

Management Evaluation

WOMEN, INFANTS & CHILDREN

1. The WIC Program shall provide and follow administrative Fair Hearing procedures for individuals.

Reference: 7 CFR 246.9, 7 CFR 246.25, MI-WIC Policy 1.04, 2.18, 2.20.
ME: Administration

- 1.1 The WIC Program provides and implements a hearing procedure through which any individual may appeal a local agency action that results in the individual's denial of participation or disqualification from the WIC Program. (7 CFR 246.9, 7 CFR 246.25, MI-WIC Policy 1.04, 2.18, 2.20)

This indicator may be met by:

- a. The WIC Program makes available the Fair Hearing rules of procedure upon request. (7 CFR 246.9(h), MI-WIC Policy 1.04)
- b. The WIC Program ensures that all Fair Hearing requests (verbal or in writing) by applicants or clients are honored within stated timeframes. Fair Hearings are carried out as specified in WIC Policy and documentation related to the Fair Hearing is recorded in the MI-WIC System and maintained at the WIC Program for three years and 150 days after the close of the fiscal period. (7 CFR 246.9(k), 246.25, MI-WIC Policy 1.04)

Documentation Required:

- The most recent copy of the State issued Fair Hearing Flyer and Rules of Local Agency Fair Hearing.
- Fair Hearing records, if applicable.

Evaluation Questions:

- Observe that the Fair Hearing Flyer and the Rules of Local Agency Fair Hearing (MI-WIC Policy 1.04, Exhibit A, B) are available upon request. (a)
 - Ask coordinator if any Fair Hearings have been held in the past 3 years; if so, verify that the documentation is on file and that it conforms to the policy requirements. (b)
 - If no Fair Hearings have been held, ask staff what are the correct actions to be taken if an applicant or client asks for a Fair Hearing. (b)
 - Ask Coordinator to state how they handle a request for Fair Hearing from staff/client. (b)
- 1.2** The WIC Program informs each individual in writing of the right to a Fair Hearing, and of the method by which a hearing may be requested. (7 CFR 246.9, MI-WIC Policy 1.04, 2.18, 2.20)

This indicator may be met by:

- a. The WIC Program informs each individual at the time of initial enrollment/certification, and recertification, in writing, of their right to a Fair Hearing by giving them a copy of the “WIC Client Agreement” to review and a printed copy at initial enrollment/certification. (7 CFR 246.9(c), MI-WIC Policy 1.04, 2.18)
- b. A copy of the right to a Fair Hearing flyer is provided to each individual who requests a Fair Hearing or more information about Fair Hearings. (MI-WIC Policy 1.04, 2.18, 2.20)

Documentation Required:

Evaluation Questions:

- Observe certification procedures/review records to ensure the client/authorized person signs the WIC Client Agreement form and is given a copy at initial certification and offered a copy at subsequent certifications. (a)
- Ask/Observe that the most recent copy of the State issued Fair Hearing Flyer is provided to applicants and clients who request a Fair Hearing or more information about a Fair Hearing. (b)

2. The WIC Program shall not discriminate against any person on the basis of race, color, national origin, sex, age or disability; and compiles data, maintains records and submits reports as required to permit effective enforcement of the non-discrimination laws and confidentiality.

Reference: (7 CFR 246.7(b)(10), 246.8, 246.19(b)(2), 246.21(b), 246.26(d), MI-WIC Policy 1.03, 1.09, 9.02, FNS Instructions 113-1, 800-1. ME: Civil Rights)

- 2.1 The WIC Program ensures that no person, on the basis of race, color, national origin, sex, age or disability, is excluded from participation, denied benefits, or subjected to discrimination under the Program. (7 CFR 246.7, 246.8, 246.19(b)(2), MI-WIC Policy 1.09, 9.02)

This indicator may be met by:

- a. The WIC Program displays the USDA non-discrimination poster, "...And Justice for All" in a prominent place in each clinic site. (7 CFR 246.8(a)(1), MI-WIC Policy 1.09)
- b. The WIC Program includes the current USDA non-discrimination statement on all materials: developed by WIC, and used for WIC clients, applicants and the general public, and includes mention of WIC. (7 CFR 246.8(a)(1), MI-WIC Policy 1.09)
- c. The WIC Program collects and reports to MDCH WIC Division racial and ethnic participation data as required by Title VI of the Civil Rights Act of 1964. (7 CFR 246.8(a)(3), MI-WIC Policy 1.09)
- d. The WIC Program forwards all complaints of discrimination to the USDA, Director, Office of Adjudication. (7 CFR 246.8(b), MI-WIC Policy 1.09)
- e. The WIC Program takes reasonable steps to provide program information in appropriate languages to applicants and clients who need service or information in a language other than English. (7 CFR 246.7(j), 246.8(c), MI-WIC Policy 1.09)

- f. The WIC Program clinic areas, waiting areas and restrooms are clean, smoke-free, safe, handicapped accessible and barrier-free. (7 CFR 246.19(b)(2))

Documentation Required:

- Samples of materials developed by local WIC agency and used for WIC clients, applicants and the general public which include mention of WIC.

Evaluation Questions:

- Observe that the "...And Justice for All" poster is displayed in a prominent location in the clinic. (a)
- Review to ensure that the current USDA non-discrimination statement (see below) appears on each of the following local agency produced materials that mention the WIC Program. (b)

The U.S. Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer. (2/24/14)

- a. Application forms
- b. Outreach flyers/brochures/letters/posters/websites
- c. WIC newsletters

- Observe that the current non-discrimination statement “USDA is an equal opportunity provider and employer.” **(2/24/14)** appears in WIC advertising on newspaper, radio, TV, website and public service announcements. (b)
- Observe certification procedures to ensure that race/ethnicity is self-reported and recorded according to policy. (c)
- Ask to see any records for civil rights complaints/investigations for the past 3 years. (c)
- Ask staff what procedures are to be followed if an applicant or client wants to file a discrimination complaint. (d)
- Ask staff to whom does the agency forward all complaints of discrimination. (d)
- Ask staff in agencies serving non-English speaking clients, if interpreters or reasonable accommodations are made to provide program information and services in appropriate languages to applicants and clients. (e)
- Observe/ask staff how clients with physical handicaps are accommodated. (f)
- Observe that the clinic and waiting areas are clean and smoke-free (e.g., restrooms supplied with soap, toilet paper, etc.). (f)
- Observe that the clinic and waiting areas are safe for children (e.g., covers on electrical outlets, no sharp edges, no open stairways, toys are clean and large enough to prevent choking accidents). (f)
- Observe that there are safe places to change diapers, with proper diaper disposal containers. (f)
- Observe that the clinic and waiting areas are barrier-free (handicapped accessible). (f)

2.2 The WIC Program complies with FNS Instruction 113-1 and the Civil Rights Web-based Training Module. (7 CFR 246.8, MI-WIC Policy 1.09, FNS Instruction 113-1)

This indicator may be met by:

- a. The WIC Program trains new staff during orientation using the Michigan WIC Civil Rights Web-based Training Module and retakes the Michigan WIC Civil Rights Training Module once a year, maintaining records of the tests in MI-WIC Staff Training. (7 CFR 246.8(a), FNS Instruction 113-1, MI-WIC Policy 1.09)

Documentation Required:

- Review test results file documented in MI-WIC (or training log) to verify completion of the Michigan WIC Web-based Civil Rights Training Module for new staff and annual test results for the Michigan WIC Civil Rights Training for existing staff. (Admin/User Setup/Staff Information/training)

Evaluation Question:

- Verify that the agency has the Michigan WIC Web-based Civil Rights Training (starting 12/10/12) documented (with test score and date) in each staff member's MI-WIC User Training record or on file. (a)

- 2.3** The WIC Program restricts the use or disclosure of information obtained from program applicants and clients, and parents or caregivers of infant and child clients. (7 CFR 246.21(b), 246.26(d), FNS Instruction 800-1, MI-WIC Policy 1.03, 1.06, 9.02)

This indicator may be met by:

- a. The WIC Program keeps the names and addresses of clients and other members of the public confidential, except to the extent necessary to carry out the purposes of conducting an investigation, hearing or judicial proceeding, or for referral and outreach to other public health and welfare programs, where authorized in the WIC Client Agreement. (7 CFR 246.21(b), 246.26(d), FNS Instruction 800-1, MI-WIC Policy 1.03, 1.06, 9.02)
- b. The WIC Program provides privacy for applicants and clients while providing program services. (7 CFR 246.26(d), FNS Instruction 800-1, MI-WIC Policy 1.03, 9.02)

Documentation Required:

- Signed Michigan WIC Employee Agreements

Evaluation Questions:

- Observe and ask staff how the local agency keeps the names and addresses of clients confidential. (a)
- Ask staff, when is it appropriate to share and or release the name and address of a WIC client to a non-WIC official. (a)
- Review signed annual **Michigan WIC Employee Confidentiality And Compliance Agreement Signature Form** 9.02a. (a)
- Observe that client records are maintained and stored to protect confidentiality. (a)
- Observe that the facilities afford privacy for income intake, medical history and counseling. (b)

3. The WIC Program shall have staff that is competent and qualified to perform the necessary services for applicants and clients.

