

July 1, 2021 Reopening Guidance

Certification Appointments

- WIC Services require in-person visits to obtain consultation by WIC dietitians and nurses, review food packages, and provide additional information such as breastfeeding consultation. As of July 1, 2021, procedures will go back into effect requiring individuals seeking certification or recertification to be physically present for eligibility determinations.
- Per FNS guidance, participants must be present for bloodwork, anthropometric measurements, and the nutrition assessment. Referral data can be used for bloodwork and anthropometric measurements per policy.
- The Rights and Responsibilities document and signing for benefits should be completed when the participant is in for the in-person appointment.
- Proof of income and address can be provided electronically per policy. All security requirements must be met. Proof of identification must be presented in-person.
- The USDA Federal Regulations allow for local agencies to waive the physical presence requirements under certain circumstances that are listed below.
 - Qualifying circumstances to waive physical presence for infants and children, without a disability include:
 - Infants under 8 weeks of age who cannot be present at certification for a reason determined appropriate by the local agency, and for whom all necessary certification information is provided;
 - If being physically present would pose an unreasonable barrier, an infant who was present at his/her initial WIC certification visit and is receiving ongoing health care;
 - Infant who was present at his/her initial WIC certification and was present at a WIC certification or recertification determination within the 1-year period ending on the date of the most recent certification or recertification determination and is under the care of one or more working parents or one or more primary working caretakers whose working status presents a barrier to bringing the infant into the WIC clinic;
 - If being physically present would pose an unreasonable barrier, a child who was present at his/her initial WIC certification visit and is receiving ongoing health care; and
 - Child who was present at his/her initial WIC certification and was present at a WIC certification or recertification determination within the 1-year period ending on the date of the most recent certification or recertification determination and is under the care of one or more working parents or one or more primary working caretakers whose working status presents a barrier to bringing the child into the WIC clinic.
 - The State or local agency must grant an exception to applicants who are qualified individuals with disabilities and are unable to be physically present at the WIC clinic because of their disabilities or applicants whose parents or caretakers are individuals

with disabilities that meet this standard (7 C.F.R. 246.7 (o)(2) Exceptions-(i)Disabilities). Examples of such situations include:

- A medical condition that necessitates the use of medical equipment that is not easily transportable;
 - A medical condition that requires confinement to bed rest; and
 - A serious illness that may be exacerbated by coming into the WIC clinic.
- Per USDA Federal Regulations, the mother must be present for her certification appointment unless she meets the exception for physical presence per the USDA Federal Regulations as outlined above.
 - Per Federal Regulations, applicants must be physically present at each WIC certification except for the circumstances listed above. If infants/children were not physically present for their initial certification visit and/or most recent certification visit within the last year, even while the USDA waivers were in place, they will need to be physically present even if they are receiving ongoing healthcare or have one or more parents/caretakers that work. The exceptions to being physically present per the USDA Federal Regulations are allowable, but not standard practice.
 - If an applicant has a serious illness that may be exacerbated by coming into the clinic, physical presence can be waived. Staff should use their best judgement as healthcare professionals to determine a serious illness that may be exacerbated by coming into the WIC clinic. If a healthcare provider has provided documentation that they do not want their patient coming to WIC, the documentation should be honored. The documentation from the healthcare provider should be scanned into the participant's record. The documentation would apply to the current in-person certification appointment. New documentation from the healthcare provider would be needed for the participant to be excused for any future in-person certification appointments.

The "Physical Presence Requirements" policy states "Medical exemptions should be approved in advance by the local WIC agency to ensure the appropriate documentation is provided in order to complete certifications". This is meant to ensure that appointments that meet the exemption for physical presence, should be approved ahead of time to ensure the participant has the needed information to complete the appointment.

Health Update Appointments

- Health Update appointments can be completed remotely.
- Infants, children, and breastfeeding women used to be required to be certified every 6 months. In 2011, new flexibilities were issued and Iowa chose to change certification periods to 1 year. Per USDA Guidance that was provided on August 29, 2011 in a document titled "Guidance for Providing Quality WIC Nutrition Services during Extended Certification Periods, extended certifications were granted based upon the following requirements:
 - "...provided the quality and accessibility of health care are not diminished."
 - "...no decrease in health and nutrition education services."
 - "...ensures that participant children receive required health and nutrition assessments."

Per the guidance document, due to the continued rise in overweight and obesity, participant heights and weights must be collected. Referral data should be less than 60 days old.

The guidance also states "For children over 1 year, CDC recommends that children have a blood test 6 months after the infant test, i.e., around 15-18 months of age. Pediatric health

authorities recommend a blood test during the 15-18 month time period because this is the most vulnerable time for children to manifest iron deficiency. State agencies are expected to make every effort to coordinate the scheduling of bloodwork for children between 12-24 months of age within the 15-18 month timeframe”.

