

<b>Department of Public Health and Social Services</b> <b>Bureau of Nutrition Services-Guam WIC Program</b>		
<b>TITLE:</b> Physical Presence Waiver & Remote Benefit Issuance	<b>POLICY NO.:</b> CS-02	Page 1 of 6
<b>APPROVED BY:</b> <i>Cydsel</i> Cydsel Victoria Toledo, MD, MHA BNS Administrator/WIC Program Director	<b>DATE OF ORIGINAL APPROVAL:</b> August 2023	
	<b>DATE REVISED/REVIEWED:</b> 2/29/24	
<b>Endorsed By:</b> Godfrey Wong, RD Acting Public Health Nutrition Specialist <i>Godfrey Wong 3/15/24</i>		

## PURPOSE

To establish guidelines in the provision of remote WIC Certification, Nutrition Education, and Issuance of Benefits.

## POLICY

- A. The Guam WIC Program shall opt into waivers to modernize WIC through enhancing remote services under the authority of the American Rescue Plan Act (ARPA) of 2021. The Guam WIC Program shall elect to use the following waivers:
  1. Physical Presence Waiver
  2. Remote Benefit Issuance
- B. Pursuant to Section 1106 of ARPA, the Guam WIC Program will waive the requirements for physical presence upon certification and recertification to allow remote benefit issuance as appropriate. The waivers will remain in effect until Sept 30, 2026, unless superseded by statute or USDA FNS determines the waivers are no longer necessary or appropriate.
  1. All individuals seeking to enroll or re-enroll in WIC shall be offered an option to have their appointments conducted in person or remotely.
- C. In accordance with the physical presence waiver, anthropometric measurements and hematologic tests for anemia may be deferred for 60 days. In addition, under 7 CFR 246.7 (e)(1)(ii)(B)(1) participants who have another qualifying nutrition risk identified, a hematologic test for anemia (Hgb/Hct test) may be deferred for up to 90 days from the time of certification without change in the participant's category (*refer to hematologic testing policy*).
  1. Proof of identity, residency, and income may be deferred up to 30 days from certification.
  2. A nutrition risk assessment must be completed at certification by a Competent Professional Authority (CPA) which may be based on information available through online communication and/or referral data.
  3. The next appointment schedule will be determined based on the participant's risk code certification provided no documents or anthropometric measurements and/or blood work data are pending (*Refer to II Section II Policies and Procedures Manual Nutrition Services FY2024 Pages 10-13*).
  4. Participants with pending documents, anthropometric measurements, and/or blood level data shall have their next appointment scheduled before the

expiration of the deferral days of the missing information (refer to *Job Aid Scheduling of Participant's Next Appointment*).

5. The front desk staff shall make the effort to obtain pending anthropometric data within 60 days from certification and blood work data before the end of 90 days of certification.
6. The CPA shall ask the participant to provide consent to release information if anthropometric measurement and blood work data will be requested from a primary care provider.
7. Nutrition education and referrals will still be provided remotely as appropriate.

D. Participants who provide the anthropometric measurements and hemoglobin/hematocrit (Hgb/Hct) levels after the initial certification triggering medium or high-risk code will have their next appointment adjusted according to the risk code protocol (*Refer to II Section II Policies and Procedures Manual Nutrition Services FY2024 Pages 10-13*).

E. Remote services will still follow the same processes of certification, recertification, and benefit issuance as in-person certification.

1. The Clinic Receptionist and non-CPA staff will conduct Phase 1 of the certification process.
2. CPA conducts same-day Phase II certification process performing nutrition risk assessments, nutrition education, referrals, food tailoring, and benefit issuance.

## DEFINITION

**Authorized Representative:** The individual designated by the participant and/or mother/legal guardian of the infant and child to act on their behalf. The AR can be a caretaker, a relative with whom the participant lives, a spouse, or significant other.

