



WIC Policy Manual



Revised: 11/2017

Mid's WIC PROGRAM PROCEDURE MANUAL

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NE WIC PROGRAM PROCEDURE MANUAL

04.

Organization & Management

POLICIES:

Appointments for Applicants and Clients

Smoke Free Clinics

Delivery of WIC Services in Special Circumstances

Community Action Partnership of Mid-Ne

WIC Program

Policy: Appointments for Applicants and Clients

Purpose: To provide guidance on scheduling appointments for applicants and participants at all clinics to assure optimal access.

Procedure:

Check Pick-up Appointments

- Pick-up appointments should be placed on check day to speed service.
- Appointments are to be scheduled at 15-minute intervals.
- Do not schedule check pick-ups on certification days unless necessary to accommodate the participant.

Update Appointments

- Secondary Education (Update) appointments should be placed on check day to speed service
- Update appointments are to be scheduled at 15-minute intervals.
- Pre-birth education visits should be scheduled the month prior to delivery in the update column.
- High Risk participants as identified in the computer system should be scheduled to receive a secondary education (update) by preferably a RD or RN.
- Do not schedule Secondary Educations (Update) Appointments in the voucher pick-ups column or on certification days unless necessary to accommodate the participant.

Certification (cert) Appointments

- Appointments are scheduled every one-half hour depending on the number of individuals being certified.
- Additional time can be extended for family groups of three or more.
- Cert column one in the appointment scheduler should be scheduled every 30 minutes at the 00 and 30 hour slots.
- Cert column two in the appointment scheduler should be scheduled every 30 minutes at the 15 and 45 hour slots
- The first column should be filled before placing appointments in the second column.

Additional guidelines:

- All applicants who walk in for benefits are to be given an appointment for the earliest possible time by meeting the processing standards.
- When a clinic schedule is altered, office and clinic staff should review and obtain approval prior to implementing the change.
- Lunch hour and five o'clock appointments need to be available at least one clinic day each week.

Issuance of month(s):

- One month of checks for any participant that needs to be seen the following month.
- Two months of checks for first issuance for new participant, infants under 6 months of age, most pregnant women and breastfeeding, not breastfeeding women with infants under 6 months, and clinics that are held every other month.
- Three months of checks for infants 6-12 months and most children if not in family with infants or higher risk participants. New baby or new participant in clinics that are held every other month and need to get them on the clinic's schedule

General Appointment Guidelines:

- Participants with appointments will be considered "on time" if they arrive within 15 minutes of the appointed time. Late arrivals can be given the option of waiting for an opening in the daily schedule or selection of the next available appointment time.
- No-show appointments should be given the same options (waiting for an opening in the daily schedule or selection of the next available appointment time) whether they walk into clinic or call.
- When following up on daily no-show appointments staff should call all participant to reschedule. This includes all new pregnant women who miss their first initial certification appointment. If no verbal contact is made then the Notice of Missed Appointment Letter should be sent.
- Pregnant women, homeless and migrant applicants and infants less than six months of age are to be given an appointment within ten days. All other applicants are to be given an appointment within 20 days.
- An Appointment Reminder Letter should be mailed two weeks prior to the applicant's upcoming WIC appointment. An appointment reminder call should be made no more than two business days prior to the applicant's upcoming WIC appointment.
- The first column of certs/recerts should be filled before placing appointments in the second cert/recert column.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual - 04. Organization & Management - E. Clinic Operations, Scheduling, & Forms – Scheduling Appointments

Approval: 11/2008

Revised: 06/2015, 07/2016, 4/2017 11/2017

Community Action Partnership of Mid-Ne

WIC Program

Policy: Smoke Free Clinics

Purpose: To provide guidance in the implementation of the Community Action Partnership of Mid Nebraska smoke-free workplace.

Procedure:

- The use of tobacco products (cigarettes, cigars, pipes, smokeless tobacco) is not allowed in any facility or vehicle that is rented, owned, or used in any capacity by Mid.
- The use of tobacco products (cigarettes, cigars, pipes, smokeless tobacco) is prohibited in any facility used by Mid. This includes clinic/class area, offices, kitchens, restrooms, shared space, shared building and hallways.
- When clinic sites are evaluated, the smoking policy of the facility is to be reviewed for compliance. Smoking policy violations are to be reviewed with the facility owners for resolution.
- Staff members who do smoke are reminded they serve as role models for participants and should not smoke in direct vision of program participants. Staff members should seek the designated smoking areas outside each facility.
- Staff members should not wear or carry items that have advertising for tobacco products. Tobacco use violations should be reported to a Coordinator, WIC Director, or Human Resources Director.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual - 04. Organization & Management - E. Clinic Operations, Scheduling, & Forms – Selection of Clinic Sites and Community Action Partnership of Mid-Nebraska-
MANUAL OF PERSONNEL POLICIES –page 6 and 7 -07/17

Approval: 11/2008

Revised: 06/2015, 11/2017

Community Action Partnership of Mid-Ne

WIC Program

Policy: Delivery of WIC Services for Special Circumstances

Purpose: To provide guidance for enabling at-risk and special population participants and applicants to receive WIC benefits.

Procedure:

WIC staff will make every effort possible, within reason, to ensure that each WIC-eligible participant and applicant has an opportunity to receive WIC benefits in a timely manner.

Options available to provide service include the following:

- Weekly late-afternoon clinics in Hastings, Kearney, and Lexington
- Twelve clinic dates per month in Hastings, Kearney and Lexington
- Offer others clinics sites outside their assigned clinic location
- Lunch hour appointments on two days each week in Hastings, Kearney, and Lexington
- Lunch hour appointment one day per month in Holdrege
- Addition of clinic dates based on need and availability of sites and dates
- Mailing check options for eligible participants
- Bilingual staff, interpreters and translated materials at sites serving minority populations.
- Toll-free telephone access to Kearney office each working day
- Full-time staff available at each stationary site to assist participants with special needs and circumstances
- Software to assist participants with Hearing impairment
- Mid Community Service Coordinators available throughout the Mid coverage area to provide additional services to our WIC families in need
- Answering machine and voice mail at Hastings, Kearney, and Lexington sites for after hours and weekend calls
- Mid WIC Cell phones available for the traveling clinics to take and receive calls

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual - 04. Organization & Management - E. Clinic Operations, Scheduling, & Forms – Frequency & Hours of Clinic Sites

Approval: 11/2008

Revised: 07/2013, 06, 2015

NE WIC PROGRAM PROCEDURE MANUAL

05.

Nutrition Services & Admin

POLICIES:

Donated Items

Outreach and Targeting

Lost Equipment

Community Action Partnership of Mid-NE

WIC Program

Policy: Donated Items

Purpose: Provide guidance on distributing donated items in the WIC Program.

Procedure:

- WIC staff time will not routinely be used to organize and/or distribute free items.
- It is recommended to have a place in a central area of the waiting room for participants to self-select the donated items.
- For the Stationary WIC clinics: Hastings, Kearney, and Lexington it will be up to the Clinic Coordinator of that area to determine if donated items are suitable for that clinic site.
- Used donated items can only be displayed for a limited time (two weeks recommended) then returned to the person/agency who gave the donated item or give to the local Goodwill, Salvation Army, etc.
- Donated items may be used for promotional WIC events involving health, nutrition and/or breastfeeding. Example: Nutrition/Breastfeeding Month.
- Donations should not be accepted if they inhibit clinic flow or the efficient use of clinic space for serving families.
- Formula related items cannot be given away. Guidance on Breastfeeding Friendly Clinic Environment is outlined in Functional area: II Nutrition Services/Breastfeeding section: A 6b.
- Items donated by a company for purposes of promotion or advertising for a manufacturer or product are not acceptable. Private donations may be accepted.
- WIC cannot be used as “warehouse” for donated items due to space and clinic flow. Staff can refer to such an agency for needed items.
- As a private non-profit corporation, Community Action Partnership of Mid Nebraska has received donations from both private individuals and warehouse agencies from time to time. These donations are not made directly to the WIC program but WIC has distributed the donations, such as clothing, garden produce, and paper goods, to participant at the WIC clinics.
- The State WIC office should be notified requesting approval for distribution on any questionable donation.
- Used car seats may not be distributed.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual - 05. Nutrition Services & Admin – B. Local Agency Budgets – Donated Items

Approval: 09/2003

Revised: 09/2001.06/2015, 11/2017

Community Action Partnership of Mid-NE

WIC Program

Policy: Outreach and Targeting

Purpose: Provide guidance for conducting outreach to target population as part of the planning process.

Procedure:

To develop a plan and timetable for outreach activities. The WIC Director, WIC Program Assistant, Coordinators, RD will assess outreach opportunities and assign responsibilities annually if needed.

The following outreach actions are to be evaluated and completed as recommended by the WIC Director, WIC Program Assistant, Coordinators and RDs. Additional actions are to be added as opportunities arise.

