

Local Agency WIC Director's Training



Webinar #3 - WIC Operations
July 20, 2015 (10:00 - 12:00 CDT)

Agenda

- Local Agency Planning and Evaluation
- Local Agency Staffing
- Clinic Operations
- Nutrition and Breastfeeding
- Vendor Management
- Civil Rights
- Outreach and Coordination
- Assessments and Memorandum of Agreements/Understanding (MOA/MOU)

Local Agency Plan - Overview

Requirement - Submit FY 2016 Annual Plan

- Joint Planning Process - 3 year goals
- Goal Areas: Breastfeeding & Nutrition
- LA Guidance and Instructions - emailed week of Aug 3rd
- Due - January 15, 2016

Local Agency Plan:

Important -
Locate Your Previous
Plan that was
submitted last year

LOCAL AGENCY ANNUAL WIC PLAN - FY 2015

INTRODUCTION & CHECKLIST

Local agency: _____ Plan Period: 10/1/14 – 9/30/15

Contact person: _____

Part 1: Plan components

- Introduction & Checklist – Part I**
 - Complete, sign, and date this introduction & check list form
- Narrative Summary**
 - Address the 6 areas identified in the plan guidance
- Breastfeeding Peer Counseling Report**
 - For agencies with BFPC funding
- Progress - Nutrition Goal: Baby Behavior**
 - Midpoint progress on 2 year joint goal
- Progress - BF Goal: Exclusive BF**
 - Midpoint progress on 2 year joint goal
- Local Agency Specific Goals (optional)**
 - Submit any new or going LA specific goals
 - Goals related to PCS (Participant Centered Services) are encouraged
 - Progress on previous LA specific goals

Submission date: _____

Signature _____

Part I & II- Mail 2 hard copies of all plan components:
Nebraska WIC Program
301 Centennial Mall South
PO Box 95026
Lincoln, NE 68509

Part 2: Plan components

- Introduction & Checklist – Part II**
- WIC Staff Listing Form***
 - Complete template on computer, listing all staff with WIC responsibilities, including contract staff
- WIC Clinic Site Listing Form***
 - Update the template to include all clinics
 - Update the template to include all clinic changes
- WIC Staff Job Descriptions**
 - Submit descriptions for new positions
 - Submit any revisions made to current job descriptions
- Local Agency WIC Clinic Procedures**
 - Submit new or revised procedures since last submission

Submission date: _____

Signature _____

*Email two completed forms to both Marge & Sarah
-WIC Staffing Form
-WIC Clinic Site Listing Form
marge.blankenship@nebraska.gov
sarah.wilson@nebraska.gov

AND

LA Name: _____ FY 2015 Action Plan – Progress Report

JOINT BF GOAL: By October 1st, 2016, increase the percent of exclusively breastfed infants participating in the WIC program.

Data Source: WIC System State 798 participation report shows the following % of fully breastfed infants. While age of infant is unknown this report does show the percentage breakdown of infants by amount of breastfeeding.

LOCAL AGENCY DATA			
Date	% all infants fully breastfed	% of all infants partially breastfed	% of all infants formula fed
June 2013			
June 2014			

STATE DATA			
Date	% all infants fully breastfed	% of all infants partially breastfed	% of all infants formula fed
June 2013	10.7%	17.4%	71.9%
June 2014	9.7%	18.3%	72.0%

JOINT STRATEGY: Promote and Support Exclusive Breastfeeding for All Mothers

ACTION STEPS: (what & why)	WHO:	WHEN:	SPECIAL NOTES:

Evaluation Method:

LA Name: _____ FY 2015 Action Plan – Progress Report

JOINT NUTRITION GOAL: By October 1st, 2016, implement a *Baby Behavior* based nutrition education approach for infant feeding.

JOINT STRATEGY #1: Collaborate with Nebraska WIC Association to develop and implement a 3- year plan for providing Baby Behavior training for all WIC local agency staff.

ACTION STEPS: (what & why)	WHO:	WHEN:	SPECIAL NOTES:

Evaluation Method:

Local Agency Plan

http://dhhs.ne.gov/publichealth/Pages/wic_local-agency-staff_data_index.aspx



Nebraska WIC Program

[WIC Home](#)

[Local Agency Staff
News and Updates](#)

[Training](#)

[Local Agency
Resources](#)

[WIC Procedures and
Policy Memos](#)

[WIC Data and
Planning](#)

[Nutrition Resources](#)

[Breastfeeding
Resources](#)

[Additional Links](#)

[Contact Us](#)

[WIC Data and Planning](#)

Nebraska's State WIC Program Goals

-  [State Goals](#) - Progress on Joint Nutrition and Breastfeeding Goals

Local Agency Plans & Data Review

-  [2015 Local Agency Plan Guidance and Check List](#)
-  [Data Packet - Breastfeeding Duration Goal 3 Year Goal](#)
-  [NWA Six Steps to Achieve Breastfeeding Goals for WIC Clinics](#)
-  [NWA Checklist for Six Steps to Achieve Breastfeeding Goals](#)
-  [Action Plan Template - BF, Nutrition/Health, PCS & Other Goals](#)
- [Staffing Chart Template](#) - emailed
- [Clinic Site Listing](#) - emailed

Monitoring - Management Evaluations



- Every 2 years - State onsite review
- 20% of clinics
- Observation, record review, interviews
- LA Self monitoring is required - annual basis
- Monitoring forms - Volume V

<http://dhhs.ne.gov/publichealth/Documents/Sec.%20D%20Page%202a-b%20Program%20Monitoring%20and%20Evaluation.pdf>

Purpose	To outline minimum requirements for program monitoring and to provide guidance on ongoing evaluation.
State Agency Management Evaluations	<p>The State Agency is required to conduct a management evaluation of each WIC local agency every two years.</p> <ul style="list-style-type: none">• The management evaluation includes evaluation of management, certification, nutrition education, participant services, civil rights, accountability, financial systems, and food delivery systems, including vendor monitoring.• State Agency staff and the local WIC agency will jointly plan the two-year evaluation schedule.• During each biennial evaluation 20% of the local agency's clinic sites must be visited.• The State Agency has standardized forms used in the evaluation process.• Written reports containing the results of the monitoring visits will be sent to the local agency WIC Director.• The local agency must respond to the State Agency's report of findings, within 60 days of receipt of the report. The response should include timeframes for implementing corrective action and other items as directed by the State Agency.
WIC Performance Measures	<p>The Nebraska WIC Program utilizes a set of WIC performance measures to provide ongoing evaluation of Program quality, efficiency and effectiveness.</p> <ul style="list-style-type: none">• Performance measure reports are sent out routinely to all WIC local agencies.• WIC local agencies should retain these reports to be used within the agency and as part of the annual planning process.• A Performance Measurement Training Guide is provided to each WIC local agency. Contact the State Agency if your agency needs an additional copy.• Performance measures will be used in the local agency management evaluation to identify areas for further review.
Local Agency Self Monitoring Requirements	Self-monitoring should be completed by local agencies to review agency WIC operations and operations of the agency's WIC clinics and any contractors.



Procedure: Local Agency Self-Monitoring

Functional Area: X Monitoring and Audits

Section: A

Citation: 246.19

Approval Date: 8/2002

Revised Date: 7/2015

Purpose

To outline minimum requirements of Local Agencies for program monitoring.

Local Agency Self-Monitoring Requirements

Self-monitoring should be completed by local agencies to review agency WIC operations and operations of the agency's WIC clinics and any contractors.

WIC Local agencies should complete self-monitoring on an annual basis.

Self-monitoring should address the following areas:

- Clinic management and services
- Nutrition, breastfeeding, and health education
- Food Delivery
- Vendor management
- Administrative operations
- Other contractor services

The State Agency has standardized forms for use in self-monitoring. See X Section A

Self-monitoring should be incorporated into the local agency's quality assurance plan.

Self-Monitoring Forms

Forms for self-monitoring can be found in X Section A

Monitoring - Management Evaluations

http://dhhs.ne.gov/publichealth/Pages/wic_local-agency-staff_procedure-manual_volume5.aspx

