

## Pennsylvania Women, Infants and Children (WIC) Policy Index

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
<b>Section 1. General Administration</b>					
1.00	<b>Program Management</b>	PA WIC shall achieve program consistency, standardization and integrity through a formal system of communication, expenditure, staff competence, training, program monitoring and emergency planning to guide staff in the execution of their duties. The WIC State Agency Policy and Procedure Manual contains the policies and procedures of WIC. All local agencies and clinics shall follow the policies and procedures as written in this manual.	<ul style="list-style-type: none"> <li>• Communication between SA, Local Agencies, vendors, and contractors</li> <li>• Reporting Requirements</li> <li>• Grant and Program Monitoring</li> <li>• Vendor Management</li> <li>• Staff Training and Development</li> <li>• Disaster Response and Recovery</li> </ul>	<ol style="list-style-type: none"> <li>1. USDA Memo 95-067.</li> <li>2. USDA Memo 96-035.</li> <li>3. USDA Memo 96-042.</li> <li>4. WIC Regulations: 7 CFR part 246.11.</li> <li>5. WIC Regulations: 7 CFR Part 246.2</li> </ol>	
1.01	<b>Local Agency Selection and Disqualification</b>	PA WIC shall periodically review the qualifications of authorized local agencies under its jurisdiction. This shall be achieved via review of current grantee performance and compliance history, review of contract/grant options, including a cost/benefit analysis of each, and pursuing the most viable option to serve and grow program participation following State procurement requirements.	<ul style="list-style-type: none"> <li>• Service Delivery Analysis</li> <li>• LA Selection</li> <li>• LA Disqualification</li> </ul>	<ol style="list-style-type: none"> <li>1. 7 CFR Part 246.5 – Selection of Local Agencies</li> <li>2. 7 CFR Part 246.18(a)(3)(i-iii) – Local Agency Appeals</li> </ol>	
1.02	<b>Abuse and Fraud Prevention and Investigation</b>	The PA WIC Program (Program) shall strive to prevent program abuse and/or fraud, investigate expeditiously any such allegations made, and sanction any participant and/or staff with findings of substantiated abuse and/or fraud. Local agencies (LA) in conjunction with the State Agency (SA) are responsible for the detection and prevention of dual participation.	<ul style="list-style-type: none"> <li>• Definitions (close friend, relative and Separation of Duties)</li> <li>• Abuse and/or Fraud Prevention</li> <li>• Complaint and Abuse/Fraud Investigation</li> <li>• FI Misuse Investigations</li> <li>• Sanctions and Disqualification Following Investigation</li> <li>• Appeal Procedures</li> <li>• LA Hearing Procedures</li> <li>• Dual Participation (Interstate and Intrastate Report)</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR Parts 246.</li> <li>2. 2, 246.7(l) 2. WIC Regulations: 7 CFR Part 246.8.</li> <li>3. WIC Regulations: 7 CFR Part 246.9</li> <li>4. USDA Memo dated August 19, 2016</li> <li>5. Department of Health Information Circular, February 1993.</li> <li>6. FNS 113, dated November 8, 2005.</li> <li>7. 2.28 Pa. Code §8.51-8.62.</li> </ol>	<p><b>Warning: This policy is currently in a state of transition and is being updated to support EBT, telehealth, waivers and other innovations resulting from the pandemic.</b></p>
1.03	<b>Local Agency Monitoring</b>	PA WIC requires State and Local Agency internal review procedures to monitor and evaluate grantee operation of the WIC Program.	<ul style="list-style-type: none"> <li>• LA Internal Clinic Monitoring</li> <li>• Clinic No Show Monitoring</li> <li>• SA Monitoring (Retail Store Review, Clinic Nutrition Services Review, Clinic Administration Review and Fiscal Review)</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR Part 246.11(d)(2).</li> <li>2. WIC Regulations: 7 CFR Part 246.19(b). (Federal Register, Vol. 59, No.148, March 31,1994)</li> <li>3. WIC Regulation: 7 CFR Part 246.20.</li> <li>4. OMB Circular A-133 5. M.D. 325.9</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
1.04	<b>Confidentiality of Participant Records</b>	The PA WIC Program shall respect and protect participant Protected Health Information (“PHI”) and WIC confidential information (collectively, hereinafter “information”) and release only the minimum information necessary to carry out the purposes of any legitimate request for release of information. In accordance with 7 C.F.R. §246.26 of the Federal WIC Regulations, confidential participant information is any information about an applicant or participant that individually identifies an applicant or participant and/or family member(s).	<ul style="list-style-type: none"> <li>Participant Information and Confidentiality Protections</li> <li>Minimum Necessary Release of Information</li> <li>Enforcement</li> <li>Reporting Child Abuse to Child Protective Services</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR, Part 246.26(d).</li> <li>PA Child Protective Services Law 23 PA. C.S.A. §§6301-6385.</li> <li>55 PA Code §§34901.1-3490.210.</li> <li>FNS Instruction 800-1 dated March 30, 1990.</li> <li>USDA Memo 93-040.</li> <li>USDA Memo 94-070.</li> </ol>	
