

1.0 Administration

Effective 02/25/2014

1.07 Local Agency Staffing

PURPOSE: This policy describes a team approach to ensure the delivery of quality WIC services. It is an overview of local agency administration, certification, nutrition education and breastfeeding staffing requirements. Policy statements define specific requirements for designated staff. Exhibits provide additional general duties that may be performed by various job descriptions.

A. POLICY:

1. Core Program Expectations of All Staff

- a. All staff shall have training and demonstrate support of WIC initiatives in the following:
 - i. Promotion and support of breastfeeding (See Policies 4.01 Breastfeeding Promotion, Protection and Support, 4.02 Breastfeeding Training)
 - ii. Client-centered approaches
 - iii. WIC Fair Hearing procedures (See Policy 1.04 Fair Hearing Procedures for Clients)
 - iv. Civil rights (See Policy 1.09 Civil Rights)
 - v. Nutrition education
 - vi. Community resources and referral
 - vii. Benefit issuance
 - viii. Maintenance of accurate recordkeeping
 - ix. Adherence to State and Local Agency policies and procedures

2. Program Administration

WIC Coordinator:

- a. The Local Agency WIC program must designate an agency representative as a WIC Coordinator to administer, plan, implement and evaluate WIC policies throughout the local agency and act as a liaison and contact with MDCH/WIC Division.
- b. The WIC Coordinator is responsible for:
 - i. Receiving and disseminating all State WIC communications to local agency staff.
 - ii. Meeting with WIC and agency staff to review policies and procedures, and share other program information.
 - iii. Assuring all WIC staff have opportunities to participate in meaningful continuing education activities, including nutrition and breastfeeding.
 - iv. Attending required state and regional meetings, and assuring that appropriate staff attends meetings and trainings as required.

- v. Assisting in planning annual budget, tracking monthly fiscal expenditures and revising budgets as needed.
- vi. Monitoring WIC caseload to sustain an average of 97% of assigned base caseload.
- vii. Requesting caseload adjustments to reflect community needs.
- viii. Assuring that all clients are offered and receive appropriate nutrition and breastfeeding education and support. (See Policies 4.01 Breastfeeding Promotion, Protection and Support and 5.01 Content of Nutrition Education.)
- ix. Maintaining a positive clinic environment for client-centered services and breastfeeding promotion and support. (See Policy 4.03 Clinic Environment.)

Breastfeeding Coordinator

- a. The local WIC Agency must designate a Breastfeeding Coordinator to provide coordination and evaluation for breastfeeding promotion, protection and support activities. (See 1.07A Breastfeeding Coordinator.)
- b. The Breastfeeding Coordinator must meet the following:
 - i. Registered Dietitian (R.D.) or Registered Nurse (R.N.) or qualifications for a CPA with at least one year of experience in breastfeeding counseling.
 - ii. Possess an advanced lactation management certification (e.g. CLS, CLC or CLE) or successfully complete lactation management training within one year.
- c. The Breastfeeding Coordinator must meet the following training requirements:
 - i. Attend Breastfeeding Coordinator Training within one year of position appointment.
 - ii. Receive on-going breastfeeding education and training. Suggested educational opportunities may include, but are not limited to:
 - Breastfeeding Coordinator Training.
 - Breastfeeding Basics, at least every five years.
 - WIC Annual Conference (sessions on breastfeeding).
 - Milk Expression Training (as available by MDCH WIC Program).
 - Breastfeeding conferences sponsored by hospitals, Michigan Association of Lactation Consultants (MALC), Western MALC, LaLeche League, etc.
 - Lactation Consultant Preparation Course, Lactation Educator Training Program, or Lactation Counselor Training Program.
- d. The Breastfeeding Coordinator is responsible for:
 - i. Keeping current with up-to-date breastfeeding information and disseminating the information to local agency staff.
 - ii. Planning and coordinating breastfeeding training/in-services for all local agency WIC staff at least four times a year. (See Policy 4.02 Breastfeeding Training.)
 - iii. Monitoring local agency breastfeeding rates.

