

Contract Agency Policies and Procedures

Policy

USDA Federal Regulations:

(f) *Delegation to local agency.* The local agency shall provide Program benefits to participants in the most effective and efficient manner, and shall comply with this part, the Department regulations governing nondiscrimination (7 CFR parts 15, 15a, 15b), the regulations governing the administration of grants (2 CFR part 200, subpart A-F and USDA implementing regulations 2 CFR part 400 and part 415), Office of Management and Budget Circular A-130, and State agency and FNS guidelines and instructions.

Authority

USDA Federal Regulations: 7 CFR Part 246.3(f)

Procedure

WIC Contract agencies are required by federal and state regulations to develop agency policies and procedures for a variety of issues. This policy provides information about some of the policies and procedures required.

Policies and procedures should be reviewed annually and revised if necessary. An effective date shall be noted on each policy and procedure. Policies and procedures shall be available to appropriate staff.

Property Management Records

- Equipment records
 - Current inventory lists shall be maintained for all equipment. See Policy titled “Equipment Purchasing Guidelines”.
- Insurance
 - Agencies must have insurance coverage for:
 - Personnel
 - Financial resources
 - Physical resources, including data processing equipment
- Physical requirements
 - Policies and documents must be maintained that ensure
 - Compliance with the local fire code
 - Compliance with OSHA standards and regulations

- Adequate security for participant records and food instruments (See Policy “Local WIC Agency Data Processing”)
- A filing system that permits easy access to clinic, contract, and financial records for review.
- Voter Registration
 - Maintain policies and documents that ensure compliance with record-keeping provisions of the National Voter Registration Act of 1993. (See Policy titled “Voter Registration”.)

Personnel Policies

- Written personnel policies must include:
 - Conditions of employment
 - Leave and absence policies
 - Grievance procedures
 - Employee performance evaluation
 - Nondiscrimination clause
 - Section 504 and ADA compliance provisions
 - Employee orientation program
 - Provisions for career development or continuing education
 - Fringe benefits
- Personnel Documents
 - Your agency shall have the following personnel documents:
 - Written contracts for individuals or organizational contractors (See Policy titled “Subcontracts”).
 - Organizational chart or table
 - Salary schedules
 - Employment application form
 - Job descriptions including
 - Duties and responsibilities
 - Education and experience required
- Americans with Disabilities Act of 1990 (ADA)
 - Local agencies must appoint a Section 504/Americans with Disabilities Coordinator.
 - Local agencies must take necessary steps toward compliance with ADA. This includes, but is not limited to:
 - Review and revision of personnel policies and practices for compliance
 - Revision of job descriptions in terms of essential duties
 - Review and revision of agency forms such as employment application forms
 - Provision of reasonable accommodations upon request
 - Orientation of all supervisors to the tenets of ADA. The Section 504/Americans with Disabilities Coordinator as well as staff in charge of

hiring or training must complete ADA training within the first month of hire.

- See policy titled “Section 504/Americans with Disabilities Coordinator.”
- **Affirmative Action**
Revised Order No. 4 of Executive Order no. 11375 requires any agency employing 15 or more people and holding a contract exceeding \$50,000 to develop an affirmative action program and plan. The agency must:
 - Appointment an individual to be in charge of the affirmative action program
 - Adopt a Board-approved statement forbidding discrimination
 - Examine recruiting, hiring, and promotion policies, salaries, and all other conditions of employment
 - Develop data on all job classifications
 - Compare the demographics of its employees to that of the population and labor force of its service area
 - Identify areas of under-representation and develop a plan to correct them
 - Develop measureable goals, objectives, action steps, and timetables
 - Update the plan as the timetables dictate including:
 - Assessing progress in meeting goals and developing new goals, objectives, action steps, and timetables
 - Developing new goals, objectives, action steps and timetables
 - See policy titled “Equal Opportunity Affirmative Action Officer”.
- **Employment Advertising**
 - All advertisements for employment must carry an equal employment opportunity statement.
 - All qualified persons must receive consideration for employment.

Other required policies

- Other required policies include, but are not limited to the following:
 - Security Plan (See Policy “Local WIC Agency Data Processing”)
 - Staff Conflict of Interest Policy and signed forms (See Policy “Staff Conflict of Interest”)
 - Clinic Cancellation Policy (See Policy “Notification of Program Changes”)
 - Missed Appointment Policy/Food Instrument (FI) Pick-up Policy
 - Clinic Walk-in Policy
 - Formula Return Policy (See Policy “Infant Formula Returns”)

Best Practices

Maintain one-year of clinic services records that are not electronically filed in the WIC data system in an accessible, centralized WIC office or a permanent WIC clinic site. Clinic services records older than one federal fiscal year may be placed in long term storage. (See Policy titled “Document Retention”).