1.05	<b>Information System Management</b>	The security and accuracy of the highly sensitive participant information maintained within the WIC Management Information System (MIS) must be ensured to comply with federal and Commonwealth regulations and safeguard the welfare of the program’s participants, and correlatively the integrity of the program. Therefore, state and local agency staff must account for the physical location and security of system-connected hardware, including desktop and laptop PCs, at all times. This involves adhering to guidelines for creating and maintaining user IDs and effective passwords and updating the system routinely. Proper procedures for capturing clinic staff and participant signatures must also be followed to adhere to regulations and protect against fraud.	<ul style="list-style-type: none"> <li>Equipment Management</li> <li>Connection to Network (commonwealth-purchased equipment only)</li> <li>Creating User IDs</li> <li>Creating and Resetting Passwords</li> <li>Password Protection Standards</li> </ul>	<ol style="list-style-type: none"> <li>Commonwealth of PA ITBSEC007 – Minimum Standards for User ID and Passwords</li> <li>USDA/FNS Handbook 701, July 2001</li> <li>WIC Regulations: 7 CFR Part 246.</li> <li>WIC Regulations: 7 CFR Part 246.2.</li> <li>USDA Memo dated July 15, 2004 SFP-04-088</li> <li>Commonwealth of PA ITBSEC006 - Electronic Signature Policy</li> </ol>	<b>Warning: This policy is currently in a state of transition and is being updated to support EBT, telehealth, waivers and other innovations resulting from the pandemic.</b>
1.06	<b>Material Development and/or Requisitioning</b>	The PA WIC State Agency shall review and approve all written and audiovisual materials developed by grantees to assure compliance with Federal and State rules, regulations, policy, procedure and guidance statements. Materials available from the State Agency shall be made available to grantee via requisition.	<ul style="list-style-type: none"> <li>Material Development (Logo, non-discrimination statement, Funding Statement, Credits, Evaluation)</li> <li>Stock Requisition</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR Part 246.8.</li> <li>FNS Instruction 800-2, June 2, 1992.</li> <li>FNS Policy on Copyrights, July 1, 1980.</li> <li>Standard General Terms and Conditions.</li> <li>USDA Memo dated May 24, 2013.</li> <li>WIC Memo 13-077-1.00 November 18, 2013.</li> <li>Departmental Regulation (DR) 4300- 003, Equal Opportunity Public Notification Policy, June 2, 2015.</li> </ol>	
1.07	<b>Civil Rights</b>	The State Agency (SA) and the Local agency (LA) shall adhere to all Civil Rights laws and regulations to ensure equal access to federally assisted programs regardless of a person’s race, color, natural origin, age, sex or disability.	<ul style="list-style-type: none"> <li>Civil Rights Training</li> <li>Non-discrimination statement</li> <li>Public Notification</li> <li>Americans with Disabilities Act Amendments Act</li> </ul>	<ol style="list-style-type: none"> <li>Title VI of the Civil Rights Act of 1964</li> <li>Title IX of the Education Amendment of 1972</li> <li>Sections 504 and 508 of the Rehabilitation Act of 1973</li> <li>The Age of Discrimination Act of 1975</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
			<ul style="list-style-type: none"> <li>Civil Rights Impact Analysis (CRIA)</li> <li>Civil Rights Questionnaire</li> <li>Civil Rights Complaints</li> </ul>	<ol style="list-style-type: none"> <li>The Americans with Disabilities Act Amendments Act (ADAAA) of 2008</li> <li>The Pennsylvania Human Relations Act of 1997</li> <li>WIC Regulations: 7 CFR, Part 246.8</li> <li>USDA Regulations: 7 CFR, Part 15</li> <li>FNS Instruction 113-1</li> <li><a href="https://www.ascr.usda.gov/directives-and-regulations">https://www.ascr.usda.gov/directives-and-regulations</a></li> </ol>	
1.08	<b>Translation and Interpretation</b>	The PA WIC Program requires local agencies (LA) to have procedures in place to serve Limited English Proficient (LEP) persons.	<ul style="list-style-type: none"> <li>Definitions (Protected Classes, LEP persons, Interpretation, Translation, Bilingual Staff, Reasonable Accommodation and Minor)</li> <li>Title VI of the Civil Rights Act of 1964</li> <li>LEP Persons</li> <li>Translation of Written Materials</li> </ul>	<ol style="list-style-type: none"> <li>USDA Guidance to Federal Financial Assistance</li> <li>Title VI of the Civil Rights Act of 1964</li> <li>Title IX of the Education Amendments of 1972</li> <li>The Rehabilitation Act of 1973: Sections 504 and 508</li> <li>The Americans with Disabilities Act of 1990</li> <li>The Age Discrimination Act of 1975</li> <li>U.S. Department of Homeland Security's (DHS) 2012 Language Access Plan</li> </ol>	
<b>Section 2. Financial Management</b>					
2.00	<b>Proof of Financial Need</b>	To define "Proof of Financial Need" required by the WIC State Agency to justify a State Agency's request to expedite payment of a grantee's invoices.	<ul style="list-style-type: none"> <li>Definitions (Financial Need, Fiscal Responsibility, Proof of Financial Need)</li> <li>Fiscal responsibility</li> </ul>		
2.01	<b>Local Agency Financial Management</b>	Local agency (LA) grantees shall prepare and submit to the State Agency (SA) for review and approval a budget for administrative and program operation upon request. Expenditure of program funds shall be consistent with 2 CFR 200 (OMB Supercircular) as well as the approved budget and constitute those costs necessary for fulfillment of PA WIC Program objectives and contract requirements.	<ul style="list-style-type: none"> <li>Budget Request</li> <li>Budget Deviations</li> <li>LA Cash Needs Request</li> <li>Allowable Nutrition Services and Administration Expenditures</li> <li>Specific Allowable Costs</li> <li>Cost Allowable with SA Approval</li> <li>Unallowable Costs</li> <li>Financial Record Keeping</li> </ul>	<ol style="list-style-type: none"> <li>OMB Super circular</li> </ol>	
