

WIC Processes without Physical Presence

Background

In December 2019, a novel coronavirus was first detected in Wuhan of the Hubei Province in China, causing outbreaks of the coronavirus disease COVID-19 that has now spread globally. The Secretary of Health and Human Services (HHS) declared a public health emergency on January 31, 2020, in response to COVID-19 and a State of Emergency was declared March 10, 2020 in North Carolina.

The USDA's Food and Nutrition Service (FNS) has granted approval to the North Carolina WIC Program's request for a physical presence waiver. The approval to waive the physical presence requirement includes the ability to defer anthropometric and bloodwork requirements necessary to determine nutritional risk for the period the physical presence waiver is in effect. All other established policies and procedures remain in place and must be followed as if participants are present in the clinic.

The North Carolina WIC Program Manual already allows for the provision of some WIC services via phone or digital platform. The guidance listed below expands the modifications to programmatic requirements and services due to potential closure of clinics or social distancing practices which alter typical procedure. This guidance will be evolving throughout the course of the COVID-19 emergency response.

It is important to note that these changes are temporary allowances during the pandemic and are not intended to fundamentally change the Program. Information required for certification should be collected and documented to the extent possible based on phone conversations or other communication with the family. In other words, local agencies may defer anthropometric and bloodwork requirements necessary to determine nutrition risk but the Competent Professional Authority (CPA) must still attempt to the best of his/her ability to assess nutrition risk based on the information available through online communication and/or referral data.

IMPORTANT: Crossroads is the proprietary, web-based management information system (MIS) designed and used for WIC operations including client services and vendor management. Crossroads has minimum PC specifications and access requirements. Any staff who is working remotely will need essentials such as VPN, a whitelisted static IP address and a signature pad. Please see WIC Program Manual Chapter 17 Information Services, Section 1: Basic PC Setup and Crossroads Connectivity Guide for details.

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Certification

Documented below are potential modifications to WIC certification processes and services allowed as needed to certify or assess a participant without physical presence.

Proofs of Identification and Residence

If an applicant, participant, or Parent/Guardian/Caretaker is unable to provide proof of identification or proof of residence via physical or digital means as impacted by the current pandemic, staff should select **COVID-19** as the reason from the **Proof of Identification** and **Proof of Residence** dropdowns on the **Family Demographics** screen.

The screenshot shows the 'General Information' tab of the Family Demographics screen. The 'Participant' checkbox is checked. The participant's name is APPLESEED, Ariana, with a date of birth of 2/1/1995. The 'Proof of Identification' dropdown menu is highlighted with a red box and set to 'COVID-19'. The 'Proof of Residence' dropdown menu is also highlighted with a red box and set to 'COVID-19'. Other fields include Last Name (APPLESEED), First Name (Ariana), M.I., Suffix, Nickname, Maiden Name, ZIP Code (28678), City (STONY POINT), State (NC), and County (ALEXANDER).

Voter Registration

Policy and process remain unchanged for Voter Registration. Please continue following current NC WIC Program Policy as outlined in Chapter 6.

At the time of application for program benefits, subsequent certification, or a change in residential address or name, local agency WIC staff must offer the opportunity to register to vote by asking with the exact wording “If you are not registered to vote where you live now, would you like to apply to register to vote here today?”

As per Program policy, remote interactions must also abide by requirements such that;

- The response by the applicant/participant or Parent/Guardian/Caretaker to the NVRA question must be recorded in the Crossroads Family Demographics screen;
- Regardless of participant response to the NVRA question, both the Voter Registration Application and the Voter Preference Form must be included in the required follow-up certification packet to be mailed to the participant;
- And finally, the NVRA Agency Transmittal Form must be submitted within 5 business days of the covered transaction. The NVRA Transmittal Form must be completed with the total

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Voter Preference Form tally including those mailed to participants. After confirming submission options with the local BOE, the Transmittal form may be submitted via email to the local Board of Elections (BOE).

