

STATE OF ALASKA

DEPT. OF HEALTH AND SOCIAL SERVICES
DIVISION OF PUBLIC ASSISTANCE

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FAMILY NUTRITION PROGRAMS
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Reply to: All Local Agencies Memorandum No-12-05

Date: February 23, 2012

Information- X

TO: X-LA WIC Coordinators
X-Satellites

Policy- x

Action-x

FROM: Kathleen Wayne *KW*
State WIC Manager

Routine (email and hard copy) - X

Urgent (fax and hard copy)-

SUBJECT: Frequently Asked Questions (FAQ) on Video-Certification and Nutrition Education Requirements

Video Certifications -

Question 1: It was mentioned that with video or Skype we should scan the room to see who else is in the room and take a quick look at the child. Is this a requirement or best practice recommendation?

Answer: The American Teleconference Standards are best practices for local agencies to use as a resource, not a requirement. Video-certifications still have to meet the same confidentiality requirements as face-to-face certifications.

Question 2: How does the grant amendment process work (as this is a non-monetary amendment)? I assume that the final grant amendment would be sent to each agency and need sign-off.

Answer: The State cannot say whether or not USDA will provide additional funds to implement the Video-certification requirements. The Western Region of USDA has stated that if the WIC grantee has access to polycom or telemedicine units, there should not be additional costs. However, if the local agency does not have access to polycoms or telemedicine units, or if there are additional costs to use the poly-com or telemedicine units, local agencies can submit a revised budget. Local agencies that are required to implement video-certification systems are required to submit an update to their service delivery plan and budget to the State WIC Office by Feb 29.

Question 3: Can clinics be reimbursed for Community Health Aid time to set up video connections, etc or to do heights and weights? if we pay for Health Aid time at one clinic, do we need to pay for it at all clinics?

Answer: See answers above. Unfortunately, the State WIC Office cannot predict what USDA will approve as far as additional costs to support this state specific requirement. The State may have one-time only funds to cover some costs and may include additional support under the WIC Funding Formula. Any changes to WIC funding will be dependent on what local agencies send to the State by February 29, 2012, as part of their updated service delivery plan and updated budget costs.

Question 4: Will there be additional funding for extra WIC staff time to do the video certifications? Coordinators understand there might be additional funding from USDA to do training during start-up and that they can request this from you by submitting a budget.

Answer: At this point, USDA has not offered additional funds to implement this state specific requirement. See answer for Question 3.

Question 5: Since we offer all of our services in person, do we need to submit a plan to the State of how we will provide virtual certifications?

Answer: The video-certification requirement relates to clients living in remotely located villages that are currently served through mailed application processes. Unless the local agency serves clients living in villages through mailed applications, the requirement does not apply and no updates are required.

Question 6: Would a local agency be able to apply for extra funds to purchase video certification equipment?

Answer: If the local agency would like to purchase video conferencing equipment and is not serve remotely located clients, you will need to find other grant funds for this purpose. Each October, USDA offers Operational Adjustment (OA) funds to support state and local agencies with one-time costs to support WIC services. Local agencies will be notified of OA funds as soon as the state receives the information and will include it in the Friday WIC Update.

Question 7: Would a local agency be able to begin offering video certifications to clients?

Answer: Video certification is only allowed for clients living in remote villages that have to be certified by mail. Certainly, there may be situations where it is difficult for a client to come to the WIC clinic, but at this point we are only requiring video-certification for local agencies that serve remote clients living in villages, and only 20% of those clients, not 100%.

Question 8: We currently have clients that prefer to drive to the local agency, but would we be able to offer them the video certification option?

Answer: The state office is not requiring all local agencies to provide video-certifications to serve WIC clients. If a local agency would like to offer video-certification to clients, they will need to submit an updated service delivery plan, but the state will not provide additional funds.

Question 9: How many times do we have to try to contact a client to schedule a video-certification appointment?

Answer: Local agencies will need to attempt to schedule at least two video-certification appointments before sending out nutrition education and benefits to a client. However, efforts must be made to help clients understand the value of nutrition education in order to effect positive changes in nutrition-related behaviors and overall health status for themselves as well as to model the same for their children. Attempts need to be documented in AKWIC.

Interactive Nutrition Education -

Question 1: How does secondary education work for high risk clients? If the client is seen by an RD at the initial certification, do they need different interactive contact during their certification (or would a regular interactive secondary education meet the requirements)? We understand that best practice may be an additional RD contact, but for some high risk clients there isn't much WIC can do once an RD contact is completed.