2.02	<b>Cost Allowability for Travel, Incentive Items, Tuition Reimbursement and Renovations</b>	The local agency (LA) shall be reimbursed for travel according to this policy and shall obtain State Agency (SA) approval prior to arranging any out of state travel, purchasing incentive items, granting staff approval to enroll in classes for reimbursement, or completing renovations through the grant agreement.	<ul style="list-style-type: none"> <li>Travel (General, Authorization to Travel, Cash Advances, Transportation, Lodging, Subsistence)</li> <li>Incentive Items</li> <li>Tuition Reimbursement</li> <li>Renovations</li> </ul>	<ol style="list-style-type: none"> <li>Internal Revenue Code section 127 as amended per 2 CFR 200.431(j)(2)</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
2.03	<b>Nutrition Education, Breastfeeding Promotion &amp; Support, and Outreach Expenditure Requirements</b>	The local agency (LA) shall expend at least one sixth of administrative and program costs on nutrition education, 1% on outreach expenditures and a dollar amount to be determined by the State Agency (SA) on an annual basis on breastfeeding promotion and support. Each LA must itemize and report all nutrition education, breastfeeding promotion, and outreach expenditures. All expenditures and documentation to support allowable costs must be consistent with standards set forth under 2 CFR 200 and 7 CFR Part 246.	<ul style="list-style-type: none"> <li>• Nutrition Education Expenditures</li> <li>• Breastfeeding Promotion Expenditures</li> <li>• Outreach Expenditures</li> <li>• Documentation of Expenditures</li> <li>• Time Logs and Time Studies</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulation: 7 CFR Part 246.11, 246.14c.1</li> <li>2. WIC Regulation: 7 CFR Parts 246.14, 246.24 and 246.25.</li> <li>3. WIC Regulation: 2 CFR 200</li> <li>4. WIC Regulation: 7 CFR Part 246</li> <li>5. Public Law 101-147.</li> <li>6. Current Pennsylvania Department of Health Contract.</li> <li>7. P&amp;P 2.05 Equipment Purchase, Inventory, and Disposition</li> </ol>	
2.04	<b>Audit of Local Agencies</b>	PA WIC shall require annual audit of all local agency grantees. Specific audit requirements for local agencies receiving WIC funding are dependent upon the nature of the local agency's organization. The local agency has the responsibility for determining if it is: (a) a governmental entity; (b) a non-governmental, nonprofit entity; (c) a nonprofit hospital not affiliated with either a governmental or an institution of higher education; or (d) a for profit entity. Specific audit requirements for WIC local agencies are prescribed by the U.S. Office of Management and Budget (OMB) 2 CFR 200, Subpart F, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and related Pennsylvania Management Directive 325.9, Processing Audits of Federal Pass-Through Funds.	<ul style="list-style-type: none"> <li>• Annual Audit required of local agencies</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulation: 7 CFR 246.20.</li> <li>2. 2 CFR 200, Subpart F</li> <li>3. Management Directive 325.9</li> </ol>	
2.05	<b>Equipment Purchases, Inventory and Disposition</b>	The Bureau of WIC shall have in place procedures to authorize, document and track equipment purchases, and dispositions made by Local Agencies and their sub-grantees. Equipment purchased with WIC funds shall be used exclusively for the WIC Program.	<ul style="list-style-type: none"> <li>• Equipment Definition</li> <li>• Equipment Purchase (Budget, Bids, Approvals)</li> <li>• Equipment Reimbursement and Inventory</li> <li>• Lost Equipment</li> <li>• Stolen or Damaged Equipment</li> <li>• Equipment Disposition</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulation: 7 CFR Parts 246.14, 246.24 and 246.25.</li> </ol>	
<b>Section 3. Program Operations</b>					
		The PA WIC Program shall provide clinic services at locations and times convenient to those it serves, in coordination with other services, in a	<ul style="list-style-type: none"> <li>• Participant Service Locations (Service Areas and Local Agencies)</li> <li>• Clinic Sites (Selecting,</li> </ul>	<ol style="list-style-type: none"> <li>1. SFP 01-111, Immunization Screening and Referral in WIC, August 31, 2001</li> <li>2. Update on Immunization Issues, SFP 20-</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
3.00	<b>Clinic Operations</b>	timely and efficient manner and in a healthy environment.	<ul style="list-style-type: none"> <li>Types and Requirements)</li> <li>• Coordination with other Social Service Agencies</li> <li>• Reception and Phone Conduct</li> <li>• Clinic Schedules</li> <li>• Voter Registration and Coordinator</li> <li>• Immunization Screening and Referral</li> </ul>	<p>105, July 3, 2002.</p> <ol style="list-style-type: none"> <li>3. FNS Instruction 800-1, March 3, 1990.</li> <li>4. OMB Circular A-102, Attachment C and OMB 2 CFR, Part 215</li> <li>5. WIC Regulations: 7 CFR Part 246.25(a).</li> <li>6. P&amp;P 1.05 Information System Management</li> <li>7. USDA Memo 99-026.</li> <li>8. Federal Register, November 18, 1998, page 63970.</li> </ol>	
3.01	<b>Mobile Clinics</b>	A mobile clinic is defined as a vehicle used to complete WIC certifications and other appointment types for participants in hard-to-reach areas that may be underserved by traditional brick-and-mortar WIC clinics. However, a secondary purpose of mobile clinics is conducting outreach or other program activities. The goal of mobile clinics is to ultimately increase access to and participation in WIC.	<ul style="list-style-type: none"> <li>• Requirements for mobile clinics</li> <li>• Procurement and requests for approvals of new mobile clinics</li> <li>• Operations</li> <li>• Disposition</li> </ul>	<ol style="list-style-type: none"> <li>1. USDA Memo 10-017.</li> <li>2. WIC Regulations: 2 CFR 200.313 3. Department of Health Standard General Terms and Conditions (Rev. 2/21)</li> </ol>	