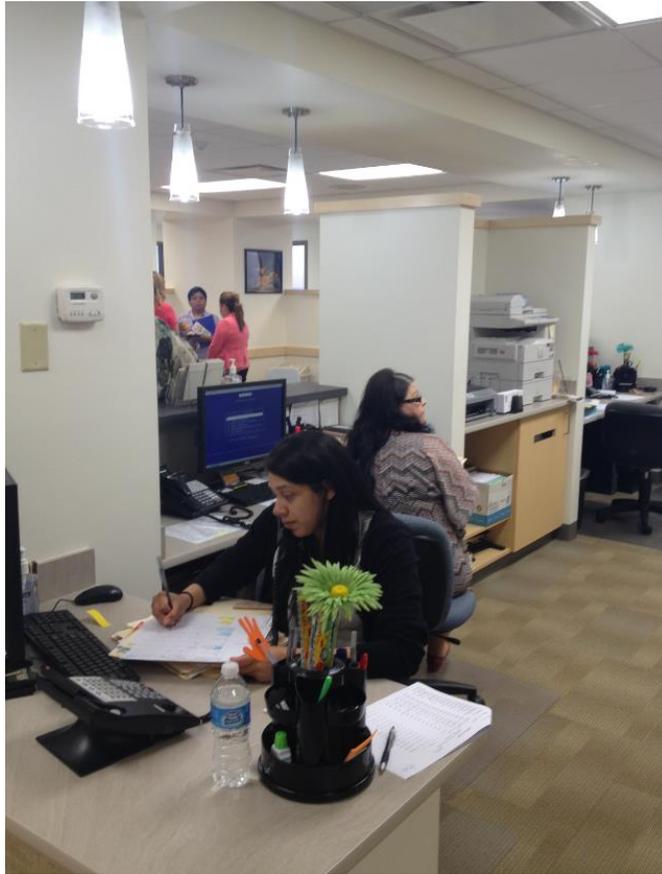
Appendix B: Local Agency Self Evaluation Forms

-  Self Monitoring Clinic Site Observation
-  Self Monitoring Clinic Observation of Staff & Client Services
-  Self Monitoring CPA Observation Form
-  Self Monitoring Active Chart Review
-  Self Monitoring Food Instrument Review
-  Self Monitoring Voided Food Instrument Review
-  Self Monitoring Vendor Management Staff Interview & Observation
-  Self Monitoring Tool for Fiscal Review

WIC Clinic Staffing



Clinic Staffing - WIC Clerk



- Job duties include:
 - Assess Identification, Residency and Income
 - Review and Explain Rights & Responsibilities
 - Print WIC Checks
 - Explain How to Use WIC Checks
 - Schedule Appointments
 - Promote and Support Breastfeeding

Clinic Staffing - WIC CPA



- Job duties include:
 - Nutrition Risk Assessment
 - Assign Food Package
 - Provide Nutrition Education
 - Promote and Support Breastfeeding
 - Print Checks
 - Explain WIC Foods
 - Schedule Appointments

Requirements for WIC CPA



Procedure: Competent Professional Authority

Functional Area: Certification, Eligibility & Coordination of Services

Section: Services B 1 a

Approval Date: 11.2012

Citation: 246.2; 246.7 (d); 246.10(b)(2) (iii)

Revised Date:

Purpose	To ensure that determination of medical/nutritional risk and prescription of supplemental foods are provided by qualified individuals in accordance with federal regulations and standards.
Definition	Competent Professional Authority (CPA) means an individual on the staff of the local agency authorized to determine nutritional risk and prescribe supplemental foods.
Qualifications	<p>Persons authorized to serve as a Competent Professional Authority include:</p> <ol style="list-style-type: none">1. Registered Dietitians (RD)2. Nutritionists (Bachelor's or Master's degree in Nutritional Sciences, Community Nutrition, clinical Nutrition, Dietetics, Public Health Nutrition or Home Economics/Consumer & Family Sciences with emphasis in nutrition)3. Eligible for Registration with the American Dietetic Association Commission on Dietetic Registration4. Registered Nurses (RN) with current Nebraska license5. Physicians/Physician's Assistants (PA), certified by the State of Nebraska Licensure Board. <p>The professional qualifications of these individuals must be documented in the local agency annual plan and available for review at Nutrition Services monitoring visits.</p>
Requirement for Registered Dietitian	<p>Each local agency is required to have on staff a minimum of one CPA that is a registered dietitian (RD) or masters-level nutritionist.</p> <ul style="list-style-type: none">• Alternatively, a person with RD qualifications may be retained as a consultant.
Other Qualifications for Position of WIC CPA	<p>The following qualifications represent State or locally medically trained individuals who may serve as a CPA:</p> <ol style="list-style-type: none">1. Baccalaureate degree from an accredited college or university with a minimum of 15 hours of course work in human nutrition.2. Baccalaureate degree from an accredited college or university with a minimum of 9 hours of course work in human nutrition and 2 years of work experience related to nutrition education. (such as WIC, EFNEP, community health educator)3. Baccalaureate degree from and accredited college or university and completion of competency based training program operated by a WIC State Agency and a minimum of 2 years work experience as a WIC CPA.4. Registered Dietetic Technician – DTR5. Licensed Practical Nurse with current Nebraska license
Questions	If a WIC local agency has questions regarding the qualifications of a specific individual, please contact the State WIC Director or State WIC Nutrition Coordinator for assistance.

