

3.0 Program Maintenance 3.02A Federal Ranking

Effective Date: 03/16/10

Federal Regulations on WIC Priority

Federal Priority Level Definition	MI-WIC Categories	Associated MI-WIC Risk codes
Priority I. Pregnant women, breastfeeding women and infants at nutritional risk as demonstrated by hematological or anthropometric measurements or other documented nutritionally-related medical conditions which demonstrate the need for supplemental foods.	PG, BE, BP, IBE, IBP, IFF	100, 200, 300 CODE SERIES
Priority II. Except those infants who qualify for Priority I, infants up to six months of age of Program participants who participated during pregnancy, and infants up to six months of age born of women who were not Program participants during pregnancy but whose medical records document that they were at nutritional risk during pregnancy due to nutritional conditions detectable by biochemical or anthropometric measurements or other documented nutritionally related medical conditions which demonstrated the person's need for supplemental foods.	IBE,IBP,IFF	700 CODE SERIES
Priority III. Children at nutritional risk as demonstrated by hematological or anthropometric measurements or other documented medical conditions which demonstrate the child's need for supplemental foods.	C1,C2,C3,C4	100, 200, 300 CODE SERIES
Priority IV. Pregnant women, breastfeeding women, and infants at nutritional risk because of an inadequate dietary pattern.	PG, BE, BP, IBE, IBP, IFF	400 CODE SERIES
Priority V. Children at nutritional risk because of an inadequate dietary pattern.	C1,C2,C3,C4	400 CODE SERIES
Priority VI. Postpartum women at nutritional risk.	NPP	ALL CODES
Priority VII. Individuals certified for WIC solely due to homelessness or migrancy and, at State agency option, previously certified participants who might regress in nutritional status without continued provision of supplemental foods.	BE, BP, NPP, C1,C2,C3,C4	501
Transfer Priority	ALL CATEGORIES	ALL CODES

3.0 Program Maintenance **3.02 Waiting List Maintenance**

Effective Date: 03/16/10

PURPOSE: To establish criteria for waiting lists for WIC clients and applicants in accordance with USDA regulation and policy.

A. POLICY:

1. All agencies, regardless of caseload, shall notify the state WIC Program if applicants/clients cannot be scheduled within the processing timeframes for applicants for a prolonged period of three months or more. (Refer to Policy 3.01, Processing Timeframes and Appointment Scheduling)
2. Agencies shall notify MDCH/WIC Division prior to discontinuing certifying or serving applicants of any waiting list group. Agencies may not fail to provide appointments for certain categories of clients (i.e. non-lactating postpartum women) without instituting a waiting list.
3. A waiting list is required if high priority clients cannot be scheduled within processing standards. Local agencies shall establish waiting lists when directed by the MDCH WIC Division, in order to provide additional certification appointments for high priority clients. The need for a waiting list is for creating priority certifications appointments, even if the local agency is meeting their current caseload requirement.
4. When a WIC agency has been given permission by the state WIC program to establish a waiting list, the WIC coordinator shall be authorized to initiate and maintain a waiting list in the MI-WIC system. Once the WIC Coordinator selects the Wait List Group check box, the Wait List process is established in MI-WIC.
5. When a Waiting List is initiated, current clients shall be notified of the implementation of a Waiting List.
 - a. Clients who have a recertification appointment scheduled within 20 days shall not have their appointments cancelled. These clients may be recertified. (Twenty days is given to provide a cushion for the required 15-day notification.)
 - b. Clients with an appointment scheduled more than 20 days from the initiation of the Waiting List shall have their appointment cancelled (this is performed automatically by MI-WIC). The appropriate cancellation notification will be automatically sent.
 - c. Local agencies shall provide all current clients without a scheduled certification appointment notice of placement on the Waiting List at the next appointment, or mail the notice if the appointment is missed.