3.02	<b>Local Agency Staffing</b>	Local WIC agencies (LAs) must hire and maintain the required positions as indicated in this policy based on the qualifications, experience and skills within. Other positions may be hired and maintained based on LA needs. WIC staff must fulfill the duties pertaining to their position within this policy unless an exception has been made by the State agency (SA).	<ul style="list-style-type: none"> <li>• Required positions and qualifications:</li> <li>• Administrative Staffing</li> <li>• Nutrition Services Staffing</li> <li>• Breastfeeding Services Staffing</li> <li>• Program Outreach Services</li> <li>• Vendor Management Services</li> </ul>	<ol style="list-style-type: none"> <li>1. 7 CFR 246.2 "Competent professional authority"</li> <li>2. USDA BFPC Management Guide</li> <li>3. WIC Breastfeeding Model Components for Peer Counseling</li> </ol>	
3.03	<b>Training of WIC Staff</b>				Still in development
3.04	<b>Caseload Management</b>	Pennsylvania Women, Infants and Children (WIC) program shall manage Federal Food and Nutrition Services Administration funds to maximize program participation among eligible applicants and maintain a waiting list when funding is insufficient to serve all applicants.	<ul style="list-style-type: none"> <li>• Definitions (Caseload/Enrollment, Participation, Participation Assignment, Target Population)</li> <li>• Participation Assignments</li> <li>• Waiting List</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR 246.7(f)(1).</li> <li>2. WIC Regulations: 7 CFR 246.7 (e).</li> <li>3. WIC Regulations: 7 CFR 246.7 (k)(3).</li> <li>4. WIC Regulations: 7 CFR 246.16 (d)(1).</li> <li>5. WIC Regulations: 7 CFR 246.7 (b)(5).</li> <li>6. FNS Instruction 803-6 Certification: Waiting Lists.</li> <li>7. Current State Agency Plan of Program Operation and Administration.</li> </ol>	
3.05	<b>Processing Standards and VOCs</b>	Food benefits shall be provided to the clients at the time of certification.	<ul style="list-style-type: none"> <li>• Processing Standards for Applications</li> <li>• Verification of Certification (VOC)</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR Part 246.</li> <li>2. WIC Regulations: 7 CFR Part 246.7(e)(2)f.</li> <li>3. SFP 01-076, dated May 17, 2001.</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
				4. SFP 01-079, dated May 24, 2001.	
3.06	<b>Program Eligibility</b>	The PA WIC Program shall require applicants to meet program eligibility criteria and achieve certification prior to enrollment and receipt of food benefits.	<ul style="list-style-type: none"> <li>Definitions (Adjunct Eligibility, Applicant, Certifications, Family, Homeless Facility, Homeless Individual, Income, Institution, Migrant Farmworker, Net Income, Participant, Presumptive Eligibility, Temporary Low Income and Unemployed Person)</li> <li>Categorical Eligibility and WIC Priority System</li> <li>Residency Requirement</li> <li>Identity Requirements</li> <li>Income Eligibility (Sources, Exclusions)</li> <li>Utilizing Client Information System (CIS)</li> <li>Enrollment</li> <li>Certification Periods</li> <li>Notification of Ineligibility</li> <li>Rights and Responsibilities</li> <li>Eligibility of Aliens and Alien (Foreign) Students</li> <li>Proxy Designation and Responsibilities</li> </ul>	<ol style="list-style-type: none"> <li>WIC Policy Memo #2013-3.</li> <li>WIC Policy Memo #2010-2.</li> <li>WIC Policy Memo #2003-3.</li> <li>WIC Policy Memo #2017-3.</li> <li>Federal WIC Regulations: 7 CFR § 246.2 and 246.7.</li> </ol>	<b>Warning: This policy is currently in a state of transition and is being updated to support EBT, telehealth, waivers and other innovations resulting from the pandemic.</b>
3.07	<b>Customer Service</b>				<b>Still in development</b>
3.08	<b>TeleWIC Services</b>	Local WIC agencies (LAs) must offer program services to applicants and participants at a clinic location; however, virtual appointments, also known as teleWIC, may be offered when appropriate as indicated in this policy.	<ul style="list-style-type: none"> <li>Policy and guidelines surrounding virtual appointments.</li> </ul>	<ol style="list-style-type: none"> <li>7 CFR 246.7(o) "Are applicants required to be physically present at certification?"</li> <li>7 CFR 246.7(e)(1) "Determination of nutritional risk."</li> <li>American Rescue Plan Act of 2021 Physical Presence Waiver; August 10, 2023 -September 30, 2026</li> <li>7 CFR 246.12(r)(4) "Food instrument and cash value voucher pick up."</li> <li>American Rescue Plan Act of 2021 Remote Benefit Issuance Waiver; August 10, 2023 - September 30, 2026</li> </ol>	
3.09	<b>Services to Special Populations</b>	Persons residing in schools, maternity homes, temporary shelters, or any other residential facilities where meals are provided as part of the usual services are eligible to participate in the program if they meet program eligibility criteria. Such persons are eligible even though they may	<ul style="list-style-type: none"> <li>Definition of a Homeless Person</li> </ul>	<ol style="list-style-type: none"> <li>USDA Memo 97-044.</li> <li>Federal Register Vol. 54, December 14, 1989, p. 51289.</li> <li>Federal Register Vol. 57, August 5, 1992, p. 34500.</li> <li>WIC Regulations: 7CFR Part 246.2 and</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
		receive Supplemental Nutrition Assistance Program (SNAP) or other forms of food assistance.		346.7 (n).	