New WIC Staff Training

- Statewide training program
- Coordinated effort between LA's and the Training Center
- Training is required
- Contact Jackie Johnson - when hiring new staff

New WIC Staff Training

3 Phase Training Approach

- Phase 1 - Learning About WIC (on-line)
- Phase 2 - Attend Training Center
- Phase 3 - Follow-up on training progress report; practice; other home agency training

New WIC Staff Training



Procedure: New Employee Training

Functional Area: II Nutrition Services

Section: C(1)

Citation: 246.11 (c)(2); 246.12(h)

Approval Date:

Revised Date: **7/2012 NEW**

Purpose

Outline the use and content of Nebraska's WIC Employee Training

Training Phases

Nebraska uses a three phrase approach to training employees.

Phase 1: is conducted at the employee's local clinic immediately after beginning their new position. This phase includes an orientation to the local agency policies and completion of the Learning About WIC modules.

Phase 2: is attendance at the Nebraska Training center within a short time after hiring, but after completing the Learning About WIC modules. The goal of training center is to have staff leave, with the ability to understand and perform the basic functions of their job with minimal supervision.

Phase 3: is the continued use and improvement of skills learned during training center and new skills with the help of a mentor and other staff at their home agency while they work in clinics.

New Staff Training - LA Role



Procedure: Local Agency's Role in Training

Functional Area: II Nutrition Services

Section: C(2)

Citation:

Approval Date:

Revised Date: **DRAFT 7/2013**

Purpose	Describe activities to be conducted by local agencies in training staff.
New Employee Training	<p>The local agency is responsible for providing and/or arranging training for all new WIC employees.</p> <p>Prior to assuming duties, the new employee should:</p> <ul style="list-style-type: none">• be oriented to local agency procedures• complete the Learning About WIC training <p>Within a reasonable time all new staff are required to attend the State WIC Training Clinic. Local agencies are responsible for scheduling the new employee for this training.</p>
Documentation of New Employee Training	<p>Documentation of new employee/WIC service provider training should be on file at the local agency. Documentation should include at a minimum:</p> <ul style="list-style-type: none">• Name of staff/provider• Topics covered• Date(s) of training• Evaluation
Routine Training	<p>The local agency is to provide routine training to all WIC staff including WIC service providers which have signed agreements with the local agency. At a minimum, that training should include:</p> <p><i>Annual Civil Rights Training</i> – Refer to Civil Rights Training procedure for details on what must be included in each training and what may be used to meet the requirement.</p> <p><i>In-Service Sessions</i> – At least annually and must be suitable for the individual staff position. Training for CPA's must be held semiannually.</p>
Acceptable Training	<p>Types of in-service training that meets the requirement include, but are not limited to:</p> <ul style="list-style-type: none">• Lectures or classes presented by state or local staff and/or community resources.

Acceptable Training (cont.)

- A staff person who attended a nutrition/health program or conference presenting the information learned to the remainder of staff upon their return.
- A review of current nutrition or health newsletters, journal articles or audio-visual materials, with staff discussing the information and the implications.

Training Documentation

Documentation of training should be on file at the local agency and include the following:

- Topics covered, objectives and outline of content
- Dates training was provided or attended
- Person(s) providing the training
- Person(s) who attended the training, including job title
- Evaluation of the training.

Allowable WIC Training

Workshops, conferences, short courses, webinars and distance learning training opportunities are an allowable WIC cost when the training relates to the staff person's WIC duties.

Non-Allowable Training

Training required as part of the local agency's own policy, and for some positions, required by regulations and statutes related to employee safety and medical/laboratory are not allowable WIC costs. This training is not within the scope of WIC and is the obligation of each local agency.