- Update the agency annually of WIC income guidelines and procedures that impact eligibility
- Mail/email WIC clinic sites and dates to area publications on a quarterly basis
- Provide WIC clinic sites and dates to Admin IT to post on the local agency website
- Make one visit/mail or email annually to area medical facilities to update WIC Program information
- Make one visit/mail or email annually to area Health and Human Service offices to update WIC Program information.
- Make one visit/mail or email annually to area sites used to hold Mid WIC clinics.
- Receive updates from the NE State WIC Administrative Operations Coordinator
- Send annual letters to homeless facilities
- Distribute WIC Brochures at area events attended by Mid
- Give presentations, which could expand outreach to targeted populations
- Consider outreach activities to the following entities:
 - Minority organizations
 - Farm workers/MEP
 - Daycares
 - Churches
 - Post-secondary educational institutions
 - High School
 - Media
 - Homeless facilities
 - Government/ non-profit agencies
 - Community organizations
 - Head Start
 - Early Head Start
 - Health Departments
 - Early Development Network

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual - 05. Nutrition Services & Admin – B. Local Agency Budgets – Purchase of Outreach, Nutrition Education, and/or Breastfeeding Promotion and Support Items

Approval: 10/2003

Revised: 02/2015, 01/2016

Community Action Partnership of Mid-NE

WIC Program

Policy: Lost Equipment

Purpose: Provide guidance on handling the loss or theft of equipment.

Procedure:

- Immediately report the loss or theft of computer or equipment to the WIC Director who should then report the loss to the MID Business Manager and/or WIC State staff. If the equipment has been stolen, the theft should be reported as soon as possible to the local police for investigation upon Agency and State guidance.
- Any computer equipment and any equipment exceeding \$5,000 reported as lost must be investigated and a written report sent to the State WIC Office when the loss occurs. The report should include the date of the loss and a summary of the investigation.
- An annual review of the property schedule is to be done by the WIC Director to verify that the schedule reflects the current use, location, and condition of the equipment. The updated version of the property statement is to be submitted to the State WIC office each year.
- Equipment that cannot be accounted for during the annual inventory review of the property schedule should be documented on the property schedule as lost.

† Indicate under the “Disposal Method” column, the date the equipment was noted as lost.

† Note: “LOST” under the “Disposal Method” column.

Interview WIC Staff to gather any information regarding the missing items such as date last used, etc., to determine changes needed in accountability and security procedures.

† Complete a WIC integrity Form if warranted.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 05. Nutrition Services & Admin – C. Expenditures & Access to Funds – Equipment Inventory

Approval: 01/2008

Revised: 09/2012, 06/2015

NE WIC PROGRAM PROCEDURE MANUAL

08.

Certification, Eligibility, & Coordination of Services

POLICIES:

Release of Information & Confidentiality

Storage & Security of the Program

Subpoenas/Court Orders/Search Warrants

Needle Stick Law:

- Exposure Control Plan

- Post-Exposure

 - WIC's Post-Exposure Checklist

 - An Exposed Incident Report

 - Source individual's medical release/refusal form

 - Sample letter to healthcare provider

Use of Latex-Free Gloves and Band-Aides

Placement of Sharps Containers

Proper Care of Hemocue Analyzer HB201+

Employee Vaccination

- Hepatitis B Vaccination Declination Statement

Referring WIC participants with Low Hemoglobin Values

Options to delay hemoglobin testing for newly PP and BF women

Disposal of Records

Separation of Duties

Employees Participating in WIC

Community Action Partnership of Mid-Ne

WIC Program

Policy: Release of Information, Confidentiality

Purpose: To provide guidelines for releasing WIC applicant and participant information.

Procedure: Participant information will not be released to other programs, organization, family members, and law enforcement without a signed "Release of Information" form. The exception to this will be the programs and agencies listed on the NE WIC Rights and Responsibilities. The entities listed are as follows:

- SNAP and SNAP Nutrition Education Program
- Medicaid
- Perinatal, Child and Adolescent Health Unit
- And Immunization programs

Guidelines for sharing participant information between WIC and NEP are as follows:

- Each NEP staff member is required to sign a Mid Confidentiality form and the State of NE MOU "memorandum of understanding" which will be kept on file for the partnership explaining the relationship between the programs

Guidelines for sharing participant information between WIC and other Mid Programs are as follows:

- A MOU is to be signed with each program/project describing the relationship and defining the parameters of information to be shared based on NE WIC guidelines
- The MOU is to be shared with WIC staff and partner program/project staff to inform all parties of the relationship

Guidelines for sharing WIC material describing WIC and locations for outreach are as follows:

- Quarterly news releases will be mailed within Mid coverage area sharing dates, locations and times of clinics
- Bimonthly WIC news/outreach will be posted on our agency facebook page, social media
- Annually when our new income guidelines are issued, mass mailing of Statewide WIC brochures in English and Spanish will be sent out to our partners.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – J. Confidentiality – Release of Information and Community Action Partnership of Mid NE-HIPPA information-pages 1-19

Approval: 11/2008

Revised: 07/2013.06/2015, 11/2017

Policy: Storage & Security of Program

Purpose: To provide guidance regarding the use and storage of participant paper files, WIC program equipment, checks, stamps and the security of buildings and vehicles.

Procedure:

Participant paper files should be protected in the following ways:

- Filed and stored in locked cabinets at Mid Buildings. Access to files is to be limited to programs staff members who are assigned the responsibility of managing participant information.
- Termed paper files should be stored in long term storage at the Mid Service Building out of anyone's view.

Participant information on WIC ID folders, appointment lists, computer reports, ect. should be:

- At the stationary clinics (Hastings, Lexington and Kearney) shredded at the site on a daily basis.
- At all the traveling clinics place the material in the designated black accordion for shredding upon return to one of the main stationary WIC sites. No participant information is left at traveling sites.

Equipment and supplies should be protected in the following way:

- All laptops are to be stored in locked cabinets and/or locked rooms when not being used.
- All laptops and equipment-scales, measuring board, hemocue, ect-should be stored in a secure room, locked building or the agency vehicle during the lunch hour if all staff members are leaving the clinic site or office.
- All laptops and computers with the NE WIC program data system should be shut down or manually placed in sleep mode when the computer will be left unattended. This includes lunch hour, absence from office, evenings and weekends.
- Equipment such as laptops and the hemocue that are sensitive to extreme conditions should be brought into the building after each mobile clinic and stored in a locked cabinet and/or locked room.
- A staff member transporting equipment in a personal vehicle should make sure that the vehicle is locked when not in use and takes other precautions to protect the equipment while in their possession.
- All equipment purchased is to be identified and recorded on the WIC Property Schedule.
- Program medical and office supplies are to be kept in a locked cabinet and/or locked room.
- Formula supplies are always to be kept in locked cabinets or rooms, not displayed to the public.

WIC Checks should be protected in the following ways:

- Check stock will be transported either in the locked printer or plastic storage container.
- Check stock is to be placed in a secure room, locked building or a locked agency vehicle during the lunch hour if all staff members are leaving the clinic site.

The security of petty cash accounts and postage stamps should be secure in the following ways:

- The assigned Petty Cash Officer is the only staff member allowed to make petty cash disbursements.
- Petty cash is to be stored in a locked box on site.
- Postage stamps are to be kept with the petty cash officer in a locked box or cabinet when not in use at each site.
- Stamps may only be sold to staff members for personal use by the Petty Cash Officer. The money is to be deposited in the petty cash box.

Mid Building/clinic sites and vehicles are to be secured by taking the following actions:

- Each site is to be locked when WIC staff members have left the site.
- Keys are checked out to specific individuals based on seniority, FTE, travel requirements, and title and recorded in a Key Check Out log for each building.
- Keys may be checked out of the key box on a daily basis by individuals who will depart or arrive before or after the building site has closed or are traveling on the weekend for program/agency purposes. A key is to be checked back in upon completion of the travel or assignment.
- Vehicle keys are to be kept in the vehicle notebook and stored in a locked cabinet at the stationary sites
- Vehicle keys are to be kept in the vehicle's phone box and stored out of the client's reach at the mobile clinics.
- Vehicles are to be locked when not in use.
- Gas tanks on WIC vehicles have a keyed cap when possible.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – J. Confidentiality – Regulatory Requirements for Confidentiality of Client Information

Approval: 11/2008

Revised: 06/2015

Policy: Subpoenas and Search Warrants

Purpose: To provide guidance in responding and releasing participant information when presented with Subpoenas or Search Warrants.

Procedure:

○ **Subpoenas**

A subpoena is a written order by a court to a request by an attorney representing a party in a legal action. A subpoena can request information, or a witness who appears in court, or for a deposition. The subpoena will identify the individual or organization seeking the information and will designate a date by which the state or local agency must respond.

In the event a verbal request is made by an attorney, clerk, etc. on behalf of any member of an enrolled individual or family member, a professional statement, a response must be:

“No information or statement can be released without a proper subpoena.”

No release of information shall be given without a specifically written consent form signed by the participant or responsible party. With the consent form, only release the dates you actually worked with that participant. Release only a statement of dates of involvement with that family member.

Do not release any information other than dates of enrollment without a subpoena.