Reference: (7 CFR 246.2, 246.7(e), 246.10(b)(2)(iii), 246.11(c)(8)(ii), MI-WIC Policy 1.07, 5.06 9.03. ME: Administration, Record Review, Staff Qualifications and Roles)

- 3.1** The WIC Program has adequate, trained, qualified staff to provide required certification, breastfeeding and nutrition services to adult clients, parents or caregivers of infant and child clients and applicants. (7 CFR 246.2, 246.7(e), 246.10(b)(2)(iii), MI-WIC Policy 1.07, 9.03)

This indicator may be met by:

- a) The WIC Program has one or more Competent Professional Authorities (CPA) who meets the required qualifications to carry out duties as specified in WIC Policy. (7 CFR 246.2, 246.7(e), 246.10(b)(2)(iii), MI-WIC Policy 1.07)
- b) The WIC Program ensures that a Nutrition Educator, Nutrition Counselor (Registered Dietitian, RD/N), Non-Nutrition Health Professional, or a Nutrition Education Assistant, who meets the qualifications in WIC Policy, provides nutrition education. (MI-WIC Policy 1.07)
- c) The WIC Program has a WIC Coordinator who meets the required qualifications and carries out the duties as specified in WIC Policy. (MI-WIC Policy 1.07)
- d) The WIC Program has a WIC Breastfeeding Coordinator who meets the required qualifications and carries out the duties as specified in WIC Policy. (MI-WIC Policy 1.07)
- e) The WIC Program has designated a Nutrition Education Coordinator who meets the required qualifications and carries out the duties as specified in WIC Policy. (MI-WIC Policy 1.07)
- f) The WIC Program has appointed a Lactation Consultant/Educator who meets the required qualifications and carries out the duties as specified in WIC Policy. By 10/1/17, the expert must be an International Board Certified Lactation Consultant (IBCLC) or the agency has a MDCH/WIC Division approved Plan for these services. (MI-WIC Policy 1.07)

- g) The WIC Program has adequate staffing at each clinic to determine WIC eligibility and to issue benefits while maintaining separation of duties. (MI-WIC Policy 1.07, 9.03)
- h) The WIC Program has adequate staffing to offer RD counseling services in a timely manner (i.e., appointment openings within 30 days) at all clinic sites. (MI-WIC Policy 5.06)

Documentation Required:

- Resume/Curriculum Vitae (CV) for all staff performing CPA duties (assigning risk codes, food packages and client nutrition education plan).
- Copies of current licenses or registrations, if required, for CPA or RD - i.e., Registered Nurse (RN), Registered Dietitian (RD), Dietetic Technician, Registered (DTR).
- Nutrition Education staff Resume/Curriculum Vitae (CV).
- Resume/Curriculum Vitae (CV), job description for staff performing WIC Coordinator duties.
- Resume/Curriculum Vitae (CV), job description for staff performing WIC Breastfeeding Coordinator duties.
- IBCLC Certification or other allowed credential documentation for staff appointed to Agency Breastfeeding Expert position (IBCLC required by 10/1/17).
- WIC Roles Report
- Agency Organization Chart
- Staff orientation or training documentation
- Clinic schedules

Evaluation Questions:

- Review CPA resume/CV/licenses to verify credentials and qualifications as described in MI-WIC Policy 1.07(a). The WIC staff functioning as a Competent Professional Authority (CPA) shall possess one of the following credentials:
 - Physician
 - Registered Dietitian
 - Nutritionist (bachelor's or master's degree in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics or Public Health Nutrition)
 - Physician's Assistant (certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority)
 - Registered Nurse

 - Dietetic Technician Registered (emphasis in community/clinical nutrition)
 - Home Economist (Bachelor's degree with emphasis in nutrition)

- Review resume to determine that the staff who provide Nutrition Education meet the criteria outlined in MI-WIC Policy 1.07-Nutrition Staffing Roles Exhibit. (b)

- Observe that CPA, RD and Nutrition Education staff perform appropriate duties for their credentials and that other staff do not perform tasks designated to CPAs/RDs. (a, b)

- Observe and review Registered Dietitian(s) resume(s)/CV and current registration card to determine that the agency provides nutritional counseling with qualified professional staff. (b)

- Review WIC Roles Report-Confirm that staff have appropriate credentials for roles assigned. (a, b)

- Review clinic schedules to ensure that all clinics have NCRD appointments available within 30 days.

- Review credential requirements and credentials presented for each of the following staff who were appointed to their positions after the implementation date for Policy 1.07 in March 25, 2014.

WIC Coordinator: At a minimum for all WIC Coordinators hired after March 25, 2014 must have a four-year degree. It is strongly recommended that the degree be in a health related profession such as dietetics, nutrition, or nursing and the individual has a minimum of one year of job-related experience.

It is recommended that the Coordinator has coursework, training and/or experience in:

- Business or management background, to include personnel management,
- Program planning and evaluation, budgeting,
- Computer word processing and spreadsheet development/maintenance,
- Community/public health, outreach and program coordination.

BF Coordinator: The Breastfeeding Coordinator hired after February, 2014 must meet the following:

- Qualifications for a CPA with at least one year of experience in breastfeeding counseling.
- Possess an advanced lactation management certification (e.g. IBCLC, CLS, CLC or CLE) or obtain lactation management certification within one year.

Lactation Consultant/Educator: (IBCLC needed by 10/1/17 or CLS, CLE or CLC) must meet the at least one of the following:

- IBCLC-Internationally Board Certified Lactation Consultant
- CLE-UCLA Lactation Education Program
- CLS-Lactation Educator Consultants Certified Lactation Specialist
- CLC- The Center for Breastfeeding's Lactation Counselor Certificate Training Program

4. The WIC Program shall certify each applicant, seeking to use WIC benefits, as eligible or ineligible for the program.

Reference: 7 CFR 246.2, 246.7, MI-WIC Policy 2.01, 2.02, 2.03, 2.04, 2.05, 2.06, 2.07, 2.08, 2.09, 2.10, 2.11, 2.12, 2.13, 2.14, 2.15, 2.16, 2.18, 2.19, 2.20. ME: Client Eligibility/Certification, Civil Rights/Client Interview

- 4.1 The WIC Program performs the certification procedure at no cost to the applicant/client. (7 CFR 246.7(m), MI-WIC Policy 2.01)

This indicator may be met by:

- a. The WIC Program does not charge applicants or clients for services. (7 CFR 246.7(m), MI-WIC Policy 2.01)
- b. Clients offered lead testing or immunizations that require payment are informed that they do not have to accept these services to receive WIC benefits. (7 CFR 246.7(m), MI-WIC Policy 2.01)

Documentation Required:

- None

Evaluation Questions:

- Ask clients if the agency has ever charged for WIC services. (a)
- Observe that there are no costs to applicants for services. (a)
- Observe that clients offered lead testing, immunizations or other services that require payment are informed they do not have to accept these services to receive WIC benefits. (b)

- 4.2** The WIC Program verifies identity, residency, presence and income eligibility of WIC applicants. (7 CFR 246.7(d)(2), 246.7(i)(4)(5), 246.7(k), 246.7(l)(2), MI-WIC Policy 2.01, 2.02, 2.03, 2.04, 2.05, 2.06, 2.07, 2.08, 2.09, 2.10, 2.11, 2.12, 2.18, 2.19)

This indicator may be met by:

- a. The WIC Program verifies the residency, presence, proof of pregnancy and income of applicants and clients at the time of each certification (annual income verification for migrant farm workers and their families) and verifies identity at the initial certification according to policy. (7 CFR 246.7(d), MI-WIC Policy 2.01, 2.02, 2.03, 2.04, 2.05, 2.06, 2.07, 2.08, 2.09, 2.10, 2.11, 2.12, 2.18, 2.19)
- b. The WIC Program ensures that applicants/clients are interviewed to determine their family size at each certification. (7 CFR 246.7(d)(2)(j), MI-WIC Policy 2.08)
- c. The WIC Program ensures that foster children are a family of one and always income eligible. (7 CFR 246.7(d)(2)(iv)(c)(2), MI-WIC Policy 2.11)
- d. The WIC Program ensures that the applicant without required proof/verification at certification is “short-certified” (for 60 days if no proof of pregnancy, identity or residency, and 30 days for no proof of income) or if no proof exists, completes the WIC, “No Proof of Identity or Residency Declaration process,” or “No Income interview questions,” when applicable. (7 CFR 246.7(d)(2), MI-WIC Policy 2.02, 2.03, 2.04, 2.07, 2.10)
- e. The WIC Program determines income for migrant farm workers once every 12 months. A self-declaration of income must be used where proof of income cannot be provided. In-kind benefits are not included as income. (7 CFR 246.7(d)(2)(ix), MI-WIC Policy 2.12)
- f. The WIC Program accepts a WIC Verification of Certification (VOC), signed WIC Bridge Card, or one of the acceptable proofs of identity to receive benefits, once the applicant is enrolled. (7 CFR 246.7(k), 246.7(l)(2), MI-WIC Policy 2.03, 2.19)