6. Current clients in Wait List Order Groups shall continue to receive services until the end of their current certification period, since terminating such clients will not create additional certification appointment slots.
7. Transferring individuals within a valid certification period, regardless of priority ranking, shall be offered an appointment within 20 calendar days or as early as possible, so as not to interrupt program benefits. At the end of the certification period, the client will be ranked according to status and priority.
8. When making an appointment with a new applicant, ask if the applicant has a health or growth concern, as prompted by the MI-WIC system. This will place the applicant in the correct Wait List Order Group based on the response to the question.
9. Breastfeeding women who change category to non-lactating postpartum will be immediately wait-listed, provided their Actual Delivery Date (ADD) is within six months. Staff will need to manually add the client's record to the Appointment Waiting List in the CLINIC module, Scheduler menu of MI-WIC.
10. Verbal or written notice shall be provided to individuals belonging to wait-listed groups, including the following (See Policy 2.20 Notice of Ineligibility, Mid-certification Termination and Expiration of Certification):
 - a. Clients who will not receive a recertification appointment.
 - b. Applicants who will not receive an initial certification appointment.
 - c. Breastfeeding women whose infants are less than six months old and change category to NPP.
11. Clients/applicants who are offered waiting list status shall be referred to other programs, e.g. CSFP or Special Nutrition Assistance Program (SNAP), whenever possible.
12. Waiting lists shall be established and maintained according to priority Wait List Order Groups, which are based on Federal ranking. (See item 13 and 3.02A Federal Regulations on WIC Priority)

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13. If the six Wait List Order Groups below are insufficient, the state WIC consultant must be notified to assist in the wait list management process.

Wait List Order Groups (Fed. Priority Ranking)	Criteria for Placing on the Waiting List
1. Non-lactating Postpartum (VI)	non-lactating women who are over sixteen years old
2. Non-lactating Postpartum (VI)	non-lactating women who are sixteen years old and under
3. Children age four (V)	a. new applicants and whose screen did not identify a health or nutrition risk. b. who are due for recertification and are without a risk in the 100-300 code series in their present certification period.
4. Children age three (V)	a. new applicants and whose screen did not identify a health or nutrition risk. b. who are due for recertification and are without a risk in the 100-300 code series in their present certification period.
5 Children age two (V)	a. new applicants and whose screen did not identify a health or nutrition risk. b. who are due for recertification and are without a risk in the 100-300 code series in their present certification period.
6 Children age one (V)	a. new applicants and whose screen did not identify a health or nutrition risk. b. who are due for recertification and are without a risk in the 100-300 code series in their present certification period.

B. GUIDANCE

1. Note: MI-WIC will provide an estimate based on enrollment and past history of appointments to aid in selecting the Wait List Groups. MI-WIC will also provide tools for managing the Wait List, once it is established.
2. In the MI-WIC system, once a waiting list is established by the WIC Coordinator according to the above procedures, any future applicant meeting the criteria of applicants in a waiting list group will automatically be placed on the waiting list, which can be accessed in the Clinic module under the Scheduler menu. If the program determines it can serve clients on the waiting list, the check box “eligible for appt” can be checked. An appointment can now be scheduled for that client.

3. When the WIC Coordinator determines an entire Wait List Group can now be served, the check box for that group will be unchecked, removing that group from wait list status.

Note: Before the coordinator unchecks a Wait List Group in the Admin Module, all the clients in that group on the Waiting List in the Clinic Module must be removed from the Waiting List.

C. DEFINITIONS:

Priority Codes - Codes based on category and risk criteria (Policy 2.13, Nutritional Risk Criteria) as established by USDA in Federal Regulation. See Exhibit 3.02A.

Waiting List - List maintained by agency in order to provide WIC services to those at higher priority than others, according to federal regulations. The Waiting List specifies those Wait List Order Groups (and corresponding Federal Priorities) that will no longer be served by the agency until appointments can be provided within processing guidelines.

References:

CFR 246.7
USDA Policy Memo 92-12

Cross References:

2.13 Nutritional Risk Criteria
2.20 Notice of Ineligibility, Mid-certification Termination and Expiration of Certification
3.01 Processing Timeframes and Appointment scheduling

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Effective Date: 2/23/10

3.03 Dual Participation

PURPOSE: To prevent a client from enrolling and receiving program benefits at more than one WIC clinic (WIC/WIC) or Commodity Supplemental Food Program (WIC/CSFP) at a time.