When approved to share client information remember to

- (a) Statements should be observations only.
- (b) Be specific about who you observed and what your visits consist of. What did you teach? What materials did you use?
- (c) No personal opinions or guessing of answer. If you do not know, state I do not know.

Retain a copy of the subpoena in an administrative file and the participant’s file

All subpoenas will go through the WIC Director. The WIC Director upon being informed of such a request must consult the State WIC office and Agency’s HR for legal counsel before action is taken. IF the WIC Director is unavailable the subpoena will go to the State WIC office.

○ **Search Warrant**

A search warrant is a request for specific information issued by a police investigator in which a timeframe is established.

Immediately upon receipt of a request for such information, notify the WIC Director or the State WIC office. All search warrants will go through the WIC Director. The WIC Director must consult the State

WIC office and Agency's HR for legal counsel before action is taken. IF the WIC Director is unavailable the Search Warrant will go to the State WIC office.

In accordance with our legal requirements, Mid will comply with a search warrant presented by police investigators.

Individual(s) serving the search warrant will be apprised of the confidential nature of Mid client information.

The WIC Director and/or staff will carefully review the search warrant and provide ONLY the specific information requested in the search warrant and no other information. All WIC staff members will obtain guidance from the WIC Director or State WIC office prior to providing any information.

The State WIC Office and Agency HR will be notified to the provisions of the information immediately after the search warrant is served.

Retain a copy of the search warrant in an administrative file and the participant's file

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – J. 5– Responding to Subpoenas and Search Warrants and Community Action Partnership of Mid-Nebraska- SUBPOENA/COURT ORDER/SEARCH WARRANT PROCEDURE -Admin 13-02/10

Approval: 11/2008

Revised: 07/2013, 06/2015 11/2017

Policy: Needle Stick Law: Exposure Control Plan

Purpose: To protect all individuals involved from transmission of blood or other bodily fluids.

General information:

Bloodborne Pathogens (BBP): pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) hepatitis C virus (HCV) and human immunodeficiency virus (HIV)

Contaminated: the presence or a reasonably anticipated presence, of blood or other potentially infectious materials, on an item or surface.

Contaminated Sharps: any contaminated object that can penetrate the skin including but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.

Exposure Incident: specific eye, nose, mouth, other mucous membrane, non-intact skin, or puncture wound contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Personal Protective Equipment (PPE): Specialized clothing and equipment worn by an employee for protection against a hazard.

Universal Precautions (UP): treating all blood and body fluid as if they are known to be infected with bloodborne pathogens.

Hand washing remains the single most effective method of preventing the spread of infection. Hands and other skin surfaces shall be washed immediately and thoroughly if contaminated with blood and/or other potentially infectious materials; also, immediately after gloves are removed, and before and after patient contact. If soap and water is not available health care employees will need to wash with antibacterial hand sanitizer.

Personal Protective Equipment (PPE) shall be used to prevent skin and mucous membrane exposure from contact with blood and other potentially infectious fluids. **Gloves** shall be worn at all times when giving shots or sticking fingers to obtain blood samples for hemoglobin, or when handling articles contaminated with blood, and all other procedures where the possibility of blood and other potentially infectious fluids may be present. Disposable examination gloves shall not be reused. **Agency smocks** are also available and worn by staff when giving shots or sticking fingers to obtain blood samples for hemoglobin, or when handling articles contaminated with blood, and all other procedures where the possibility of blood and other potentially infectious fluids may be present.

Procedure for needles and other disposable sharps:

Great care should be taken in handling all sharp items to prevent accidental injury.

- Do not attempt to replace caps on needles or lancets before disposal. Needles will not be bent, removed, sheared or purposely broken or otherwise manipulated by hand.
- No reusable sharps will be used in any task or procedure by Mid employees.
- Finger sticks for hemoglobin screening at the WIC clinics will be completed by a single-use, self-retracting blade, example Becton Dickinson Safety Flow Lancets.
- A variety of Lancets will be reviewed each year by the WIC nurses and CPAs to determine the best option for our participants.

Disposal of infectious waste

- Proper wear, and removing, of all Personal Protective Equipment (PPE) is required to clean up any blood or and other potentially infectious materials.
- All sharps and items containing blood samples (lancets and cuvettes) will be handled as regulated waste and disposed of in an OSHA approved sharp container.
- All sharp containers will be placed up and out of the reach of children. At the stationary site (Lexington, Hastings and Kearney) a wall bracket will be installed for the placement of all sharp containers in use. At the mobile (traveling) clinics the WIC nurse and /or CPA will determine the most appropriate spot for efficiency and protection.
- When a biohazard container reaches the indicated full line marked it is to be returned to the Kearney WIC Office for proper disposal
- Disposal items (e.g. tissues, paper towels, gloves, cotton balls, etc.) should be placed in a regular trash bag and disposed of at the satellite clinic at the end of the day with the permission of the site by a CPA WIC staff.
- Infectious items that are dripping or flaking (e.g. cotton balls, tissues, ect.) with blood and other potentially infectious materials must be placed in a RED BIOHAZARD BAG.
- CPA WIC staff should exercise professional judgment to make a determination based on visual factors if any additional contaminated materials not listed above should be placed in a RED BIOHAZARD BAG.
- All RED BIOHAZARD BAGS should be returned to the Kearney WIC Office for proper disposal

Training/Education

- The WIC Director and the Clinic Coordinators shall be responsible for ensuring that all WIC employees are aware of this policy and that this information is easily accessible at the WIC clinics.
- An Annual review of procedure and supplies used to perform needle sticks is to be completed with WIC CPAs who perform needle sticks. Issues considered include the following:

Universal Precautions (UP): treating all blood and body fluid as if they are known to be infected with bloodborne pathogens.

Personal Protective Equipment (PPE): Specialized clothing and equipment worn by an employee for protection against a hazard.

Housekeeping: cleaning, decontaminating, and disposing of all infected surfaces and fluids

Engineering controls: removing or isolating the hazards from exposure

Work Practice Controls: complete all tasks in order to prevent infection

Potential exposure to injury from contaminated sharps

Effectiveness of current sharps to decrease exposure to injury
Availability of sharps that would decrease exposure/injury
Work practice procedures that would increase exposure/injury

Community Action Partnership of Mid-NE

Reference: citation OSHA BBP standard, NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – Infection Control and Universal Precautions

Approval: 11/2002

Revised: 11/2012, 06/2015

Policy: Needle Stick Law: Post-Exposure

Purpose: The purpose of this policy is to reduce and give guidance of the risk of infection after exposure to bloodborne pathogens such as HBV, HCV, and HIV.

Procedures:

Initial Action: The exposed site should be cleaned with soap and water (skin) or flushed liberally with tap water (mucous membranes, eye) as soon as possible after the exposure. The employee should notify the **WIC Director/Clinic Coordinator/Human Resource Director** immediately after sustaining an occupational exposure. The WIC Director or Clinic Coordinator will assist the employee in completing these forms:

- **An Exposed Incident Report.**
- **Source individual's medical release/refusal form**
- **Sample Letter to Health Care Provider**

The employee should be sent directly to the local Health Dept or personal physician if source is believed to be at risk for bloodborne diseases.

All forms will be given to the Human Resource Director to be filed.

TESTING EMPLOYEE'S BLOOD

Post-exposure blood can be conducted at the local Health Dept or local physician. The employee's blood should be tested for HBV, HCV, HIV and any other contagious bloodborne pathogens. It will be the responsibility of the local Health Dept or personal physician to inform employee of his/her test results. If the employee declines to have his/her blood drawn for testing, the refusal should be noted on the **Exposed Incident Report** and signed.

TESTING THE SOURCE PATIENT'S BLOOD

If the source patient status is known, he/she will be asked to have his/her blood drawn, and consent to the appropriate tests. The release portion of the **Source Individual's Medical Release/Refusal Form** must be completed, signed and dated by the source for testing. It will be the responsibility of the local Health Dept or personal physician to inform the source of his/her test results. If source refuses to have testing done, the refusal portion of the **Source Individual's Medical Release/Refusal form** should be completed, signed and dated. Exposed employee will be given information regarding source's patient's results without the patient's name or any relevant identifying information.

COUNSELING

- The local Health Dept or personal physician will be asked in a **Sample Letter to Health Care Provider** to provide the employee at the time of initial evaluation information and counseling regarding safe sexual practices and the need to refrain from donating blood, organs, or semen, or breastfeeding, until the possibility of infection has been eliminated.

Community Action Partnership of Mid-NE

Reference: citation OSHA BBP standard, NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – Infection Control and Universal Precautions

Approval: 11/2002

Revised: 11/2012, 06/2015



COMMUNITY ACTION PARTNERSHIP OF MID-NEBRASKA
WIC's Post-Exposure checklist

PLEASE VERIFY THAT THE FOLLOWING DOCUMENTS ARE COMPLETED PROPERLY WITH APPROPRIATE SIGNATURES AND DATES. THE DOCUMENTS THAT ARE INCLUDED WITH THE PACKET SHOULD BE CHECKED OFF BY THE WIC CLINIC COORDINATOR or PROGRAM DIRECTOR. THE WIC DIRECTOR WILL THEN RETURN THEM TO THE HUMAN RESOURCES DIRECTOR.

