

FY 2019 State Plan Proposed Changes & Comments

SECTION I- GOALS AND OBJECTIVES				
POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
I. Vendor Management	Y			
EBT Goals to be completed based upon timelines in IAPD which is pending USDA approval.				
II. Nutrition Services & Breastfeeding	Y			
Goals Completed				
III. Information System	N			
IV. Organization & Management	N			
V. NSA Expenditures	N			
VI. Food Funds Management	N			
VII. Caseload Management	N			
VIII. Certification, Eligibility and Coordination of Services	N			
IX. Food Delivery and Food Instrument Accountability and Control	N			
X. Monitoring and Audits	N			
XI. Civil Rights	N			

FY 2019 State Plan Proposed Changes & Comments

SECTION II LOCAL POLICY AND PROCEDURES (P&P)				
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EBT provisions included, check based system provisions removed.	Y	Separate policy sections for EBT were created with a name ending with (EBT). These are found within most functional areas.		
I. Vendor Management				
II. Nutrition Services & Breastfeeding:				
Changed “next steps to health” to “quick WIC tips”	N	In II. Nutrition Services-Breastfeeding/Nutrition Education and Counseling/Nutrition Education pg 6		
Added IBCLCs can resolve HR for risk factors 602 and 603	N	In II. Nutrition Services-Breastfeeding/Nutrition Education and Counseling/Nutrition Education; pages 7 – 8 This is a request from UAWA.		
Changed “within the issuance period” to “within 90 days”	N	In II. Nutrition Services-Breastfeeding/Food Package Prescriptions/Ordering Formula from the State pg 3		
Added best practice to return as soon as	N	In II. Nutrition Services-		

FY 2019 State Plan Proposed Changes & Comments

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possible once formula no longer needed.		Breastfeeding/Food Package Prescriptions/Ordering Formula from the State pg 3		
Added Risk 142-Preterm or Early Term Delivery (replaces Prematurity Risk)	Y	Nutrition Risk Manual, pg 69-76		
Added Risk 311 History of Preterm or Early Term delivery (replaces old History of Prematurity Risk)	Y	Nutrition Risk Manual, pg 119-125		
Added new Risk 383 Neonatal Abstinence Syndrome	Y	Nutrition Risk Manual, pg 303-308		
Revised Risk 411 e and 411 i to include donor human milk acquired directly from individuals or the Internet.	Y	Nutrition Risk Manual, pg 311, 313-314;321		
Revised Risk 425 e to remove tofu from 425 e.	Y	Nutrition Risk Manual, pg 328		
Cannot issue a 0 amount	Y	II. Nutrition Services- Breastfeeding/Food Package Prescriptions/Tailoring Food Packages pg 3		
Substituting for 1 doz eggs not currently functioning in VISION system	N	In II. Nutrition Services- Breastfeeding/Food Package Prescriptions/Tailoring Food Packages pg 6		
Removed 46 oz tomato or veg juice as being listed on special food letter	N	In II. Nutrition Services- Breastfeeding/Food		

FY 2019 State Plan Proposed Changes & Comments

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		Package Prescriptions/Foods that are Authorized pg 14		
Definition and policy regarding store brand/private label modified. Substitutions for name brand products would no longer be allowed when store brand is required. Malt-O-Meal cereals will still be authorized but will not be listed in the definition of store brand/private label.	N	In II. Nutrition Services-Breastfeeding/Food Package Prescriptions/Foods that are Authorized pg 13		
Added: refrigerate after opening UHT milk		In II. Nutrition Services-Breastfeeding/Food Package Prescriptions/Foods that are Authorized pg 8		
III. Information System				
Added a list of confidential documents/forms of ID that should not be scanned.	N	Documentation		
Description of ad hoc reports updated with new reports and changes made in the last year.	N	Ad Hoc Reports		
IV. Organization & Management				
Policy added regarding state procedure for notifying local clinics of VISION system outages. (policy previously implemented via memo 2018-2-P)	N	SharePoint		
Added a policy to protect the confidentiality of information discussed	Y	Confidentiality		

FY 2019 State Plan Proposed Changes & Comments

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with applicants and participants in the clinic.				
Added <i>Utah Early Childhood Integrated Data System (ECIDS)</i> , <i>U.S. Census Bureau</i> and <i>Utah Data Research Center</i> to list of programs the State WIC Office has data sharing agreements with.	N	Confidentiality		
Guidance added regarding reporting suspected sexual abuse of a minor, and preventing allegations of abuse.	N	Confidentiality		
V. NSA Expenditures				
VI. Food Funds Management				
VII. Caseload Management				
VIII. Certification, Eligibility and Coordination of Services				
Clarifications regarding non-birth mother breastfeeding women were copied from the Breastfeeding Aids section in order to locate them in a logical place.	N	Categories and Certification Periods, Breastfeeding Aids		
Endorsers and Proxies section renamed Guardians and Proxies for EBT. The term “guardian” was recommended by UAWA to replace “endorser”. UAWA also recommended allowing two additional guardians to be allowed per family.	N	Endorsers and Proxies (EBT)		
Policy added that clinic staff must verbally remind participants that selling,	N	Rights and Responsibilities		