New WIC Staff Training

Training Website Information:

- ▶ http://dhhs.ne.gov/publichealth/Pages/wic_local-agency-staff_training_GLINK.aspx

Training Center

Nebraska WIC Training Center - General Information

-  Training Clinic Schedule
-  Training Clinic Welcome Letter
-  Directions to Training Clinic

To Do - Before Attending Training Center

-  Learning About WIC - Orientation Training Modules
-  Points to Cover Reminder
-  Trainee Background Sheet - CPA and Clerk (fillable form)
-  Clerk Self-Assessment (fillable form)

Nutrition & Breastfeeding

- Nutrition Education in WIC
- Nutrition Education using SNAP-Ed and EFNEP
- Breastfeeding Promotion and Support
- Breast Pump Policy

Goals of WIC Nutrition Education

- Emphasize the relationship between nutrition, physical activity and health
- Assist the client in achieving a positive change in dietary & physical activity habits
- Support improved nutritional status and the prevention of nutrition-related health problems.
- Designed to consider the nutritional needs and concerns, household situation, cultural practices, environmental limitations and educational abilities of the individual.

Nutrition Education Contact Basics

- Provided by qualified WIC CPA staff
- Provides interaction with client and is relevant to clients status, nutrition risk and concerns.
- Includes accurate and current information
- Is appropriately documented in the WIC system

Frequency of Nutrition Education Contacts

	Certification Periods and Nutrition Education Contacts					
	Infant 0-5 months old at initial cert	Infant 6-11 months old at initial cert	Child 1-4 years old	Pregnant	Breastfeeding Exclusive or Part	Not Breastfeeding
How long certified	Up to age one	Six months	Six months	Up to 6 weeks postpartum	Up to infants first birthday	6 months from date of delivery
How many nutrition education contacts needed	4	2	2	3	2 to 4	2
When are nutrition education contacts provided	Certification visit	Certification visit	Certification visit	Certification visit	Certification visit	Certification visit
	2nd Ed 1 month after cert visit	2nd Ed 2-3 months after cert visit	2nd Ed 2-3 months after cert visit	2nd Ed after 20 weeks gestation	2nd Ed between 2-4 months postpartum	2nd Ed between 2-4 months postpartum
	Mid-cert visit at 6 months old			2nd Ed during third trimester month before EDD	Breastfeeding Mid-cert visit at 6 months of age	
	2nd Ed at 9 months old			2nd Ed at 9 months postpartum if breastfeeding		

Nutrition Education through SNAP-Ed & EFNEP



Procedure: Nutrition Education Contacts Through SNAP-Ed and EFNEP

Volume: Nutrition Services/ Breastfeeding

Section: Nutrition Education

Citation: 246.11 (d)(1)

Approval Date: JULY 2013

Revised Date:

Purpose

To provide guidance for working with program staff from the **Supplemental Nutrition Assistance Program-Education (SNAP-Ed)** and **Expanded Food and Nutrition Education Program (EFNEP)** in the provision of nutrition education to WIC clients.

SNAP-Ed and EFNEP Defined

The University of Nebraska-Lincoln Extension SNAP-Ed and EFNEP programs provide services to help families on a limited budget improve the quality of their diet. SNAP-Ed and EFNEP participants acquire the knowledge, skills, attitudes and behavior changes necessary to improve their health. SNAP-Ed and EFNEP are free to all participants who meet income guidelines.

Participants are provided nutrition education from a specified curriculum that is delivered by SNAP-Ed and EFNEP staff. Participants may be taught individually or in small groups in the WIC clinic setting.

WIC, SNAP-ED, EFNEP Collaboration

WIC and SNAP-Ed/EFNEP recognize the importance of the services provided by the other programs and agrees that the integration of efforts increases the opportunities for each program to achieve their shared and respective goals.

These goals include:

- Decrease in the duplication of efforts for each program.
- Shared nutrition and health messages developed, utilized and reinforced.
- Sharing of training resources for staff as appropriate.

Referral of Clients to SNAP-Ed

- WIC will promote SNAP-Ed and EFNEP to all interested clients via the use of promotional materials and verbal referrals.
- SNAP-Ed and EFNEP may recruit clients from the waiting room of the WIC clinic.
- The WIC CPA may refer clients to SNAP-Ed and EFNEP
- WIC clients have the right to refuse a referral to SNAP-Ed or EFNEP, or to ask that nutrition education be provided by a WIC CPA.

If a client presents with more complicated nutrition concerns that the SNAP-Ed or EFNEP staff member cannot address – the client should be referred back to the WIC CPA for nutrition education.

