

**Memo Name:** Medical Documentation Waiver Ending  
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**Procedure Reference:** Medical Documentation During a Pandemic

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## Medical Documentation

Medical Documentation waivers were intended to provide short term flexibility early in the COVID-19 pandemic when timely access to health care providers posed a challenge to participants. As defined by federal regulations, medical consultation from a licensed provider is necessary to safely and appropriately prescribe certain supplemental foods to participants who have a documented qualifying condition. Due to the above mentioned necessity, USDA FNS has set an expiration date for all medical documentation waivers, of December 31, 2021. This policy memo provides guidance for how to handle medical documentation, otherwise known as a physician authorization form or PAF, after the expiration of the medical documentation waivers.

### Existing PAFs

When a PAF expires, best practice is to obtain a new PAF signed by a medical provider with prescriptive authority, in the following forms:

- original written document
- electronic document
- fax

If none of these options are available, than a CPA can take medical documentation verbally over the phone.

- This verbal PAF only lasts 2 weeks
- After two weeks, it is required to obtain a PAF signed by a medical provider, with prescriptive authority
- If a WIC employee does not receive a PAF signed by a medical provider within two weeks, contact the provider to obtain a copy and document the contact in Journey

## **New PAFs**

Prescription Authorization Forms (PAF), for specialty formulas and WIC eligible nutritionals, can be filled out verbally over the phone, with the participant's medical provider, for 2 weeks.

- For new PAFs, the CPA can take verbal medical documentation over the phone
  - This verbal PAF last for 2 weeks and then we are required to obtain a PAF signed by a medical provider with prescriptive authority
  - Please follow the steps above for filling out a PAF according to if the CPA is in the clinic or not in the clinic

## **Formula Changes**

- This will require a **NEW PAF**
- Please follow the requirements above for NEW PAFs

## **Acceptable Methods to Receive NEW or Updated PAFs**

Each local agency is responsible for determining how a WIC client or physician offices can securely share this information with WIC staff. Possible acceptable options to receive PAF information include:

- Secure drop box or drop off location outside of the clinic
- Mail
- Electronic
- Fax
- By phone call- the WIC CPA can take information verbally over the phone and complete the PAF fillable form or paper copy of the PAF

## **Out of State Transfers**

### **Transfers Who Bring a PAF:**

Clients who bring a valid PAF for the specific formula would have a food package assigned according to normal procedures and for the length of time specified on the PAF. Other states may allow physicians to write PAFs for longer periods of time than Nebraska. The end date listed on the PAF should be used, even when the time is greater than six months.

### **Transfers Seen by a Physician in Nebraska:**

Those who do not have a PAF and who have seen a physician in Nebraska would require the CPA to reach out to the physician using the steps provided in **New PAFs** section earlier in this memo.

## **Transfers Who Have NOT Been Seen a Physician in Nebraska:**

Clients who do not have a PAF and who have not seen a physician in Nebraska would require:

- Staff to reach out to the state the client moved from to determine if a PAF exists and the length of time the PAF is valid for.
  - Best practice would be to ask the other state to send the PAF electronically using a secure method.
  - When it is not possible for the previous WIC clinic to send the PAF electronically you may take the information verbally over the phone. Using a Nebraska PAF, fill in the information provided following the steps outlined above in the “Existing PAFs” section. In the signature line, write in both the name of the person providing the information from the other WIC program and your name.
  - When you are unable to reach the transferring state or clinic or the PAF has expired you may provide benefits up to two months for the special formula. A PAF should be sent to the client. They must have their new physician complete and return the PAF within the two month time period to continue receiving the formula.