
- Conduct compliance buy to verify if unauthorized store redeems FIs
- State agency or its banking institution checks vendor/farmer/farmers' market ID numbers on food instruments submitted for redemption against the authorized vendor/farmer/farmers' market list before paying vendors/farmers/farmers' markets for FIs submitted for redemption
- Inform all participants who might use the unauthorized store
- Other (specify): Authorized vendors must be fully certified in order create an account with Solutran to send in claim files. Invalid stores and claim files will not be reimbursed by the processor.

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

5. Price Lists

a. Price list information is routinely collected from vendors:

Yes No; Explain: _____ (Proceed to item #6)

b. Price list data are collected:

Real Time or Daily via EBT system Monthly Quarterly Semiannually

Other (specify): _____

c. Price data are collected by:

State agency staff

Local agency staff

Reports are submitted by vendors

EBT system

Other (specify): _____

d. The data collected has food prices for (check all that apply):

All brands and sizes of supplemental foods

Highest price supplemental food items within food categories

Most commonly redeemed food items; please specify:

All authorized vendors

A sample of authorized vendors (please describe the sampling method used):

Other (specify): Outlier prices will not be included in the calculations for average price per peer group.

e. The State agency/local agency verifies price data provided by vendors:

During routine monitoring visits

Does not verify on a routine basis

Other (explain): Monitoring activities are to be determined after statewide implementation is completed.

If the vendor is identified as a high-risk vendor; please explain the method:

f. The State agency/local agency analyzes price data:

Manually on a routine or as needed basis

On an Automatic Data Processing system and uses it to:

Generate estimated food instrument values

Help inform WIC staff on vendor selection decisions

Develop vendor peer groups

Flag individual food instruments that appear to be overcharges

Other (specify): To assist in determination of need for manual price adjustments due to market trends; monitor trends in price changes by vendors; identify vendors who consistently price WIC foods at or near the NTE price.

6. System to Detect Suspected Overcharges

a. Does the State agency screen for suspected overcharges:

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

C. Food Instrument Redemption and Disposition

- Yes, vendor claims are issued for overcharges
 - No, the State agency makes price adjustments to food instruments submitted for redemption at amounts above edit limits.
 - No, the State agency does not identify overcharges and/or issue claims for overcharges. (Proceed to section *D. Manual Food Instruments*.)
 - Other (specify): Vendor claims for overcharges will only be redeemed at the NTE amount during the claims settlement process. The state agency will no longer use the pay-and-chase system to recover overcharges.
-

b. The methods used to identify vendor overcharges are:

- Comparison of vendor's reported prices to charged prices
 - Comparison of redemption values of vendor with other vendors in the vendor's peer group
 - Comparison of redemption values of vendor with all vendors
 - Other (specify): _____
-

c. To receive payment or justify and correct a claim for a price adjustment or vendor overcharge, the vendor must: (Check all that apply)

- Provide an updated price list
 - Provide written justification for the higher prices
 - Provide receipts
 - Other (specify): _____
-

d. What action(s) is/are taken when a vendor overcharge occurs? (Check all that apply)

- Routine monitoring or remedial vendor training is conducted
 - Vendor is designated as high-risk and scheduled for compliance investigation
 - Vendor is provided with a written warning of potential sanction for overcharging
 - Vendor is terminated for cause
 - Vendor is sanctioned
 - Other (specify): _____
-

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

D. Manual Food Instruments

DOES NOT APPLY (PROCEED TO NEXT SECTION)

1. Manual FIs Policy

a. Manual FIs are utilized for the following reasons:

- New participants
- Automated FIs not available
- Mutilated automated FIs
- Wrong food package on automated FI
- Wrong dollar amount on automated FI
- Provide for the special needs of the homeless
- Food package tailoring
- Routine monitoring visits (i.e., educational buys) of vendors/farmers
- Compliance buys of vendors/farmers
- Special conditions, e.g., disasters
- Other (specify): _____

b. The State agency requires the following for completing the manual FI register:

- Participant/proxy signature Local agency staff initials
- Date of FI pick-up Other (specify): _____

c. Manual FIs have a "Not to Exceed Value" of:

- Same dollar amount for all manual food instruments \$ _____
- Variable dollar amount depending on type of prescription on manual FI
- Variable dollar amount depending on participant category on manual FI
- No limit
- Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

2. Manual FI Documentation and Disposition

a. A report containing the serial numbers of manual FIs issued by local agencies is sent to the State agency:

- Not applicable Weekly Monthly
- Other (specify): _____

b. Local agencies are required to provide documentation to substantiate a valid or invalid certification record for manual FIs issued and redeemed but for which no participant record currently exists by utilizing:

- Turnaround documents to establish valid certification records
- Telephone calls to the State/local agency on irregularities
- Other (specify): _____

c. If the manual FI inventories do not achieve 100% reconciliation of all issued and unissued FIs, the local agency (check all that apply):