A. POLICY:

1. The local agency is responsible for prevention and resolution of dual participation of clients within the WIC Program or with WIC and CSFP programs throughout the state. Dual Participation occurs when a client receives benefits from more than one WIC, or WIC and CSFP program during the same benefit month.
2. The local agency notifies the applicant/client of the illegality of participating in another WIC or CSFP program at each enrollment/certification (see 2.18A Michigan WIC Client Agreement).
3. Prevention of Dual Enrollment
 - a. At the time of application, the local agency shall document the required client information (client name, date of birth and gender) into MI- WIC for comparison with other enrollees to detect possible dual enrollment in another WIC clinic or CSFP/Focus:HOPE.
 - b. Local agencies shall take the following steps to prevent dual enrollment:
 - i. Perform a statewide search of all clients prior to performing a Precertification.
 - ii. If an existing client is identified, use that record.
 - iii. If an existing record is not identified, complete the Precertification screen.
 - iv. Resolve potential dual enrollees that occur on the Precertification screen immediately.
 1. Upon precertification, if a potential WIC/WIC dual enrollee is identified, WIC staff shall evaluate the information to determine if the client is actually a duplicate enrollee. A duplicate enrollee scenario occurs when more than one MI-WIC record exists for the same client. If the enrollee has an existing MI-WIC record, use that record.
 2. Upon precertification, if the system indicates the applicant is participating in Focus:HOPE/CSFP and the client now desires to be on the WIC program, the dual record must be resolved by selecting 'WIC' on the Resolve CSFP Dual Enrollment screen to request termination from CSFP **prior to completing certification**. Clients are permitted to receive CSFP benefits until the WIC certification can be completed.

4. Investigating and Resolving Potential System-generated Dual Enrollment Listings:
 - a. The WIC-WIC and WIC-CSFP Resolve Dual Enrollment screens and the reports derived from these matches may be accessed by authorized users at any time to determine the most recent matches. See 5a. and 6a. for frequency of MI-WIC system matches for WIC/WIC and WIC/Focus:HOPE dual enrollment.
 - b. The local agency shall review dual enrollment listings monthly, using the Resolve Dual Enrollment and Resolve CSFP Dual Enrollment screens or the WIC Dual Enrollment and WIC-CSFP Dual Enrollment reports in MI-WIC.
 - c. The local agency shall investigate/resolve each client listed as a WIC/WIC or WIC/Focus:HOPE CSFP dual enrollee within 45 days of identification by the MI-WIC system, and document the resolution on the appropriate screen.

5. Processing and Resolving WIC/WIC Dual Enrollment
 - a. The MI-WIC system detects WIC/WIC dual enrollment matches on a daily basis for clients who have an active record in the MI-WIC system.
 - b. The local agency shall record resolution of dual enrollment matches on the Resolve Dual Enrollment screen by determining which scenario applies and following the table below to resolve.

Scenario	Required Action
Not the same client	Select Resolve- Different Client
Same client; no overlapping certifications	<ol style="list-style-type: none">1. Determine which record has the most current certification information and designate that record as the active record.2. Use MI-WIC to select the resolution that will result in keeping the record with the most current information and blocking the other record.
Same client; overlapping certifications; no overlapping benefits	<ol style="list-style-type: none">1. Determine which record has the most recent benefit issuance and designate that record as the active record.2. Use MI-WIC to select the resolution that will result in keeping the record with the most current certification/benefit information remaining active and blocking the other record.

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<p>Same client; overlapping certifications; receiving overlapping benefits; no dual redemptions as verified in EPPIC</p>	<ol style="list-style-type: none"> 1. If duplicate records involve more than one local agency, contact the other local agency to coordinate resolution. 2. If necessary, contact the client to determine which record to designate as active. 3. If unable to contact the client by telephone, print and send the WIC-WIC Dual Participation letter. 4. After consultation with the client and other local agency when applicable, select the appropriate resolution option to result in keeping the desired record, and blocking the other record. If possible, void any outstanding benefits. 5. If there is no response to the letter within 45 days, terminate both client records using Termination Reason Dual Part, No Response. Note: If possible, void any outstanding benefits.
<p>Same client; overlapping certifications; overlapping benefits; dual redemption verified in EPPIC</p>	<ol style="list-style-type: none"> 1. Use MI-WIC to select resolution of Investigate. 2. Notify Compliance Investigator (see Policy 9.01 Client Compliance).