- iv. In conjunction with the WIC Coordinator, completing the sections and goals related to breastfeeding in the Nutrition Services Plan.
- v. Evaluating educational materials for accuracy and positive presentation of breastfeeding. (See Policy 5.01 Content of Nutrition Education.)
- vi. Assessing the content of individual client contacts and group sessions that address infant feeding to assure that breastfeeding is presented as the norm for infant feeding. (See Policy 5.01 Content of Nutrition Education.)
- vii. Overseeing the local agency breast pump program. This includes the ordering, inventory, distribution and maintenance of breastfeeding equipment and completion of required documentation. (See Policies 4.01 Breastfeeding Promotion, Protection and Support and 4.04 Breastfeeding Equipment, Inventory and Maintenance.)
- viii. Identifying, coordinating and collaborating with community breastfeeding stakeholders.
- ix. Providing assistance to WIC clients when staff or peer counselors are faced with lactation issues beyond their scope of service.
- x. Managing, coordinating and mentoring the WIC Breastfeeding Peer Counselors unless the agency has made other arrangements with the State WIC program.
- xi. Collaborating with MSUE to manage the Mother-to-Mother Peer Counselor services within the WIC agency.

3. Certification Staffing

- a. A local agency must have adequate staffing to determine WIC eligibility (see Policy 2.01 Eligibility/Certification of Clients) and to provide benefits while maintaining separation of duties. WIC agencies shall implement separation of duties within the certification process so that one employee is not responsible for determining eligibility for all certification criteria and issuing food benefits for the same client. If an alternative to this is necessary, the local agency must follow the requirements in Policy 9.03, Employee Conflict of Interest.
- b. The following items must be performed during certification. They may be performed by any designated staff at the discretion of the local agency.
 - i. Determination of income eligibility.
 - ii. Performance and documentation of anthropometric measurements.
 - iii. Performance and documentation of hematological measurements.
 - iv. Administration of, and client assistance with, dietary and health histories if used.
 - v. Provision of information on client program rights and responsibilities, WIC foods and use of benefits.
 - vi. Assessment of client need for referral to other services.
 - vii. Issuance of benefits.

- c. The Competent Professional Authority (CPA) shall perform the following listed required duties during certification:
- i. Determine the client's nutritional risk.
 1. Assess anthropometric and hematological data. (See Policies 2.15 Anthropometric Risk Determination and 2.16 Hematological Risk Determination.)
 2. Assess health, diet, and breastfeeding history.
 - ii. Assess the need for services.
 - iii. Assign risk(s) with validation where applicable. (See Policy 2.13 Risk Determination.)
 - iv. Provide the following (See Policies 4.01 Breastfeeding Promotion, Protection and Support and 5.01 Content of Nutrition Education):
 1. Eligibility Explanation
 2. Nutrition education, including encouragement and support of breastfeeding
 3. Development of nutrition education plan for the current certification period based on client concerns
 - v. Prescribe food package benefits with approvals as needed. See Policy 7.01 Food Package Determination.
 - vi. Determine need for and authorize Class II formulas. Request local agency RD or MDCH WIC Division approval for Class III formula. (See Policy 7.03 Food Packages for Qualifying Conditions.)
 - vii. Make referrals to nutrition, breastfeeding, health, public assistance or community services. (See Policy 6.02 Referrals.)
 - viii. For all high-risk clients, including clients receiving Class III formulas, initiate a problem list, explain the benefits of RD services and schedule with a registered dietitian all high-risk clients for individual counseling and care plan development, or document client refusal of RD services. (See Policy 5.02 Required Services for Nutritional High Risk Clients.)
 - ix. Confirm that all certification criteria have been met.
 - x. Provide follow-up and documentation of care plan as assigned.
- d. The WIC staff functioning as a Competent Professional Authority (CPA) shall possess one of the following credentials:
- i. Physician
 - ii. Registered Dietitian
 - iii. Nutritionist (bachelor's or master's degree in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics or Public Health Nutrition)
 - iv. Physician's Assistant (certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority)
 - v. Registered Nurse
 - vi. Dietetic Technician Registered (emphasis in community/clinical nutrition)
 - vii. Home Economist (Bachelor's degree with emphasis in nutrition)

