

1.07 Local Agency Staffing and Training

PURPOSE: This policy identifies specific requirements for staffing and training to ensure the delivery of quality WIC services. Defining staff qualifications, roles and responsibilities helps guarantee that clients receive nutrition services from staff who have the appropriate education, training, skills and/or experience for the position they hold and operate within their scope of practice. This policy also helps to assure staff receive sufficient orientation, competency-based training, continuing education activities as well as periodic performance evaluations.

A. POLICY

1. STAFFING

a. WIC Coordinator

- i. The Local Agency must designate a WIC Coordinator to administer, plan, train, implement, execute, and evaluate policies throughout the local agency and, act as a liaison and contact with the Michigan Department of Health and Human Services WIC Division.
- ii. All WIC Coordinators hired after February 25, 2014, must have at least a four-year bachelor's degree.
 - (a.) It is strongly recommended the degree be in a health-related profession, such as dietetics, nutrition, or nursing, with a minimum of one year job-related experience.
 - (b.) It is recommended the Coordinator has coursework, training and/or experience in all areas noted below:
 - (i.) Business or management, to include personnel management.
 - (ii.) Program planning, evaluation, and budgeting.
 - (iii.) Computer word processing and spreadsheet development/maintenance.
 - (iv.) Community/public health, outreach, and program coordination.
- iii. The WIC Coordinator is responsible for:
 - (a.) Receiving and disseminating all relevant and appropriate communications to local agency staff.
 - (b.) Ensuring adherence with state and local policies and procedures within the agency, including any subcontracts, through training, monitoring and quality assurance processes.
 - (c.) Meeting with all appropriate agency staff to review policies and procedures

and share other program information.

- (d.) Assuring every staff person has opportunities to participate in meaningful continuing education activities, including the topics of nutrition and breastfeeding.
- (e.) Attending required state and regional meetings and assuring that appropriate staff attend meetings and trainings as required.
- (f.) Assisting in planning annual budget, tracking monthly fiscal expenditures, and revising budgets as needed.
- (g.) Monitoring caseload to sustain assigned target level.
- (h.) Requesting caseload adjustments based on community demographics.
- (i.) Assuring that all clients are offered and receive appropriate nutrition and breastfeeding education and support. (See Policies 4.02, Client Breastfeeding Education and 5.01, Nutrition Services Overview.)
- (j.) Maintaining a positive clinic environment for client-centered services and nutrition and breastfeeding promotion and support. (See Policy 4.01, Local Agency Breastfeeding Responsibilities and Staff Roles.)

b. Nutrition Education Staff

i. *Nutrition Education Coordinator*

- (a.) The Local Agency must designate a Nutrition Education Coordinator, who will plan, develop, and evaluate nutrition program services for the local agency. The Nutrition Education Coordinator must meet the qualifications for a Competent Professional Authority (CPA) and have a minimum of one year of job-related experience.
 - (i.) Job-related experience could be met through an established mentorship from another local agency or the State agency.
 - (ii.) The Nutrition Education Coordinator is strongly encouraged to hold a degree in the field of nutrition.
 - (iii.) This role is preferably held by a Registered Dietitian/Registered Dietitian Nutritionist.
- (b.) The Nutrition Education Coordinator is responsible for the following:
 - (i.) Coordinating direct nutrition services to clients [See Chapter 5, Nutrition Services Policies].
 - (ii.) Mentoring and sharing best practices with nutrition services staff, including client-centered nutrition counseling.
 - (iii.) Facilitating and/or providing nutrition in-service training to local agency staff who provide nutrition services to clients.
 - (iv.) Participating in the development, implementation, and evaluation of the local agency Nutrition Services Plan (NSP).
 - (v.) Providing technical assistance and consultation to local agency staff and other health professionals in nutrition services areas.

- (vi.) Identifying, coordinating, and collaborating with community nutrition stakeholders.
- (vii.) Participating in local/state workgroups to improve nutrition and program services.

ii. Registered Dietitian/Registered Dietitian Nutritionist (RD/RDN)

- (a.) The local agency must have access to a qualified RD/RDN to provide nutrition services to high-risk clients.
- (b.) The RD/RDN must have the RD/RDN credential, granted from the Academy of Nutrition and Dietetics' Commission on Dietetic Registration.
- (c.) The RD/RDN is responsible for providing required nutrition services to high risk clients and any other clients referred to the RD/RDN. (See Policy 5.06, Required Services for High Risk Clients.)

iii. Competent Professional Authority (CPA)