Anthropometric measurements must be obtained at least once during the certification period, with measurements for children being collected 6 months after the certification appointment.

- If required hemoglobin and anthropometric measurements cannot be obtained from a referral source, they must be completed in-person at the WIC clinic. Every effort should be made to obtain anthropometric and bloodwork measurements for health update appointments, whether through obtaining the measurements through referral data or collecting the measurements at the WIC clinic. In obtaining referral data, a participant can provide the data if the documentation is from the healthcare provider source.
 - There may be extenuating circumstances which may make it difficult to collect these measurements. Efforts should be made to obtain these measurements, however benefits cannot be denied if the measurements cannot be collected as the participant is certified and is eligible for benefits.
 - If a health update is being rescheduled due to not having anthropometric or bloodwork data, consider completing pieces of the Health Update appointment by phone and then schedule a future appointment to collect anthropometric and/or bloodwork data.
- When issuing benefits for a Health Update appointment being completed remotely, mark the “No Signature Available” check box in the Signature Capture to User Pop-up. Select “HU- No physical presence”.

Nutrition Education Appointments

- Nutrition Education appointments can be completed remotely.
- When issuing benefits, mark the “No Signature Available” check box in the Signature Capture to User Pop-up. Select “NE - No physical presence”.

Referral Data

- The policies “Anthropometric Measurements” and “Blood Tests” were updated and provided via email on 10.13.2021. They were updated to include language that “WIC staff can take these measurements verbally from staff at the source (e.g. nurse at the doctor’s office or Head Start program)”. Verbal reports from the caregiver are not allowed.
- If WIC staff are obtaining referral data from a healthcare provider, a signed release of information form must be signed. If the participant is not physically present and it is not possible to obtain an actual signature on the form, the participant can document on a piece of paper the information required from the form, that they authorize the WIC agency to contact the documented entity, sign and date, take a picture, and email or text the picture to the WIC agency. The picture must be uploaded into the Focus system. If this is not possible, a verbal consent from the participant authorizing the WIC staff member to contact the healthcare provider is allowed. The contents of the release of information form must be read to the participant. If the participant verbally consents for staff to contact the healthcare provider regarding the contents discussed, you can. The CPA must document in the participant’s record that the contents of the release of information form was read to the participant and the participant gave verbal permission for the WIC agency to contact the healthcare provider.

Remote Appointments

- If an appointment is being completed remotely, they can be completed utilizing virtual technologies. Telephonic communication with standard documentation in clients' records are acceptable practices. Should both the contractor and the client have mobile technology, the IDPH encourages contractors to utilize technologies with end-to-end encryption. Security requirements for equipment and applications must meet requirements in the local agency's contract. Per 7 CFR 246.26 (d)(1)(i), applicant and participant confidentiality must be maintained no matter how the information is provided. Contractors and their subcontractors shall comply with contract requirements and USDA and IDPH policies and procedures to protect client confidentiality and assure security of the client information, including electronic files.
- If a participant is not physically present for a certification appointment due to the specified circumstances per USDA Federal Regulations, the appropriate reason must be chosen in Focus within the "Identity" panel for why the participant was not physically present.
 - Choose the reason "< 8 weeks of age" for infants under 8 weeks of age who cannot be present at certification for a reason determined appropriate by the local agency and for whom all necessary certification information is provided.
 - Choose the reason "Ongoing health care" if being physically present would pose an unreasonable barrier, an infant or child who was present at his/her initial WIC certification visit and is receiving ongoing health care.
 - Choose the reason "Work Schedule" for infants and children who were present at his/her initial WIC certification and was present at a WIC certification or recertification determination within the 1-year period ending on the date of the most recent certification or recertification determination and is under the care of one or more working parents or one or more primary working caretakers whose working status presents a barrier to bringing the infant or child into the WIC clinic.
 - Choose the reason "Medical condition" for applicants who are qualified individuals with disabilities and are unable to be physically present at the WIC clinic because of their disabilities or applicants whose parents or caretakers are individuals with disabilities that meet this standard (7 C.F.R. 246.7(o)(2) Exceptions- (i)(Disabilities). Examples of such situations include:
 - A medical condition that necessitates the use of medical equipment that is not easily transportable;
 - A medical condition that requires confinement to bed rest; and
 - A serious illness that may be exacerbated by coming into the WIC clinic.
- If a participant is not physically present for a certification appointment due to the specified circumstances per USDA Federal Regulations, proof of income, address, and identification can be provided electronically.
- It is preferable that the Rights and Responsibilities document is electronically signed within Focus. However, if this is not possible, the entire document should be read word for word to the participant. If the participant agrees to the content of the form, choose the following reason in Focus that a signature could not be captured: "R & R Verbally Confirmed". A copy of the document then must be mailed, texted, or emailed to the participant. See the policy "Physical Presence Requirements".
- When issuing/reissuing benefits remotely, verify the participant's date of birth, address, and phone number.