Physical Presence

If the applicant / participant is not present, select the **Physical Presence** “No” radio button on the **Participant Demographics** screen. Select the reason **COVID-19** from the **Physical Presence Exception Reason** dropdown list.

Physical Presence **Physical Presence Exception Reason** ★

Yes No

Incarcerated Status **Special Needs**

Yes No

Proof – Income

If the participant is not adjunctively eligible and is unable to provide documentation of proof of income via physical or digital means, staff should select **COVID-19** from the **Proof** dropdown in the **Income Details** container and enter self-reported income in the **Amount** field.

Income Details Total Items: 1

Source	Proof	Frequency	Amount	Duration
Salary	COVID-19	Monthly	\$2,320.00	12

Zero Income Declaration Reason:

Comparison Frequency: Monthly Total Income: \$2,320.00 Eligibility Guideline Amount: \$3,289.00

Certification Signature: Participant Rights and Responsibilities

During a certification without physical presence, the applicant/participant or Parent/Guardian/Caretaker will not be able to review and sign the Rights and Responsibilities (R&R) per normal procedure. Instead, the R&R must be read aloud by WIC

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staff and following expression of understanding from the applicant/participant or Parent/Guardian/Caretaker, WIC staff will indicate “Mailed-COVID-19” in the certification signature area within Crossroads. A printed copy of the R&R must be included in the certification package mailed to the participant.

1. Click Rights & Responsibilities in the Quick Links
2. Keeping all participants checked, Click OK
3. On the Rights and Responsibilities Signature pop-up, click “Capture Signature”.
4. Print “Mailed – COVID-19” on the e-signature pad and hit ‘Ok’.
5. Click Save.

Anthropometric Measures

There are three options for entering height/weight if actual measures are not available:

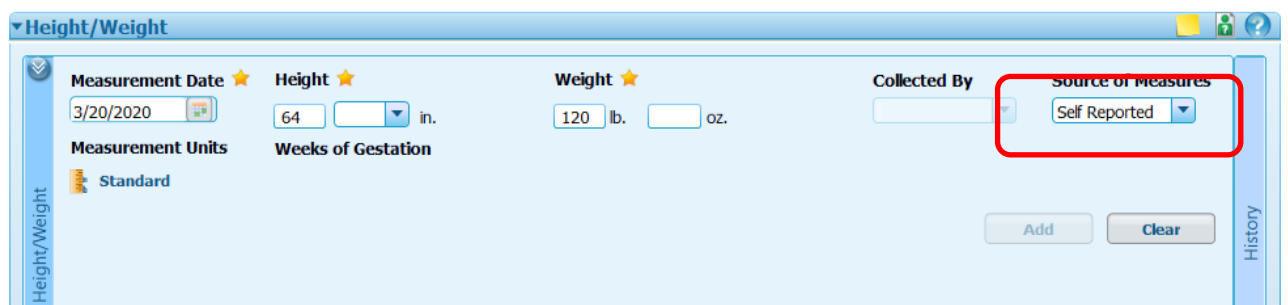
1. Self-reported (by participant or parent/guardian)
2. Duplicate measures (if family can’t self-report and participant is not new)
3. Average measures (if family can’t self-report and participant is new)

Self-Reported

If anthropometric measures are not available, self-reported measures may be entered.

Select **Self Reported** from the **Source of Measures** dropdown list in the

Height/Weight container on the **Anthro/Lab** screen.



The screenshot shows a software interface for entering anthropometric data. The title bar reads "Height/Weight". The form contains several input fields: "Measurement Date" with a calendar icon and the value "3/20/2020"; "Height" with a value of "64" and a unit dropdown set to "in."; "Weight" with a value of "120" and a unit dropdown set to "lb."; and "Source of Measures" with a dropdown menu currently showing "Self Reported". The "Source of Measures" dropdown is highlighted with a red rectangular box. Below these fields are "Add" and "Clear" buttons. On the left and right sides of the form, there are vertical labels "Height/Weight" and "History" respectively.