## PROCEDURE

### A. Phase 1 Remote Certification Appointments

1. Receptionist/WIC staff contacts participants by phone, texts, or emails 1-2 business days before the scheduled appointment to remind them of their upcoming appointment.
  - i. Offer an option to conduct certification in person or remotely.
  - ii. Remind the participant to email, fax, or upload via the participant portal the required documents needed for certifications prior to the scheduled appointment. These documents include:
    - a. proof of identification, residency, and income,
    - b. anthropometric measurements taken within the past 60 days, and blood work data within the past 12 months without a change in participant category (see Procedure A.12.iii).
    - c. legal guardianship if applicable.
    - d. foster care placement letter and/or foster payments if applicable.
  - iii. Receptionist/WIC staff shall document in HANDS under the NOTES tab. In the Note Type field choose "staff alert". Note down any successful or unsuccessful attempts made on reminder calls.
2. During the Phase I appointment verify the identity of the Participant and/or Authorized Representative (AR) over the phone by asking the following:
  - i. Birthdate of the participant and/or the AR.

- ii. Physical address or mailing address of the participant and/or AR.
3. Review proof of identity, residency, and income documents if available (Refer to Documentation of Identity, pages 16-17 II.VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY 2024).
4. Complete the proof of identity and residency fields in the **Family and Participant Module of HANDS** respectively. If documentation for proof of identity and/or proof of address is not available, select "V- Forgot Documentation" under the respective fields.
5. If any of the required documents are not available at the time of certification, inform the participant and or AR that missing documents must be submitted within 30 calendar days from certification to avoid termination except in certain circumstances; (Refer to Applicants with No Proof of Identity page 17, Applicants with No Proof of Residency Page 18, II.VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY 2024).
  - i. Proof of residency does not exist due to homelessness, disaster evacuees, victim of theft, loss or disaster.
  - ii. Currently not working and/or has zero income.
6. If proof of identity and or residency does not exist select "no proof exists" in the proof of identity and address field option.
7. Ask if participant is currently enrolled in SNAP, Medicaid or TANF and verify status for adjunct eligibility using the DPHSS PHPro system.
8. Verify Income documents if not adjunct eligible (Refer to Income Eligibility Pages 21- 37, Ineligibility Pages 54-55 II.VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY 2024). Income
  - i. Determine the total number of people in the household and compare with the current Income Eligibility Guidelines.
  - ii. If the participant's income is ineligible, inform the participant or AR of the ineligibility and their right to a fair hearing, which can be viewed online at <http://dphss.guam.gov/woman-infants-infants-wic-program> or sent via the Guam WIC email upon request.
  - iii. Advise participant/AR to reapply when there is a change in their household income or household size.
9. Complete the income module in HANDS.
  - i. If proof of income does not exist, under Income module click on Documentations tab and select "20: Waiver Form No proof of income exists.
  - ii. For participants that claim to have no source of income or zero income.
    - a. Checkmark **Yes** at the Zero Income field.
10. Discuss Participant Rights and Obligations, and WIC Rules and Regulations with the participant or AR. (Refer to WIC Rights and Obligations, Pages 48-49 and 67-69, Rules and Regulations Pages 49-50 II. VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY 2024).
  - i. Inform the participant/AR that the Rights and Obligations document can be emailed, viewed online at: <http://dphss.guam.gov/woman-infants-infants-wic-program/>, or picked up at the WIC clinic.
  - ii. Once Rights and Obligations are provided, click signature type and select Rights & Obligations". Write "**Remote Cert**" in the Rights and Obligations signature box.

11. Check anthropometric and blood work data and provide a copy to the CPA for Phase II of the certification process.
12. If anthropometric measurement and blood work data are *not available*, instruct participants or AR to do the following:
  - i. Provide the most recent height and weight taken within 60 days and/or blood work data taken within 12 months without a change in category if such data record is available from their primary care provider (*refer to the Biochemical Data Collection Chart attached*, or
  - ii. Request participant to come to the WIC clinic anytime as a walk-in during office hours or on their next scheduled appointment to have their anthropometrics and blood work taken, or
  - iii. Request the participant to provide consent to the medical provider to release blood work data and anthropometric measurement information to the WIC program if available. staff shall email the participant/AR "Request For Data Consent Form", or direct the participant to download the form from the website <http://dphss.guam.gov/woman-infants-infants-wic-program/>, or direct to pick up the consent form at any WIC clinic locations (Refer to Release of Information Pages 53-54, II. VIII.CECS Policies and Procedures Certification, Eligibility, Coordination of Services FY2024)
13. Issuance of eWIC card
  - i. Instruct the participant or Authorized Representative to come into the clinic any time during hours of operation to receive, sign for, and set PIN for eWIC card.
  - ii. Verify Authorized Representative's identity before issuance of EWIC card
  - iii. Provide eWIC card information handout and educate on its usage and care when participant/AR comes in to receive the eWIC card.
14. Encourage AR to download EZWIC app and provide instructions on how to set up and use the EZWIC app.
15. The receptionist shall endorse the participant/AR to the assigned CPA for phase II certification.