NAME of employee: _____

	Supervisor (Please initial)	Human Resources
<input type="radio"/> An Exposed Incident Report	_____	_____
<input type="radio"/> Source individual's medical release/refusal form	_____	_____
<input type="radio"/> Sample Letter to Health Care Provider	_____	_____



COMMUNITY ACTION PARTNERSHIP OF MID-NEBRASKA
WIC Program
Exposed Incident Report

Exposed Individual:

Name	Employee's Identification number (four digits)
Address	
<p>1. Check part of the body that were exposed:</p> <ul style="list-style-type: none"> <input type="radio"/> Eye(s) <input type="radio"/> Mouth <input type="radio"/> Mucous membrane <input type="radio"/> Non-intact skin <input type="radio"/> Puncture <input type="radio"/> Other _____ (list) 	
<p>2. What was the employee exposed to?</p> <ul style="list-style-type: none"> <input type="radio"/> Blood <input type="radio"/> Vomit <input type="radio"/> Urine <input type="radio"/> Feces <input type="radio"/> Other _____ (explain) 	
<p>3. Describe the exposure incident by answering the following questions:</p> <p>What work was being done?</p> <p>What caused the incident?</p> <p>What PPE (see Policy: Needle Stick Law: Exposure Control Plan) was worn?</p> <p>What actions were taken immediately following the incident?</p>	

I hereby affirm that the information found on this **Exposure Incident Report Form** is a true and correct account of my exposure incident. I understand that all information collected during this evaluation and the contents of this report will remain confidential.

Employee's signature:	Date
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(A) I further authorize/refuse (**circle one**) my employer to release all relevant medical records to the Health Care Provider who will be performing the medical evaluation and follow-up for this exposure incident.

(B) I further authorize/refuse (circle one) to have my blood drawn for testing. I understand that all information collected during this evaluation and the contents of this report will remain confidential.

(A)Employee's signature	Date	Refusal	Permission
(B)Employee's signature	Date	Refusal	Permission



COMMUNITY ACTION PARTNERSHIP OF MID-NEBRASKA
WIC Program

Source individual's medical release/refusal form

Name:

Address:

You have been involved in an incident that has exposed the following employees to your blood or body fluids:

Permission for Source Individual's Medical Release

(A) I hereby grant permission to have my blood drawn and tested to determine if I am a carrier of a bloodborne disease.

(B) I also grant permission to have the test results released to the individuals listed above and to the Health Care Providers performing the follow-up evaluations. I am also aware that my decision does not affect my WIC eligibility.

(A) Source Individual's signature	Date
(B) Source Individual's signature	Date

Refusal for Source Individual's Medical Release

I have had the exposure evaluation process explained to me and I hereby refuse to consent to blood testing to determine my infectious status with regard to bloodborne pathogens, including but not limited to Hepatitis B virus (HBV) or Human Immunodeficiency Virus (HIV). I understand that by refusing to do so, those individuals who were exposed to my blood or body fluids will have limited information to determine their potential for contracting these diseases. I am also aware that my decision does not affect my WIC eligibility.

Source Individual's signature	Date
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COMMUNITY ACTION PARTNERSHIP OF MID-NEBRASKA
WIC Program

Sample Letter to Health Care Provider

Dear Health Care Provider

date

Based on the attached Exposure Incident Report, the following employee sustained an occupational exposure to bloodborne pathogens. Under the Occupational Safety and Health Administration 2001 Needlestick Safety and Preventive Act, we are obligated to request a medical evaluation and follow-up for this employee.

You are being provided with the following information:

- A copy of the OSHA standard
- A copy of the Exposure Incident Report
- A copy of the Source individual's medical release/refusal form

Please verify within 15 days that the exposed employee has been informed of the following:

- The results of the evaluation
- Any medical condition resulting from exposure
- Any further evaluation or treatment needed
- Any information and/or counseling regarding the possibility of infection

Please send the verification letter to:

Community Action Partnership of Mid-NE
Human Resource Director
PO Box 2288
Kearney NE 68845

Sincerely,

Community Action Partnership of Mid-NE

WIC Program

Policy: Use of Latex-Free Gloves and Band-Aids

Purpose: To provide guidelines to promote consistent safe practices for Latex-sensitive employees, WIC participants/responsible parties, and visitors.

Procedure:

1. To protect those with known and unknown latex allergies or sensitivities, all gloves and Band-Aids used at WIC will be latex-free.
2. WIC staff who order gloves or Band-Aids will only order latex-free products.
3. All WIC participants' chart with known latex allergies will be flagged.

Community Action Partnership of Mid-NE

Approved: 5/08

Revised: 3/2010, 7/2011

Community Action Partnership of Mid-NE

WIC Program

Policy: Placement of Sharp Containers

Purpose: To provide safety while at WIC clinics. The WIC staff will follow the recommendation of the agency to provide safety for all WIC participants and staff.

Procedure:

- All Sharp Containers will be placed in the locking security brackets while in use at each of the stationary sites (Kearney, Lexington and Hastings).
- A locking security bracket is located at each of the stationary sites within the CPA's area.
- All Sharp Containers will be placed up and out of the reach of WIC participants while in use at each of the traveling clinics. This location will be determined by the CPAs.
- All Sharp Containers that fill to the indicated full line need to be returned to the Kearney WIC office where the WIC Director will transport to the Administrative Building for proper mailing of waste.
- While Sharp Containers are being transported from one traveling WIC clinic to the next the lid will be tightly sealed for safety.

Refer to the **Exposure Control Plan and Post-exposure** policy for further instructions on safety and injuries.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – Infection Control and Universal Precautions

Approval: 05/2009

Revised: 11/2012, 06/2015

Community Action Partnership of Mid-NE

WIC Program

Policy: proper care of Hemocue HB201+

Purpose: To provide safety and maintenance of WIC equipment.

Procedure:

- Hemocues will be placed in a locked office while in use at each of the stationary sites (Kearney, Lexington and Hastings).
- Hemocues for the mobile sites will be transported in a traveling case and stored in a locked vehicle, locked building and or locked office.
- Hemocues will be tested for accuracy at the beginning of each day they are in use.
- Hemocues will be cleaned at the beginning of each day in use with hemocue Inc alcohol wipes and recorded on the hemocue log.
- A monthly hemocue log is assigned to each hemocue analyzer.
- Test using the side of a middle or ring finger- no finger should be tested if wearing a ring
- Use microcuvettes within the 90 days requirement after bottle is opened for the first time
- Use the microtainer within the 10 minutes allowed from air exposure.
- Completely fill the microcuvette and look for bubbles, wipe off excess blood.
- Microcuvettes and microtainers disposed of in a sharp container.
- All filled Sharp Containers will be handed to the WIC Director for transportation to the Administrative Building for proper mailing of waste.
- Staff will view the training video provided by the Hemocue company on an annual basis
- In addition all size of microtainers are reviewed on an annual basis for best options for our clients.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual-08. Certification, Eligibility, & Coordination of Services- B - Nutrition Risk Determination, Documentation, & Priority Assignment

Written: 4/13

Revised: 11/2017

Community Action Partnership of Mid-NE

WIC Program

Policy: Employee Vaccination

Purpose: The purpose of this policy is to inform and define who is eligible for vaccine through Employment with Mid's WIC program.

Procedure: Mid promotes staff wellness through an agency immunization program. The following information gives clarification on allowable vaccines and who is eligible.

- When funds and product are available all WIC employees at Mid will have the opportunity to receive the Flu shot at the cost of the WIC Program.
- When funds and product are available all WIC CPAs performing hemoglobin testing will have the opportunity to receive the Hepatitis B vaccine at the cost of the WIC Program.
- When funds and product are available all WIC employee at Mid will have the opportunity to receive any new or additional vaccine recommended by CDC at the cost of the WIC program with State WIC approval.
- Most if not all vaccines will be administrated through the Mid immunization program at a time and place that works for that program. The dates and times will be given in advance for planning purposes.

Community Action Partnership of Mid-NE

Reference: citation OSHA BBP standard, NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – Infection Control and Universal Precautions

Approval: 02/2010

Revised: 11/2012, 06/2015

Community Action Partnership of Mid-NE

WIC Program

Policy: Referring WIC participants with Low Hemoglobin Values

Purpose: To ensure WIC participants with hemoglobin levels of 10 g/dl or lower are referred for appropriate follow up.

General Information: Low hemoglobin levels and anemia can contribute to poor health outcomes. Hemoglobin levels found to be 10 g/dl or lower may need additional testing and follow up from a health care provider.

Hemoglobin levels obtained at a WIC clinic that are found to be 10 g/dl or less should receive a referral to a health care provider. CPA's may use their professional judgment to determine how the referral should be made from the listed choices. The referral can be made directly to the health care provider with the participant's permission/completion of release of information form or the referral information may be written down and given directly to the participant to be shared with their health care provider.