Clients Eligible to Receive SNAP-Ed and EFNEP Nutrition Education Contacts

While all WIC clients are eligible to participate in SNAP-Ed and EFNEP programming available in the WIC clinic; only specific categories of WIC clients may have those education contacts documented and used to fulfill the second nutrition education requirement.

- Postpartum Women
- Children age 1-4

Only low risk clients are eligible to have SNAP-Ed/EFNEP education counted as a second nutrition education visit.

Breastfeeding Promotion



**Your Baby
Your Gift
Breastfeed
Anytime...
Anywhere...**

WIC
385-5188

San Francisco Medical Center
1001 CALIFORNIA ST. 10TH FLOOR
SAN FRANCISCO, CA 94142

Central District
HEALTH DEPARTMENT

photography done by
Niki Manning Photography

La Leche Materna... En Cualquier Tiempo-En Cualquier Lugar...



*Breastfeeding...
a gift of love*

*that lasts
a lifetime*

HELLO

Breastfeeding Support



Breastfeeding Policies



Procedure: Breastfeeding Promotion and Support

Volume: Nutrition Services/Breastfeeding

Section: A 6 b

Citation: 246.11(c)(7); WIC NSS

Approval Date: July 2013

Revised Date:

Purpose

To establish breastfeeding as the normal feeding method for infants. To encourage WIC participants to breastfeed their infants and to provide optimal support to breastfeeding women.

Breastfeeding promotion and support is provided to all pregnant and breastfeeding WIC participants.

Positive breastfeeding messages must be incorporated into all relevant educational activities, materials and outreach efforts where infant feeding is discussed.

All breastfeeding counseling and education is provided by competent staff and follows recommended breastfeeding education topics and timeline, tailoring the education to the individual participants needs.

Promotion to Pregnant Women

All pregnant WIC participants are encouraged to breastfeed unless contraindicated for health reasons (e.g. HIV positive, use of contraindicated drugs/medications, etc.).

Every pregnant participant will be provided breastfeeding education/counseling which:

- Integrates breastfeeding promotion into the continuum of prenatal care.
- Includes an assessment of participant's knowledge, concerns and attitudes related to breastfeeding at the earliest opportunity in the prenatal period and provides prenatal education based on this assessment.

Prenatal counseling/education should include helping the mother to communicate effectively with hospital staff, physician or health care providers about her decision to breastfeed.

Support for Breastfeeding Women

Every breastfeeding woman will be provided breastfeeding support which:

- Includes assessment of participant's knowledge and experiences as soon as possible after delivery.
- Counseling and education to promote exclusive breastfeeding until appropriate timing for addition of solid foods.
- Support for returning to work or school, including work environment and breast milk collection and storage.

Breastfeeding Peer Counseling

Breastfeeding Peer Counselors provide evidence-based, mother-to-mother support to encourage initiation and continuation of breastfeeding. Local agencies are encouraged to implement a BFPC program according to the standards provided in the Loving Support BFPC Model.



Procedure: Guidelines for a Breastfeeding Peer Counselor Program

Functional Area: Nutrition Services/Breastfeeding

Section: A 7

Citation: Loving Support® Model for Peer Counseling

Approval Date: November 2012

Revised Date:

Purpose

To provide guidelines for the Breastfeeding Peer Counselor Program

Definition of a Breastfeeding Peer Counselor

A Breastfeeding Peer Counselor is a mother who:

- Has breastfed one or more infants
- Has successfully completed a breastfeeding peer counselor training program, and
- Is competent to provide breastfeeding advice and information to WIC clients

Peer counselors are women in the community with personal breastfeeding experience who provide information and support to WIC mothers. Peer Counselors help prevent and manage common breastfeeding concerns and offer mother-to-mother support and encouragement through the breastfeeding experience.

Role of a Breastfeeding Peer Counselor

The role of a Breastfeeding Peer Counselor includes:

- Working within their scope of practice and job description.
- Providing guidance and support and up-to-date information on breastfeeding to interested pregnant and lactating clients.
- Being familiar with common problems encountered by breastfeeding women.
- Being trained to anticipate problems to help prevent their occurrence.
- Referring more difficult problems to a trained WIC Breastfeeding Specialist.

WIC Breastfeeding Peer Counselor Training Program

WIC Breastfeeding Peer Counselors must successfully complete a required training program prior to working as a peer counselor. The Breastfeeding Peer Counselor training program includes:

- Becoming familiar with the philosophy and mission of WIC.
- Successful completion of the state approved *Loving Support® Through Peer Counseling: A Journey Together* curriculum.
- Local agency specific policies and procedures
- Peer counselors may participate in observational learning experiences such as clinic settings or home visits with visiting nurses, breastfeeding classes, as specified by local agency.

