

**UMATILLA-MORROW HEAD START, INC
WIC PROGRAM
POLICY AND PROCEDURES**

PROGRAM INTEGRITY

Policy: Umatilla-Morrow Head Start, Inc., WIC Program does experience instances where there is no more than one staff member available to provide services in a clinic. To ensure maintenance of program integrity, a file monitor will be conducted on a quarterly basis.

Procedure:

1. WIC Manager will complete a participant record review four times a year. Record review will be carried out to ensure program integrity when separation of duties is not possible in a clinic staffed by one Certifier.
2. Record review will include 15% of the participants who showed for their appointments in each clinic. All records of participants identified as having a close relationship with the Certifier, i.e. family members, relatives, friends, or co-workers will be reviewed.
3. Record review will be carried out using the TWIST Client Record Review Checklist.
4. Monitoring for compliance with the Hardship Waiver related to certification periods for the Arlington and Fossil participants will be included in the quarterly monitors.

Participants who have their scheduled recertification due in a month when clinic is not held in their local area may have their certification renewed at 5 months. The certification of a pregnant woman can not be extended, even when there is difficulty in appointment scheduling.

5. Monitoring for compliance with the Hardship Waiver related to Second Nutrition Education Contacts for the Arlington and Fossil participants will be included in the quarterly monitors. Key sections of the TWIST Client Record Review Checklist for Second Nutrition

Education Contact include: NE Plan section: numbers 14 through 17 and 19 and 20; Progress Notes Section: 21 and 22.

6. To comply with the hardship waiver, scheduling of Second Nutrition Contacts will take place as follows:
 - Face-to-face Second Nutrition Education Contacts will be scheduled for participants two months after their certification.
 - Appointment reminder calls will occur within 4 days prior to the scheduled appointment. For those participants that do not have a telephone contact number, a written notice will be mailed.
 - Second Nutrition Education month to hold will be in the 4th month of certification.
 - If the participant misses their Second Nutrition Education Contact, a no show will be documented for the appointment.
 - A Certifier will call the participant by month end to schedule a telephone appointment and/or offer to reschedule the missed appointment at the nearest clinic available.
 - If the participant does not have a telephone contact number, a notice including a toll free contact number will be mailed to the participant. This notice will include a request that the participant/caretaker call to reschedule their appointment.
 - The rescheduled Second Nutrition Education Contact will be scheduled in the first week of the following month as an appointment type F3.
 - The Second Nutrition Education Contact will be provided by a Certifier or by an RD if high risk follow-up is needed.
 - When telephone contacts take place, any nutrition education materials that normally would have been shared during a face-to-face contact will be mailed to the participant.
 - When the Second Nutrition Education contact is completed, either at an alternative clinic or by telephone, the local print designation will be deleted and Food Instruments (FIs) issued. If telephone Second Nutrition Education Contact is completed, FIs will be mailed the first week of the 4th month of certification period.
 - Second Nutrition Education contact will occur by month end of the 4th month of the certification period unless refused. If Second Nutrition Education Contact is refused, FIs will be issued two months after certification when clinic is held in the local area.

- The Second Nutrition Education Contact will be documented in the participant's TWIST Certification record. Record may be updated in the following locations:

Nutrition Education Plan Section in NE Provided and/or Goals tab

Diet Assessment Section in the Summary tab

Progress Notes

7. WIC staff providing telephone Second Nutrition Education Contacts will receive training on how to effectively provide nutrition education by telephone and document the contact.