Referrals to hematology and/or health care provider should be entered if appropriate.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – WIC Blood Work Requirements

Approval: 11/2014

Revised: 06/2015, 12/2016

Community Action Partnership of Mid-NE

WIC Program

Policy: Option to Delay Hemoglobin Testing for Postpartum and Breastfeeding Women

Purpose: To give CPA's and postpartum/breastfeeding women the option to delay hemoglobin testing required at certification until four to six weeks postpartum.

General Information: Low hemoglobin levels are commonly found shortly following delivery due to blood loss during delivery and other factors. CDC recommends that the postpartum anemia screening be completed at 4-6 weeks postpartum.

Postpartum and breastfeeding women may be seen for certification shortly after delivery, prior to the 4-6 week postpartum period, when the CDC recommends anemia screening. The CPA may have the option, using their professional judgment to have the postpartum/breastfeeding woman wait to complete the hemoglobin testing until she is 4-6 weeks postpartum when would expect that the value would not be as affected by recent delivery.

If this option is chosen, the CPA should note on the care plan that the hemoglobin is being delayed, and on "Blood" panel in Journey, select "No" to Blood Work Taken. Then enter "Other" on reason why no test performed, and on notes indicate the test will performed in 1 mo. The CPA is also responsible for communicating to the clerk that only this month and next month's checks should be issued and an appropriate appointment is made at the next visit for the hemoglobin to be completed.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – B. Nutrition Risk Determination, Documentation, & Priority Assessment – Hemoglobin Technique

Approval: 07/2013

Revised: 11/2014, 4/2017

Community Action Partnership of Mid-NE

WIC Program

Policy: Disposal and Retention of Records

Purpose: To provide documentation of the procedure in the agency's retention and disposal of records.

Community Action Partnership of Mid NE WIC records will be retained according to the policy of Retention of Records established and printed in the NE State WIC Procedure Manual.

Following State policy, all WIC records will be retained for three years plus closeout. Records will be retained longer than three years plus closeout if they are needed for resolution of an audit or any legal action.

Each year a written request will be sent to the State WIC office requesting approval to dispose of WIC records older than three years plus closeout. Type of records, date of records, and disposal method will be specified in the request.

Confidentiality of all records will be maintained during disposal.

NOTE: For disposal of records in the areas of:

Fiscal: Information clarified in the MANUAL OF ACCOUNTING POLICIES–RECORD RETENTION AND DESTRUCTION-page 8

Program: WIC follows the State program recommendations found in the NE State WIC Procedure Manual 08-k

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – K. Records Management – Disposal of Records-Retention of Records and Community Action Partnership of Mid-Nebraska-
MANUAL OF ACCOUNTING POLICIES–RECORD RETENTION AND DESTRUCTION-page 8 06/16

Approval: 09/2008

Revised: 09/2011, 06/2015, 4/2017, 11/2017

Community Action Partnership of Mid-Ne

WIC Program

Policy: Separation of Duties

Purpose: To provide guidance for effective delivery of services for Community Action Partnership of Mid-Nebraska WIC while following the State manual on separation of duties.

Procedure:

- Mid's clinics are scheduled and consists of at least one clerk, and one CPA (nurses and/or dietitians).
- Each staff title (CPA and clerk) have their own job description to follow which outlines completely different tasks. Clerks issue checks, and determine eligibility of income, residency and ID. The CPAs (a nurse or dietitian) work to assess, assign and educate on all health and nutrition issues and topics. No single staff member is ever scheduled to complete an enrollment for a family on their own.
- The NE statewide WIC computer system supports separation of duties based on job descriptions and allows access to certain areas based on one's title.
- Steps are taken and in place regarding this review of policy with all new WIC employees.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – A. Eligibility Determination & Documentation – Separation of Duties

Approval: 12/2009

Revised: 10/2016

WIC Program

Policy: Employees Participating in WIC

Purpose: To provide guidance for effective delivery of services for Community Action Partnership of Mid-Nebraska WIC staff eligible to participate in any Mid programs.

Procedure:

- Any staff member and their family who meet the requirements of the WIC program are eligible to participate.
- A staff member must follow the rules and regulations of the program as any other individual participating in the WIC program.
- Another WIC staff member must complete the certification process and a different staff member must issue vouchers to the participating staff member or members of their family. One WIC staff member cannot complete the entire certification process on their own. If the WIC staff member has a conflict with the employee and wishes to be served by another WIC staff member accommodations can be made. Mid will respect the interest of both parties.
- All WIC information regarding a participating WIC staff member is to be treated with the same confidentiality given to any other WIC participants.
- A staff member may also participate, if eligible, in any other program provided by Community Action Partnership of Mid-Nebraska, Inc.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – A. Eligibility Determination & Documentation – Services for Eligible WIC Staff and Community Action Partnership of Mid-NE-
MANUAL OF PERSONNEL POLICIES –page 9, Section B, Compensation -07/17

Approval: 11/2008

Revised: 06/2015, 07/2016

Community Action Partnership of Mid-Ne

WIC Program

Policy: Outreach Networking

Purpose: To provide guidelines for providing materials describing WIC and locations of local agencies and clinics.

Procedure: to maintain a mechanism for mutual sharing of general program information between WIC and other community services. This would include income guidelines, who qualify, how you apply, dates times and locations of our WIC clinics, what WIC provides. NOTE: Participant information will not be released to without a signed "Release of Information" form.

Guidelines for sharing WIC material describing WIC and locations for outreach are as follows:

- Quarterly news releases will be mailed within Mid coverage area sharing dates, locations and times of clinics
- Bimonthly WIC news/outreach will be posted on our agency facebook page, social media
- Annually when our new income guidelines are issued, mass mailing of Statewide WIC brochures in English and Spanish will be sent out to our partners.
- Staff members may attend community organization to network with other agencies who serve our same WIC target population.
- Membership to organizations, with pre approval, is allowed for networking and outreach.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual - 08. Certification, Eligibility, and Coordination of Services – C Referrals

Approval: 11/17

Revised:

NE WIC PROGRAM PROCEDURE MANUAL

09.

Food Delivery

POLICIES:

Inventory, Issuance, and Storage of Check Stock
Clinic Cancelled/Rescheduled/Mass Mailing

Community Action Partnership of Mid-Ne

WIC Program

Policy: Inventory, Issuance and Storage of Check Stock

Purpose: To provide guidance on inventory check stock for staff members who process WIC checks.

Procedure:

- One staff will be assigned at each of our Stationary clinic (Lexington Hastings and Kearney) to notify the State on quarterly orders and if they are running low on checks.
- The stationary sites will be responsible for ordering and taking physical inventory before and after each clinic. This includes their stationary location plus all traveling clinics housed from their location
- storage and security of unused checks during lunch and off hours are placed in a locked room and or building
- Checks are stored in the traveling printers. Additional checks are stored in a secure plastic container.
- All check stock is either stored in printer with staff present or placed in a locked cabinet when out of use.
- A physical inventory of checks is completed after and before each clinic day.
- Storage and security of unused checks during lunch and traveling are placed in a locked room, building or agency vehicle.
- Any voided check with client or food information will be returned to the Kearney WIC office for file and storage for 3 years plus closeout
- The WIC Program Assistant in Kearney is responsible for gathering all checks orders from each stationary site. This included the order made, shipment received along with:
 - Number of boxes order
 - The carton number
 - Location of delivery
 - The date checks were received

WIC Program Assistant will retain all email order confirmation in one file and must retain the list for 3 years plus closeout.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 09. Food Delivery – D. Documentation of Check Issuance – Receipt and Security of WIC checks

Approval: 10/2003

Revised: 1/2006, 06/2016

WIC Program

Policy: Clinic Cancelled/Rescheduled/Mass Mailing

Purpose: Notifying clients if clinic must be cancelled, rescheduled or a mass mailing has been determined

Procedure:

- Incidents and situations that might occur in which a clinic may be closed or cancelled (not limited to).
 1. Inclement Weather
 2. Death of a staff member
 3. Natural Disaster
 4. Complications at clinic site (funerals at churches, etc.)
 5. Other situations as determined by program or agency administration

- The decision to cancel or reschedule will be made by the WIC Director and Executive Director upon advice from the WIC team in that area. Decisions to close outside clinics will be based on local courthouse closings, road conditions, school closings, local weather assessments and caseload. Refer to your Mid Agency Policy, Administrative policy, Admin 2, for further information.
- The decision to conduct a mass mailing based on computer problems or caseload increase will be determined by the WIC Director and the WIC team.

Steps to be taken to notify participants of a clinic cancellation:

1. The calling WIC PHONE TREE will begin immediately after the decision is made to cancel or reschedule a clinic. Partners with WIC are listed on the WIC PHONE TREE and will be notified as well.
2. Local TV and radio stations will be notified with the pertinent information by the WIC Director, and/or one of the Coordinators.
3. The WIC clinic site may be notified to put a sign on the door with pertinent information regarding the closed WIC clinic.
4. Staff may call as many participants as possible to inform them of the clinic cancellation if time and staff personnel are available. Leaving a message on the WIC answering machine will also be an option informing families of cancellation when they call the WIC Mid numbers.