Duplicate Measures

If no measures are available and the participant or parent/guardian can’t report their own or their infant’s/child’s height or weight, enter DUPLICATE measures from the most recent visit. Take the following steps:

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1. Navigate to the **History** container (under the **Height/Weight** container) on the **Anthro Lab** screen and note most recent measures.
2. Navigate back to the **Height/Weight** container. Enter the most recent measures and select **COVID-19** from the **Source of Measures** dropdown list. Select **Save**.
3. If you navigate back to **History**, select the current row and then select the **Selected Row Details** arrow, you will see a row of duplicate measures and a **Source of Measures of COVID-19**.



The screenshot shows a table with columns: Measurement Date, Height, Weight, Expected Weight, Actual Weight, Age at Measurement, BMI, % HT/Age, % WT/Age, % WT/LT, and % BMI/Age. Two rows are visible. The first row is selected, and its details are shown below the table. The details include Contact Date (3/20/2020), Collected By, and Source of Measures (COVID-19).

Measurement Date	Height	Weight	Expected Weight	Actual Weight	Age at Measurement	BMI	% HT/Age	% WT/Age	% WT/LT	% BMI/Age
3/20/2020	40 (S) in	42 lb, 0 oz	0 lb, 6 oz		4 years, 1 mon	18.5	36.6%	86.9%	N/A	97.9%
1/16/2020	40 (S) in	42 lb, 0 oz			3 years, 11 mo	18.5	47.6%	90.4%	N/A	97.9%

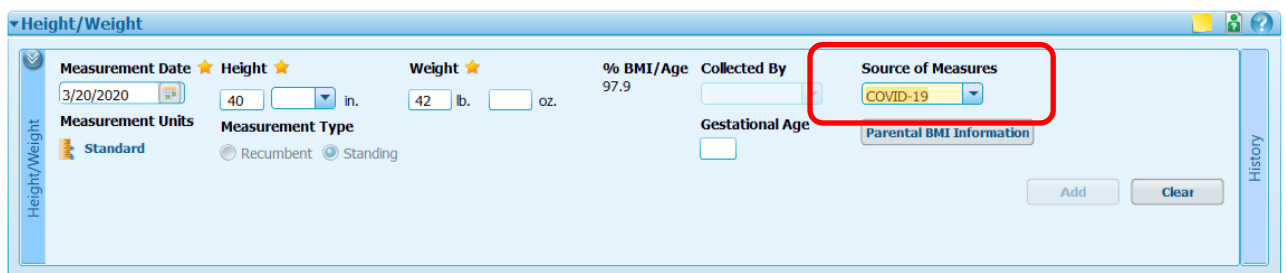
Selected Row Details:

Contact Date	Collected By	Source of Measures
3/20/2020		COVID-19

Average Measures

If no measures are available, the parent/guardian can't report their infant's/child's height or weight, and the participant is new (no history exists) enter average measures for the infant's/child's height or weight for age. Take the following steps:

1. For height: enter the length/height that corresponds with the plot point at which the child would measure if he/she was at the 50th percentile for height for age.
2. For weight: enter the weight that corresponds with the plot point at which the child would measure if he/she was at the 50th percentile for weight for age.
3. Select **COVID-19** from the **Source of Measures** dropdown list. Select **Save**.



The screenshot shows the Height/Weight form with the following fields: Measurement Date (3/20/2020), Height (40 in), Weight (42 lb, 0 oz), % BMI/Age (97.9), Collected By, and Source of Measures (COVID-19). The Source of Measures dropdown is highlighted with a red box. There are also buttons for Add and Clear.