4. Nutrition Education Services Staffing

- a. Local agencies must designate a Nutrition Education Coordinator to plan, develop and evaluate nutrition education activities for the local agency.
- b. A local agency shall have adequate staffing to provide required nutrition education services to WIC clients. The services to be covered include general nutrition education and high risk nutrition counseling; breastfeeding education will be provided to appropriate clients – see section 5, Breastfeeding Staffing.
- c. The local agency shall assure that all WIC staff receives appropriate training, including VENA/client-centered education and breastfeeding education. (See Policy 4.02 Breastfeeding Training.)
- d. Minimum staff qualifications for nutrition services functions are defined in Exhibit 1.07G Nutrition Staff Roles.

5. Breastfeeding Staffing:

- a. By October 1, 2017 the local WIC Agency must appoint an International Board Certified Lactation Consultant (IBCLC) to serve as the lead breastfeeding technical support expert. In an agency where an IBCLC is not on staff, the agency must submit a plan for State approval. The plan must demonstrate how equivalent on-site technical support will be provided.
- b. The IBCLC must meet the following training requirements:
 - i. Maintain current IBCLC certification
 - ii. Keep current with up-to-date breastfeeding practices and information
- c. The IBCLC is responsible for:
 - i. Working directly with breastfeeding dyads in the clinic.
 - ii. Acting on all referrals from other WIC staff regarding complex breastfeeding situations beyond their scope of practice.
 - iii. Assessing complex breastfeeding situations and providing counseling to high-risk mothers and infants.
 - iv. Providing mentorship to WIC staff.
 - v. Providing technical lactation orientation for new WIC staff.
 - vi. Providing technical lactation updates/training to WIC staff at least twice a year.
 - vii. Assisting in content development of classes and other client educational opportunities to assure accuracy of the information presented.
 - iii. Assisting Breastfeeding Coordinator with recommendations for educational materials, breast pump orders and goals and objectives in the Nutrition Services Plan.

B. GUIDANCE:

1. It is recommended that the Breastfeeding Coordinator:
 - a. Develop and maintain effective communication and collaboration with other private and public health care systems, educational systems, and

community organizations to ensure optimal breastfeeding education and support for families by:

- i. Participating in local and regional breastfeeding coalitions and networks.
 - ii. Participating in breastfeeding promotion at meetings of local professional groups.
 - iii. Disseminating current and relevant breastfeeding information to local affiliates of professional groups and collaborating agencies.
- b. Develop a community breastfeeding resource list.
- c. Participate in outreach activities that promote breastfeeding by:
- i. Interacting with MDCH/WIC Division and other local WIC agencies to coordinate and implement breastfeeding promotion activities.
 - ii. Be a member of the State WIC Breastfeeding Workgroup (i.e. participate in meetings, if possible, and review minutes.)

Reference:

Federal Regulation; 7 CFR Part 246.2

Cross Reference:

- 1.09 Civil Rights
- 2.14 Risk Determination
- 2.15 Anthropometric Risk Determination
- 2.16 Hematological Risk Determination
- 4.01 Breastfeeding Promotion, Protection and Support
- 4.02 Breastfeeding Training
- 5.01 Content of Nutrition Education
- 5.02 Required Services for Nutritional High Risk Clients
- 6.02 Referrals
- 7.01 Food Package Determination
- 7.03 Food Package for Qualifying Conditions
- 9.03 Employee Conflict of Interest

Exhibits:

- 1.07A Local WIC Agency Breastfeeding Coordinator
- 1.07B Lactation Consultant/Educator
- 1.07C WIC Peer Counselor Supervisor/Coordinator
- 1.07D WIC Peer Counselor
- 1.07E MSUE Breastfeeding Peer
- 1.07F WIC Coordinator
- 1.07G Nutrition Staffing Roles