- (a.) A local agency must have adequate staffing to implement acceptable separation of duties within the certification process. (See Policy 9.03, Employee Conflict of Interest and Separation of Duties.)
- (b.) The Competent Professional Authority (CPA) shall possess one of the following credentials:
 - (i.) Physician
 - (ii.) Registered Dietitian/Registered Dietitian Nutritionist (RD/RDN)
 - (iii.) Nutritionist (bachelor's or master's degree in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics or Public Health Nutrition)
 - (iv.) Physician's Assistant (certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority)
 - (v.) Registered Nurse (RN)
 - (vi.) Dietetic Technician Registered (emphasis in community/clinical nutrition)
 - (vii.) Home Economist (Bachelor's degree with emphasis in nutrition)
- (c.) The Competent Professional Authority is responsible for providing direct nutrition services to clients (See Chapter 5, Nutrition Services Policies) and providing technical assistance and consultation to local agency staff and other health professionals in nutrition services.
- (d.) The CPA should have – or access to – the literacy and language skills appropriate to address the needs diverse of clients.

iv. Health Educator

- (a.) A local agency may hire a Health Educator to assist in providing nutrition education.
- (b.) The Health Educator may not function as a Competent Professional Authority (CPA), as they do not meet the necessary qualifications. Health Educators will have a degree in Health Education.
- (c.) The Health Educator may perform the following:
 - (i.) Providing nutrition education to clients in a classroom setting or facilitating client completion of interim nutrition education in the clinic, i.e., self-directed education modules, bulletin boards, and wichealth.org.
 - (ii.) Developing nutrition education materials under guidance of the Nutrition Education Coordinator.
 - (iii.) Documenting nutrition education follow-up in MI-WIC, including wichealth.org completion.

c. Breastfeeding Staff*i. Breastfeeding Coordinator*

- (a.) The local agency must designate a Breastfeeding Coordinator to provide coordination and evaluation for breastfeeding promotion, protection, and support activities.
- (b.) The Breastfeeding Coordinator must meet the following qualifications:
 - (i.) Registered Dietitian Nutritionist (RD/RDN) or Registered Nurse (RN) or qualifications for a CPA with a minimum of one year of experience in breastfeeding counseling. Breastfeeding counseling experience could be met through an established mentorship from another local agency or the State agency.
 - (ii.) Possess an advanced lactation management certification (e.g., LCE, CLS, CLC), or obtain certification within one year.
 - (iii.) Demonstrated experience in program management.
- (c.) The Breastfeeding Coordinator is responsible for:
 - (i.) Keeping current with up-to-date breastfeeding information and disseminating the information to local agency staff.
 - (ii.) Planning and coordinating breastfeeding training/in-services for all local agency staff at least four times a year.
 - (iii.) Monitoring local agency breastfeeding rates.
 - (iv.) In conjunction with the WIC Coordinator, completing the breastfeeding, goals, objectives, and other relevant sections of the Nutrition Services Plan.
 - (v.) Evaluating education materials for accuracy and positive presentation

- of breastfeeding. (See Policy 5.01, Nutrition Services Overview.)
- (vi.) Assessing the content of individual client contacts and group classes that address infant feeding to ensure breastfeeding is presented as the norm for infant feeding. (See Policy 5.01, Nutrition Services Overview.)
 - (vii.) Overseeing the local agency breast pump program. This includes the ordering, inventory, distribution and maintenance of breastfeeding equipment and completion of required documentation. (See Policies 4.04, Breastfeeding Equipment Ordering, Inventory Retrieval, and Maintenance and 4.05, Breastfeeding Equipment Issuance and Documentation.)
 - (viii.) Identifying, coordinating, and collaborating with community breastfeeding stakeholders.
 - (ix.) Providing assistance to clients when staff or peer counselors are faced with lactation issues beyond their scope of service.
 - (x.) Managing, coordinating, and mentoring the Breastfeeding Peer Counselors unless the agency has made other arrangements with the State WIC program.

ii. Lactation Consultant (IBCLC)

- (a.) As of October 1, 2017, the local agency must have an International Board Certified Lactation Consultant (IBCLC) on staff or under contract to serve as the lead breastfeeding technical support expert. The IBCLC must have dedicated time, separate from other clinic duties, to provide these clinical services. In an agency where an IBCLC is not on staff, the agency must submit a plan for State approval. The plan must demonstrate how equivalent on-site technical support will be provided.
- (b.) The Lactation Consultant must possess current IBCLC certification issued by the International Board of Lactation Consultant Examiners.
- (c.) The Lactation Consultant is responsible for:
 - (i.) Providing clinical lactation assessment and counseling services to clients including those with complex breastfeeding situations.
 - (ii.) Acting on all referrals from other WIC staff regarding complex breastfeeding situations beyond their scope of practice.
 - (iii.) Assisting the Breastfeeding Coordinator in providing lactation mentoring and training to clinic staff, if IBCLC is employed by the local agency.

iii. Breastfeeding Peer Counselor Manager

- (a.) The local agency may designate a Breastfeeding Peer Counselor Manager other than the Breastfeeding Coordinator to manage the breastfeeding peer counseling program at the local agency level.
- (b.) The Breastfeeding Peer Counselor Manager must meet the following qualifications:
 - (i.) Demonstrated experience in program management.
 - (ii.) Demonstrated expertise in breastfeeding management and promotion.
 - (iii.) Minimum of one year breastfeeding counseling experience.
 - (iv.) Possess an advanced lactation management certification (e.g., LCE, CLS, CLC), or obtain certification within one year.
- (c.) The Breastfeeding Peer Counselor Manager is responsible for managing the breastfeeding peer counselor program, which includes:
 - (i.) Overseeing the planning, management, implementation, evaluation, and reporting of peer counseling activities.
 - (ii.) Reporting on peer counseling program activities to supervisor and the State agency.
 - (iii.) Keeping current with up-to-date breastfeeding information and disseminates this as well as FNS-provided information to other local agency staff.
 - (iv.) Establishing training for peer counselors.
 - (v.) Mentoring peer counselors, providing routine follow-up, support, and guidance.
 - (vi.) Coordinating with local community stakeholders such as hospitals and health care providers to enhance the effectiveness of the peer counseling program.
 - (vii.) Working in conjunction with the Breastfeeding Coordinator and WIC Coordinator, develops goals and objectives for the final agency peer counseling program and helps conduct needs assessment activities to identify gaps in breastfeeding resources and services.

iv. Breastfeeding Peer Counselor

- (a.) The local agency must hire a Breastfeeding Peer Counselor who is a paraprofessional that has breastfed their own baby and is trained to help new parents with questions on basic breastfeeding. They provide support to WIC families to help them meet their breastfeeding goals.
- (b.) The Breastfeeding Peer Counselor must meet the following qualifications:
 - (i.) Have breastfed at least one baby for a minimum of six months.
 - (ii.) Be enthusiastic about breastfeeding and have a desire to help other

clients.

- (iii.) Be familiar with WIC; current or previous WIC client is preferred.
- (iv.) Have good communication and organizational skills.
- (v.) Be fluent in the language of the majority of clients they counsel.
- (vi.) Be a member of the community for whom they serve.

(c.) The Breastfeeding Peer Counselor is responsible for:

- (i.) Providing basic breastfeeding education and support to WIC families.
- (ii.) Being familiar with the resources available to clients.
- (iii.) Having familiarity with the questions a new breastfeeding person may ask.
- (iv.) Referring clients to other resources during critical periods when breastfeeding challenges may occur.
- (v.) Being available outside of standard business hours.

v. *Breastfeeding Senior Peer Counselor*

- (a.) The Senior Breastfeeding Peer Counselor is a paraprofessional support person who provides both basic and more advanced breastfeeding information and support to pregnant and breastfeeding clients to help meet their breastfeeding goals.
- (b.) The Breastfeeding Senior Peer Counselor must meet the following qualifications:
 - (i.) Expertise in peer counseling and management through a minimum of two years previous experience as a WIC Breastfeeding Peer Counselor.
 - (ii.) Strong communication and customer service skills.
 - (iii.) Ability to communicate in a professional, courteous, and tactful manner.
 - (iv.) Enthusiasm about breastfeeding and desire to help clients.
 - (v.) Good organizational skills.
 - (vi.) Fluent in the language of the majority of clients they counsel.
 - (vii.) Member of the community for whom they serve.
- (c.) In addition to the duties of the Breastfeeding Peer Counselor, the Senior Breastfeeding Peer Counselor is also responsible for:
 - (i.) Assisting and mentoring peer counselors.
 - (ii.) Representing WIC in the community and with partner organizations.
 - (iii.) Providing staff training on breastfeeding topics.

d. Nutrition Services Support Staff

- i. *Clerks/Technicians* (common position title in Michigan WIC; title may vary by local agency)

- (a.) A local agency must have adequate staffing to implement acceptable separation of duties within the certification process. (See Policy 9.03, Employee Conflict of Interest and Separation of Duties.)
- (b.) Clerks/Technicians are responsible for the following:
 - (i.) Providing clinic and office support to CPA and other nutrition staff.
 - (ii.) Helping implement Program policies and protocols.
 - (iii.) Providing excellent customer service to clients.
 - (iv.) Multi-tasking and supporting client centered approaches.
 - (v.) Working as a team member.
 - (vi.) Participating in nutrition and breastfeeding promotion and support.
 - Clerks/Technicians may not provide nutrition education (See Policy 5.02, Nutrition Education Contacts).
 - Clerks/Technicians may only document nutrition education for self-directed education, as needed (See Policy 5.05, Nutrition Education Documentation).

ii. Call Center Staff (Scheduler role)

- (a.) A local agency may have staff who work only in a call center.
- (b.) Call Center Staff may be responsible for the following:
 - (i.) Addressing incoming calls/inquiries and referrals from applicants and/or existing clients.
 - (ii.) Scheduling appointments.
 - (iii.) Providing referrals to breastfeeding peer counselors. (See Policy 4.02, Client Breastfeeding Education.)

2. TRAINING

- a. The WIC Coordinator is responsible for ensuring all staff receive orientation, and initial and continual training to function efficiently and effectively in their roles, helping clients to receive accurate and relevant information, education, and referrals.
- b. The cost for WIC-related trainings is an allowable WIC expense and must be budgeted as part of the Local Agency WIC grant.
- c. Staff must complete training related to their job duties in accordance with this policy, as detailed on the Staff Training Plan. See Policy 1.07A.
- d. Training Completion Timeframes
 - i. For new employees, required trainings must be completed within the timeframe specified in Policy 1.07A, Staff Training Plan.

- ii. For existing employees, required trainings must be completed within the timeframe specified in Policy 1.07A, Staff Training Plan, from the policy implementation date.
- e. Local agency staff shall be trained in areas of civil rights compliance in accordance with Policy 1.09, Civil Rights.
- f. Implicit Bias Training is required for all staff within 60 days of hire and annually. Staff can complete State-provided or other local agency-approved implicit bias training.
- g. Ongoing Training Requirements
 - i. CPA and RD staff must complete staff development training relevant to nutrition services four times a year.
 - ii. All staff, with the exception of WIC Coordinator and Call Center Staff, will complete training relevant to breastfeeding services four times a year.
 - iii. Training modes include, but are not limited to in-services, staff-led trainings, online training, webinars, self-study modules, journal article review, college courses, seminars, and conferences. In the first year of employment, trainings in Policy 1.07A, Staff Training Plan, can count towards these requirements.

Note: Nutrition and breastfeeding services trainings are separate. Each has a requirement of four trainings per year.
- h. Consider the following factors regarding ongoing training needs/requirements:
 - i. Training needs identified during Management Evaluations, site visits, individual certification observations, and/or chart audits.
 - ii. Local agency nutrition education and breastfeeding goals outlined in the agency's Nutrition Services Plan.
 - iii. Current staff skills and experiences.
 - iv. The need for general versus specialized training, based upon current staff needs and relevance of training to WIC services.
 - v. Participant needs, changes in population served, and health trends in your WIC population.

- vi. Sponsorship of trainings (e.g., State Agency provided training, training by established professional organization, on-line trainings, webinars etc.).
- i. Documentation of completed staff training and education is required.
 - i. Training can be documented in any organized manner preferred by the agency that allows for review at Management Evaluations. Options include:
 - (a.) Policy 1.07A, Staff Training Plan.
 - (b.) Paper or electronic tracking form.
 - (c.) MI-WIC Staff Training screen.
 - ii. Documentation will include name of employee, date of training, and name/type of training.
 - iii. Staff unable to complete required training within the specified timeframe shall document the extenuating circumstances and an alternate plan for completion.
- j. All WIC staff providing nutrition services shall be observed at least annually for competency-based nutrition services skills as part of the employee's annual performance evaluation.

B. GUIDANCE

1. It is recommended staff repeat training as needed to enhance skill development or strengthen competencies related to job duties and ensure current practices. Best practice is to repeat trainings in ≤ 5 years.
2. It is recommended all CPA and RD staff collaborate with coworkers and mentors to receive feedback on client centered counseling skills.

Reference:

Federal Regulation; 7 CFR Part 246.2
USDA WIC Nutrition Services Standards, 2013
USDA WIC Breastfeeding Policy and Guidance, July 2016

Cross Reference:

1.07A Staff Training Plan
1.09 Civil Rights
4.01 Local Agency Breastfeeding Responsibilities and Staff Roles
4.02 Client Breastfeeding Education
4.04 Breastfeeding Equipment Ordering, Inventory Retrieval, and Maintenance
4.05 Breastfeeding Equipment Issuance and Documentation
5.01 Nutrition Services Overview

5.02 Nutrition Education Contacts

5.05 Nutrition Education Documentation

5.06 Required Services for High Risk Clients

9.03 Employee Conflict of Interest and Separation of Duties