- Reports the FI serial numbers to the State agency

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

D. Manual Food Instruments

Provides the FI serial numbers to local vendors/farmers

Other (specify): _____

(Provide a copy/citation of the State agency's prescribed procedures if the manual FI inventory cannot be reconciled.)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

E. Special FI Issuance Accommodations

1. Alternative FI Issuance

a. The State agency has implemented the following FI issuance policy (check all that apply):

- All participants are required to pick up FIs at the clinic or local agency, except in unusual circumstances
- Participants/proxies are required to show identification at FI card pick up
- FI cards are routinely mailed to participants except (1) when the participant is scheduled for nutrition education (including breastfeeding promotion and support activities) or a certification appointment and (2) in areas where SNAP benefits are not mailed, as these areas are known to have experienced high mail issuance losses
- Benefits are provided electronically to a location such as a grocery store under certain conditions; thus participants may not always pick up FIs at the clinic
- Other (specify): _____

2. Mailing Policy/Procedures

a. The State agency provides local agencies with guidelines/procedures for mailing FIs to individual participants:

- Yes No

b. Policy requires participants to pick up FIs whenever certification appointment is due or nutrition education (including breastfeeding promotion and support activities) is scheduled:

- Yes No

c. The State agency has implemented the following policy regarding mailing FIs (check all that apply):

- FIs are sent first class mail *(first class is considered *regular* mail)
- FIs are sent registered mail
- FIs are sent certified mail
- FIs are sent restricted mail
- Return receipt is requested on FIs sent certified mail
- Envelope specifies, "Do not forward, return to sender" or "Do not forward, address correction requested"
- Other (specify): _____

d. The State agency approves mailing FIs under the following conditions (check all that apply):

| | State-Wide | LA with SA Approval | Case by Case |
|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| Participant hardship | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Travel-related issues | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Better clinic management | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Participant safety | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Participant convenience | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Cost effectiveness | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(if other, specify): The PENN system is down and benefits cannot be written to the card.

e. When mailing FIs, documentation of FI issuance is:

- Signed by the participant at the following FI pick-up/visit
- Noted "mailed" and initialed/dated by local agency staff

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

E. Special FI Issuance Accommodations

Signed and dated by local agency staff after return receipt is received

Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

3. Participants who receive FIs by mail are sent:

One month of FIs

Two months of FIs

Three months of FIs

Other (specify): Depends on the circumstances

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

P&P 4.02, Food Instrument Security and Distribution

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

F. Vendor Cost Containment System Certification

If the State agency has authorized or plans to authorize any above-50% vendors, FNS must certify the State agency's vendor cost containment system. The State agency that has not yet received FNS certification must submit a request for certification/recertification that contains the following information.

DOES NOT APPLY (PROCEED TO SECTION G)

1. Calculation of new competitive price levels

Describe how the State agency derived or will derive new competitive price levels for regular vendors, which exclude the prices of above-50-percent vendors.

2. Maximum allowable reimbursement levels for regular vendors and above-50-percent vendors

a. Explain how the State agency will ensure that average payments to above-50-percent vendors do not exceed average payments to comparable regular vendors.

b. The State agency plans to exempt above-50-percent vendors from the calculated competitive price criteria and maximum allowable reimbursement levels.

Yes No If yes, how many vendors will be exempted? _____

Are these vendors needed to ensure participant access to supplemental foods?

Yes No

c. The State agency applies peer-group-specific maximum allowable reimbursement levels to food instruments during the food instrument redemption process.

Yes No If yes, describe the procedure or process used:

3. Describe the State agency's methodology for grouping above-50-percent vendors in its peer group system (i.e., separately or in peer groups with regular vendors) and the criteria the State agency uses to identify comparable vendors for each group of above-50-percent vendors.

4. The State agency plans to exempt *non-profit* above-50-percent vendors from competitive price criteria and maximum allowable reimbursement levels.

Yes No If yes, provide the following information in detail :

a. Describe the reason the State agency has decided to exempt such vendors (i.e., the benefits to the program) and the number of non-profit vendors to be exempted.

b. Describe the reason the non-profit above-50-percent vendors are needed to ensure participant access to supplemental foods.

c. Does the State agency collect shelf prices from non-profit vendors?

Yes No

d. Describe how the prices of the non-profit vendors compare to those of other vendors in their geographic area that are subject to competitive price criteria and allowable reimbursement levels.

e. Describe how the State agency establishes the level of reimbursement for the non-profit above-50-percent vendors that it has exempted.

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

F. Vendor Cost Containment System Certification

5. **The State agency has fully implemented the competitive price criteria and maximum allowable reimbursement methodologies described in items 1 and 2 above.**

Yes No

If the State agency has not fully implemented the revised competitive price and maximum allowable reimbursement methodologies, describe the current status of this effort and include the timetable for achieving full implementation.