3.10	<b>EBT Card Management</b>	The PA WIC State Agency will supply WIC Electronic Benefit Transfer cards (eWIC cards) to Local Agencies. Local Agencies shall accept shipments of eWIC cards and maintain a system to track eWIC card inventory records for all eWIC cards received until disposition. The State Agency will monitor eWIC card management practices and audit eWIC card inventory at Program Reviews.	<ul style="list-style-type: none"> <li>• Card Storage</li> <li>• Monitoring Inventory Threshold</li> <li>• Shipping, Receiving and Transferring Cards</li> <li>• eWIC Card Check In and Check Out</li> <li>• Monthly Physical Inventory</li> <li>• Lost, Stolen or Damaged Cards</li> <li>• Other Hot Card Reasons</li> <li>• Disqualification/Termination</li> <li>• Moving Out of State</li> <li>• Mailing Cards</li> </ul>	<ol style="list-style-type: none"> <li>1. 7 CFR 246.12(p)</li> <li>2. 7 CFR 246.12(q)</li> <li>3. 7 CFR 246.12(r)(4)</li> </ol>	
3.11	<b>Universal Precautions</b>	PA WIC shall require that all State and Local Agency (LA) personnel, including contracted and subcontracted employees, involved with blood testing participate in training, demonstrate proficiency in, and exercise universal precautions to prevent exposure to bloodborne pathogens. The Occupational Safety and Health Administration (OSHA) regulations related to Bloodborne Pathogens, 29 CFR, Subpart Z, 1910.1030 (dated 12/6/91, last updated 4/3/12) and Needlesticks and Other Sharps Injuries (29 CFR, Part 1910, dated 1/18/01) must be followed.	<ul style="list-style-type: none"> <li>• Exposure Control Plan</li> <li>• Hepatitis B</li> <li>• Administrative Requirements</li> <li>• Clinical Requirements</li> </ul>	<ol style="list-style-type: none"> <li>1. Centers for Disease Control (CDC), Updated US Public Health Service Guidelines for the Management of Occupational Exposures to HBV, HCV, and HIV and Recommendations for Postexposure Prophylaxis. MMWR, June 29, 2001, Vol. 50 (RR11): 1-42.</li> <li>2. Pennsylvania Department of Environmental Protection, Bureau of Waste Management, Post Office Box 69170, Harrisburg, Pennsylvania 17106-9170.</li> <li>3. Selected EPA-registered Disinfectants: <a href="https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants">https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants</a></li> <li>4. OSHA Regulations 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens; Final Rule. Federal Register, Vol. 56, No. 235, Friday December 6, 1991, Last Updated April 3, 2012: <a href="http://www.ecfr.gov/cgi-bin/textidx?SID=6a8639d0689ab3120f4389041765360b&amp;mc=true&amp;node=se29.6.1910_11030&amp;rgn=div8">http://www.ecfr.gov/cgi-bin/textidx?SID=6a8639d0689ab3120f4389041765360b&amp;mc=true&amp;node=se29.6.1910_11030&amp;rgn=div8</a></li> <li>5. OSHA Regulations 20 CFR 1910, Occupational Exposure to Bloodborne Pathogens; Needlesticks and Other</li> </ol>	

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
				<p>Sharps Injuries; Final Rule. Federal Register, Vol. 66, No. 12, Thursday January 18, 2001:  <a href="https://www.osha.gov/pls/oshaweb/owadis.p.show_document?p_table=FEDERAL_REGISTER&amp;p_id=16265">https://www.osha.gov/pls/oshaweb/owadis.p.show_document?p_table=FEDERAL_REGISTER&amp;p_id=16265</a></p> <p>6. CDC Vaccine Information Statement – Hepatitis B Vaccine:  <a href="http://www.cdc.gov/vaccines/hcp/vis/vis-statements/hep-b.pdf">http://www.cdc.gov/vaccines/hcp/vis/vis-statements/hep-b.pdf</a></p> <p>7. Hepatitis B FAQs for Health Professionals:  <a href="http://www.cdc.gov/hepatitis/HBV/HBVfaq.htm">http://www.cdc.gov/hepatitis/HBV/HBVfaq.htm</a></p> <p>8. Human Immunodeficiency Virus (HIV) in Healthcare Settings:  <a href="http://www.cdc.gov/HAI/organisms/hiv/hiv.html">http://www.cdc.gov/HAI/organisms/hiv/hiv.html</a></p>	
<b>Section 4. Food Delivery System</b>					
4.00	<b>Retail Store Management</b>	PA WIC shall employ a uniform statewide retail purchase system for all WIC foods, with the exception of special formulas, to assure competitive pricing and maximize WIC dollars.	<ul style="list-style-type: none"> <li>• Food Delivery System</li> <li>• WIC Retail Store Selection Criteria</li> <li>• Authorization of New Retail Stores</li> <li>• Reauthorization of Existing Stores</li> <li>• Training of WIC Retail Stores</li> <li>• Inadequate Participant Access (IPA)</li> <li>• Retail Store Conflict of Interest</li> <li>• Vendor Information Confidentiality</li> <li>• Retail Store Files, Content and Management</li> </ul>	<ol style="list-style-type: none"> <li>1. PA WIC Regulations, Chapters 1101, 1103, 1105, 1107, 1109, 1111 and 1113.</li> <li>2. PA MIS User Guidance.</li> <li>3. WIC Regulations: 7CFR Part 246.12(g)(3).</li> <li>4. 7 CFR Ch.11 §246.12(t.)</li> <li>5. 7 CFR Ch.11 §246.26 e. and f.</li> </ol>	