Documentation Required:

- WIC Ineligible Client Report
- MI-WIC Expiring Short Certs Report

Evaluation Questions:

- Observe certification process to determine if identity (initial certification only), residency, presence, proof of pregnancy and income verification was correctly completed. (a)
- Observe that current Medicaid Eligibility is verified by use of MI-WIC, MI-Health Plan Benefits website, CHAMPS, MCIR or other confirmation. Observe that current Food Stamps/SNAP or FIP Eligibility are verified through the use of the XEROX phone/online system (verifying current month deposits). (a)
- Observe income determination and verification process to ensure that the family's total annual income is no greater than the current WIC Income Guidelines issued by the State or the client is verified adjunctively eligible. (a)
- Observe that identity is verified and documented for all new enrollees and new authorized persons. (a)
- Observe clients being interviewed during certification to determine their family size. (b and c)
- Observe or ask to determine if foster children are always assigned a family size of one. (c)
- Review records (Expiring Short Certs Report) to verify that clients who have no proof of residency, pregnancy, identity (initial certification only) or income at certification are provided a short certification/notice or have signed the no proof of residency or identity declaration form. (d)
- If there are no "short cert" or ineligible client listings with "no proof of income, identity, pregnancy or residency", ask staff when and how does the "no proof of residency, pregnancy, identity or income" process get used? (d)
- Observe/ask that clients who declare no income (and are not adjunctively eligible) are followed up using the "no income" pop up screen. (d)
- Observe and review records to verify that clients who are migrants have income verification performed every 12 months (according to VOC). (e)

- Observe and review records to verify that self-declaration of income is allowed when adjunctively eligible, migrant, homeless or works for cash, and that in-kind benefits and the value of Food Stamp/SNAP (Supplemental Nutrition Assistance Program) benefits are not included as income. (a, e)
- Observe that a VOC document or other identification is required to certify, obtain WIC benefits, recertify or transfer. (f)
- Observe or ask staff if the agency allows visual personal recognition by WIC staff at issuance of benefits or recertification once initial proof of identity has been obtained. (f)

4.3 The WIC Program uses the USDA/MDCH WIC nutritional risk criteria as a basis for certification. (7 CFR 246.7(e)(1), 246.7(e)(2), 246.7(g), MI-WIC Policy 2.13, 2.15, 2.16, 6.04)

This indicator may be met by:

- a. Health and Diet Assessment: The WIC Program screens health and diet information (including Client Assessment (CAR) Tool) at each certification, recertification and infant evaluation. Infants and children shall also be screened during child evaluations. (7 CFR 246.7(e)(1), 246.7(g)(1)(iv), MI-WIC Policy 2.13, 2.14)
- b. Anthropometric Assessment: The WIC Program requires or obtains a height or length, head circumference and weight measurement documented in the applicant's file at the time of certification, recertification and infant/child health evaluation in accordance with the Anthropometric Measurement Procedures Manual. (7 CFR 246.7(e)(1), 246.7(g)(1)(iv), MI-WIC Policy 2.15)
- c. Hematological Assessment: The WIC Program requires or obtains a hematological test as a screening tool to assess for low serum iron levels, as a part of the assessment for nutritional risk. The WIC Program requires asking if a child has had a blood lead screening test and referral if the child has not been tested. Hematological testing shall be performed according to the standard procedures established in the WIC Laboratory Procedure Manual. (7 CFR 246.7(e)(1), 246.7(g)(1)(iv), MI-WIC Policy 2.16, 6.04)

- d. Assignment of Risk: The WIC Program's Competent Professional Authority (CPA) determines an individual's nutritional risk by considering dietary, anthropometric, hematological, and health history assessments and assigns all applicable risks. (7 CFR 246.7(e)(2), MI-WIC Policy 2.13, 2.14, 2.15, 2.16)

Documentation Required:

- Active Client Records
- Required Laboratory Logs
- Local Agency Procedure for Retest Blood work

Evaluation Questions:

- Observe certification procedures to verify that:
 - a. The client MI-WIC screens, Health and Diet Questions form (if used) and Client Assessment Reference (CAR) Tools are reviewed with the client by the CPA to identify/validate risks. (a)
 - b. Anthropometric measurements are performed according to WIC Procedures. (b)
 - c. Anthropometric measurements utilized during the certification are obtained not more than 60 days prior to the certification (and for women, obtained during pregnancy or the postpartum period, depending on client status). (b)
 - d. The Hematological assessment is performed according to WIC procedures/policy. (c)
 - e. Observe staff asking if a child has had blood lead screening test and provide a referral if the child has not been tested. (c)
 - f. Blood work logs and records are maintained as required (c)
 - g. All applicable risks are assessed and accurately assigned, with required documentation. (d)

- 4.4** The WIC Program determines the categorical eligibility for pregnant women (PG), non-lactating postpartum women (NPP), breastfeeding women (BE and BP), infants (IBE, IBP, IFF), or children (C1, C2, C3, C4) (7 CFR 246.7(l)(2), MI-WIC Policy 2.01, 2.03, 2.10)

This indicator may be met by:

- a. The WIC Program determines the categorical eligibility at each certification or category change through interviews, birth record, proof of pregnancy, or assessment of pregnancy/breastfeeding status. (7 CFR 246.7(l)(2), MI-WIC Policy 2.01, 2.03, 2.10)

Evaluation Questions:

- Observe/ask staff how the breastfeeding category is determined. (a)
- Observe or review client records to verify that the agency:
 - a. Obtains proof of pregnancy, has verification of pregnancy/visible proof, or documents needed for proof to determine categorical eligibility. (a)
 - b. Women who claim to be pregnant, but have no verification or visible proof of pregnancy are enrolled without proof for 60 days using the “short-cert” process. (a)
 - c. Obtains physical proof of identity, including date of birth (i.e. birth or immunization record, Medicaid card), to certify new applicants. (a)

- 4.5** The WIC Program issues a completed Verification of Certification (VOC) to each family enrolled at each certification. (7 CFR 246.7(k), MI-WIC Policy 2.19)

This indicator may be met by:

- a. The WIC Program issues a current VOC to the client or proxy at each certification or recertification, which includes the following: name of WIC staff and signature. (7 CFR 246.7(k)(4), MI-WIC Policy 2.19)

Documentation Required:

- Completed VOC documents.

Evaluation Questions:

- Observe that a current VOC is issued, at each certification and recertification or upon transfer, and the VOC is explained to each new client. (a)
- Observe that the current mandatory information is contained on the VOC. The VOC should include the **printed name and signature of an agency official** in addition to the elements provided by MI-WIC. (a)

5. The WIC Program shall provide program services and benefits to applicants, adult clients, parents or caregivers of infant and child clients, and whenever possible, to child clients in an efficient and effective manner.

Reference: (7 CFR 246.3(f), 246.4, 246.7, 246.12(p), National Voter Registration Act of 1993, Public Law 101-147, MI-WIC Policy 1.10, 2.17, 2.18, 2.19, 2.20, 2.21, 3.01, 3.02, 3.03, 3.04, 6.01, 6.02, 6.05, 8.03, ME: Client Eligibility/Certification, Outreach and Referrals)

5.1 Program Referral and Access. The WIC Program provides applicants, clients, and parents or caregivers of infant and child clients (or proxies) with information on other health related, substance abuse treatment and public assistance programs, and when appropriate, shall refer applicants and clients to such programs. (7 CFR 246.7(b)(2), P.L.101-147, MI-WIC Policy 6.02, 6.05)

This indicator may be met by:

- a. The WIC Program provides written information and referrals regarding Medicaid to potentially eligible clients. (7 CFR 246.7(b)(2), MI-WIC Policy 6.02)
- b. The WIC Program advises and refers each client, parent or caregiver of the types of health and community services that may benefit the client, including Maternal Infant Health Program (MIHP)/Healthy Start/Nurse Family Partnership, etc., referrals for all pregnant women and infants. (7 CFR 246.7(b)(2), MI-WIC Policy 6.02, 6.05)
- c. The WIC Program makes available a list of local resources for drug and other harmful substance abuse counseling, prevention and treatment, where they are located, how they may be obtained, and why they may be useful at the first WIC visit and thereafter as appropriate. (Public Law 101-147, MI-WIC Policy 6.02)

Documentation Required:

- Written information is available in clinic regarding Healthy Kids/Medicaid/MI-Child/Healthy Michigan Plan enrollment.
- Information is available in clinic regarding local substance abuse counseling, prevention, treatment and referral programs.