Answer: A high risk care plan should be developed which includes suggestions for the CPA to follow for the next 6 months. That should include suggested secondary interactive nutrition contacts, a repeat contact by the Registered Dietitian, weighing the client, additional iron checks, etc. Federal law does not address whether the local agency staff believe the nutrition education contact would be helpful or not. All WIC staff must offer the targeted nutrition education information that addresses the client's nutrition risks.

Question 2: Will there be a grant amendment for the interactive secondary education policy also?

Answer--Since the federal regulations have not changed, we will not amend the FY 12 WIC Grant agreement, however, LA Memo 12-03 Notice of Program Compliance clarifies the federal nutrition regulations and expectations for physical presence.

Question 3: Does interactive nutrition education need to be done by WIC staff? Historically EFNEP certificates of class completion have worked for secondary education. For example, would an IBCLC visit count as the secondary education? Would an MOA be required for the education to count (I don't believe we have had an MOA with EFNEP)? We understand it must be documented.

Answer: If an IBCLC is paid by the Breast Feeding Peer Counseling (BFPC) grant, it would not count as a secondary nutrition education contact under WIC. If the IBCLC is paid out of WIC grant funds, not BFPC, it could be counted. BFPC funds are to be used for activities that are in addition to current required WIC activities. If the IBCLC is paid by another funding source, for example Medicaid, then the contact can be counted under WIC.

Please note that if nutrition education services are provided by an agency other than the local agency, there should be a Memorandum of Agreement which outlines the expectations that those services include Value Enhanced Nutrition Assessment (VENA), Participant Centered Services (PCS), interactive nutrition education methods, and is targeted to client's nutrition risks. EFNEP education could be counted under risk 401-Failure to meet Dietary Guidelines.

Question 4: Who can complete education? Does it need to be a CPA or could it be front desk staff?

Answer: It is not directly stated in the federal regulations nor in the Alaska WIC Policy and Procedure Manual who can provide nutrition education. However, under Chapter 2 of the AK WIC Policy and Procedure Manual, page 24, it states that only CPAs can use the Nutrition Care Plans. In addition, WIC nutrition education contacts have to follow VENA, PCS, must target the client's nutrition risks, and must be an interactive nutrition education contact. The nutrition education must also be documented. Front line staff can receive this knowledge by becoming a CPA.

Question 5: Can a client refuse interactive secondary education and still receive WIC benefits.

Answer: 7 CFR 246.11 (a) (b) Nutrition Education— individual participants shall not be denied supplemental foods for failure to attend or participate in nutrition education activities. However, efforts must be made to help clients understand the value of nutrition education in order to effect positive changes in nutrition-related behaviors and overall health status for themselves as well as to model the same for their children..

Question 6: How many times do we need to offer nutrition education contacts for low-risk and high-risk clients?

Answer: Local agencies must attempt to contact the client at least twice for both low and high-risk clients before issuing a food package. For high risk clients, the local agency will need to also send a letter to the client notifying them that two or more attempts have been made to schedule an appointment with the WIC Registered Dietitian. A copy of the letter should be kept in the client's file and documented in AKWIC/SPIRIT system.

Here is suggested language:

“You have been referred to the WIC dietitian to discuss xxxxx. We have been unable to contact you to schedule an appointment. Please call NAME, RD, at your convenience. Her contact

information is xxx@xxxxxxx or xxx-xxxx. We want to make you aware of this important opportunity to support good health for you and your family.”

Question 7: Many clinics have tried to increase interactivity by having written questions after a client has read a bulletin board, brochure or newsletter. Would this qualify (we understand it would be ideal to relate the education to their risk factors)? Would this qualify as interactive if a staff reviewed their answers or discussed the bulletin board/newsletter?

Answer: Interactive display boards, pamphlets, brochures, and newsletters can be used to provide information to WIC clients, but of themselves, do not meet the requirement for a nutrition education contact and do not necessarily provide targeted nutrition information. WIC clients will need to talk with a CPA in-person, by phone, or through emails or use an approved web-based nutrition education system in order for it to be counted as a contact.

Question 8: I would like to set a 2 attempt rule of thumb. In other words, if the client dnka (did not keep appointment) twice or we have made 2 attempts to contact the client to set up an HR appointment without success, then we would count the two attempts as an effort was made on our part. Does this sound fair to you? Of course as the AK WIC policy manual states, the HR appointment would be at each new certification period and the 2 attempts would start over again.

Answer: All WIC clients should be given at least two opportunities to receive nutrition education, regardless if they are high- or low-risk. The two nutrition education contact opportunities should be documented.