6. **The State agency plans to exempt *pharmacy* vendors from competitive price criteria and maximum allowable reimbursement levels.**

Yes No

If yes, the State agency has confirmed that these pharmacies provide **only** exempt infant formula and/or WIC-eligible nutritional foods to program participants.

7. Does the State agency collect shelf prices from pharmacies that provide only exempt infant formula?

Yes No

8. **Complete the table on the following page to demonstrate that the State agency's procedure for establishing and implementing competitive price criteria and maximum allowable reimbursement levels ensures that average payments per food instrument or food item to above-50% vendors do not exceed average payments to regular vendors.**

9. **Please attach and cite of a copy of the report(s) that the State agency will use to monitor average payments per food instrument to above-50% vendors and regular vendors. If the State agency does not have such a report, describe the State agency's plans to develop and implement a report(s) for monitoring purposes, including the report contents or fields.**
-

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

F. Vendor Cost Containment System Certification

Table 1. Data for WIC Vendor Cost Containment Certification – Overview

Please provide the following information on the regular vendors and the above-50-percent vendors authorized by the State agency available through June 30th, the State agency should enter data for the period for which data are available, replacing “June” with the applicable.

| | |
|--|------------------|
| 1. How many authorized regular vendors did the State agency have as of June 30th? (or month of: _____) | 1. |
| 2. For all authorized regular vendors, what was the total amount of WIC redemptions paid as of June 30? | 2. |
| 3. How many above-50-percent vendors did the State agency have as of June 30th? | 3. |
| a. Non-pharmacy above-50-percent vendors | |
| ▪ Number of <i>WIC-only</i> stores | |
| ▪ Number of other types of above-50-percent vendors (excluding pharmacies) | |
| b. Above-50-percent pharmacy vendors | |
| c. Total above-50-percent vendors (sum of a and b) | |
| 4. What was the total amount of redemptions paid to these above-50-percent vendors as of June 30th? | 4. |
| a. Non-pharmacy above-50-percent vendors | |
| b. Above-50-percent pharmacy vendors | |
| c. Total above-50-percent vendors (sum of a and b) | |
| 5. How many peer groups of above-50-percent vendors (either separate peer groups or groups with regular vendors) has the State agency identified? | 5. |
| 6. How many above-50-percent vendors and regular vendors has the State agency authorized that do <u>not</u> meet competitive price criteria, but are needed to ensure participant access to supplemental foods? | 6. req |

Supplemental WIC State Plan Guidance section IX.I - Vendor Cost Neutrality Assessment will be issued in the spring.

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

G. Home Food Delivery Systems

DOES NOT APPLY (PROCEED TO NEXT SECTION)

1. Home Food Delivery Systems Overview

a. Home delivery vendors include (check all that apply):

- Dairies
- Private delivery service doing WIC business only
- Private delivery service
- Other (specify): _____

b. Participants who receive home food delivery:

- Are notified in writing of the types and quantities of foods
- Are issued FIs that they sign and provide to the vendor when the food is delivered
- Are delivered not more than a one-month supply of supplemental foods at any one time.
- Indicate by authorized signature on a FI, receipt or signature document, the supplemental foods received
- Other (specify): _____

c. Supplemental foods may be delivered:

- Only to the participant of record
- To the participant of record or proxy of record
- To any adult at home during time of delivery
- To anyone at home at the time of delivery
- Other (specify): _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

2. Documentation

a. The forms verifying delivery are reconciled against vendor invoices:

- Weekly
- Monthly reconciliation of the signed FIs or other signed receipts or signature documents from participant or proxies.
- Other (specify): _____

b. Signatures of participants who sign the food receipt document/FIs are compared to the signature on file.

- No
- Yes, sample
- Yes, 100%

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

H. Direct Distribution Food Delivery Systems

DOES NOT APPLY

1. Direct Distribution Food Delivery - General

a. The State agency uses a direct distribution food delivery system to:

- Distribute all of its WIC Program foods
- Distribute only exempt infant formula and/or medical foods
- Distribute (specify): _____

b. The State agency uses:

- Warehouse not used
- One central warehouse, deliveries directly to local agencies
- One central warehouse from which foods are sent to one or more subsidiary warehouses before delivery to local agencies
- Other (specify): PA WIC has a contract with CAP Lancaster. CAP Lancaster provides infant formula and WIC eligible nutritionals to WIC participants or local agencies. The warehouse is located at 601 South Queen Street, Lancaster PA 17608

c. Warehouses are operated by:

- State agency Local agency
- Other state or public agency Under contract with a private business
- Other (specify): CAP Lancaster

d. Warehouses used for storage of WIC foods are also used to store other FNS program commodities (Please specify which commodities):

- Yes No Specify commodities: _____

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):
P&P 4.05, Special Formula Distribution Center

2. Food Distribution

a. Foods are distributed to participants:

- Grocery store fashion
- Pre-packaged
- Other (specify): Shipped in cardboard boxes with appropriate packing materials

b. Participants receiving food are required to sign:

- A register once for all foods received
- A register/form for each food item received
- Other (specify): In accordance with the shipping company policies

c. Foods are distributed to participants:

- Monthly
- Not to exceed a one-month supply at any one time to any participant
- Other (specify): _____

d. Participants with limited access to facilities used for distribution have available to them:

Services provided by:

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

H. Direct Distribution Food Delivery Systems

| | Local Agency | Other Sources |
|--------------------------|-------------------------------------|--------------------------|
| Home delivery | <input type="checkbox"/> | <input type="checkbox"/> |
| Cost-free transportation | <input type="checkbox"/> | <input type="checkbox"/> |
| Other | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(if other, specify): Formula can be shipped to either the clinic or a participant's home. The local agency determines if the formula should be shipped directly to the clinic to be picked up there by the participant

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation):

P&P 4.05, Special Formula Distribution Center

3. Warehouse Insurance and Inspections

a. Insurance for the warehouse covers (check all that apply):

- Theft Fire Infestation Spoilage
 Other (specify): The state agency does not require proof of insurance

b. Warehouses are inspected by a public authority responsible for enforcing:

- Fire safety laws and regulations (specify date and grade of last inspection): _____
 Sanitation laws and regulations (specify date and grade of last inspection): _____
 Other (specify): State Agency staff visit/inspect twice per year

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation):

P&P 4.05, Special Formula Distribution Center

4. Monitoring and Inventory Control

Please describe the State agency's methods for ensuring WIC supplemental foods are under proper inventory control (separation of duties for intake and inventory; stock rotation; performance of perpetual and physical inventory duties; reconciliation against issuance records; etc.).

The state agency has a contract with CAP Lancaster. The state agency conducts inventory reviews twice per year. Actual stock is counted and is reconciled with documentation of what CAP Lancaster has purchased and shipped to participants/local agencies

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

I. Electronic Benefit Transfer (EBT)

1. Is EBT implemented statewide?

- Yes (*Proceed to question 2*)
- No (*Continue to 1.a.*)

a. Does the State agency have an active EBT Project as of July 31, 2016?

- Yes No

b. Does the State agency follow APD requirements for EBT management and reporting?

- Yes No

c. Does the State plan to meet the October 1, 2020 EBT implementation deadline?

- Yes No

2. What is the State agency policy for permitting replacement cards and transfer of balances per 7 CFR 246.12(bb)(2)?

Replacement cards are provided after a five (5) day waiting period.

3. What are the State agency procedures for providing customer service during non-business hours for EBT cards per 7 CFR 246.12(bb)(3)?

All Local Agencies have voicemail for messaging after hours.

4. Does the State agency use the formula for EBT terminal minimum lane coverage in 7 CFR 246.12(z)?

- Yes No

a. If no, please provide the date of the approval of the approved alternative installation formula as required per 7 CFR 246.12(z)(2).

5. Does the State agency use the NUPC database?

- Yes No

X. MONITORING AND AUDITS

(Please indicate) **State Agency:** Pennsylvania for **FY** 2020

Monitoring and Audits involves State agency efforts to review local agency/clinic activities on an ongoing and timely basis, and to track all audits involving WIC Program activity.

A. Monitoring-246.19(b): requires State agencies to establish a management evaluation system.

B. Audits-Subpart F to 2 CFR Part 200, as applicable: describe State agency audit responsibilities.

X. MONITORING AND AUDITS

A. MONITORING

1. Local Agency/Clinic Monitoring Activity (to be updated each year)

a. Local agencies/clinics monitored:

- 12 Number of local agencies monitored last annual period
15 Number of clinics monitored last annual period
14 Number of local agencies to be monitored this current annual period
17 Number of clinics to be monitored this current annual period

Specify last annual period, from: 10/01/2017 to 09/30/2018 (month/day/year – month/day/year; must be applied consistently)

Specify current annual period, from: 10/01/2018 to 09/30/2019 (month/day/year – month/day/year; must be applied consistently)

b. Number of local agencies/clinics required to submit Corrective Action Plans (CAPs) to redress deficiencies identified during monitoring last year: 11 (Number)

c. The State agency uses a tracking device, such as a chart or spreadsheet, which summarizes the reviews of all local agencies.