Checks are to be mailed to participants who are eligible to receive checks when a clinic is canceled. All scheduled staff members, able to make it into the office, should assist in mailing out participant's checks within 24 hours of the clinic cancellation. This is valid when one of the stationary WIC sites is open and not valid when an Administrative day is awarded at that site. The following steps should be taken when mailing a mass amount of WIC checks.

1. The WIC Director or WIC Program Assistant will notify the State WIC Office of the cancellation and request permission to mail checks.
2. Staff will evaluate each family and determine check eligibility, schedule for the next appointment, verify address, insert appropriate paperwork, and document in system.
3. Checks, an appointment, and appropriate forms are mailed to each eligible participant.

Steps to be taken to on mass mailing:

With computer problems staff will notify participants in person or via phone. Leaving a message or sending a note in the mail with the checks may also be an option in informing families of mass mailing.

With sustaining caseload checks can be mailed to participants who are eligible to receive checks when working on sustaining or increasing caseload.

The following steps should be taken when mailing a mass amount of WIC checks.

1. The WIC Director or WIC Program Assistant will notify the State WIC Office the reasoning of mass mailing.
2. Staff will evaluate each family and determine check eligibility, schedule for the next appointment, verify address, insert appropriate paperwork, and document in system.
3. A participants will not be allowed more than two mailing of WIC checks within a year. This would include mailing due to illness, transportation, or employment. Mailing checks due to clinic cancellation or computer problems does not count.
3. Checks, an appointment, and appropriate paper work are mailed to each eligible participant.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 09. Food Delivery – E. Special Check Issuance Accommodations – Mailing WIC checks and Community Action Partnership of Mid-NE-Snow Closing-Admin 2-01/14

Approval: 10/2003

Revised: 09/2011, 06/2015, 11/2017

10. Monitoring & Audits

POLICIES:

Program Planning and Assessment

Community Action Partnership of Mid-NE

WIC Program

Policy: Program Planning and Assessment

Purpose: Provide guidance on the assessment of local needs, program planning, monitoring and evaluation.

Procedure:

To monitor and assess the needs of the WIC-eligible population, the following actions should be taken.

- Review available resources for pertinent information
 - Mid surveys and assessments conducted
 - Senior Management Monday Morning Meetings with Community Needs listed on the agenda
 - Responses to Mid website, Mid emails, Mid calls, Mid complaints
 - NE WIC computer data

Compile and review with staff a comparison report of demographic information, caseload, customer surveys and no-show rates for each clinic to identify potential for growth and areas of concern

To complete the annual plan the following actions should be taken

- Attend State WIC Annual Plan meetings
- The local agency Annual Plan Team **may** consist of the following staff members, but not limited to :
 - Clinic Coordinator of Lexington Kearney and Hastings clinic sites
 - WIC Program Assistant
 - RD staff
 - Breastfeeding Coordinator
 - WIC Director
- WIC Director with team and/or WIC staff will meet to review the annual plan, work on action steps, and evaluate progress on an as need basis.

To complete program self-monitoring and evaluation the following actions should be taken

- Visits by the WIC Director, WIC Program Assistant , and/or RDs should occur a minimum of two times per year in Hastings, Kearney and Lexington clinic site to conduct chart review, clinic observation and meet with staff to discuss local clinic issues. At least 20% of the mobile clinics will be visited once a year with the idea of rotating all sites within a five year time frame.
 - Clinic Coordinators are to make sure at least five chart reviews are completed each quarter in Hastings, Kearney and Lexington clinics. In addition Clinic Coordinators are to make sure at least five chart reviews are completed each quarter for a total of their assigned mobile clinics. Reviews completed by local staff should be returned to the office in Kearney. Each quarter is determined by January-March, April-June, July-September and October-December.
 - In addition WIC R.D.'s will complete at least five chart reviews each quarter in Hastings, Kearney and Lexington clinics and at least one chart review for each mobile clinics.
 - Clerks are to complete 5 chart reviews every quarter in their designated WIC site this includes their stationary and a total of their assigned mobile clinics.

- Performance Measures will be shared with staff to review individual, clinic, and local agency progress at staff meetings throughout the year.
- Client Wait-Time Analysis Tool will be reviewed by WIC Director, WIC Program Assistant or RD on an annual basis.
- Clinic Observation of Staff and Clinic Services Form will be conducted on a biannual basis as a group.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 10. Monitoring and Audits – A. Monitoring – Local Agency Self-Monitoring and Community Action Partnership of Mid-NE-Manual of Accounting Policies-Page 9-July 2016

Approval: 10/2003

Revised: 06/2015, 11/2017

NE WIC PROGRAM PROCEDURE MANUAL

11.

Civil Rights

POLICIES:

Americans with Disability Act

Community Action Partnership of Mid-Ne

WIC Program

Policy: Americans with Disability Act

It is the policy of the Community Action Partnership of Mid-Nebraska (Mid) to ensure that all applicants and participants in agency programs and functions have suitable access to service in accordance to the Americans with Disabilities Act.

Procedure: Mid will do the following:

- Our HR Director has been assigned the position of site reviewer, also known as the 504 Coordinator. The HR Director is responsible for ensuring all sites either owned or leased by Mid have suitable access or accommodations in accordance with the Americans with Disabilities Act.
- A self-evaluation of program accessibility for each new clinic will be conducted. If the new location does not meet clinic site accessibility a written letter will be submitted to the State WIC office.
- All buildings owned or being built by Mid will undertake a thorough architectural review for compliance with the ADA Act.
- Prior to leasing, a potential site will be reviewed to ensure compliance to ADA requirements.
- Sites without legal control of the premises (non-owned or non-leased sites) will be reviewed for compliance and accommodation arrangements.

The Community Action Partnership of Mid-Nebraska will not discriminate against individuals with disabilities. It is our intent to provide reasonable accommodations to otherwise qualified and disabled staff, clients, and applicants, as long as that accommodation does not place an undue hardship on the agency.

Any participant who requires an accommodation will need to speak to a Mid staff person to notify them of the accommodation. When the accommodation is required at a Mid clinic or business location, the participant will need to request the accommodation prior to the scheduled appointment date. Accommodations will be made upon request unless the agency determines that the modifications present an undue hardship or fundamentally alters the nature of services.

Final determination of whether the accommodation places an undue hardship on Mid will be left up to the CEO and/or the Business and Housing Director and/or the Human Resources Director.

Any participant who feels that they were discriminated against in accessing, receiving, or participating in a Mid program/service does have the right to submit a written grievance.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 11. Civil Rights – A. Administration – Services for Disabled Persons and Community Action Partnership of Mid-Nebraska-Agency Site Access Policy-Admin 5-11/17

Approval: 11/2008

Revised: 07/2013, 06/2015, 11/2017

Community Action Partnership of Mid-NE WIC Policies

POLICIES:

Providing a Safe Clinic Environment

Identification of Special Circumstances: Loss of Infant

Lunch Hour Clarification

Dress Code

Eligibility of Staff Development

Personal Phone Use

Amount of Personal Items

State and Agency Forms

In Stock Formula Issuance

Employee of Breastfeeding

Agency Cell Phone

Pre Birth Protocol

WIC Service Code of Conducts

Community Action Partnership of Mid-Ne

WIC Program

Policy: Providing a Safe Clinic Environment

Purpose: To provide guidelines in offering a safe environment for our WIC participants and staff.

Procedure:

1. Parents/Guardians may need to be reminded to not leave their child(ren) unattended.
2. WIC is a public service available for all to attend and apply.
3. If a WIC staff member has factual information of an individual committing a crime it is the staff responsibility to report this to the authorities.
4. No employee shall have his/her children at the worksite without the consent of his/her Program Director.

Community Action Partnership of Mid Nebraska

Reference: Community Action Partnership of Mid-Nebraska-Manual of Personnel Policies-Conditions of Employment-G-page 7, 07/17 and Community Action Partnership of Mid-Nebraska-Safety Manual

Written: 5/08

Revised: 8/11, 10/13

Community Action Partnership of Mid-Ne

WIC Program

Policy: Identification of Special Circumstances: loss of infant

Purpose: To enable staff to respond sensitively and appropriately to mothers who may be grieving the loss of an infant

Procedure:

- For sensitivity, a staff member should contact the appropriate WIC staff (WIC and the BFPC(s) **as soon as possible** via email/group messaging. The information should include: mother's name, family ID number, due date, miscarriage date, and any other information communicated by the mother. WIC staff would also enter in Journey:
 - Change the participant category to Not Breastfeeding and mark the Miscarriage box in the 'Participant Category' panel
 - Document in the "appointment notes" of the miscarriage
 - Schedule the post partum appointment accordingly (recertification) and
 - Document in alerts of the miscarriage setting the expiration
- Any new and/or updated information regarding a loss of an infant should be added **as soon as possible** so all parties are involved in the sensitivity.
- An Agency sympathy card, in English and Spanish, are available to send out to the family expressing staff condolences.