4.01	<b>Retail Store Quality Assurance</b>	PA-WIC requires the State Agency and Local Agency staff to review the effectiveness of the WIC food delivery system and to monitor grantee operations of the WIC Program by conducting: a. Investigations of Complaints; b. Compliance Monitoring Reviews of Authorized Stores; c. Local Agency Retail Store Management Reviews	<ul style="list-style-type: none"> <li>• Compliance Monitoring Review of Authorized Stores</li> <li>• High Risk Vendors</li> <li>• Routine Reviews</li> <li>• Compliance Investigations</li> <li>• Inventory Audits</li> <li>• WIC Transaction Reviews</li> <li>• LA Retail Store Management Reviews</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Federal Regulation: 7 CFR 246.12(j)</li> <li>2. WIC P&amp;P 1.07, Civil Rights.</li> <li>3. WIC Regulations §1105.6 Monitoring</li> </ol>	
4.02	<b>Training of WIC Retail Stores</b>	The WIC program shall assure WIC authorized stores are educated in WIC Program Regulations and applicable policies and procedures to improve	<ul style="list-style-type: none"> <li>• Vendor Training Requirements</li> </ul>	<ol style="list-style-type: none"> <li>1. PA WIC Regulations §1103.2, 1105.1, 1105.6, and 1107.1.</li> <li>2. WIC Retail Store Handbook.</li> </ol>	



Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
		WIC program services and prevent program non-compliance.			
4.03	<b>Special Formula Distribution System</b>	The State Agency will establish, through Local Agency Agreement, a Distribution Center for special formulas. The Distribution Center staff will ship requested special formulas to either the Local Agency clinic or the participant's home. Problems relating to Distribution Center operations or delivery of special formulas which cannot be addressed by Distribution Center staff, will be referred to the State Agency	<ul style="list-style-type: none"> <li>• Distribution Center Orders</li> <li>• Damage/Breakage of Special Formula Delivered</li> <li>• Replacement of Special</li> <li>• Special Formula Shipped from one LA to another.</li> </ul>	<ol style="list-style-type: none"> <li>1. P&amp;P 5.09 and 5.10.</li> <li>2. PA MIS System User Manual.</li> </ol>	
<b>Section 5. Nutrition and Breastfeeding Services</b>					
5.00	<b>Nutrition and Risk Assessment</b>	PA WIC shall, as part of the nutrition/health assessment, promote and employ a consistent method for collecting hematological and anthropometric measurements, conducting a nutrition assessment, and determining nutrition risk.	<ul style="list-style-type: none"> <li>• Anthropometric Measurements</li> <li>• Hematological Testing</li> <li>• Nutrition Assessment</li> <li>• Screening and Referrals</li> <li>• Nutrition Risk</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR, Part 246.7(e)</li> <li>2. USDA Memo 92-10 Bloodwork Protocols.</li> <li>3. FNS Instruction 803-2, Certification: Nutritional Risk/Participant Priority System, April 1, 1988.</li> <li>4. Final WIC Policy Memo 2011-5, WIC Nutrition Risk Criteria</li> <li>5. Child Nutrition Act of 1966: WIC Nutrition Risk Criteria   Food and Nutrition Service (usda.gov)</li> <li>6. Substance Use Prevention: Screening, Education, and Referral Resource Guide for Local Agencies. USDA-FNS, FNS 276</li> </ol>	
5.01	<b>Nutrition Education and Counseling</b>	PA WIC shall make nutrition education available to all participants at no cost to promote healthy food and lifestyle choices.	<ul style="list-style-type: none"> <li>• Planning Nutrition Contacts</li> <li>• Provision of Nutrition Education and Counseling</li> <li>• Documentation of Nutrition Education and Counseling</li> <li>• Provision of Nutrition Education and Counseling for High-Risk Participants</li> <li>• Nutrition Education Plans</li> <li>• Nutrition Education Coordination Between WIC and External Programs</li> </ul>	<ol style="list-style-type: none"> <li>1. WIC Regulations: 7 CFR Part 246.11, including 7CFR Part 246.11(a)(3); 7 CFR 246.2.</li> <li>2. Public Law 108-265, the Child Nutrition and WIC Reauthorization Act of 2004 (June 30, 2004).</li> <li>3. WIC Nutrition Services Standards, FNS, USDA (August 2013).</li> <li>4. WIC Program Nutrition Education Guidance (January 2006)</li> </ol>	
