

Clinic Environment

Policy

USDA Federal Regulations:

(c) *State agency responsibilities.* The State agency shall perform the following activities in carrying out nutrition education responsibilities including breastfeeding promotion and support:

- (7) Establish standards for breastfeeding promotion and support which include, at a minimum, the following:
 - (i) A policy that creates a positive clinic environment which endorses breastfeeding as the preferred method of infant feeding.

USDA Federal Regulations:

(d) *Confidentiality of applicant and participant information – (1) WIC purposes.* (i) Confidential applicant and participant information is any information about an applicant or participant, whether it is obtained from the applicant or participant, another source, or generated as a result of WIC application, certification, or participation, that individually identifies an applicant or participant and/or family member(s). Applicant or participant information is confidential, regardless of the original source and exclusive of previously applicable confidentiality provided in accordance with other Federal, State or local law.

USDA Federal Regulations

(b) *Provisions of agreement.* The agreement between the State agency and each local agency shall ensure that the local agency –

- (4) Prohibits smoking in the space used to carry out the WIC Program during the time any aspect of WIC services are performed

FNS Instruction 113-1

1 Prominently display the USDA nondiscrimination poster “And Justice for All” or an FNS approved substitute, except in family day care homes.

USDA Federal Regulations:

- (a) *Accessibility.* A recipient shall operate each assisted program or activity so that when each part is viewed in its entirety it is readily accessible to and usable by qualified handicapped persons. This paragraph does not necessary require a recipient to make each of its existing facilities or every part of an existing facility accessible to and usable by qualified handicapped persons.
- (b) *Method.* A recipient may comply with the requirements of paragraph (a) of this section through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aids to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities in conformance with the requirements of § 15b.19, or any other method that results in making its program or activity accessible to qualified handicapped persons. A

recipient is not required make structural changes in exiting facilities where other methods are effective in achieving compliance with paragraph (a) of this section. In choosing among available methods for meeting the requirement of paragraph (a) of this section, a recipient shall give priority to those methods that serve qualified handicapped persons in the most integrated setting as appropriate.

Iowa Department of Public Health (IDPH) General Conditions:

33. Contractor's Certification Regarding Environmental Tobacco Smoke

- a. Public Law 103-227, also known as the Pro-Children Act of 1994 (Act), requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, early childhood development services, education or library services to children under the age of 18, if the services are funded by Federal programs either directly or through State or local governments, by Federal grant, contract, loan, or loan guarantee. The law also applies to children's services that are provided in indoor facilities that are constructed, operated, or maintained with such federal funds. The law does not apply to children's services provided in private residences; portions of facilities used for inpatient drug or alcohol treatment; service providers whose sole source of applicable Federal funds is Medicare or Medicaid; or facilities where WIC coupons are redeemed. Failure to comply with the provisions of the law may result in the imposition of a civil monetary penalty of up to \$1,000 for each violation and/or the imposition of an administrative compliance order on the responsible entity.
- b. The Contractor certifies that it will comply with the requirements of the Act and will not allow smoking within any portion of any indoor facility used for the provision of services for children as defined by the Act.
- c. The Contractor agrees that it will require that the language of this certification be included in any subcontract or sub award that contains provisions for children's services and that all subrecipients shall certify accordingly. Failure to comply with the provisions of this law may result in the imposition of a civil monetary penalty of up to \$1000 per day

34. Tobacco Free Environment

The Contractor agrees that will not allow smoking or tobacco use within any portion of any indoor facility it leases, rents, or owns, and over which it has the authority to establish policy. The Contractor agrees that is shall comply with Iowa's Smokefree Air Act, contained at Iowa Code chapter 142D.

Authority

USDA Federal Regulations: 7 CFR Part 246.11(c)(7)(i)

USDA Federal Regulations: 7 CFR Part 246.26 9(d)(1)(i)

USDA Federal Regulations: 7 CFR Part 246.6 (b)(4)

FNS Instruction 113-1: IX (B)(1), excerpt

USDA Federal Regulations: 7 CFR Part 15b.18 (a) – (b)

IDPH General Conditions: 33 and 34

Procedure

The clinic environment plays a large role in providing quality nutrition services to assist in participants achieving positive health outcomes and also can help in retaining participants. Participant centered services and exceptional customer service must be provided in a safe, respectful, child friendly, and clean environment that is conducive to participants achieving positive health outcomes.

There are requirements that must take place at clinic locations which are described within this policy.

Clinic Accessibility

The WIC Program must provide services to disabled clients. See the policy titled “Participants with Disabilities” for more information.

The Section 504/Americans with Disabilities Coordinator (see policy titled “Section 504/Americans with Disabilities Coordinator”) reviews all new clinic sites and ensures compliance with the “WIC Clinic Access Survey” (See the policy “WIC Clinic Access Survey” and “WIC Clinic Access Survey” form in the Organization and Management Forms section).

Smoking

No smoking is allowed in clinics.

