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**From:** Wayne, Kathleen A (HSS)

**Sent:** Friday, May 30, 2014 3:39 PM

**To:** HSS DPA WIC Coordinators; Welch, Scooter (HSS Sponsored); O'Gara, Kathy (HSS Sponsored); Bennis, Don

**Cc:** HSS DPA WIC Juneau; HSS DPA WIC Anchorage; 'Danielle Rybicki' ([afdr@uaa.alaska.edu](mailto:afdr@uaa.alaska.edu))

**Subject:** WIC Update May 30

**Hi Everyone,**

Dana Kent will be on annual leave starting Monday, June 2 – Friday, June 20. If you have questions for Dana that cannot wait until her return on Monday, June 23, please forward them to Becky Carrillo at 465-8629 or [Rebecca.carrillo@alaska.gov](mailto:Rebecca.carrillo@alaska.gov). For SPIRIT related questions contact the SPIRIT helpdesk at 334-4900 or [wicspirithelpdesk@alaska.gov](mailto:wicspirithelpdesk@alaska.gov).

- 1. Secondary Nutrition Education Reminder--** As per the LA Memos 2013-03 rev 1 and 2013-5 regarding mandatory program compliance- Compliance with Nutrition Education Requirements, “For all agencies, nutrition education may be mailed to the client only after two attempts have been made to contact client, WIC grantees must document these nutrition education contact attempts in the client’s chart.” We are aware that there is conflicting guidance in some parts of the WIC P&P, so please follow these LA memos until further clarification is provided.
- 2. Chewing Tobacco—A Nutrition Risk?:** Chewing tobacco is not a currently recognized risk factor for WIC. Alaska WIC requested that it be added, and received the response:  
"Though chewing tobacco is recognized as having harmful effects on health, there is insufficient scientific evidence as to the relationship between nutritional status and the use of smokeless tobacco. The use of smokeless tobacco should not be used as a risk for any category of participant." WIC participants using chewing tobacco should still be encouraged to stop, and provided with appropriate referrals. Please document in the SOAP note. We will continue to request that the USDA add this risk factor, and if you have information about the dangers of chewing tobacco you'd like to include, please send it to Jennifer Johnson at [jennifer.johnson@alaska.gov](mailto:jennifer.johnson@alaska.gov).
- 3. Infant Food Checks:** The Vendor group has noticed that many infant food warrants are being underspent. Sometimes it looks like the family only got one jar of baby food on a warrant that would let them have 64 oz. Please be sure to have WIC staff review the table “Infant Food Quantities” in the Food List with all clients receiving infant food warrants to be sure they understand the amount of food they can have on each warrant. Please contact Jennifer Johnson (465-8104) with comments or suggestions.

4. **Logic Models:** In our effort to make the FY15 Logic Models a useful document, Jennifer Johnson has been meeting with coordinators by phone to discuss their current draft. If I haven't called you yet, please send me an email with a good time to meet next week. We'll follow this up with a meeting to think about Performance Measures on June 26, 2014 at 8:15 am. (This is the RD Working Group Meeting Slot, but we'll be talking about performance measures this time). Please add it to your calendar. Call Jennifer Johnson with questions or comments at 465-8104
5. **Social Media Campaign-** Working with DHSS Communications Manager Clay Butcher, the Alaska WIC Program is implementing a social media campaign on Facebook starting next week. It's timed to precede the opening of the Farmer's Markets, and to promote use of the fruit and vegetable voucher and the farmers market nutrition program vouchers at farmers markets. So keep an eye out! You'll be hearing more about how it worked at the fall Coordinator's meeting. Please call Jennifer Johnson (465-8104) or Sandra Harbanuk (465-4704) with comments or suggestions.
- 6.

**SPIRIT Tips and Reminders:**



⇒ **Reset Local Reference Data each day.** Logging off/on SPIRIT does not reset the data. You must right click the “W” in your task bar, and click on “Reset Local Reference Data.” The suggested procedure is to do this at the start of each day.

**Also remember to:**

- Only have one staff person in a participant's folder (record) at the same time.
- Only have one household member's folder open at a time.
- Change breastfeeding status or amounts through the Mom's record (Infants Born from This Pregnancy).
- Clear On-Site lists after running batch

**These practices can cause difficult data problems and erroneous benefit issuance if not followed.**

**SPIRIT Help Desk Info:**

Send all questions, issues and errors to the WIC SPIRIT Helpdesk at [wicpsirithelpdesk@alaska.gov](mailto:wicpsirithelpdesk@alaska.gov) or phone them at 907-334-4900.

Agency participation is available for April, 2014 in the State module. Select “File”, “System Outputs” and “Reports”. Next select “Reported Participation WIC – Monthly Unduplicated” (report# CLD016) in the drop down box to run April caseload for your agency.