Yes No

If the State agency uses a tracking device, it shows (check all that apply):

- Date of most recent review for each local agency/clinic
 Number of clinics reviewed in most recent review for each local agency/clinic
 Listing of findings for most recent review of each local agency/clinic
 Date of State agency notice of findings in most recent review for each local agency/clinic
 Date of local agency/clinic corrective action plan in most recent review for each local agency and/or clinics
 Outcome of corrective action plan

d. In preparing to conduct a local agency review, the State agency reviews data reports on:

- No-shows by category
 Administrative costs claimed
 Financial reports
 Priorities served
 Caseload
 Racial/ethnic
 Staff/participant ratios
 Participant nutrition surveillance data for participants in that local agency/clinic
 Other (specify): Nutrition Risk Utilization Report

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):

P&P 1.04SP, Local Agency Monitoring

X. MONITORING AND AUDITS

A. MONITORING

2. Local Agency/Clinic Monitoring Procedures

a. The State agency uses an established protocol when it monitors local agencies/clinics.

Yes No

If yes, please provide the citation of where it can be found in the appendix or procedure manual:

X - Appendix A- Program Review Handbook

This monitoring protocol includes:

- Advance notification of monitoring visit
- Determination of timeframes for conducting the review
- Designation of local agency/clinic staff to assist State agency staff during review
- Discussion of review findings on-site with local agency/clinic
- Specified time frame for providing written review report
- Specified time frame for local agency/clinic submission of corrective action plan, not to exceed 60 days from receipt of State agency's report
- Instructions or guidance for preparation of corrective action plan (e.g., inclusion of implementation time frames)
- Evaluation of adequacy of corrective action
- Follow-up with local agency/clinic to ensure corrective action measures are implemented
- Written notification of closure of the review
- Other (specify): _____

b. Monitoring of local agencies/clinics is conducted by (check all that apply):

- State WIC staff
- District or regional staff
- Other health programs
- Other (specify): _____

c. Specialists in the following areas monitor the areas of their expertise:

- Certification and eligibility determination
- Caseload management
- Nutrition services
- Breastfeeding promotion and support
- Targeting and outreach policies
- Financial management of administrative funds
- Food delivery system
- Vendor management
- Civil rights
- Information Systems security
- Other (specify): _____

X. MONITORING AND AUDITS

A. MONITORING

If the State agency uses reviewers to monitor areas in which they do not have expertise and/or prior knowledge, describe how the State agency trains or equips its reviewers to conduct the review:

d. The State agency uses a standard local agency/clinic review form.

Yes No

If yes, please provide the citation of where it can be found in the appendix or procedure manual:

X - Appendix B- Program Monitoring Tool for both Nutrition and Monitoring Sections

If yes, the review form covers the following areas:

- An assessment of local agency/clinic management
- An assessment of patient flow
- Certification case file reviews, including procedures for determining adjunctive income eligibility
- Caseload management
- Training of local agency and clinic staff
- Nutrition education
- Breastfeeding promotion and support
- Targeting and outreach policies
- Financial management of administrative funds
- Validation of staff time spent on WIC
- Food instrument accountability
- Vendor training and monitoring, if these functions are delegated to a local agency/clinic
- Civil rights compliance
- Other (specify): _____

e. The State agency has developed procedures for local agencies/clinics to use when they evaluate:

- Their own operations
 - Subsidiary/satellite operations (e.g., county health department clinic)
 - Subcontractors (e.g., community action program, hospital)
 - Homeless facilities/institutions
 - Other (specify): The State Agency offers the monitoring tool to the local agencies; however, it is not mandated that they use ours
-

If you selected any of the options above, please provide the citation of where it can be found in the appendix or procedure manual and answer the following questions:

X - Appendix B- Program Monitoring Tool for both Nutrition and Monitoring Sections

Do these procedures include a monitoring tool?

Yes No

Are all local agencies/clinics required to follow these procedures?

Yes No (specify basis for exemptions): _____

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):

P&P 1.04SP, Local Agency Monitoring and P&P 4.03SP, Retail Store Quality Assurance

X. MONITORING AND AUDITS

A. MONITORING

3. Use of Local Agency/Clinic Review Data

a. The State agency analyzes the results of local agency/clinic monitoring visits to determine whether deficient areas are common among its local agencies/clinics.

Yes No

b. The State agency utilizes local agency/clinic review data to (check all that apply):

Identify outstanding operational approaches that could be shared with other local agencies/clinic

Track individual local agency/clinic performance

Compare administrative costs/expenses among local agencies/clinics

Compare staffing and organization among local agencies/clinics

Other (specify): _____

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):

P&P 1.04SP, Local Agency Monitoring

X. MONITORING AND AUDITS

B. AUDITS

Do not include management evaluations or other reviews conducted by FNS regional offices or by WIC State agencies. This section concerns the audits conducted under Subpart F to 2 CFR Part 200 and audits conducted by USDA’s OIG.

1. Audits (Federal, State, and Local)

a. Number of audits conducted during FY- 2018 : 2,019 .

| b. Entities audited (includes both State and local agencies) | Auditor(s) | Period of Audit | Status/disposition of audit at this time (management decision, final action, etc.) |
|---|-------------------|------------------------|---|
| See Appendix C | | | |
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If additional audits were conducted, please provide separately.