B. Phase 2 Remote Certification is done by the CPA

1. CPA will call the AR and verify identity over the phone by asking any of the questions. (see procedure A.2.)
2. Complete the required fields under Cert Tab. Checkmark "Client Not Present" and select "**H-Physical Presence Waiver**" under reason client not present filed.
3. Complete the required fields in the Medical Tab;
  - i. Input anthropometrics and blood level data if available.
  - ii. If anthropometrics and/or blood level data are not available at the time of certification, select pending code 11. Physical Presence Waived at Certification for anthropometrics and bloodwork.
4. Complete the health and dietary assessment. (Refer to II. VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY2024 pages 42-43)
5. Determine and document nutrition risk. (Refer to Risk Identification Page 44, II.VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY2024)

6. Provide nutrition education. (Refer to Education Page 49. II. VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services FY2024)
7. Provide referrals applicable to the participant's identified needs. (Refer to Referrals Pages 50-53, II.VIII. CEC Policies and Procedures Certification, Eligibility, Coordination of Services State Plan FY2024)
8. Prescribe food benefits (Refer to Food Instrument Issuance Page 5, II.VIII. CEC Policies and procedures Certification, Eligibility, Coordination of Services State Plan FY2024)
9. Issue benefits remotely and schedule the next appointment based on the following scenario:
  - i. Pending documents such as identity, residency, and income shall only be issued 1-month benefits.
  - ii. Pending anthropometrics shall be issued benefits up to 2 months following the 60-day deferral.
  - iii. Pending bloodwork shall be issued up to 3 months following the 90-day deferral,
  - iv. Participants with pending documents, and/or anthropometric measurements, and/or blood work, shall follow the lowest number of month issuance if participants have multiple scenarios applicable to them. (refer to *Job Aide Scheduling of Participant's Next Appointment*)
  - v. For participants with no pending documents/data the next appointment schedule will be based on the participant's risk level at certification (Refer to II Section II Policies and Procedures Manual Nutrition Services FY2024 Pages 10-13).
10. Document SOAP note. (Refer to Documentation of Education Page 14, II.II. NS Policies and Procedures Manual Nutrition Services State Plan FY2024)
  - i. Document in HANDS "**physical presence waiver**" followed by SOAP notation.
  - ii. Pending documents and data are to be documented in P of SOAP note for a follow-up.

**C. All Other Appointments for Remote Benefits Issuance**

1. WIC staff shall call participants who miss their appointment to offer remote services or reschedule.
  - i. Participants who cannot be reached after two attempts shall have their benefits issued and their next appointment scheduled. (refer to *Issuance of Benefits Policy*)
2. For anthropometrics and blood work that are still pending after initial certification, select pending code 6 ht/wt pending doc for Anthropometrics and pending code 7 hgb/hct pending doc for bloodwork.
3. Provide nutrition education applicable to the participant.
4. Issue benefits remotely and schedule the next appointment.
5. Document in HANDS "**remote benefits issuance**" followed by the SOAP note.

**D. Reminder Calls shall be conducted by the front desk staff**

1. Front Desk Staff shall check the scheduler in HANDS and call, text, or email participants 1-2 business days before their next scheduled appointment and document reminders in HANDS (See Procedure A.1i.ii.iii). Reminder calls shall include the following.
  - i. Option to have WIC appointments conducted in-person or over the phone

- ii. Type of WIC appointment.
- iii. To bring pending documents that are still needed (identity, residency, and /or income).
- iv. To bring needed pending data (e.g. anthropometrics and/or bloodwork)
- v. Receptionist/WIC staff shall document in HANDS under the NOTES tab. In the Note Type field choose "staff alert". Note down any successful or unsuccessful attempts made on reminder calls.

## REFERENCES

## ATTACHMENTS:

