

# MI-WIC POLICY

## *Administration*

### 1.0 Administration

*Effective Date: 05/31/2018*

### 1.07 Local Agency Staffing and Training

*Implementation Date: 10/01/2018*

**PURPOSE:** This policy identifies specific requirements for staffing and training to ensure the delivery of quality WIC services. Exhibits provide examples of work and training requirements. 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 the following qualification:
  - (a.) At least a four-year Bachelor's degree. It is strongly recommended that 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 that the Coordinator has coursework, training and/or experience in:
    - (i.) Business or management, to include personnel management;
    - (ii.) Program planning and evaluation, budgeting;
    - (iii.) Computer word processing and spreadsheet development/maintenance; and,
    - (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 4.01 Breastfeeding Promotion, Protection and Support and 5.01 Nutrition Education Overview and Elements of Client-Centered Nutrition Education.)
- (j.) Maintaining a positive clinic environment for client-centered services and nutrition and breastfeeding promotion and support. (See Policy 4.03 Clinic Environment.)

iv. See Exhibit 1.07A, WIC Coordinator, for required training and examples of work.

### **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.
- (b.) The Nutrition Education Coordinator must meet the qualifications for a Competent Professional Authority (CPA) and have a minimum of one year of WIC nutrition counseling experience. This role is preferably staffed by a Registered Dietitian Nutritionist (RD/RDN).
- (c.) 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.
- (d.) See Exhibit 1.07B, Nutrition Education Coordinator, for required training and examples of work.

#### *ii. Registered Dietitian/Registered Dietitian Nutritionist*

- (a.) The local agency must have access to a qualified Registered Dietitian/Registered Dietitian Nutritionist (RD/RDN) to provide nutrition services to high-risk participants.
- (b.) The nutritionist has the following qualifications:
  - (i.) RD/RDN credential
- (c.) The RD/RDN is responsible for the following:
  - (i.) Providing required services to high risk clients, as outlined in Policy 5.06 Required Services for High Risk Clients.
    - Providing nutrition education tailored or customized to the identified needs/interests of each high-risk participant.
    - Developing individual care plans for high-risk participants.
    - Prescribing food packages to high-risk participants, as appropriate.
    - Approving Class III formula packages, as needed.
    - Referring high-risk participants to other health-related and social services, as necessary.
    - Documenting referrals and appropriate follow-up to referrals for high-risk participants.
    - Tracking high-risk participants' progress and documenting outcomes.
- (d.) See Exhibit 1.07C, Registered Dietitian/Registered Dietitian Nutritionist, for required training and examples of work.

### *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 the following:
  - (i.) Provide direct nutrition services to clients [See Chapter 5, Nutrition Services Policies].
    - Perform a complete nutrition assessment
    - Assign appropriate food package
    - Provide appropriate referrals
  - (ii.) Provide technical assistance and consultation to local agency staff and other health professionals in nutrition services areas
- (d.) See Exhibit 1.07D, Competent Professional Authority, for required training and examples of work.

### *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](http://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](http://wichealth.org) completion.
- (d.) See Exhibit 1.07E, Health Educator, for required training and examples of work.

### 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 hired after February 25, 2014 must meet the following qualifications:
  - (i.) Registered Dietitian Nutritionist (RD/RDN) or Registered Nurse (RN) or qualifications for a CPA with at least one year of experience in

- breastfeeding counseling.
- (ii.) Possess an advanced lactation management certification (e.g. CLS, CLC or CLE), or obtain certification within one year.
- (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 Education Overview and Elements of Client-Centered Nutrition.)
  - (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 Education Overview and Elements of Client-Centered Nutrition.)
  - (vii.) Overseeing the local agency breast pump program. This includes the ordering, inventory, distribution and maintenance of breastfeeding equipment and completion of required documentation. (See Policies 4.01, Breastfeeding Promotion, Protection and Support and 4.04, Breastfeeding Equipment, Inventory and Maintenance.)
  - (viii.) Identifying, coordinating and collaborating with community breastfeeding stakeholders.
  - (ix.) Providing assistance to 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.
- (d.) See Exhibit 1.07F, Breastfeeding Coordinator, for required training and examples of work.

### *ii. Lactation Consultant*

- (a.) As of October 1, 2017, the local agency must have an International Board Certified Lactation Consultant (IBCLC) to serve as the lead breastfeeding technical support expert. In an agency where an IBCLC is not on staff, the agency must submit a plan for State approval. The plan must demonstrate how equivalent on-site technical support will be provided.
- (b.) This individual has advanced training, knowledge, and skills in lactation required by the International Board of Lactation Consultant Examiners and as

indicated by International Board Certified Lactation Consultant (IBCLC) certification.

- (c.) The IBCLC must have dedicated time, separate from other clinic duties, to provide these clinical services.
  - (i.) This position provides clinical lactation assessment and counseling services to clients. The IBCLC may also provide lactation mentoring and training to staff and Peer Counselors.
  - (ii.) The IBCLC must have phone contact within 1 business day of the assessed need for clinical lactation service. If determined by the IBCLC that the client is in need of clinical lactation services, an appointment with the IBCLC for a visual assessment will be offered within two business days.
- (d.) See Exhibit 1.07G, Lactation Consultant, for required training and examples of work.

### *iii. Breastfeeding Peer Counselor Manager/Coordinator*

- (a.) The Local Agency may designate a Breastfeeding Peer Counselor Manager/Coordinator other than the Breastfeed Coordinator to manage the breastfeeding peer counseling program at the local agency level.
- (b.) The Breastfeeding Peer Counselor Manager/Coordinator 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.) Successful completion of advanced lactation certification training. International Board Certified Lactation Consult (IBCLC) is preferred, but individuals may be exam-eligible or have other lactation specific certification such as CLS or CLC.
- (c.) See Exhibit 1.07H, Breastfeeding Peer Counselor Manager/Coordinator, for required training and examples of work.

### *iv. Breastfeeding Peer Counselor*

- (a.) A Breastfeeding Peer Counselor is a paraprofessional support person who gives basic breastfeeding information and encouragement to pregnant and breastfeeding mothers to help women initiate and continue breastfeeding. Breastfeeding peer counselors provide a valuable service to their communities, addressing barriers to breastfeeding by offering breastfeeding education, support, and role modeling. Peer Counselors are familiar with the resources available to clients, have familiarity with the questions a new breastfeeding mother may ask, and recognize when to refer

mothers to other resources during critical periods when mothers may experience difficulty. Peer Counselors are available outside of standard business hours.

- (b.) The Breastfeeding Peer Counselor must meet the following qualifications:
  - (i.) Breastfed at least one baby for a minimum of six months.
  - (ii.) Enthusiastic about breastfeeding, and wants to help other mothers.
  - (iii.) Familiar with WIC; current or previous WIC client is preferred.
  - (iv.) Good communication and organizational skills.
  - (v.) Fluent in the language of the majority of clients they counsel.
  - (vi.) Member of the community for whom they serve.
  - (vii.) Available outside of standard business hours.
- (c.) See Exhibit 1.07I, Breastfeeding Peer Counselor, for required training and examples of work.

v. *Breastfeeding Senior Peer Counselor*

- (a.) A Senior Breastfeeding Peer Counselor is a paraprofessional support person who provides both basic and more advanced breastfeeding information and encouragement to pregnant and breastfeeding mothers to help women initiate and continue breastfeeding. The Senior Peer Counselor assists and mentors new peer counselors in their job. Senior Peer Counselors represent WIC in the community and with partner organizations. Senior Peer Counselors may provide support outside of the clinic and outside standard business hours.
- (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.) Enthusiastic about breastfeeding, and wants to help other mothers.
  - (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.) See Exhibit 1.07J, Senior Breastfeeding Peer Counselor, for required training and examples of work.

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.) Nutrition Service Support Staff 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.) Participating in nutrition and breastfeeding promotion and support.
  - (v.) Multi-tasking and supporting client centered approaches.
  - (vi.) Working as a team member.
  
- (c.) See Exhibit 1.07K, Nutrition Services Support Staff, for required training and examples of work.

## 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 summarized on the Staff Training Plan. See Exhibit 1.07L.
  
- d. Training Completion Timeframes
  - i. For new employees, required trainings must be completed within the timeframe specified in Exhibit 1.07L, Staff Training Plan.
  - ii. For existing employees, required trainings must be completed within the timeframe specified in Exhibit 1.07L, Staff Training Plan from the policy implementation date.
  
- e. Civil Rights Trainings is required annually for all staff. See Policy 1.09 Civil Rights.
  
- f. Ongoing Training Requirement
  - i. All WIC CPA and RD staff will complete staff development training relevant to WIC nutrition services four times a year. Staff development training should occur throughout the year.
    - (a.) Civil Rights Training *does not count* toward this requirement.
    - (b.) 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.
    - (c.) Completing the required trainings meet the four times a year requirement for a new employee's first year.



- g. 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; and
  - vi. Sponsorship of trainings (e.g., State Agency provided training, training by established professional organization, on-line trainings, webinars etc.).
  
- h. 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.) State provided Staff Training Plan. Refer to Exhibit 1.07L.
    - (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.
  
- i. 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 that 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  $\leq 5$  years.
2. It is recommended that all CPA and RD staff receive client centered service skills feedback from a mentor or coworkers at least annually.

## Reference:

Federal Regulation; 7 CFR Part 246.2  
2013 USDA WIC Nutrition Services Standards

## Cross Reference:

1.09 Civil Rights  
2.01 Eligibility/Certification of Clients  
2.14 Risk Determination  
2.15 Anthropometric Risk Determination  
2.16 Hematological Risk Determination  
4.01 Breastfeeding Promotion, Protection and Support

- 4.04 Breastfeeding Equipment, Inventory and Maintenance
- 5.01 Content of Nutrition Education
- 5.02 Required Services for Nutritional High Risk Clients
- 5.06 Required Services for High Risk Clients
- 6.02 Referrals
- 7.01 Food Package Determination
- 7.03 Food Package for Qualifying Conditions
- 9.03 Employee Conflict of Interest and Separation of Duties

Exhibits:

- 1.07A WIC Coordinator
- 1.07B Nutrition Education Coordinator
- 1.07C Registered Dietitian/ Registered Dietitian Nutritionist
- 1.07D Competent Professional Authority (CPA)
- 1.07E Health Educator
- 1.07F Breastfeeding Coordinator
- 1.07G Lactation Consultant
- 1.07H Breastfeeding Peer Counselor Manager/Coordinator
- 1.07I Breastfeeding Peer Counselor
- 1.07J Breastfeeding Senior Peer Counselor
- 1.07K Nutrition Services Support Staff
- 1.07L Staff Training Plan