Evaluation Questions:

- Observe/review that written information on Medicaid/MI-Child/Healthy Kids/Healthy Michigan Plan is available in the clinic. (a)
- Observe/review that a woman, infant or child with no health insurance is referred to Healthy Kids (Medicaid), Healthy Michigan Plan or MIChild for enrollment. (a)
- Observe/review that the local agency advises and refers each client, parent or caretaker of the types of health and community services available, including Maternal Infant Health Program/Healthy Start/Nurse Family Partnership for all pregnant women and infants, where they are located, how they may be obtained, and why they may be useful at certifications and infant and child evaluations. (b)
- Observe that a list of local resources for drug and other harmful substance abuse counseling, prevention and treatment is provided at initial visit and readily available to WIC clients. (c)

5.2 Processing Standards. The WIC Program serves applicants and clients, within the required timeframes and in an efficient and effective manner. (7 CFR 246.3(f), 246.7(f), 246.7(k), MI-WIC 3.01, 3.02, 3.04)

This indicator may be met by:

- a. The WIC Program certifies applicants (including providing benefits) within the following time frames: Within 10 calendar days of the initial contact by applicants who are pregnant and breastfeeding women, infants, migrant farm workers and homeless individuals. All other applicants are certified as eligible or ineligible or placed on a waiting list within 20 days of the initial request for benefit. (7 CFR 246.7(f)(2), MI-WIC Policy 3.01)
- b. The WIC Program provides transferring clients, who are currently eligible, a priority enrollment appointment within 20 calendar days of contacting the agency or as soon as possible so as not to disrupt benefits. (7 CFR 246.7(k), MI-WIC Policy 3.01, 3.04)
- c. The WIC Program notifies MDCH/WIC if the agency is currently not serving all client categories. (MI-WIC Policy 3.01, 3.02)

Documentation Required:

- MI-WIC “Clients scheduled outside of 10/20 day limit” report
- MI-WIC Waiting list report
- MI-WIC “Priority Enrollment by Category” report

Evaluation Questions:

- Verify availability of high priority appointments within 10 days of contacting the agency by utilizing MI-WIC to see when the next Cert/Pcert appointments are available. Review for 10-day appointment date window availability for Pregnant and Breastfeeding women and infants, homeless or migrant applicants to verify these applicants are scheduled for certification appointments within 10 days of contacting the agency. Review MI-WIC “Clients scheduled outside of 10/20 day limit” report. (a)
- Observe/verify that children and non-lactating women applicants are scheduled for an appointment within 20 days of contacting the agency, or placed on a waiting list, if a waiting list is in effect for the agency. Review MI-WIC “Clients scheduled outside of 10/20 day limit” and “Waiting list” reports. (a)
- Observe that newly certified clients (who are not currently hospitalized) are provided benefits immediately upon determination of eligibility. (a)
- Observe or ask staff if currently eligible transfer applicants with verification of certification are scheduled within 20 days, or without lapse in benefits and without rescreening. (b)
- Ask staff/verify that all client categories are offered appointments, or if not, that MDCH/WIC has been notified and a waiting list has been implemented. (c)

- 5.3** Certification Periods. The WIC Program certifies based upon the required certification periods for each pregnant, breastfeeding, non-breastfeeding, infant, and child category. (7 CFR 246.7(g), MI-WIC Policy 2.17, 3.04)

This indicator may be met by:

- a. The WIC Program certifies eligible clients for the certification periods specified in WIC Policy. (7 CFR 246.7(g)(i), MI-WIC Policy 2.17)
- b. The WIC program allows certification extensions according to WIC Policy. (7 CFR 246.7(g), MI-WIC Policy 2.17)
- c. The WIC Program certifies transfer clients for the certification periods specified on the Verification of Certification or other certification evidence provided or equivalent to the Michigan WIC Program period for that status, whichever is longer. (7 CFR 246.7(g)(ii), MI-WIC Policy 2.17, 3.04)
- d. The WIC Program schedules and performs evaluations mid-certification for infants and children who are enrolled for certification periods lasting eight months or more. (MI-WIC Policy 2.17)

Documentation Required:

- None

Evaluation Questions:

- Observe certification/review client records to verify that the certification period is assigned correctly for each client. (a)
- Observe certification/review client records to verify that the agency is allowing certification extensions per WIC Policy. (b)
- Observe/review client records to verify that transfer clients certification periods are based on the VOC or certification evidence provided or MDCH/WIC allowed period. (c)
- Observe evaluation/review client records to verify that the agency is scheduling/performing infant and child evaluations (IEVAL/CEVAL) as required. (d)
- Are benefits issued to clients who do not complete infant or child evaluations? (d)

- 5.4** Notification of Client Rights and Responsibilities. The WIC Program informs and provides applicants, adult clients, and parents or caregivers of infant and child clients with required rights and responsibilities information. (7 CFR 246.7(i)(8), 246.7(j), National Voter Registration Act of 1993, MI-WIC Policy 1.10, 2.18, 2.19, 2.20, 3.03, 8.03)

This indicator may be met by:

- a. At the time of initial entry, out-of-state transfer or Authorized Person change, the WIC Client Agreement is read by or read to the WIC applicant, client or Authorized Person, in a language that is understandable to that client. The client then signs the Agreement and is given a signed copy. At recertification, the client reviews and signs the WIC Client Agreement and is provided a copy upon request. (7 CFR 246.7(i)(8), 246.7(j), MI-WIC Policy 2.18)
- b. At each certification, every program applicant, client or caregiver is informed of the illegality of dual participation and benefit misuse, the importance of keeping WIC appointments, and the right to a proxy through review of the WIC Client Agreement. (7 CFR 246.7(j)(1-4), MI-WIC Policy 2.18, 3.03, 8.03)
- c. The WIC Program provides notices of ineligibility, mid-certification termination, short certification and expiration/termination of certification to applicants and clients as required. (7 CFR 246.7(j), MI-WIC Policy 2.19, 2.20, 2.21)
- d. At each certification, recertification or with change of address, the client is offered an opportunity to register to vote and the local agency sends the completed registration forms to county or township officials (forms may be sent as a batch) and declination forms are retained for 24 months. (National Voter Registration Act of 1993, MI-WIC Policy 1.10)

Documentation Required:

- Voter Registration declination forms, completed voter registration forms, Affidavit of Voter not in possession of Picture Identification Form (ID Affidavit).
- WIC Ineligibility Report

Evaluation Questions:

- Observe/review that the agency asked the client/authorized person to read (or read to) and sign the WIC Client Agreement at each cert/recert and receive a copy at least at the initial enrollment. (a)
 - Observe that during the initial certification visit, the applicant is notified about (b):
 - a. Proxy availability and responsibilities.
 - b. WIC-approved vendors.
 - Observe at recertification the authorized person/client is asked if they are having any problems using the WIC food benefits. (b)
 - Observe/review that the applicant/client, if not eligible, is given a "Notice of Ineligibility" which explains the reason for ineligibility and right to a Fair Hearing. (c)
 - Observe that the client is offered to register to vote or update their voter registration at every certification, recertification or when they report an address change. (d)
 - Observe that voter registrations are handled according to policy, including verification of photo ID using acceptable photo identification or completion of Affidavit of Voter not in Possession of Picture Identification Form (ID Affidavit) for clients completing Voter Registrations and declination forms are retained for 24 months. (d)
- 5.5** Dual Enrollment. The WIC Program identifies and prevents dual enrollment. (7 CFR 246.7(l), MI-WIC Policy 3.03)

This indicator may be met by:

- a. The WIC Program follows procedures to prevent dual enrollment during initial certification and routinely follows up possible or actual dual enrollees (WIC/WIC or WIC/CSFP) from the Dual Enrollment reports or screens. (7 CFR 246.7(l), MI-WIC Policy 3.03)

Documentation Required:

- Dual Enrollment Reports/screens

Evaluation Questions:

- Observe/review records to verify that all clients receive notification of the illegality of WIC and/or CSFP dual enrollment through the review of the “WIC Client Agreement” at each certification and recertification. NOTE: Verbal notice is NOT required by policy.
- Review WIC/WIC and WIC/Focus:HOPE/CSFP Dual Enrollment Reports/screens to verify documentation, follow-up/resolution and investigation pertaining to the possible dual enrollee. (a)
- Observe/ask staff how dual enrollment checks are acted on in MI-WIC prior to enrollment, certification or recertification. (a)
- Observe/ask when dual enrollees are designated as “investigate” (a)

- 5.6** Outreach. The WIC Program informs potentially eligible individuals in their service area about the availability of program benefits. (7 CFR 246.4(a)(7), MI-WIC Policy 6.01)

This indicator may be met by:

- a. The WIC Program publicly announces, at least annually, information about eligibility criteria for participation in their service area and location of local agencies. (7 CFR 246.4(a)(7), MI-WIC Policy 6.01)
- b. The WIC Program aims outreach toward high priority individuals, such as women in early pregnancy, homeless individuals and migrant farm workers and their families and eligible low income women not on Medicaid. (7 CFR 246.4(a)(7), MI-WIC Policy 6.01)
- c. The WIC Program disseminates program information to the general public including offices and organizations that deal with significant numbers of potentially eligible persons and collects information and updates community resources regularly. (7 CFR 246.4(a)(7), MI-WIC Policy 6.01)

Documentation Required:

- Outreach Plan MI-WIC/Activity Outreach Log and materials.