Posted Signage

Clearly identify WIC and clinic hours at clinic entrances. Ensure signage conveys positive messages (e.g. Enjoy your food and drink outside) and images that are culturally diverse.

The following must be clearly posted at each clinic:

- Walk-in/late arrival policy
- Missed appointment or food instrument pickup policy (See policy titled “Missed Appointments and Food Instruments” policy.)
- No smoking sign
- “And Justice for All” poster. This poster must be posted in a prominent location and must be displayed at a minimum at entrances WIC participants may enter and in waiting areas. For more information, see the policy titled “Complaints”.

Safety

Provide a safe environment. Examples of how this can be accomplished include, but is not limited to the following:

- Childproofing the clinic area
- Ensuring that all equipment, medical supplies, and waste is kept out of reach of participants. This includes disposal devices.
- Barricading open stairways that are not in use
- Positioning electrical cords away from the traffic areas or tape cords to the floor to prevent tripping

Maintain Confidentiality

Participant confidentiality must be maintained. Examples of how this can be accomplished include, but is not limited to the following:

- Arranging clinic stations to minimize the ability to overhear other clinic conversations (e.g. using separate rooms or dividers, increasing the distance between stations, etc.).
- Using alternate methods to collect participant data to avoid others overhearing clinic conversations. The document titled “Information Collection Form” can be used to collect participant information without the participant verbally providing the information.
- Logging out of the data system when a computer is not in use.

Endorse Breastfeeding as the Preferred Infant Feeding Method

Breastfeeding must be endorsed as the preferred infant feeding method. Examples of how this can be accomplished include, but is not limited to:

- Promote breastfeeding throughout the clinic, including the waiting rooms
- Locate the breastfeeding area away from the clinic entrance
- Provide comfortable chairs with arms
- Select educational materials that portray breastfeeding as the preferred infant feeding method
- Display posters, pins, and buttons that promote breastfeeding
- Integrate breastfeeding promotion into each prenatal nutrition education contacts
- Include participant’s family and friends in breastfeeding education and support sessions
- Use print and audiovisual materials and office supplies that are free of formula product names
- Store formula out of view
- Develop a policy that discourages staff from accepting formula from manufacturers for personal use.
- Support breastfeeding-friendly workplace policies.

Collaboration with Other Programs

Many times other programs collaborate with the WIC Program and may be onsite during a WIC clinic. Participants are often able to utilize these services while attending WIC appointments. This collaboration is strongly encouraged, however staff must ensure that participants understand that these services are not WIC services, they are voluntary, and available in addition to their WIC benefits.

Best Practices**Clinic Signage**

It is strongly encouraged for signs to be posted:

- Indicating where the participant needs to go (e.g. Check-in, etc.)
- In the primary languages spoken in the clinic
- Indicating available breastfeeding areas

Creating a Positive Learning Environment

- Lessen barriers between you and the participant and promote rapport by:
 - Maintaining eye contact and focusing on the participant, not the computer
 - Shifting visual obstacles, such as computers, monitors, and large desk accessories to the side so they are not physical barriers between staff and participants
 - Sitting beside the participant
- Make use of waiting time between stations by providing a variety of nutrition education materials throughout the clinic, including posters, bulletin boards, educational displays, and newsletters.
- Limit distractions and noise levels of the clinic by:
 - Selecting clinic sites with carpeted floor areas
 - Keeping audiovisual equipment away from areas where one-to-one encounters occur
 - Keeping the room temperatures as comfortable as possible
 - Designate a supervised play area for children and/or offer activities for children

Breastfeeding Promotion

Follow the goals from the National WIC Association's (NWA's) National Breastfeeding Strategic Plan and steps from the NWA's Six Steps to Achieve Breastfeeding Goals for WIC Clinics.

The goals in the NWA National Breastfeeding Strategic Plan include the following:

- Promote and support exclusive breastfeeding for all mothers
- All WIC staff members are knowledgeable and skilled in breastfeeding promotion and support
- WIC is recognized as a community resource for breastfeeding promotion and support
- NWA and WIC agencies advocate for the development and implementation of local, state, and federal policies and procedures that protect, support, and promote breastfeeding

The NWA's Six Steps to Achieve Breastfeeding Goals for WIC clinics include:

- Step 1: Present exclusive breastfeeding as the norm for all mothers and babies
- Step 2: Provide an appropriate breastfeeding friendly environment
- Step 3: Ensure access to competently trained breastfeeding staff at each WIC clinic
- Step 4: Develop procedures to accommodate breastfeeding mothers and babies
- Step 5: Mentor and train all staff to become competent breastfeeding advocates and/or counselors
- Step : Support exclusive breastfeeding through assessment, evaluation, and assistance

The NWA's National Breastfeeding Strategic Plan and Six Steps to Achieve Breastfeeding Goals for WIC Clinics can be found at: <https://www.nwica.org/statement-on-progress-towards-the-gold-standard>.