- c. If more than two matches are listed, the user must resolve each pair of clients separately.
- d. If overlapping benefit redemptions involve more than one agency, contact the other local agency to coordinate resolution of dual participation (i.e. to determine investigation strategies). See 9.01 Client Compliance.
- e. For all resolution types selected, automated notes will be added to the Client Notes section of both client records reflecting action taken.

6. Processing and Resolving WIC/Focus:HOPE CSFP Dual Enrollment

- a. The MI-WIC system detects WIC/Focus:HOPE dual enrollment matches on a weekly basis, including clients actively certified in WIC who later enroll in WIC/Focus:HOPE CSFP.
- b. The local agency shall record resolution of dual enrollment matches on the Resolve CSFP Dual Enrollment screen by determining which scenario applies and following the table below to resolve.

Scenario	Required Action
Not the same client	Select Not the Same Person.
Same client; client wishes to remain on WIC	1. Select WIC. 2. This results in a notification being sent to CSFP requesting termination.
Same client; client wishes to remain on CSFP	1. Select CSFP. 2. This results in the client being automatically terminated from WIC.
Client does not contact Program or no resolution is recorded	The MI-WIC system automatically terminates the enrollee 45 days from the date of notification.

- c. The MI-WIC system automatically sends a letter to all certified clients listed on the WIC-CSFP Dual Enrollment report requiring selection of either CSFP or the WIC Program to receive supplemental foods.
 - d. For all resolution types selected, automated notes will be added to the Client Notes section of both client records reflecting action taken.
 - e. For a client who has been terminated from WIC as a result of a WIC/Focus:HOPE CSFP Dual Participation match resolution or failure to respond to the letter and subsequently chooses to participate in the WIC Program, the local agency shall contact CSFP by phone to communicate client preference of WIC. This action shall be documented as a note in the client's record.
7. Processing and Resolving WIC/non-Focus:HOPE CSFP Dual Enrollment
- a. Local agency staff shall compare client information with non-WIC system-interfaced CSFPs (non-Focus:HOPE) in their communities at least every six months to detect dual enrollment.
 - b. If a dual enrollee is identified, the client shall be notified of the illegality of dual enrollment and requested to select participation in either WIC or CSFP (See 3.03A WIC-CSFP Dual Participation Notice). The local agency shall, at the same time, place a termination reason of Dual Part, No Response with a termination date 45 days from the date of the notification in the client's record.
 - c. The local agency shall document resolution of dual matches. Retain these CSFP client listings and resolution documentation for 3 years and 150 days. (See Policy 1.06 Record Retention and Destruction)

8. If the local agency suspects WIC/CSFP dual enrollment, staff shall contact CSFP to determine if the client is receiving benefits from CSFP.
 - a. If the client is not receiving benefits from CSFP, no further action is required.
 - b. If the client is receiving dual benefits and is redeeming WIC benefits, refer the case to the local agency compliance investigator (See Policy 9.01 Client Compliance).

9. The local agency shall follow Policy 9.01 Client Compliance for clients identified as dual participants.

B. GUIDANCE

1. Dual Enrollment reports provide a mechanism to monitor dual enrollment listings.

References:

Federal Regulations: 246.7 (j)(1), 246.7 (l)

Cross-references:

- 1.06 Record Retention and Destruction
- 2.18 WIC Client Agreement
- 2.20 Notice of Ineligibility, Mid-Certification Termination and Expiration of Certification
- 9.01 Client Compliance Policy

Exhibit:

- 3.03A WIC/CSFP Dual Participation Notice

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3.03A Dual Participation

Sample WIC-CSFP Dual Participation Letter

«date»

«wic clinic name»

«client name»

«client id»

«client dob»

«authorized person name»

«address»

«city, state zip»

Dear «authorized person»:

The WIC Program does not allow a person to be enrolled on Michigan WIC and Commodity Supplemental Food Programs (CSFPs). «Participant name» is listed on more than one program. You must choose one program by «date (= date of letter plus 45 days)», or «participant name» will be taken off both programs.

Please call or visit the program of your choice at «clinicname» at «telephonenumber», or << insert CSFP name>> at «CSFP telephone number».

If you have any other questions, or feel that you have been treated unfairly, please contact the WIC Program at «WIC telephone number».

<Insert Agency Name>

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