Evaluation Questions:

- Review outreach Plan Activity Log/MI-WIC records and supporting materials to verify the agency:
 - a. Announces publicly, at least annually, WIC eligibility criteria and locations. (i.e., website, newspaper) (a)
 - b. Has documented target outreach activities aimed at high risk individuals, such as pregnant women, homeless families and migrant farm workers and eligible low income women not enrolled on Medicaid. (b)
 - c. Coordinates outreach efforts with other programs, such as Lead, Breastfeeding Support, Maternal Infant Health Program (MIHP), Immunizations, Family Planning, Medicaid Outreach, and Department of Human Services. (c)
 - d. Sends and collects WIC outreach/program information to referring agencies. (c)

6. The WIC Program shall make nutrition education available to adult clients, parents or caregivers of infants and child clients, and whenever possible to child clients.

Reference: (7 CFR 246.11, 246.12 and FNS Guidelines and Instructions, WIC Policy Memorandum 2008-1, USDA WIC Nutrition Services Standards (2013), MI-WIC Policy 2.13, 4.01, 4.02, 4.03, 5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07) ME: Certification, Record Review and Nutrition Education

- 6.1 The WIC Program makes nutrition education available to clients, parents or caregivers of infant and child clients, directly, or through arrangements made with other agencies. (7 CFR 246.11, MI-WIC Policy 5.02)

This indicator may be met by:

- a. The WIC Program ensures that at least the required nutrition education (NE) contacts are made available during each certification period to all clients (through individual or group sessions). (7 CFR 246.11(e)(2), MI-WIC Policy 5.02)

Documentation Required:

- Record Review (NE, breastfeeding support screens, and past appointment records)

Evaluation Questions:

- Review nutrition education, breastfeeding support, NE Plan and appointment documentation from client records to ensure that the nutrition education is offered and documented as required. NE Plan represents offer of nutrition education if wichealth.org, self-directed education or education mall is offered. (a)
- Review process for scheduling and documenting NE offered.

- 6.2** The WIC Program ensures that client centered nutrition education bears a practical relationship to nutritional needs, household situations, clients' concerns, food preference, cultural and literacy needs. (7 CFR 246.11, P.L. 100-690, MI-WIC Policy 5.01, 5.03, 5.04, 5.05)

This indicator may be met by:

- a. The WIC Program includes assessment prior to nutrition education that explores the client's individual concerns, nutritional needs, socioeconomic factors, food preferences, language/literacy needs, cultural values and learning readiness. (7 CFR 246.11(b)(1-2), 246.11(e)(6), MI-WIC Policy 5.01)
- b. The WIC Program ensures that clients are given the opportunity to review previous nutrition education and ask questions, either immediately or at the next visit (especially for self-directed nutrition education such as; on site/education mall, wichealth.org, take-home modules) and qualified staff provide answers. (MI-WIC Policy 5.05)
- c. The WIC Program provides nutrition education that assists the client to achieve a positive change in health habits, improve nutritional status and prevent nutrition-related problems through optimal use of the WIC supplemental foods and other nutritious foods. (7 CFR 246.11(b)(2), MI-WIC Policy 5.01)
- d. The WIC Program's Competent Professional Authority (CPA) and the client together will develop a Nutrition Education Plan (NE Plan) at certification and Infant or Child Evaluation that prioritizes client health concerns for further education and support during the certification period. The Nutrition Education Plan identifies a topic and method (including breastfeeding support) to address these concerns. The CPA documents the NE Plan and provides a copy to the client. (MI-WIC Policy 5.01, 5.03, 5.04)
- e. The WIC Program ensures that information is available to raise awareness about the dangers of using drugs and other harmful substances. (7 CFR 246.11(b)(1), MI-WIC Policy 5.03)

Documentation Required:

- Record Review

Evaluation Questions:

- Observe that the CPA establishes rapport with the client (Welcome and Introduction).
- Observe that during the assessment, the CPA:
 - identifies and explores client concerns.
 - asks clarification questions in a caring/collaborative manner.
 - notes questions and acknowledges that education will follow the completed assessment.
 - reviews the Health History questions/screens and CAR Tool- if warranted, probes areas deeper. (a)
- CEVAL: Observes that the client/CPA focus is on health, eating and activity changes since certification assessment and summarizes the conversation in the assessment note. CAR tool is used only if needed to identify NEW medical conditions.
- Observe the CPA reviewing previous nutrition education provided, i.e. what actions the client tried, plans or questions the client has. Is there affirmation/support of client positive changes and progress? (b)

NOTE: If follow-up occurs before next clinic recert/evaluation, do qualified staff ask open-ended questions, provide answers and support and offer referrals as appropriate, especially for clients who complete self-directed nutrition education (on site/education mall, wichealth.org, take-home modules). (b)

- Observe that the client education provided reflects the client's concerns and needs while stressing the relationship between proper nutrition, and good health. (a)
- Observe the CPA summarize the concerns identified and ask client what they would like to work on? (a)
- For current education, observe that the CPA and client discuss (a) topics and (b) client behavior changes based on client concerns? Look for the CPA suggestions for anticipatory education? (c)

- Observe that the client's nutrition education promotes positive change in food/health habits; improved nutritional status through use of WIC foods and other nutritious foods and prevention of nutrition/health related problems. Open-ended questions and motivational interviewing are used to encourage client dialogue. (c)
- Observe the CPA stresses the positive long-term benefits of nutrition education and encourages the client to attend and participate in nutrition education activities? (MI-WIC Policy 5.03) (c)
- Observe that the client and CPA determine the Nutrition Education Plan for the client, based on client concerns. Nutrition Education topics are suggested; the client may select alternate topics. (d)
- Observe that the CPA reviews NE Plan (onscreen or hard copy, 5.01D) with client . (d)
- Observe/review that the client received a copy of the NE Plan at each certification/recertification and infant/child evaluation. (d)
- Review client record for documentation of the Nutrition Education Plan. (d)
- Observe that information is provided to each new enrollee/client that raises awareness about the dangers of using drugs or other harmful substances. (Welcome to Michigan WIC brochure, and/or NE Plan document). (e)
- Does the CPA close the interaction with the client on a positive note? (Express appreciation for their time and let them know you are looking forward to hearing how things go.)
- Verify that clients who complete wichealth.org modules have EBT benefits loaded without requiring clinic visits. (e)

- 6.3** The WIC Program provides an eligibility explanation for each client at certification and recertification. (7 CFR 246.11(a-f), WIC Policy Memorandum 2008-1, MI-WIC Policy 5.03)

This indicator may be met by:

- a. The WIC Program's Competent Professional Authority (CPA) provides and documents that the Eligibility Explanation has been given to each client at certification and recertification with the following components:

- "You are being enrolled in WIC today because WIC's services (food, nutrition education, referrals and breastfeeding information and support) can help with your health concerns." (NE Plan)
- Food benefits provided from WIC enrollment are supplemental to other sources of food and meant for the client, not the household. (Client Agreement)
- For pregnant women, encouragement to breastfeed unless contraindicated for health reasons.
- For postpartum women, encouragement to continue breastfeeding.