5.02	<b>Breastfeeding Promotion and Support</b>	PA WIC shall provide breastfeeding education to encourage breastfeeding through a combination of promotional, educational and support activities.	<ul style="list-style-type: none"> <li>• Breastfeeding Promotion and Education</li> <li>• Breastfeeding Screening, Assessment and Documentation</li> </ul>	<ol style="list-style-type: none"> <li>1. Breastfeeding Promotion and Support - A How-to Guide for WIC Staff.</li> <li>2. State Agency self-study breastfeeding modules: Series 1-3</li> </ol>	<b>Warning: This policy is currently in a state of transition and is</b>

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
			<ul style="list-style-type: none"> <li>• Breastfeeding Staffing</li> <li>• Breastfeeding Peer Counseling Programs</li> <li>• Breast Pump Purchase, Rental and Distribution</li> <li>• Purchase and Distribution of Breastfeeding Aids</li> </ul>	<ol style="list-style-type: none"> <li>3. Clinic Monitoring Tools for breastfeeding promotion and support.</li> <li>4. State Agency Breastfeeding Plan Guidance.</li> <li>5. NWA Position Paper: Breastfeeding Promotion and Support in the WIC Program.</li> <li>6. AAP Policy Statement: Breastfeeding and the Use of Human Milk, 2005</li> <li>7. The Surgeon General's Call to Action to Support Breastfeeding, 2011</li> <li>8. WIC Federal Regulations, Section 246.11. January 2011; 3921. USDA Memo 99-047</li> <li>9. Grow Baby Grow Modules. WIC anthropometric manual</li> <li>10. Assessing Growth of Breastfed Infants: MIS System reference materials.</li> <li>11. Breastfeeding Promotion and Support: A How-to Guide for WIC Staff.</li> <li>12. Using Loving Support to Manage Peer Counseling Programs: A training curriculum designed for management staff of the Special Supplemental Program for Women, Infants and Children (WIC), FNS and Best Start Social Marketing, July 2004.</li> <li>13. USDA Memo 99-145.</li> <li>14. USDA Memo 00-013.</li> <li>15. NAWD Position Paper: Guidelines for WIC Agencies Providing Breast Pumps.</li> <li>16. State Agency Training Curriculum: "Expression and Storage of Breast Milk"</li> </ol>	<p>being updated to support EBT, telehealth, waivers and other innovations resulting from the pandemic.</p>
5.03	<b>Formula Issuance for Breastfed Infants</b>	PA WIC shall provide supplementation to breastfed infants when clinically indicated due to questionable or inadequate intake, a breastfeeding/medical problem or who have begun receiving supplemental formula prior to their certification appointment.	<ul style="list-style-type: none"> <li>• An Infant/Mother Feeding Assessment Screening</li> <li>• A Mother wants/needs to Supplement her infant</li> </ul>	<ol style="list-style-type: none"> <li>1. Policy and Procedure 5.02</li> </ol>	
5.04	<b>Breastfeeding Peer Counselor Programs</b>				<p>Still in development</p>

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
5.05	<b>Authorized Product List (APL) and Statewide Food List</b>	The PA WIC State agency (SA) will review and approve foods for inclusion in the program and create a standard statewide food list that will be reviewed every five years and updated yearly as appropriate. The SA will also be responsible for maintaining the Authorized Product List (APL) which is a list of all approved Universal Product Codes (UPCs).	<ul style="list-style-type: none"> <li>• SA Roles and Responsibilities</li> <li>• LA Responsibilities</li> </ul>	1. WIC Regulations: 7 CFR part 246.10	
5.06	<b>Issuance of Food Packages</b>	The Pennsylvania Special Supplemental Nutrition Program for Women, Infants and Children (PA WIC) shall prescribe authorized supplemental foods to eligible participants according to food packages established by USDA. Proration, reissuance, and card balance corrections shall occur based on certain circumstances.	<ul style="list-style-type: none"> <li>• Definitions (Breastfeeding woman, Partially Breastfeeding Woman)</li> <li>• Authorized Food Packages</li> <li>• Issuance of Food Packages</li> <li>• Proration of Food Packages</li> <li>• Reissuance of Food Packages</li> <li>• Card Balance Correction</li> </ul>	1. WIC Regulations: 7 CFR subparts 246.2 and 246.10.	
