

**PURPOSE:** Specify requirements for local agencies to use WIC funds for transportation costs of clients when access is a barrier.

**DEFINITION:**

*Client* means pregnant, breastfeeding, and postpartum persons, infants and children who are receiving supplemental foods or food instruments or cash-value vouchers under the Program.

**A. POLICY**

1. Local WIC agency NSA funds may be used to cover transportation costs to and from WIC clinics for clients who are unable to attend appointments due to limited and/or no access to transportation. (See Policy 11.01, Program Costs.)
2. Local agencies that choose to cover transportation costs must submit a written policy to the State office. At a minimum, the policy must include:
  - a. Rationale on why providing transportation services is essential to ensure program access and reasonable and necessary for the operation of the Program. (See Policy 11.01, Program Costs.)
  - b. Process for providing transportation for clients who have demonstrated a barrier to Program access.
  - c. Modes of transportation to be used based on the least cost to the agency.
  - d. Authorization procedures for transportation benefit purchase and/or payment and associated distribution.
3. State agency approval of the local agency policy is necessary prior to funding client transportation costs.
4. Direct reimbursement to clients for transportation cost is not an allowable cost.
5. The local agency must distribute transportation benefits fairly and equitably and adhere to Policy 1.09, Civil Rights.

6. The local agency must maintain appropriate documentation of all transactions related to WIC funds used to cover transportation costs for future audit, site visit, and/or desk review. At a minimum this includes:
  - a. Client name, date used, transportation type, amount, and purpose for use.
  - b. Receipt for the transportation costs (electronic or paper form is acceptable).
  - c. Local agencies must document administrative approval verifying that costs were approved to purchase, and payment was provided for transportation costs in accordance with agency policy. This approval can be verified through a standard form that includes details of cost and payment with signature.
7. Retain all documentation based on Policy 1.06 Record Retention and Destruction.

**B. Guidance**

1. Local agencies should consider other competing demands for NSA funds when considering funding transportation costs. Alternatives to providing transportation include establishing a satellite or mobile clinic, especially if many clients are affected.
2. Consider the following when approving transportation costs. Does the client or caretaker of a client:
  - a. Have access to a car or safe and reliable transportation to get to their WIC appointment?
  - b. Have someone that can take them to their WIC appointment?
  - c. Live close to public transportation?
  - d. Have special needs that would stop them from taking public transportation?
  - e. Identify as homeless or have housing instability?
  - f. Experience abuse or domestic violence at home?
  - g. Have disabilities or injury that require special accommodations to get to their WIC appointment?

**References:**

7 CFR 246.14 (c)(7)

WIC Policy Memorandum 95-2: Clarification of Allowability of Transportation Costs for WIC Participants <https://fns-prod.azureedge.us/sites/default/files/resource-files/95-2-ClarificationOfTransportationCost.pdf>

**Cross References:**

1.06 Record Retention and Destruction

1.09 Civil Rights

11.01 Program Costs