(7 CFR 246.11(a)(b), WIC Policy Memorandum 2008-1, MI-WIC Policy 5.03)

Documentation Required:

Evaluation Questions:

- Observe that the client's eligibility explanation is given and documented during certification/recertification (e.g., Welcome to WIC Program brochure, Nutrition Education Plan and WIC Client Agreement). (a)
- Observe that the CPA and other WIC staff provide verbal encouragement to breastfeed to pregnant women. (a)
- Observe that the CPA and other WIC staff provide verbal encouragement to continue breastfeeding to women who have initiated breastfeeding. (a)

- 6.4** The WIC Program shall assure that nutrition education provided contains client centered, accurate and up-to-date nutrition information. (7 CFR 246.11, MI-WIC Policy 5.01)

This indicator may be met by:

- a. The WIC Program maintains written group or self-directed lessons for each topic area used/offered for nutrition education. (MI-WIC Policy 5.01)
- b. The WIC Program reviews common, frequently used nutrition education materials for appropriateness using MI-WIC Policy Exhibit 5.01C. (MI-WIC Policy 5.01)

Documentation Required:

- Group/Self-Directed Nutrition Education Modules/Lesson Plans-related MI-WIC Policy Exhibit 5.01 E.
- Nutrition Education Materials-related MI-WIC Policy Exhibit 5.01 C evaluations.

Evaluation Questions:

- Review nutrition education lesson plans to verify that the agency maintains lesson plans for group or self-directed nutrition education. (a)
- Review modules to verify that nutrition education lessons:
 - a) Have an evaluation component to assist the client in achieving a positive change in health behavior, resulting in improved health or nutritional status. (a)
 - b) Lessons include all required components outlined in MI-WIC Policy Exhibit 5.01C). (a)
 - c) Are appropriate for the racial ethnic diversity of populations served. (a)
- Review reinforcements/materials to verify that:
 - a) Reinforcements/materials are evaluated for appropriateness using MI-WIC Policy Exhibit 5.01C. (b)

- b) Reinforcements/materials are written in plain language and targeted at client reading levels (acceptable range 4th-8th, preferred, 4-6th grade), with some exceptions for acceptable WIC terms (i.e., breastfeeding, nutrition education, supplemental, nutritionist/RD, formula, obesity, vitamins, minerals, vegetables) and for meeting individual client needs, if client demonstrates higher reading levels. (b)
- c) Reinforcements/materials are appropriate for the racial ethnic diversity of populations served. (b)

6.5 The WIC Program promotes, protects, and supports breastfeeding. (7 CFR 246.11(c)(7), 246.11(c)(8), MI-WIC Policy 1.07, 4.01, 4.02, 4.03)

This indicator may be met by:

- a. The WIC Program creates a positive clinic environment, which endorses breastfeeding as the preferred method of infant feeding. (7 CFR 246.11(c)(8)(i), MI-WIC Policy 4.01, 4.02, 4.03)
- b. The WIC Program incorporates task-appropriate breastfeeding promotion and support training into orientation programs for new staff involved in direct contact with clients. (7 CFR 246.11(c)(8)(iii), MI-WIC Policy 1.07, 4.01, 4.02, 4.03)
- c. The WIC Program sensitizes local agency staff to their own attitudes and beliefs about breastfeeding, provides continuing education on breastfeeding initiation and maintenance, and informs staff on state and national activities, which promote, protect and support breastfeeding. (MI-WIC Policy 1.07, 4.01, 4.02, 4.03)
- d. The WIC Program provides breastfeeding education and support during the prenatal and post-partum periods for women, infants and children. (7 CFR 246.11(c)(8)(iv), MI-WIC Policy 1.07, 4.01, 4.03)

Documentation Required:

- Breastfeeding friendly clinic environment checklist
- Staff training log or meeting minutes
- Record Review

Evaluation Questions:

- Observe that the facility provides an area conducive to breastfeeding that includes comfortable chairs with arms, and is away from the entrance. (b)
- Observe that the clinic is a breastfeeding positive environment (i.e., Breastfeeding friendly signage, breastfeeding posters in all client areas, no formula displayed). (b)
- Ask how all new staff become oriented to breastfeeding and are provided continuing breastfeeding training at least on a quarterly basis. (c, d)
- Review/observe that Breastfeeding support and documentation (i.e., Breastfeeding Assessment/Support, Breastfeeding Statistics) is completed as required for pregnant women, breastfeeding women, infants and children. (e)
- Review/observe that Breastfeeding Peers are providing education, support and documentation of actions in client records. (e)

- 6.6** The WIC Program makes nutrition counseling services available to clients, and parents or caregivers of infant and child clients identified at nutritional high risk or who receive Class III formulas. (7 CFR 246.12(e)5, USDA WIC Nutrition Services Standards (2013), MI-WIC Policy 1.07, 2.13, 5.01, 5.06)

This indicator may be met by:

- a. The WIC Program identifies and offers high risk and Class III formula clients opportunity to meet with the Registered Dietitian (RD) for assessment and for development of an individualized care plan. If the client refuses the opportunity to meet with the RD, this action must be documented in the client record. (MI-WIC Policy 2.13, 5.06)
- b. The WIC Program ensures that a Registered Dietitian is accessible to see nutrition high-risk clients, completes the nutrition assessment, and develops individual care plans (ICP) based on client concerns or documents that a care plan is not needed. (USDA WIC Nutrition Services Standards (2013), MI-WIC Policy 5.06)
- c. The CPA documents the nutrition high risk condition and creates a problem list. (MI-WIC Policy 2.13, 5.06)

- d. The WIC Program monitors nutrition high risk and Class III formula clients to ensure that clients receive appropriate nutrition care. (MI-WIC Policy 5.06)

Documentation Required:

- High Risk Client Report/Records
- Record Review-Nutrition Care Plans for High Risk Clients
- Class III Formula Report

Evaluation Questions:

- Observe that scheduling for the RD visit (NCRD) is offered as a routine part of the WIC Program to encourage utilization of RD services. (a)
- Observe that High Risk clients are explained the benefits of counseling and encouraged to take advantage of this individual service? (a)
- Review high risk/Class III client records to determine if services with the RD are scheduled/offered and documented. (a)
- Review clients' individual care plans for appropriate content and complete documentation. (b)
- Observe that high risk counseling provided meets client concerns and high risk guidelines or ask how the counseling provided meets high risk guidelines. (b)
- Observe that CPA's are documenting problem lists, where applicable on the Problem List tab of the Individual Care Plan screens. (c)
- Review documentation of how agency monitors high risk services, i.e., observation, record reviews, client interviews. (d)

7. The WIC Program shall make food packages available to clients that are prescribed or approved by the MDCH WIC Division, which take into account the client's age and dietary needs.

Reference: (7 CFR 246.10, MI-WIC Policy 1.07, 7.01, 7.02, 7.03, 7.04, 7.05, 7.06, 8.04, 8.05, 8.06, ME: Client Eligibility/Certification, Record Review)

7.1 The WIC Program notifies clients about authorized foods and provides clients the authorized Food Guide. (7 CFR 246.10, MI-WIC Policy 7.02, 8.06)

This indicator may be met by:

- a. The WIC Program informs authorized persons, clients or proxies of the foods that may be purchased with WIC food benefits by providing a current WIC Food Guide and explaining its use. (MI-WIC Policy 7.02, 8.06)
- b. The WIC Program notifies clients of changes to the authorized Food Guide, as soon as possible, when a food has been removed from or added to the eligible list. (MI-WIC Policy 7.02)

Documentation Required:

- Any state or local agency materials regarding authorized foods, if used.

Evaluation Questions:

- Observe that during the initial certification, the current WIC Food Guide was explained and provided to clients. (a)
- Observe that the current WIC Food Guide and Formula Insert is provided as needed (Formula insert issued only when family uses infant formula). (a)
- Ask/observe that the local agency notifies clients of changes in the authorized Food Guide in a timely manner, and provides materials as indicated. (b)

- 7.2** The WIC Program's Competent Professional Authority (CPA) assigns food packages that are appropriate for clients, taking into consideration their age and dietary needs. (7 CFR 246.10(b)(2)(iii), 246.10(c), MI-WIC Policy 1.07, 7.01, 7.03, 7.04, 7.05)

This indicator may be met by:

- a. The WIC CPA assigns a maximum food package unless the maximum is not appropriate for the client, taking into consideration the client's age, nutritional needs, the quantities and types of supplemental foods prescribed, food preferences, household conditions, and to adjust for breastfeeding mothers and breastfed infants. (7 CFR 246.10(c), MI-WIC Policy 1.07, 7.01, 7.03, 7.04, 7.05)
- b. The WIC CPA makes available to the client at least one food from each group based on client category and type of food package allowed. Foods are excluded or lessened if the client declines any of the foods offered in the package, or if the CPA determines the food is contraindicated for the client due to a special medical problem. (7 CFR 246.10(b)(2), 246.10(c), MI-WIC Policy 7.03, 7.04, 7.05)

Documentation Required:

- Client Record

Evaluation Questions:

- Observe and/or review records to verify the CPA determines and assigns an appropriate food package based on WIC Policy and the client's needs. (a, b)
- Observe and/or review records to verify that Partially Breastfed Infants (IBP) receive a food package based on their current breastfeeding/formula use. (a, b)
- Observe and/or review records to determine that no infant formula is received when the Breastfeeding Exclusive woman receives a BE package. (a, b)

- 7.3** The WIC Program provides special dietary formula and food packages to clients based on medical documentation (7 CFR 246.10, MI-WIC Policy 1.07, 7.03).