X. MONITORING AND AUDITS

B. AUDITS

c. Entities not audited and reason (e.g., local office is not a subrecipient local agency, entity did not expend \$750,000 , as applicable or more in Federal funds during the fiscal year, etc.)

| Entities not audited (includes both State and local agencies) | Reason Entity Not Audited |
|--|----------------------------------|
| Bradford Hospital | Financial criteria not met |
| Broad Top Area Medical Center | Financial criteria not met |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):
P&P 2.04 Audit of Local Agencies

2. Audit Management Decision

a. Methods used by the State agency to ensure that corrective action is taken on audit findings include (check all that apply):

- State agency has a copy of the corrective action plan on file.
- State agency tracks audits to determine if the same problems are recurring from year to year.
- Local agency must file periodic reports.
- State agency contacts local agency by phone or in writing periodically.
- State agency visits local agency.
- Other (specify): _____

b. State agency actions taken to ensure that all claim amounts are recovered include (check all that apply):

- Local agency files periodic reports.
- State agency contacts local agency by phone or in writing.
- State agency monitors receipt of a check in the amount of an audit claim.
- State agency establishes and employs billing/offsetting of account procedures.
- Other (specify): _____

c. State agency accounting procedures for claim amounts recovered:

- Recovered claim amounts from prior fiscal years are returned to FNS.
- Recovered claim amounts are reallocated if collected within the same fiscal year.
- Claim amounts are verified with local agency.
- Other (specify): _____

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):
X - Appendix C - Single Audit Reports Received During SFY 18-19

X. MONITORING AND AUDITS

B. AUDITS

3. Availability of Audit Reports

- a. **The State agency receives and maintains for at least three years copies of all organization-wide audits involving the WIC Program and maintains a listing of those audits.**

Yes No, copies are retained by: Bureau of Audits

- b. **Procedures used for maintaining files to reflect the trail from the receipt of the audit to final action include:**

Detailed breakdown of each audit finding is tracked separately.

Individuals are assigned to monitor each audit.

One individual is assigned to monitor all audits.

Other (specify): _____

- c. **The State agency maintains a listing of all planned audits for the coming Fiscal Year.**

Yes No

(Indicate recent FYs which included WIC in the single audit report: _____

- d. **The State agency ensures WIC participation in a single audit and other audits by (check all that apply):**

Developing a tracking system that monitors the status of each audit

Establishing a contact person for each audit

Including this audit requirement in the local agency contract

Other (specify): _____

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):

P&P 1.08, Information System Management

XI. CIVIL RIGHTS

(Please indicate) **State Agency:** Pennsylvania for FY 2020

The Civil Rights section of the State Plan should cover the training of State and local staff on issues, rules and regulations related to civil rights, public notification of nondiscrimination requirements, the monitoring of local agencies and clinics for compliance with civil rights regulations and rules, the collection of relevant racial/ethnic information and procedures for handling civil rights complaints.

A. Administration - 246.4(a)(17): describe the procedures the State will use to comply with the civil rights requirements described in 246.8, including the processing of discrimination complaints.

B. Public Notification Requirements and Nondiscrimination Notification - 246.8(a)(1): describe the policies and procedures used to ensure that public notification regarding nondiscrimination in the WIC Program reaches all participants and potential participants in an appropriate language (246.8(c)) through WIC Program materials.

C. Compliance Review and Monitoring Activity - 246.8(a)(2): describe the policies and procedures used to monitor and review local agencies to verify that they are in compliance with civil rights laws and regulations.

D. Data Collection and Reporting - 246.8(a)(3): describe the methods used to collect and monitor racial/ethnic data in compliance with title VI of the Civil Rights Act of 1964.

E. Complaint Handling - 246.4(a)(17): describe the policies and practices used to ensure civil rights complaints are handled properly at the State and local level.

XI. CIVIL RIGHTS

A. Administration

1. The State agency designates an individual to coordinate, implement, conduct training and enforce civil rights efforts.

Yes No

a. The following methods are used to inform and update State and local agency staff of their obligations under civil rights rules, regulations and instructions:

| | State Agency | Local Agency |
|---|-------------------------------------|-------------------------------------|
| Briefing for new employees | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Handouts for new employees | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Memos and updates | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Presentations by civil rights coordinator | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Presentations by staff other than WIC Program | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other | <input type="checkbox"/> | <input type="checkbox"/> |

If other, specify: _____

b. Civil rights training is provided annually.