Community Action Partnership of Mid Nebraska

Reference:

Written: 12/03

Revised: 12/08, 12/09, 7/11, 1/13, 11/13 6/16

Community Action Partnership of Mid-Ne

WIC Program

Policy: Lunch Hour Clarification

Purpose: To provide guidelines on lunch hour checking in and out on timesheet

Employees of the agency are permitted an hour lunch break as well as two fifteen minute breaks per the Community Action Partnership of Mid-Ne policy manual. "Some employee's work schedule may deviate from the normal schedule to meet the needs of the program." Mid Personnel Policies page 5

The WIC schedule should attempt to provide these breaks whenever schedules allow. In the interest of maintaining mental and physical health as well as productivity, staff members should take the prescribed breaks whenever possible.

Staff should be off the clock during lunch in the following situations:

Time is allowed in the clinic schedule for a lunch break, so staff need to clock out and take a lunch break on or off the clinic premises.

Staff leaves the clinic or office to purchase food or run errands.

Staff members are at an "in" or "out of" town meeting, but are free to pursue their own interest during the lunch break.

Staff should not clock out during a lunch break in the following situations:

The lunch is served as part of a workshop and staff members are asked to participate and not leave the premises

Work continues during the consumption of lunch. For example, clients are scheduled during the lunch hour or lunch is consumed at your office desk as you continue to work

A scheduled lunch break is interrupted by a client's request. The time required providing customer service should be recorded on your timesheet

Lunch is consumed in a vehicle traveling between clinics, your assigned worksites, or meetings.

Community Action Partnership of Mid Nebraska

Reference:

Written: 12/01

Revised: 12/08, 12/09

Reviewed: 10/11, 10/13

Community Action Partnership of Mid-Ne

WIC Program

Policy: Dress Code

Purpose: To provide guidelines in appropriate wear for work.

Procedure:

The Community Action Partnership of Mid Nebraska Personnel Manual page 6 gives the following directives on employee dress:

“Employees of Mid are expected to maintain a professional and high standard of dress. Professional appearance also means that the agency expects you to maintain good hygiene and grooming while working.”

The following requirements are presented to more clearly define the application of this policy to WIC staff members.

- Staff is expected to dress appropriately for the job. Staff members are expected to look professional whenever serving or interacting with the public.
- Slacks are preferred. Shorts and blue denim and faded/stonewashed jeans are not allowed. Jeans may be worn on Friday if the staff member has purchased a “Jean Day” card from Human Resources Director at Mid. This card allows wearing jeans only if you are not working in clinic and are not acting in a public capacity that Friday. Cold weather is not an acceptable reason to wear blue jeans. A staff member traveling in cold weather should find alternate ways of dressing to keep warm. Jeans may be worn on announced designated days. Uniforms consisting of smocks and pants may be worn by clinic staff.
- Decorative t-shirts and sweatshirts may be worn. Our WIC issued Breastfeeding and Nutrition t-shirts may be worn. Those with company or school names or logos, other than Mid shirts, are not allowed except on announced designated days or “Jeans Day.”
- When skirts, dresses are worn, they should be appropriate in length. Skorts must resemble a skirt and be an appropriate length. An appropriate length would be approximately a hand-width above the knee
- Shirts/blouses/dresses that reveal the abdomen, cleavage, the back or shoulders (halter tops, for example) will not be allowed without the appropriate shirt underneath or over the wear.
- Shoes should be appropriate for the job of the day. Consider safety when select foot wear.

Community Action Partnership of Mid Nebraska

Reference: Community Action Partnership of Mid-Nebraska- MANUAL OF PERSONNEL POLICIES-page 6--07/17

Written: 12/08

Revised: 12/09, 8/11, 10/13, 2/16, 11/17

Community Action Partnership of Mid-NE

WIC Program

Policy: Eligibility of Staff Development

Purpose: To provide clarification and guidance in selecting eligibility of all staff development training/ workshop/ conference for WIC employees. The WIC Director shall approve the coordination of all staff development training/workshop/conference for WIC employees. Employee eligibility for participation will be determined on a case by case basis and as funding allows.

Procedure:

FTE- an employee with an FTE of 80% (receiving benefit from the agency) or higher will have a greater opportunity to participant over an employee under that percentage.

Length of Employment with Mid- an employee with an older employee date will have a greater opportunity to participate over an employee with a newer date. A recommendation of 3 months for new employees should be taken prior to enrollment in a training/ workshop/ conference. (This does not include the State WIC Training clinic or the annual WIC conference)

Nature of the Education- an employee with the profession of the training/ workshop/ conference will have a greater opportunity to participate over an employee who does not. (Example: a supervisory workshop would be allowed to an employee who supervises staff.) An agenda must be reviewed prior to approval to verify that the topic is WIC related. All educational training will be pertinent to the WIC program.

Staffing Clinics- All clinics must be managed with appropriate staff prior to enrolling in a training/ workshop/ conference. The goal is to have a WIC staff person from each stationary site attend a training/ workshop/ conference to share the knowledge with all WIC participants in our service area.

Repeat in Educational Opportunity-an employee who has not attended a training/ workshop/ conference in a specific area will have a greater opportunity than an employee who has attended. The goal is to have all our WIC staff receiving opportunities for education.

Sharing the Education -staff who attends the training/ workshop/ conference may have an opportunity to share the information at the next available WIC staff meeting for all to benefit.

Interest in the Education- A WIC staff interested in a training/ workshop/ conference may inform the WIC Director and/or Breastfeeding Coordinator prior to the cut-off date given. It is the WIC staff member who would like to attend a training/ workshop/ conference responsibility to communicate and obtain prior approval with the WIC Director and/or Breastfeeding Coordinator.

Licensure and/or certificates- the cost of the licensures, certificates or recertifying will be reviewed on a case by case basis and the factors considered will be: requirements for the job title, length of time employed at Mid, (at least 3 months tenure with the agency is preferred for reimbursement of license or certification fees) current FTE, (FTE of 80% or higher with be given a higher priority) Employment at other entities and availability of funding. Mid may pay the cost based on all factors. Licensure certificates and recertifies refer to CBE CLC IBCLC and RDs. Due to LPN and RN licenses not being a requirement of employment for the WIC program, reimbursement for those licensure fees is not available, per the State WIC office.

Funding- the cost of the training/ workshop/ conference (travel, lodging, food, registration) will be considered in any enrollment.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 05. Nutrition Services & Admin – B. Local Agency Budgets – Allowable Costs

Approval: 04/2008

Revised: 02/2015, 01/2016

Community Action Partnership of Mid-Ne

WIC Program

Policy: Personal Phone Use

Purpose: To provide guidelines in offering good customer service.

Procedure:

1. All personal phone use will be kept to a minimum. Personal phone use consists of: internet, texting, voicemail and talking.
2. During clinic hours/staff meetings/trainings all personal calls can be conducted during your break in a designated area away from the workstations. Before a break is taken make sure the clinic is manageable for other staff members and that you have notified a staff member of your break.
3. All personal phones should be kept on vibrate or silent to avoid distractions.
4. In regards to personal phone use while driving please refer to the Mid Driver Safety Manual.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual, Vol. 1 Section A, Page 1

Written: 7/08

Reviewed: 10/13

Revised: 12/09, 10/11, 2/16

Community Action Partnership of Mid-NE

WIC Program

Policy: Amount of Personal Items

Purpose: To provide guidance in personal items displayed at a WIC clinic. The WIC Program will provide a safe and neutral environment for our participant at the WIC clinics. The WIC clinic space will represent our WIC mission statement for all people.

WIC Mission Statement: To safeguard the health of low-income women, infants, and children up to age 5 who are at nutrition risk by providing nutritious foods to supplement diets, information on healthy eating, and referrals to health care.

Procedure:

- No holiday decoration will be allowed that may offend any of our WIC participants.
- WIC clinics will not look cluttered with nick-knacks not related to the WIC mission.
- WIC clinics will only have items providing the message of nutrition, breastfeeding, health and parenting.
- Personal items will be limited to the amount of one storage box (12 X12).

Items associated with the job can be requested for possible approval.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual, Vol. 1 Section K, Page 1.

Written: 6/08

Revised: 12/09, 8/11, 10/13, 2/16

Community Action partnership of Mid-Nebraska

WIC Program

Policy: State and Agency forms.

Purpose: To provide information to our WIC staff and participants on their rights and responsibilities

Procedure:

1. All WIC clinics and offices will display the Non-discrimination statement **Non-discrimination statement** poster required by the State WIC Office.

2. All Stationary clinics (Kearney, Hastings and Lexington) will display the forms and posters listed below required by the Mid Agency:

Grievance procedure and form,

Code of Ethics,

Client Code of Conduct

Our Mission,

Brand Promise “Helping people changing lives”

7 Principles

Federal Labor Law Poster

State of NE Labor Law Poster

Tornado/fire map

3. All traveling clinics (Arapahoe, Gothenburg, Cozad, Gibbon, Holdrege, Red Cloud, Superior, Harvard, Franklin, Alma, and Minden) will display the forms and posters listed below required by the Mid Agency:

Non-discrimination statement

Grievance forms

Tornado and fire map

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure Manual, Vol. I Section K, page 5

Written: 6/08

Revised: 12/09, 07/11, 10/13, 2/16, 4/16, 9/16

Community Action Partnership of Mid-NE

WIC Program

Policy: In Stock Formula Issuance

Purpose: To provide guidance when issuing or receiving formula and to maintain accurate records.