The State Breastfeeding Peer Counselor Coordinator is available to assist local agencies with the training program.

Breastpump Program



Procedure: Breast Pump Policy General Information

Volume: Nutrition Services/Breastfeeding

Section: A 6 Appendix

Approval Date: 11.2012

Citation: 246.14 (b)(1)(iii), MPSF-1:WC-95-37 Revised Date:

Purpose	To provide guidance on provision of breast pumps for WIC breastfeeding mothers to support the initiation and continuation of breastfeeding by providing breast milk to their infants when they cannot be together.
Allowable Costs	Breast pumps that directly support the initiation and continuation of breastfeeding are an allowable WIC Program cost
Provision of Breast Pumps	<p>WIC provides breast pumps as one component of breastfeeding support services.</p> <p>Breast pumps should be provided to WIC breastfeeding participants based on individual need and requested support, not as an inducement to consider or to continue breastfeeding.</p> <p>Generally, breast pumps are provided to mothers who are having difficulty establishing or maintaining an adequate milk supply due to maternal/infant illness; during mother/infant separation (such as hospitalization or a return to work or school); and to mothers who have temporary breastfeeding problems, such as engorgement.</p>
Breast Pumps Are Not For Everyone	<p>Breast pumps may be offered to participants based on need. Some women benefit significantly from the use of a breast pump, while many others do not need breast pumps to initiate and continue breastfeeding.</p> <p>Most women, in normal circumstances, can establish and maintain lactation without using a breast pump.</p> <p>In fact, providing breast pumps to all breastfeeding women regardless of need may have the unintended effect of discouraging breastfeeding. This practice may give breastfeeding women the impression that special equipment is needed to express milk manually and, thus, reinforce lack of confidence.</p>



Vendor Management Overview

- The vendor management component of the Nebraska WIC program includes three main areas
 - Selection & Authorization of WIC stores
 - The Vendor management staff ensures stores that are authorized are clean & sanitary, offer wholesome WIC foods at a competitive price, and that there is adequate participant access.
 - Occurs every 2-3 years
 - Training & Education of WIC stores
 - Training is completed at time of authorization & annually.
 - Can be done by state & local agency vendor managers
 - Monitoring & Follow up
 - Used to detect **violations** of WIC program procedures
 - Completed by both state and local vendor staff

Local Agency Vendor Manager

- Primary role is to serve as a liaison between the WIC Program and retailers.
- Assists State WIC Vendor Management Coordinator in carrying out the policies & procedures
- Responsibilities
 - Vendor application process
 - Review application & conduct onsite visit
 - Assist with contract training & contract signing
 - Monitoring
 - Assist with quarterly price lists
 - Routine monitoring visits
 - Review problem checks
 - Training
 - Train store staff as requested
 - Can be completed via phone, written correspondence, and onsite visit.

Clinics

- Opening, Closing or moving a Clinic requires approval
 - Approval is requested using the Clinic Change Form.
 - http://dhhs.ne.gov/publichealth/Documents/WIC_Request_for_Clinic_20Approval_Form.pdf
 - Request approval as soon as possible, but no later than 90 days prior to the anticipated action.
- USDA must approve all clinic closings and moves

NEW Clinic Requirements

- Smoke Free Building
- Handicap Accessible
- Breastfeeding Space
- Must have Internet Connection

Closing A Clinic

- Survey Participating Families to Determine if they can travel to another clinic.
- Why the clinic is closing.
- Caseload by racial group at clinic.
- Plan for notifying families about clinic closing.