5.07	<b>Food Package Tailoring</b>	Pennsylvania Women, Infants and Children (WIC) program shall authorize Competent Professional Authorities (CPAs) and Competent Paraprofessional Authorities (CPPAs) to prescribe and tailor food packages to assure participants receive the maximum amounts of allowable foods.	<ul style="list-style-type: none"> <li>• Staff allowed to create food packages.</li> <li>• Tailoring Food Package</li> </ul>	1. WIC Regulations: 7 CFR Part 246.10. 2. USDA Food Package Policy & Guidance (March 2018)	
5.08	<b>Infant Formula</b>	Pursuant to 42 U.S.C 1786(h)(8)(A)(i), the Pennsylvania Special Supplemental Nutrition Program for Women, Infants and Children (PA WIC) uses a competitive bidding system to procure infant formula. PA WIC uses a “single solicitation,” “single-supplier” competitive bidding system.	<ul style="list-style-type: none"> <li>• Definitions (Inf ant Formula, Exempt Formula, Contract Formula: Primary, Alternate and Transitional, Non- Contract Formula)</li> <li>• CPAs &amp; CPPAs role</li> <li>• Primary Infant Formula</li> <li>• Prescriptions</li> <li>• Ready-to-Feed Formula</li> <li>• Non-Contract Formulas</li> </ul>	<ol style="list-style-type: none"> <li>1. 42 U.S.C 1786</li> <li>2. Federal Food, Drug, and Cosmetic Act, as amended by the Infant Formula Act of 1980 (Pub. L. 96– 359)</li> <li>3. WIC Regulations: 7 CFR subparts 246.2; 246.10, including 246.10(e)(1)(iii); 246.16a.</li> <li>4. Federal Food Drug and Cosmetic Act; Section 201 21 USC 321(z); Section 412, Section 350a (h)(1)</li> <li>5. 21 CFR 105.3</li> <li>6. USDA WIC Policy Memorandum #2014-1A, Clarification on Medical Documentation for Infant Formula Issued in Food Packages I and II (January 7, 2014)</li> </ol>	
5.09	<b>Returned Formula Inventory</b>	PA WIC shall operate a Formula Return Register to track formulas being returned by participants as a result of switching formulas or no longer needing formula.	<ul style="list-style-type: none"> <li>• Documented Inventory</li> <li>• LA responsibilities</li> <li>• Returned Formula</li> </ul>		

Policy #	Policy Name	Policy Description	Topics Included in the Policy	Policy References	Comments
5.10	Exempt Infant Formula and WIC - Eligible Nutritionals	PA WIC shall issue infant formula, exempt infant formula or WIC-eligible nutritionals to women, infant or child participants with a documented qualifying condition as noted in the definitions in section B below.	<ul style="list-style-type: none"> <li>Definitions (Exempt Infant Formula, Phenylketonuria (PKU), WIC Eligible Nutritionals)</li> <li>Prescription Requirements</li> <li>Shipping of formula</li> <li>PKU Formula Issuance Procedure</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulation: 7 CFR part 246.10 [c], [e] (3)</li> <li>FNS-268: WIC Eligible Formulas and Medical Foods or Products</li> <li>FD&amp;C Act Section 412, Section 350a(h)(1)</li> <li>WIC Services to Eligible PKU Patients: Memorandum of Understanding Revised September 1994.</li> </ol>	Warning: This policy is currently in a state of transition and is being updated to support EBT, telehealth, waivers and other innovations resulting from the pandemic.
<b>Section 6. Outreach/ Referral</b>					
6.01	Local Agency Outreach Activities	PA WIC shall perform an on-going evaluation of program utilization and develop, coordinate and deploy outreach initiatives to enhance program participation and reduce or eliminate barriers to new and continued program participation.	<ul style="list-style-type: none"> <li>Outreach Network Log</li> <li>Target Groups for Outreach</li> <li>Outreach Network</li> <li>Outreach Activities</li> <li>Outreach Announcements</li> <li>Documentation</li> <li>Outreach During Full Enrollment</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR Part 246.4(a)(7)</li> <li>WIC Regulations: 7 CFR Part 246.4(b)</li> </ol>	
6.02	Participant Referral System	PA WIC shall assure all program applicants/participants receive the State Agency developed "Community Services" brochure or a state approved local agency (LA) referral brochure that lists health-related and public assistance programs and, when appropriate, are referred to needed services.	<ul style="list-style-type: none"> <li>Participant Referral Systems</li> <li>Maintaining Documentation</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR part 246.7(a)(b)(1)(2)(3).</li> <li>USDA Memo 97-044.</li> </ol>	
6.03	Referral Agreements for Health Care Services	PA WIC shall provide access to appropriate health care services to all participants either by the direct provision of these services or by referral to providers of free or low cost health care in the community. Health care services are defined as ongoing routine prenatal obstetrical and pediatric care, and include routine examinations, diagnosis and treatment.	<ul style="list-style-type: none"> <li>Develop and Implement Procedures</li> </ul>	<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR part 246.6(b)(5).</li> </ol>	
6.04	Outreach in Hospitals	PA WIC shall assure that potential program candidates receiving care as hospital inpatients and/or out-patients receive education about the benefits of WIC, as well as the opportunity for authorization and certification.		<ol style="list-style-type: none"> <li>WIC Regulations: 7 CFR Part 246.6(f)(1)(2).</li> </ol>	