Procedure:

1. Clinic Coordinator/or assigned employee should conduct an inventory of formula quarterly and record the action in the logbook.
2. The formula inventory should include checking to make sure the formula is not near/past the expiration date.
 - a. If formula is found to be nearing the expiration date, it should be given in place of checks being printed.
 - b. If it is an uncommon formula, a WIC CPA should run the report **Formula and Medical Food Issuance** under **Food Benefits Reports** in Journey to see who in the state are on the formula. Then provide this information to the clinic Coordinator
 - c. If formula is found to be expired is should be disposed of in the following way.
 - i. Powdered formula cans should be opened and poured into a garbage can
 - ii. Liquid formula should be opened and poured down a drain.
3. Transactions involving the receiving or issuing of formula need to be overseen by a CPA. Formula should be checked at time of receiving for damage to cans and expiration dates
4. Transactions should be recorded in the logbook by CPA/Clinic Coordinator.
5. For sanitary purposes transportation of formula should be placed in a non-recycled sack or bag.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 09. Food Delivery – F. Special Formula Situations – Formula Returned to the WIC Agency Purchased with WIC Checks

Approval: 07/2008

Revised: 06/2015, 1/2016

Community Action Partnership of Mid-NE

WIC Program

Policy: Employees of Breastfeeding

Procedure: To support and give guidance to employees who wish to breastfeed in the workplace.

Definition: Express breast milk-Breastfeeding a child, pumping, manual expressions

The WIC Program at Community Action Partnership of Mid-NE is committed to promoting and supporting breastfeeding as the best source of nutrition for infants. This commitment includes a work place environment for our WIC employees to successfully breastfeed while on the job. The agency follows section 7 of the Fair Labor Standards Act (FLSA)

<http://www.dol.gov/whd/nursingmothers/>

The WIC Director will make a reasonable effort to work with the employee that breastfeeds, allow the employee to express breast milk during work hours, and to find a room for this purpose. Such a space should be equipped with the following: an electrical outlet, a comfortable chair, and a table or work surface. This room should have a lock on the door and where possible, should be close to an area for washing hands and rinsing out breast pumping equipment.

NOTE: in accordance with federal law, a restroom should not be utilized for the purpose of expressing milk. Other arrangements should be made to find an appropriate space to express breast milk.

For the stationary sites (Lexington, Hastings, and Kearney) the Clinic Coordinator will determine the best area for this space. For the mobile sites the employee will need to visit with the WIC staff and the contact person of the facility on an area that would work best for the breastfeeding employee. Any costs associated with the choice of the employee to breastfeed in the workplace will not be chargeable to the WIC program or agency.

Employees that breastfeed will be offered flexible schedules within the constraints of their job responsibilities to allow adequate time for expressing milk or nursing their baby.

Employees with an extended break schedule will be on the employee's personal time, thus requiring extended work days. Employee must understand that extended breaks are personal time, not work time.

Employees will be responsible for informing their Director of scheduling needs and determine the time period for which these scheduling arrangements are needed and appropriate.

Employees will be responsible for providing containers for storing expressed breast milk, appropriately labeled for storage, and providing their own refrigeration where such is not available on-site. Employee will be responsible for leaving the area clean and orderly for the next employee's use.

Community Action Partnership of Mid-NE

Reference: NE WIC Procedure Manual – 02. Nutrition Services & Breastfeeding – A. Nutrition Educations & Breastfeeding – Breastfeeding Friendly Clinic Environment

Approval: 09/2008

Revised: 07/2013, 06/2015

Community Action Partnership of Mid-NE

WIC Program

Policy: Agency Cell Phones

- Agency cell phones are for program use only. No personal calls are allowed. If a personal call is made, reimbursement to the agency is required for the call made.
- Phone calls to the agency cell phone should not be forwarded to personal phones.
- Phone logs will be monitored on a regular basis.
- Due to the current phone plan we are not able to make out of State calls. Please make prior arrangements to have another BFPC take over the BFPC's calls while out of state.
- Notify Coordinator with any technical problems regarding the agency cell phone as soon as possible. Only the coordinator is allowed to fix, replace, correct, add or change the current phone plan.
- Agency cell phones can be used during the hours of 9:00 am to 9:00 pm unless otherwise stated by the WIC participant needing assistance. Hours after 9:00 pm and before 9:00 am need to be restricted as family time.
- Agency cell phones are the property of the program and need to be taken care of at all times.
- Any phone calls related to the program can be made, for example to your coordinator, to a medical facility to inquire about breast pumps, to a hospital to speak with a WIC mom.

Community Action Partnership of Mid Nebraska

Reference: Community Action Partnership of Mid-Nebraska- Personal Cell Phone Use Policy -Admin 23-07/13

Written: 07/10

Revised: 11/26/12

Community Action Partnership of Mid-NE

WIC Program

Policy: Pre-Birth Protocol

1. Schedule in month prior to estimated due date if possible.
2. Review care plan for concerns and goals.
3. Review if BFPC has been assigned and the BFPC documentation.
4. Obtain and enter weight and view prenatal weight gain grid.
5. Obtain updated information on any changes in health or pregnancy. Determine if any new medications added or about the use of prenatal vitamins. If new medications started, determine if the medications are anticipated to be continued after delivery and if will affect breastfeeding. May need to refer to IBCLC or Dr. Hale's Medication's and Mother's Milk book for resource to share with client's physician. If not taking prenatal vitamins, encourage to take, and continue taking them after delivery or as directed by physician.
6. Inquire about plans to breastfeed through open ended questions. Example: "Tell me about how you plan to feed your baby." "Tell me about your plans with breastfeeding."
 - A. If client indicates plans to breastfeed or is undecided: Provide encouragement, support and education.
 - B. Educate on the following:
 - importance of benefits of breastfeeding
 - why exclusive breastfeeding for 6 months is recommended
 - good latch
 - supply and demand
 - skin-to-skin contact
 - feeding frequency/hunger cues
 - avoiding early introduction of bottles and formula
 - C. For women who are undecided about breastfeeding, try to determine what the woman's perceived barriers to breastfeeding are in a nonjudgmental manner. Workplace breastfeeding laws may also be shared if returning to work is perceived barrier to breastfeeding. Offer referral to BFPC if not already enrolled, or encourage to contact. Refer to IBCLC if woman anticipates extra support may be needed (ex. Flat or inverted nipples, known health concerns of baby).
 - D. Show or discuss with client the enhanced food package assigned for exclusively breastfeeding mothers, and share that exclusively/mostly breastfeeding mothers can remain on the WIC program for up to one year.
7. If client indicates she is not planning to breastfeed: Address perceived barriers to breastfeeding in nonjudgmental manner.
 - Proceed with providing information about benefits of breastfeeding (unless breastfeeding is contraindicated).
 - Educate on importance of skin-to-skin.

- Educate women on size of newborn stomachs being very small, and only small amounts of formula at a time.
 - Remind participant that formula checks cannot be issued early/prior to next appointment.
8. For all pregnant women, provide and discuss: “Understanding Your Baby’s Cues/When Your Baby is Hungry”, “Normal Newborn Behavior: Days 1-3”, and sleep/crying handouts. Address any other questions or concerns that the client may have.
 9. Provide additional referrals if needed and enter the referrals into Journey.
 10. Document progress and /or concerns on care plan.
 11. Enter education contact into computer and handouts provided into Journey.

Community Action Partnership of Mid Nebraska

Reference: NE WIC Procedure

Written: 07/10

Revised: 11/26/12, 05/2016

Community Action Partnership of Mid-Ne

WIC Program

Policy: WIC service code of conducts

WIC staff may provide transportation for a WIC family to and from WIC site in extreme weather and/or extreme distance and when all other means do not apply or are not available to ensure program benefits.

Procedure:

All personnel of Community Action Partnership of Mid-Nebraska will conduct themselves in accord with the provisions of the following when providing direct services to clients:

1. All resources should be used when WIC family doesn't have transportation to get to a WIC clinic. Examples include but are not limited to: RYDE, public transportation, family friends, taxi, neighbor, and or walking.
2. If all resources have been exalted WIC staff can transport WIC families to and from site to house only. Extreme distance includes walking over a mile to or from WIC site to home. .
3. Staff may not transport children without an accompanying parent or guardian OR written permission from the parent or guardian. Car seat/booster seats would be required for all parties.
4. Transportation of a WIC family by one staff member alone is prohibited.

Community Action Partnership of Mid Nebraska

Reference: Community Action Partnership of Mid-NE, Pers-61 Service code of conduct-5/2015

Written: 05/2015

Revised: 2/2016