Important: System-assigned nutrition risk criteria related to anthropometric measures

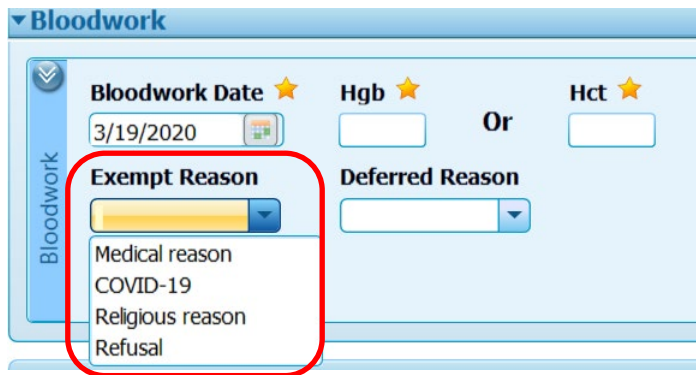
have been temporarily deactivated during this workaround. Nutrition risk criteria related to anthropometric measures **MUST** be entered manually by the CPA on the **Assigned Risk Factors** screen.

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Please Note: the **Collected By** field defaults to the logged-in user name. To enable the **Source of Measures** dropdown list, highlight the user name in the **Collected By** field and use the Delete or Backspace button on your keyboard. Another way to do this is: click in the **oz.** field then use the Tab button to navigate to the **Collected By** field, then use the Delete or Backspace button.

Bloodwork

If bloodwork measures are not available, select **COVID-19** from the **Exempt Reason** dropdown list.



The screenshot shows a form titled "Bloodwork" with a sidebar on the left labeled "Bloodwork". The form contains several fields: "Bloodwork Date" with a calendar icon and the value "3/19/2020", "Hgb" and "Hct" fields with star icons, and "Or" text between them. Below these are "Exempt Reason" and "Deferred Reason" dropdown menus. The "Exempt Reason" dropdown is open, showing a list of options: "Medical reason", "COVID-19", "Religious reason", and "Refusal". A red circle highlights the "Exempt Reason" dropdown menu.

Please Note: Until bloodwork is entered, nutrition risk criteria 401 or 428 are unable to be assigned.

Assigned Risk Factors

System-assigned nutrition risk criteria related to anthropometric measures have been temporarily deactivated. Nutrition risk criteria related to anthropometric measures **MUST** be entered manually by the CPA on the Assigned Risk Factors screen if appropriate data exists and is available. Nutrition risk criteria 401 or 428 may not be used unless bloodwork is completed.

Delete any inappropriate/erroneous risk codes generated by the Crossroads system and add any appropriate risk codes that are missing. If risk codes cannot be deleted or added, document accordingly in the Care Plan. Please refer to the WIC Program Manual Chapter 6C, Attachment 2, WIC Nutrition Risk Criteria.

Care Plan

The nutrition assessment should be completed to the extent possible and the care plan completed as if the participant were present in the clinic. This may be done via telephone and depending on local agency capabilities, via telehealth services. The

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Competent Professional Authority (CPA) must still attempt to the best of his/her ability to assess nutrition risk based on the information available through online communication and/or referral data. Document appropriately in the Care Plan section in Crossroads.

Nutrition Education and Goals

Relevant goals and nutrition education should be participant centered, addressing topics or areas of concerns as requested by the participant. The Competent Professional Authority (CPA) must still attempt to provide participant centered nutrition education to the best of his/her ability based on the information available through online communication and/or referral data.

Issue Benefits

The issuance of 3 months of food benefits is recommended for most participants seen during the COVID- 19 pandemic. Please refer to the WPM, Chapter 8, Section 3 for exceptions.

After the participant is certified, mail or provide the following:

New participants:

- Assigned eWIC card
- The eWIC card brochure
- WIC Approved Store List
- Shopping Guide

All participants:

- NC WIC Program Notice
- Printed Shopping List
- Rights & Responsibilities
- Voter Registration Preference Form
- Voter Registration Application
- Nutrition Education and WICHealth.org materials
- List of Referral organizations (if indicated)

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Mid Certification and Other Assessments

To the extent possible, scheduled mid certification assessments and other assessments should occur. In the lack of physical presence, these services can be provided remotely using the same provisions allowed for with certifications that occur without physical presence. Refer to the sections of this guidance under certification for instructions on how to document special circumstances related to the situation.