This indicator may be met by:

- a. The WIC Program CPA/RD approves and provides special dietary formula and food packages as indicated for clients with special dietary needs, based on complete medical documentation received for:
- Standard infant (Class I) formulas after 1 year of age.
 - Soy beverage food package for children.
 - Hypoallergenic infant (Class II) formulas.
 - Specialty formulas (Class III).
 - Other special food packages as indicated per policy. (7 CFR 246.10(c)(1), MI-WIC Policy 1.07, 7.03)

Documentation Required:

- Formula Usage Report
- Ad hoc soy beverage report

Evaluation Question:

- Using clients selected from the Formula Usage Report and ad hoc soy beverage report, review client records per criteria identified on the Active Record Review-Class I (except infants), Class II and III.
(a)

- 7.4** The WIC Program accepts and distributes returned formula following WIC Policy. (MI-WIC Policy 8.05).

This indicator may be met by:

- a. The WIC Program designates a staff person to be responsible for securing and monitoring the appropriate distribution of returned formula to clients or eligible programs. (MI-WIC Policy 8.05)
- b. The WIC Program provides returned formula to clients for the following reasons: transitioning an infant from one formula to another, to tide a family over if the certification is not complete, or as deemed necessary by the WIC Coordinator. (MI-WIC Policy 8.05)
- c. The WIC Program accepts, reissues, or donates returned formula according to WIC Policy. This includes documentation of acceptance, issuance, and donation of returned or excess formula to clients, food pantries or other non-profit organizations. (MI-WIC Policy 8.05)

Documentation Required:

- Returned formula log/inventory (8.05A, as revised 9/10/13).
- Local agency Policy for handling returned formula.

Evaluation Questions:

- Determine/ask who is designated for returned formula security, inventory maintenance and distribution. (a)
- Review Local agency policy for securing and handling returned formula. (a) *“The agency shall develop and maintain a local agency policy that identifies procedures for handling returned formula, as well as the individual responsible for monitoring its inventory and issuance.”*
- Observe that returned formula is issued to WIC clients for the following reasons:
 - a) Transitioning an infant from one formula to another.
 - b) To tide a family over if the certification is not complete.
 - c) For other reasons deemed necessary by the WIC Coordinator. (b)

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- Review returned formula log(s) (Returned Formula Log 8.05 A-9/2013) to verify acceptance, issuance, or donation of returned formula was documented as required. (c)
- Observe that all returned formula is stored securely out of view of clients. (c)
- Verify Retention of logs for required 3 years and 150 days past the end of the fiscal year. (c)

8. The WIC Program shall implement a food delivery system prescribed by the MDCH WIC Division.

Reference: 7 CFR 246.11, 246.12(o), 246.12(p), 246.12(r)(2), 246.12(r)(7), 246.12(r)(8), MI-WIC Policy 3.04, 5.01, 8.01, 8.04, 8.06, ME: Recordkeeping and Accountability

8.1 The WIC Program provides food benefits to WIC clients, or their proxies for supplemental food. (7 CFR 246.11, 246.12(o), 246.12(p), 246.12(r)(2), 246.12(r)(7), 246.12(r)(8), MI-WIC Policy 3.04, 5.01, 8.01, 8.04, 8.06, 8.09)

This indicator may be met by:

- a. The WIC Program ensures that the client has access to no more than three complete (non-prorated) months of food benefits at one time. (7 CFR 246.12(r)(7), MI-WIC Policy 8.01)
- b. The WIC Program ensures that clients, proxies, and those who are out-of-state transfers are provided with information on using the Michigan WIC Bridge Card/EBT benefits. (7 CFR 246.12(p), MI-WIC Policy 3.04, 8.06)
- c. The WIC Program ensures that individual clients are not denied supplemental foods for failure to attend or participate in nutrition education activities. (7 CFR 246.11(a)(2), MI-WIC Policy 5.01)
- d. The WIC Program follows procedures for re-issuance of WIC benefits. (7 CFR 246.12, MI-WIC Policy 8.04)

Documentation Required:

- Review of Benefit Reissuance by Family Report

Evaluation Questions:

- Observe/verify benefit issuance to ensure that not more than three complete months of benefits were issued/available at a time. (a)
- Observe/verify that clients were issued Michigan WIC Bridge Cards (EBT) at initial certification and card replacements according to WIC Policy. (a)
- Observe instructions on the use of WIC benefits and EBT card use for newly enrolled or transfer clients or their proxies. (b)
- Observe or ask clients if the local agency provides clients' benefits if they do not participate in nutrition education activities. (c)
- Observe benefit re-issuance procedures to ensure that client returns unopened formula, staff voids remaining benefits (if identifiable by client) and re-issue pro-rated benefits (EBT or returned formula). (d)

9. The WIC Program shall maintain full and complete records concerning program operations.

Reference: (7 CFR 246.25, MI-WIC Policy 1.03, 1.06, 1.11, 2.16, 4.04, 5.03, 5.08, 6.03, 8.01, 8.08, 8.09, 10.01, ME: Recordkeeping and Accountability)

9.1 The WIC Program maintains full and complete records concerning program operations. (7 CFR 246.2, 246.7, 246.12, 246.17, 246.19(b)(6), 246.25, MI-WIC Policy 1.06, 1.11, 1.12, 4.04, 5.08, 6.03, 6.03, 8.05, 9.03, 10.01)

This indicator may be met by:

- a. The WIC Program maintains complete and accurate records including, but not be limited to, information pertaining to financial operations, equipment purchases and inventory, local agency policies and procedures, training, quality assurance/audits/record reviews. (7 CFR 246.7, 246.17(b)(2), 246.19(b)(6), 246.25(a)(1), MI-WIC Policy 1.11, 1.12, 4.04, 5.08, 6.03, 9.03, 10.01)
- b. If an audit or litigation is pending for the period of the records, the records and reports retained until completion of the audit or litigation process. (7 CFR 246.17, 246.25(a)(2), MI-WIC Policy 1.06)

Documentation Required:

- The State and Local Agency Policy & Procedure Manual (physical copy or electronic record), minimally of required policies listed below.
- Local agency equipment purchases/inventory, computer equipment, printers, scanners, signature pads and multi-user pump inventory, large purchases exceeding \$2500.
- Record of lead tests and/or MIHP screening funds included in WIC budget, if performed by WIC funded staff.
- Required logs or records (e.g., training records (not in MI-WIC), subpoena, child abuse reports, administrative hearing records).
- Records of annual program evaluation of each sub-contractor and clinic site.
- WIC collaboration agreements, if applicable. No Collaboration Agreement is required for Project FRESH nutrition education and coordination, this is covered by a statewide agreement.
- Breast pump inventory and issuance.

Evaluation Questions

- Review documents requested to ensure the local agency maintains full and complete records concerning program operations including:
 - a) Equipment purchases/inventory
 - b) Required logs and records
 - c) Training - logs for trainings not documented in MI-WIC.
 - d) Lead and MIHP billing and recovered funds attribution to WIC budget, if performed by WIC funded staff. (a)
- Verify that all required records, audit or investigation documents are maintained on file for 3 years and 150 days after the completed fiscal year, or until the review, audit or investigation is complete, unless otherwise specified in MI-WIC Policy 1.06. (b)
- The current Michigan WIC and local agency Policy and Procedure Manual is accessible. (a)
- Verify that all breast pump inventory and issuance records are maintained. (a)
- Verify that the local agency annual clinic evaluation reviews and Corrective Plans of Action have been completed for all clinics and subcontractor sites (and they retain all records of any evaluation, monitoring, training or follow up provided). (MI-WIC Policy 1.11) (a)
- Verify the local agency Policy and Procedure Manual contains at least the following Policies, as applicable: (a)
 - a) Local agency Disaster/Emergency Planning and Coordination Plan. (MI-WIC 1.12, September 2013)
 - a. *The local agency shall develop a disaster plan that will include:*
 - i. *A copy of the parent agency's disaster preparedness plan, if applicable.*
 - ii. *Local governmental/community agency emergency contact information.*
 - iii. *State and local WIC staff contact information.*
 - iv. *A plan for notifying clients of service disruption, relocation and availability of WIC services.*
 - b) Collaborative WIC Agreement for nutrition education (NOT including Project FRESH), if applicable. (MI-WIC Policy 5.08)