# STATE OF ALASKA

DEPT. OF HEALTH AND SOCIAL SERVICES  
DIVISION OF PUBLIC ASSISTANCE

SEAN PARNELL, GOVERNOR

FAMILY NUTRITION PROGRAMS

-- JUNEAU

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Reply to: **All Local Agencies Memorandum No-12-03 Revision 1**

**Date:** May 16, 2012

**TO:** X-LA WIC Coordinators  
X-Satellites

**FROM:** Kathleen Wayne *KW*  
State WIC Manager

**Information- X**

Policy- x

Action-x

Routine (email and hard copy) - X

Urgent (fax and hard copy)-

**SUBJECT:** Revised Notification of Mandatory Program Compliance

**This version supersedes the previous version dated February 3, 2012.**

## **USDA State Technical Assistance Review (STAR)--**

**Video-Certification---**During the 2009 STAR the AK WIC Program was cited as non-compliant with federal regulations requiring all WIC applicants to be physically present at certifications. CFR 246.7 (o) (1) *Are applicants required to be physically present at certification?—(1) In general. The State or local agency must require all applicants to be physically present at each WIC certification.*

WR USDA stated in the FY 09 audit that they may withhold 100% of our program funds if it is determined the State Agency has failed to comply with its correction action plan, or any other requirements, as per CFR 246.19(a)(2).

The WIC Program Office has negotiated with WR USDA to require 20% of clients who cannot be seen in-person at certification, must be certified through video means instead of 100% of those clients. The State WIC Program Office is offering program funds, as necessary, to support additional grantee infrastructure costs to ensure compliance with the physical presence requirement.

In a subsequent email from USDA regarding the requirement for video-certifications to include nutrition assessment and counseling, it was stated, *"we (USDA) believe that the quality of service suffers when rural participants in Alaska are handled by mail or phone."* Alaska WIC will also be required to conduct video nutrition assessment and counseling for these same 20% of remote clients.

**Compliance with Nutrition Education Requirements--**During the FY 11 STAR the Western Regional Office of USDA cited that Alaska WIC is out of compliance with the full implementation of 7 CFR 246.11 Nutrition Education. The STAR cited, "Significant retraining needs to be provided to local agency staff with regard to nutrition risk assignment, food package assignment, and medical documentation to ensure proper assignments are made and required documentation is maintained.

The State needs to revise its nutrition education policies and develop a training plan to ensure local agency staff provides effective nutrition education through accepted media that is relevant to each participant's individual needs as identified through the nutrition assessment.

**State's Corrective Action Plan--** Based on feedback from WIC Local Agencies, the State WIC Program Office is implementing the following program requirements:

### **Video-Certification Requirements--**

By March 15, 2012, Alaska WIC grantees who serve clients that they do not see in-person will be required to certify twenty-percent (20) of those clients by video methods.

Allowed Systems for Virtual Certification—Alaska WIC grantees may use any of the following means to conduct virtual certification.

- PolyCom / AFCAN Carts
- WebX or Go To Meetings
- OWL <http://www.library.state.ak.us/dev/owl.html>
- Other type of secure virtual system

Virtual Certification Service Delivery Plan —By February 29, 2012 WIC grantees must submit to the State a plan of how they will provide virtual certification services. The plan must include:

- Number of WIC participants that are not see in-person during certification of eligibility determination.
- Virtual certification system used by grantee
- Budget—the majority of WIC grantees serving remote clients have access to existing Polycom or other conferencing systems within their organization. For these organizations, we anticipate that the process to implement certifications will have little to no additional infrastructure costs. However, if additional costs are identified that cannot be covered through existing program resources, please submit a budget itemizing and explaining the need for the additional costs.

#### **Compliance with Nutrition Education Requirements—**

By May 25, all WIC Grantees must fully implement the following WIC nutrition education requirements:

**Nutrition Education and Counseling--** all WIC CPAs must implement Participant Centered Education (PCE) skills during nutrition education and counseling client contacts, ensure that all nutrition education contacts are interactive, and that nutrition education materials are targeted to client’s nutrition risks. Interactive nutrition education contacts are defined as one of the following:

- Face-to-face
- Video
- Phone
- Electronic

WIC grantees that delivery nutrition education services to remotely located clients must also follow one of the four interactive methods. For all agencies, nutrition education may be mailed to the client only after two attempts have been made to contact client. WIC grantees must document these nutrition education contact attempts in the client’s chart.

WIC LAs must ensure that CPAs receive annual nutrition education and counseling training, are regularly monitored for demonstrating correct nutrition education and counseling skills, and documentation for training and monitoring requirements is kept on file for review during biennial-Management Evaluations.

**Nutrition Risk Assessment and SOAP Notes—**all WIC CPAs must assign correct nutrition risk codes and complete SOAP notes for all WIC clients. WIC LAs must ensure that CPAs receive annual PCE training, perform regular client charts audits to ensure correct risk codes are assigned and complete SOAP notes are written, and documentation for training and monitoring requirements is kept on file for review during biennial-Management Evaluations.

**Non-Compliance—**Any grantee who does not comply with these program requirements may have their grant payments withheld until the grantee comes into compliance with this or any other program requirement, or the grantee may be terminated.

**Resources—**Local Agencies should use the following resources when implementing these program requirements.

- AK WIC Nutrition Care Plans---  
<http://hss.state.ak.us/dpa/programs/nutri/downloads/LocalAgency/2010/AlaskaWICNutritonCarePlanManual-combined.pdf>
- UAA Training Modules ---Nutrition Assessment and “Documentation and Charting” Presentation from Spring 2011 WIC Coordinator’s meeting

- Participant Center Services PowerPoint—attached to Feb 3 WIC Friday Update and will be posted to AK WIC website.

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Reply to: All Local Agencies Memorandum No-12-05

**Date:** February 23, 2012  
**TO:** X-LA WIC Coordinators  
X-Satellites  
**FROM:** Kathleen Wayne *KW*  
State WIC Manager

**Information- X**

Policy- x

Action-x

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.