Confidentiality

- Sharing and Disclosure of WIC Information
- Releasing Client Information
- HIPPA and WIC
- Volunteers, Students, Interns

Responding to Subpoenas & Search Warrants

- Contact State Office
- Follow Procedure at:
<http://dhhs.ne.gov/publichealth/Documents/Section%20J%20page%205%20Responding%20toSubpoena%27s%20Court%20Orders,Search%20Warrants.pdf>
- Attorney available at Local Agency

Abuse & Neglect



- Required to report
- Report to Nebraska Abuse/Neglect Hotline:
1-800-652-1999
- Information to Release from Client Records

Participant Violations/Sanctions

- **Violation:** Any intentional action of a client, authorized representative or a proxy that violated Federal or State statutes, regulations, policies or procedures.
- Three levels of Violations with corresponding Sanctions
 - Education
 - 5 Points Assigned
 - 10 Points Assigned

Client Sanctions

- Sanctions stay in record for ONE Year
- Accumulation of 20 Points = 1 Year Disqualification
- Local Agency Role
- State Agency Role

http://dhhs.ne.gov/publichealth/Documents/client_violations_and_sanctions.pdf

CLIENT VIOLATIONS & SANCTIONS

TYPE ONE VIOLATIONS: EDUCATE		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
C - Signing a WIC check before presenting it to the vendor for purchase of WIC foods.	<ul style="list-style-type: none"> ✓ Document client follow-up on Client Integrity Follow-up Form ✓ Educate 	
D - Failure to sign a WIC check.		
A - Using check before the first date to use or after the last date to use.		

TYPE TWO VIOLATIONS: SANCTION -- 5 Points		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
F - Redeeming a WIC check at a non-authorized WIC store or redeeming a WIC check for food or primary contract infant formula at a special purchase store.	<ul style="list-style-type: none"> ✓ Document client follow-up on Client Integrity Follow-up Form ✓ Evaluate ✓ Educate ✓ Assess 5 sanction points, if warranted, for 12 months duration 	<ul style="list-style-type: none"> ✓ Monitoring, Enforcement & Support of Local Staff
T - Accepting foods or formula purchased with WIC checks from a person other than the WIC program.		
E - Purchasing WIC approved foods or formula in amounts greater than that listed on the WIC check.	<ul style="list-style-type: none"> ✓ Document client follow-up on Client Integrity Follow-up Form ✓ Evaluate ✓ Educate ✓ Assess 5 sanction points, if warranted for 12 months 	<ul style="list-style-type: none"> ✓ Monitoring, Enforcement & Support of Local Staff ✓ Information forwarded to State for assessment of claims
G - Exchanging WIC formula at the store without approval by WIC staff.		
H - Purchasing foods or formula in a WIC category not specified on the WIC check.		

TYPE TWO VIOLATIONS: SANCTION -- 10 Points		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
R - Giving away WIC clients' WIC food or formula to someone else outside the immediate family for the second party's personal use, exchange or sale.	<ul style="list-style-type: none"> ✓ Document client follow-up on Client Integrity Follow-up Form ✓ Evaluate ✓ Educate ✓ Assess 10 Sanction points, if warranted, for 12 months duration 	<ul style="list-style-type: none"> ✓ Monitoring, Enforcement & Support of Local Staff

Sanction Forms

- ▶ Integrity Screening Form
- ▶ http://dhhs.ne.gov/publichealth/Documents/Section_20P_page_6_Sanction-Forms.pdf

Serving Persons Living In Institutions

- *Nebraska WIC does not serve persons residing in institutions.*
- Institution - any 24 hours residential accommodation that provided meal service.
 - Exceptions: private residences, domestic abuse shelters and homeless facilities.

Services for Homeless Individuals

- Nebraska WIC does provide services to individuals who are homeless and are living in facilities such as:
 - Temporary shelters
 - Crisis centers
 - Homeless shelters
 - Domestic violence shelters

Homeless Facilities

- Homeless Facility:
- Provides meal service,
- Is a supervised publicly or privately operated shelter designed to provide temporary shelter,
- Is a shelter designed to provide temporary shelter in a crisis situation (Abuse Shelters),
- A public or private place not designed for or normally used as a regular sleeping accommodation

Assessment of Homeless Facilities

- Must be completed before anyone living there can receive WIC benefits.
- Initial Assessment
- Annual follow-up assessments
- Assessment form located:
http://dhhs.ne.gov/publichealth/Documents/Section_M_Page_4_Assessment_of_Homeless_Facilities_Jan_2009.pdf

Civil Rights

- Training

 - State Agency

 - Local Agency

Civil Rights - Public Notification

- Annual Notice
- Non-Discrimination Statements
- Minority Groups
- Web Pages

Discrimination Complaints

- Discrimination Complaint:
- Reporting Timeline
- Accepting Complaints
- Documentation
- Send to State Office - 5 Days
- Retention

- WIC Clinics Located in a Hospital
- MOU's
- Coordination of Services
- Interagency Agreements
- Outreach & Targeting