- c) Returned Formula Policy (MI-WIC Policy 8.05)
- d) Immunization Policy (MI-WIC Policy 6.03) required if within a local health department: policy related to WIC/Immunization program collaboration, update of immunization records, appropriate information on specific childhood preventable diseases, benefits of immunization and CDC recommended immunization schedule will be provided. (cite ONLY as MPR 12.d, if not found)
- e) Hemoglobin Retest Parameters (MI-WIC Policy 2.16)

9.2 The WIC Program follows the provisions for EBT card inventory, security, storage and issuance. (7 CFR 246.2, 246.7, 246.12(q), 246.25, MI-WIC Policy 8.08, 8.09)

This indicator may be met by:

- a. The WIC Program maintains inventory records of all WIC Bridge Cards received and dispersed. (7 CFR 246.2, 246.7, 246.25(a)(1), MI-WIC Policy, 8.08, 8.09)
- b. The WIC Program follows procedures for issuance of WIC Bridge Cards. (7 CFR 246.25(a)(1), MI-WIC Policy 8.08, 8.09)
- c. The WIC Program follows procedures for security of WIC Bridge Cards, keeping bulk supplies secured and unissued WIC Bridge Cards in a locked file cabinet or other secure area to prevent theft or misuse. (7 CFR 246.2, 246.7(l)(1), 246.12, MI-WIC Policy 8.08, 8.09)

Documentation Required:

- Michigan WIC Bridge Card Issuance Log
- Michigan WIC Bridge Card Daily Inventory Control Log
- WIC Bridge Cardholder Signature Forms

Evaluation Questions:

- Review the MI-WIC EBT Card Inventory, Michigan Bridge Card Issuance Log, Michigan WIC Bridge Card Daily Inventory Control Log and the Michigan WIC Bridge Cardholder Issuance Signature Form to ensure the local agency maintains records of all cards received, on hand and issued. (a)

- MI-WIC EBT Cards Inventory - Verify that the Michigan WIC Bridge cards “on hand” are entered into the inventory screen and are consistent with the physical inventory. (a)
- Verify that WIC EBT card issuance and inventory forms and records are retained for at least 3 years and 150 days past the close of the fiscal year. (a)
- Observe the inventory procedures for Michigan WIC Bridge cards. (b)
- Michigan WIC Bridge Card Daily Inventory Control Log - Verify that the first and last EBT card stock number of cards for daily use are physically verified and documented with staff initials and date at the start and end of the day. (b)
- Review the Michigan WIC Bridge Card Daily Inventory Control Log to verify that a monthly inventory (of bulk and daily use cards) has been performed by non-EBT card issuance staff. (b)
- Review Michigan WIC Bridge Card Issuance Log to ensure the local agency maintains a record of each card issued or replaced at the clinic. (b)
- Observe the issuance procedures for WIC Bridge cards. (b)
- Michigan WIC Bridge Card Issuance Log - Verify that the cards are logged at issuance. (b)
- Michigan WIC Cardholder Signature Form - Verify new clients receive education for using the EBT card and that the WIC Cardholder Signature form is signed and retained, according to policy. (b)
- Review WIC Bridge Cardholder Signature forms to ensure that the local agency completes and retains the forms as required. (b)
- Observe and verify that all WIC Bridge cards (bulk and daily use) are always kept either securely locked (with limited staff access) or secured under direct staff observation. (c)
- Observe that all WIC Bridge cards are stored securely at the end of the day. (c)

10. The WIC Program shall prevent, detect, and document program violations.

Reference: (7 CFR 246.2, 246.7(h)(1-2), 246.7 (j), 246.12(u), MI-WIC Policy 2.18, 3.03, 9.01, 9.02, 9.03, ME: Administration, Certification)

10.1 The WIC Program implements measures to prevent, detect, and document client or employee fraud and abuse violations. (7 CFR 246.2, 246.4(a) 26, 246.7(h)(1-2), 246.7j), 246.12(u), MI-WIC Policy 3.03, 9.01, 9.02, 9.03)

This indicator may be met by:

- a. The WIC Program documents, investigates and resolves client and employee fraud and abuse complaints to prevent and detect intentional actions that violate federal or state program regulations, policies or procedures within allowed timeframes. (7 CFR 246.2, 246.7(h)(1-2), 246.7(j), 246.12(u), MI-WIC Policy 3.03, 9.01, 9.02, 9.03)
- b. The WIC Program implements controls to prevent and detect employee fraud and abuse. (7 CFR 246.2, 246.4(a)(26), MI-WIC Policy 9.02, 9.03)

Documentation Required:

- Complaint/Compliance Reports
- Employee Complaint/Compliance logs and records
- Dual Enrollment reports (clients listed as “investigate”)
- Single Certifier Audits and Logs/Single User Certification Reports and follow up.
- Local agency procedure regarding services to family or friends.

Evaluation Questions:

- Interview Coordinator to determine how client and employee fraud and abuse complaints are documented. (a)
- Ask staff what they do if a client or employee fraud or abuse complaint is made. (a)
- Verify that client’s identified by Dual Enrollment Reports (WIC/WIC and WIC/CSFP) as possible **dual participants** are investigated and resolved according to policy. (a)

- Verify that for client abuse complaints documented in MI-WIC, an investigation is completed. Verify that investigation resolution is consistent with policies (i.e., warnings, sanctions/disqualification and restitution applied when indicated). (a)
- Verify that for staff abuse complaints an investigation is completed and fully documented. Verify that investigation resolution is consistent with policies (i.e., warnings, sanctions/disqualification and restitution applied when indicated). (a)
- Interview staff and verify records regarding separation of duties in certification procedures. (b)
- Verify that “Single Certifier” audits/follow-up has been performed within 30 days on 20% of client records when a single certifier verified eligibility and issued benefits. (b)
- Ask staff how the agency provides services to clients who are staff, staff relatives or staff friends. (b)

11. The WIC Program shall demonstrate full cooperation with the WIC Management Evaluation process.

Reference: (7 CFR 246.19, MI-WIC Policy 1.05, ME: All)

11.1 The WIC Program responds to all questions and reporting requirements of the MDCH WIC Division Management Evaluation process. (7 CFR 246.19, MI-WIC Policy 1.05)

This indicator may be met by:

- a. The WIC Program responds in writing to all pre and post Management Evaluation requests by the State WIC Office, and in the timeframe established by the State WIC Office. (7 CFR 246.19, MI-WIC Policy 1.05)
- b. The WIC Program provides access to all WIC clinics and records as requested by the State WIC Office/Representative(s). (7 CFR 246.19(b)(1-2), MI-WIC Policy 1.05)

Documentation Required:

- The most recent Management Evaluation Report
- Corrective Plan of Action

Evaluation Questions:

- Did the local agency implement its corrective plan of action as planned? (a)
- Did the local agency allow access to all WIC clinics and records as requested during the Management Evaluation Process? (b)

12. The local agency shall assure that all WIC infants and children are assessed for immunization status at each certification using a documented record, and when indicated, referred for immunization.

Reference: (MI-WIC Policy 6.03, Executive Memorandum 12-11-00, USDA WIC Policy Memorandum #2001-7, ME: Certification)

12.1 All infant and child clients will be assessed for immunization status using a documented record during certification, recertification and infant/child health/nutrition evaluation. (MI-WIC Policy 6.03)

This indicator may be met by:

- a. Local agencies shall review the MI-WIC immunization status or the client's individual immunization record, the MCIR record or other computerized system record which indicates the name of the vaccine and the date that it was given, if the record is provided/available at the time of certification. (MI-WIC Policy 6.03)
- b. Local agencies shall refer those children for immunization services whose immunization assessment indicates that the child is not up to date. (MI-WIC Policy 6.03)
- c. Local agencies shall provide information regarding specific childhood preventable diseases, the benefits of immunization, and CDC's recommended schedule for vaccinations for infants and children according to local agency policy. (MI-WIC Policy 6.03)
- d. For agencies/clinics that are within a local health department, a local agency policy related to WIC/Immunization collaboration is on file and is being followed. (MI-WIC Policy 6.03)

Documentation Required:

- Chart review results

Evaluation Questions:

- Observe local agency staff reviewing the documented I/C client immunization record at each cert/recert/infant/child evaluation. (a)
- Observe local agency staff assessing immunization status and making referrals if appropriate for each I/C client. (b)
- Verify that immunization materials are available regarding specific childhood preventable diseases, the benefits of immunization and CDC's recommended schedule for vaccinations for infants and children per Local Agency Policy. (c)
<http://www.cdc.gov/vaccines/parents/downloads/parent-ver-sch-0-6yrs.pdf>
- For agencies within a Local Health Department, verify that a local agency Immunizations Policy is on file and is followed. (d)