Nutrition Education

Per State policy, Nutrition Education can be provided over the phone. Use of online nutrition education (wichealth.org) is also encouraged. The temporary modification to the state policy is to allow High Risk Nutrition Education to be performed over the phone.

Local Agency Formula and other Products

Inventory and product disposal

Local Agency staff is accountable for the management of infant formula and other products including the receipt, storage, inventory, issuance, and disposal. The disposal of products received by any source that is damaged, tampered with, or past expiration date should continue to be managed per policy.

Medical Documentation

Medical documentation must be received prior to issuance of an exempt infant formula or WIC-eligible nutritional. One month's issuance may be provided with verbal medical documentation. Local Agency staff must work with families and health care providers to obtain written medical documentation for continued issuance. Follow established documentation and procedure guidance.

Ordering Formula and Other Products from the NSB

If formula and other products must be ordered from Nutrition Services Branch (NSB) because they are not available in the retail system, local WIC staff must submit orders per Program guidance at this time. Please also notify the NSB of any clinic schedule or staffing changes that may impact the availability of staff to properly receive and issue the product to participants.

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If no confirmation of order submission is received by the Local Agency staff, please follow-up on the order request to ensure timely processing.

Pump Issuance

After the completion of a breastfeeding assessment, a Competent Professional Authority, WIC Designated Breastfeeding Expert, or Breastfeeding Peer Counselor may determine that the issuance of a pump is necessary. Local agencies must develop procedures for assurance for the continuation of breast pump issuance. The staff member should follow the steps below for remote issuance:

1. The staff member would determine participant eligibility for a pump based on the breastfeeding assessment and the criteria outlined in the NC WIC Program Manual.
 - If a participant meets the criteria for the issuance of a multi-user electric pump, the local agency has the option to issue a single-user electric pump.
 - Single-user breast pump requests may be requested [here](#). Please utilize your local agency's available inventory before requesting supplies from the state agency.
2. The staff member must provide the required participant education for issuing a breast pump per Chapter 9; Section 5 (pg. 14) verbally.
3. The staff member must review with the participant the "Breastfeeding Supplies Release of Liability and Loan Agreement" form. When the participant is not available to sign the document, the staff member may either:
 - Print and sign the "Breastfeeding Supplies Release of Liability and Loan Agreement" for the participant. The document should be scanned into Crossroads as soon as possible.
 - Or the staff member may document in the family care plan that each required section of the "Breastfeeding Supplies Release of Liability" was reviewed with the participant.
4. Documentation of breastfeeding supplies issuance should be completed in Crossroads.
 - For "Capture Signature", the staff member may enter "COVID-19"
5. The local agency must provide the following documents with the pumps when remote issuance occurs:
 - "Breastfeeding Supplies Release of Liability and Loan Agreement"

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- “Storage and Preparation of Breast Milk” available for order via the Nutrition Services Branch’s Materials Requisition Form.
6. The local agency must develop a plan for the receipt of pumps to the participant. The local agency may consider the following options:
- The participant may pick up the pump from the local agency
 - The local agency may offer “curb-side” pick-up as an option.
 - The local agency may ship the breast pump to the participant’s current physical address.
 - The local agency staff member may deliver the pump to the participant’s current physical address. The Nutrition Services Branch recommends that staff members do not enter the participant’s resident or interact with participant or any co-habitants or guests.
7. The staff member should adhere to the NC WIC Program Manual (Chapter 9: Section 5 [pg. 14-15]) for all procedures for follow-up.

If the local agency decides to continue the issuance of multi-user electric pumps, they must be flexible with return dates. The return of a multi-user electric pump should not supersede the health and safety of the participant, staff, or general public.