State agency staff Yes No

Local agency staff Yes No

c. Civil rights training includes the following:

| | State Agency | Local Agency |
|--|-------------------------------------|-------------------------------------|
| Collection and use of racial/ethnic data | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Effective public notification systems | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Complaint procedures | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Compliance review techniques | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Resolution of noncompliance | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Requirements for reasonable accommodation of persons with disabilities | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Requirements for language assistance | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Conflict resolution | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Customer Service | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

If other, specify: _____

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

XI. CIVIL RIGHTS

A. Administration

2. The State agency has copies of the following materials on file:

- FNS Instruction, 113-1
- Title VI (1964), 7 CFR 15
- Title IX, Education Amendments, 7 CFR 15a (sex discrimination)
- Section 504, Rehabilitation Act of 1973, 7 CFR 15b
- Racial/Ethnic data collection policy and reporting requirements
- Age Discrimination Act of 1975, 45 CFR Part 91
- Americans with Disabilities Act, 28 CFR Part 35
- Civil Rights Restoration Act of 1987

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

3. The State agency's policy for reasonable accommodation for the disabled includes the most up-to-date special provisions for the disabled.

- Yes No

(Refer to FNS Instruction 113-1, Civil Rights Compliance and Enforcement—Nutrition Programs and Activities)

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 3.00SP, Clinic Operations

XI. CIVIL RIGHTS

B. Public Notification Requirements and Nondiscrimination

1. Public Notification

a. The State agency requires its local agencies to include the nondiscrimination policy statement and civil rights complaint procedure on the following (check all that apply):

- | | |
|---|--|
| <input checked="" type="checkbox"/> Outreach letters to the general public | <input checked="" type="checkbox"/> Radio announcements |
| <input checked="" type="checkbox"/> Program information letters | <input checked="" type="checkbox"/> Publications |
| <input checked="" type="checkbox"/> Program information brochures | <input checked="" type="checkbox"/> Posters |
| <input checked="" type="checkbox"/> Program information bulletins | <input checked="" type="checkbox"/> Newsletters |
| <input checked="" type="checkbox"/> Newspaper announcements | <input checked="" type="checkbox"/> Referral material |
| <input checked="" type="checkbox"/> Internet | <input checked="" type="checkbox"/> Television announcements |
| <input checked="" type="checkbox"/> Letters of invitation in the public hearing process | <input checked="" type="checkbox"/> Application forms (including computer-based forms) |
| <input checked="" type="checkbox"/> Certification forms to be signed by participants | <input type="checkbox"/> Other (specify): _____ |

XI. CIVIL RIGHTS

B. Public Notification Requirements and Nondiscrimination

b. The State agency requires that the USDA nondiscrimination poster, "And Justice For All," or an FNS-approved substitute be displayed in the following places frequented by applicants and participants:

- Clinic waiting rooms
- Food instrument issuance offices
- Group/individual nutrition education areas
- Test kitchens
- Warehouse distribution centers
- Other (specify): Visibly posted in each clinic in areas frequented by applicants and endorsers

c. Check the group categories that the State agency and its local agencies publicly inform of the following information (check all that apply; see key below):

- | 1 | 2 | 3 | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Availability of program benefits |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Eligibility criteria for participation |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Location of LA/clinics operating WIC Program and (800) telephone numbers |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Hours of service of LA/clinics operating WIC Program |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Rights and responsibilities |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Nondiscrimination policy |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Civil rights complaint procedure |

1 = general public

2 = grassroots/community organizations that deal with potentially eligible minorities

3 = potential eligibles/applicants/participants

d. The State agency ensures that advocacy/minority organizations and the general public are informed of the benefits/policies listed above (please provide the appropriate Procedure Manual citation of materials used):

- Annually More frequently

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights and P&P 6.01SP, Local Agency Outreach Activities

2. Nondiscrimination Notification

a. The State agency or local agency:

- Provides applicants/participant with key information, such as applications and materials describing eligibility criteria and procedures for delivery of benefits, in appropriate languages other than English in areas where a significant proportion of people with limited English proficiency (LEP) reside.
- Appropriate bilingual staff, volunteers, or other translation resources are available to serve applicants and participants in areas where a significant proportion of people with limited English proficiency (LEP) reside.
- All rights and responsibilities listed on the certification form are read to or by the applicants and participants in the appropriate language, or if the participant is sight or hearing impaired and requires assistance.

XI. CIVIL RIGHTS

B. Public Notification Requirements and Nondiscrimination

b. The State agency provides WIC Program materials and translators in the following languages (Check all that apply; M = Materials, VT = Volunteer Translators, PT = Paid Translators, BS = Bilingual Staff):

| M | VT | PT | BS | |
|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | English |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Spanish |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | French |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vietnamese |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Chinese |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other Asian/Pacific (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Tribal (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Braille |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Sign Interpreter |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Other (specify): _____ |

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

Local Agencies are required to use Propio Language Services P&P 1.10SP, Civil Rights, P&P 6.01SP, Local Agency Outreach Activities, and P&P 3.03SP, Nutrition and Risk Assessment

XI. CIVIL RIGHTS

C. Compliance Review and Monitoring Activity

1. Compliance Review

a. Civil rights reviews of local agencies are conducted:

- Separately
 - In conjunction with another department, organization or service as part of an overall review
 - Other (specify): Civil Rights reviews are done in conjunction with the administrative & nutrition program reviews of the clinics
-

b. The State agency reviews all of its local agencies for civil rights compliance with the nondiscrimination laws and regulations when it does its reviews.

- Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

1.04SP, Local Agency Monitoring and P&P 1.10SP, Civil Rights

2. Monitoring Activity

a. In addition to the local agency reviews, the State agency uses the following means to ensure that local agencies operate in a nondiscriminatory manner:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Review of the racial/ethnic enrollment and/or participation data | <input checked="" type="checkbox"/> Review of complaints |
| <input checked="" type="checkbox"/> Review of denied applications | <input checked="" type="checkbox"/> Review of participant surveys |
| <input checked="" type="checkbox"/> Review of waiting lists | <input checked="" type="checkbox"/> Participant interviews |
| | <input type="checkbox"/> Other (specify): _____ |

XI. CIVIL RIGHTS

C. Compliance Review and Monitoring Activity

b. The State agency checks for the following in local agency applications:

- The local agency has corrected all past substantiated civil rights problems or noncompliance situations
- The Civil Rights Assurance is included in the State-Local Agency Agreement
- A description of the racial/ethnic makeup of the service area is included in the application
- Appropriate staff, volunteers, or other translation resources are available in areas where a significant proportion of people with limited English proficiency (LEP) reside

c. The State agency checks for the following in its civil rights reviews of its local agencies:

- Case records include racial/ethnic data
- Where applicable, an explanation of why the racial/ethnic WIC participant level is not proportionate to the income eligible racial/ethnic population
- The local agency has conducted civil rights training for its staff
- The project area displays the USDA nondiscrimination poster, "And Justice For All," or an FNS-approved substitute
- Program information has been provided to applicants, participants, and grassroots organizations or similar minority groups
- The nondiscrimination policy statement and civil rights complaint procedure are included on all printed materials such as applications, pamphlets, forms, or any other materials distributed to the public
- Racial/ethnic data are collected by actual count and maintained on file for 3 years
- The local agency has corrected all past substantiated civil rights problems or noncompliance situations
- Civil rights complaints are handled in accordance with the procedures outlined in FNS Instruction 113-1:

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

XI. CIVIL RIGHTS

D. Data Collection and Reporting

1. Data Collection

a. The State agency ensures the following when collecting civil rights data:

- All racial/ethnic categories are collected and reported as part of the program participant characteristics report
- Racial/ethnic data definitions are in accordance with current OMB guidance and WIC policy, and clinic procedures are in place to ensure the data is collected accurately
- Data reported on participant characteristics include the number of persons on WIC master lists or persons listed in WIC operating files who are certified to receive WIC benefits
- Collected racial/ethnic data and records are accessible only to authorized personnel

b. The State agency maintains a civil rights file which retains collected racial/ethnic data for three years.

- Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

2. The State agency instructs its local agencies to obtain a participant's racial/ethnic category by (check all that apply):

- Allowing self-identification by participant (must be used at participant's request)
 - Visual identification/sight assessment by local agency staff
 - Local agency staff personally know participant's racial/ethnic category
 - Other (specify): _____
-

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

XI. CIVIL RIGHTS

E. Complaint Handling

1. The State agency ensures the following:

- WIC Program applicants and participants are informed where and how they may file a complaint of discrimination by directing them to the USDA Office of the Assistant Secretary for Civil Rights (OASCR) website (http://www.ascr.usda.gov/complaint_filing_cust.html) for proper Discrimination Complaint Filing processes.
- WIC Program applicants and participants are informed that they can file their complaints directly with the U.S. Department of Agriculture, their State Agency or their local Agency. However, the local/State Agency must then forward their complaint either directly to the FNS HQ Civil Rights Division or the U.S. Department of Agriculture.
- All local agency staff are trained in discrimination complaint procedures
- All written and verbal complaints alleging discrimination based on race, color, national origin, age, sex, or disability are accepted from applicants and participants by State agency and local agency staff and forwarded to the FNS HQ Civil Rights Division.
- Complaints alleging discrimination based on race, color, national origin, or age are forwarded to the FNS HQ Civil Rights Division through an FNS-established complaint procedure. (Regional Office receives copy of all complaints.)
- Complaints alleging discrimination based on sex or disability are forwarded to the FNS HQ Civil Rights Division (for those State and local agencies without an FNS-approved grievance procedure in place).
- Complaints alleging discrimination based on sex or disability are forwarded to the FNS HQ Civil Rights Division.

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

2. The State agency uses a discrimination complaint form it has developed for acceptance of a complaint.

- Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights

3. The State agency establishes and ensures that local agencies implement specific timeframes concerning discrimination complaints:

- An individual has the right to file a complaint within 180 days of the alleged discriminatory action.
- All complaints are processed and closed within 90 days of receipt.

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

P&P 1.10SP, Civil Rights