FY 2019 State Plan Proposed Changes & Comments

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giving away or offering to sell WIC formula, food or checks is a violation of the Rights and Responsibilities and is considered fraud. This was already implemented via memo.				
For EBT, text of the R&R will be printed within the Authorized Food Booklet and will not be a separate hand out. Laminated R&Rs will still be read in the clinic.	N	Rights and Responsibilities (EBT)		
For EBT, ID Packets will be discontinued. The e-WIC card will be an acceptable form of ID for family members for subsequent certifications.	N	Proof of Identity (EBT)		
Policy added that state staff will participate in participant violation counseling where the sanctions of repayment of benefits, suspension or disqualification are likely. Added requirement that participants who are not sanctioned for violations of selling benefits must provide a receipt showing the items were not purchased with WIC benefits.	N	Participant Violations		
Clarification added to explain when the state may approve a new endorser/proxy in place on imposing a participant violation sanction.	N	Participant Violations		
Participant violations will be significantly different with EBT. Several violations will no longer be possible including: using benefits outside of authorized dates,	N	Participant Violations (EBT)		

FY 2019 State Plan Proposed Changes & Comments

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alteration of checks, redemption of lost checks, exceeding max value of a CVV.				
Policy modification to allow provisional certifications to be used for forgotten proofs when there is a transportation hardship with returning home to get the proofs and return to the clinic. A few examples of when provisional certification is appropriate were added.	N	Provisional Certification and Unreasonable Barrier (Affidavit)		
Clarification added that when counting the number of household members, a pregnant woman is <u>may be</u> counted as one plus the number of fetuses she is carrying (This is not required).	Y	Households		
Added clarifications and instructions for marking ineligibility and issuing notices in VISION.	N	Ineligible Applicants		
Removed policy allowing use of the VOC application process to reinstate foster children.	N	Termination		
Modification to policy regarding what to accept as current for proof of address/residency	N	Residency		
Clarification added regarding determining income for those living off of savings.	N	Income Types		
Added clarification that egg substitution isn't currently functioning in VISION for homeless food packages	N	Homeless Applicants		
IX. Food Delivery and Food Instrument Accountability and Control				
New Card Inventory section added for	Y	Card Inventory		

FY 2019 State Plan Proposed Changes & Comments

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EBT.				
Check Handling and Issuance section will be renamed E-WIC Card Handling and Issuance. This section will have significant additional changes at a later date.	Y	Check Handling and Issuance (EBT)		
Significant changes to instructions to be given to participants added for EBT	Y	Instructions to Participants (EBT)		
Lost Checks section renamed Lost Cards for EBT. Significant policy changes made.	Y	Lost Cards (EBT)		
Replacing returned formula	N	Food and Formula Returns		
X. Monitoring and Audits				
XI. Civil Rights				
Other Comments:				
Changed Food Stamps term to “SNAP” in all policies since this term is now widely used in Utah. This term will also be used in VISION.	N	Ad Hoc Reports, Adjunct Eligibility, Confidentiality,		

FY 2019 State Plan Proposed Changes & Comments

SECTION III- STATE OPERATIONS				
POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
I. Vendor Management				
EBT provisions included, check based system provisions removed.	Y	Separate policy sections for EBT were created with a name ending with (EBT). These include: Cash-Value Benefits, Compliance Purchase and Inventory Audits, Definitions in Food Delivery, Description of Food Delivery System, Documentation of Vendor Sales, EBT Capability, ECR Reimbursement, File submissions, Lost e-WIC Cards at Vendor, Payment Disputes and Appeals, Reimbursement and Claims, Transaction Procedures, Use of Incentive and Promotions, Vendor Authorization, Vendor Violations and Sanctions, WIC Vendor		

FY 2019 State Plan Proposed Changes & Comments

SECTION III- STATE OPERATIONS

POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
		Identification		
Updates made to abbreviated Administrative Reviews	N	Administrative Review		
Updates made to procedures for compliance purchases	N	Compliance Purchases and Inventory Audits		
Vendor stocking requirements updated in order to better meet participant needs and ensure requirements are reasonable for vendors to decrease food waste. Requirements put in table format.	N	Food Inventory Requirements		
Definition and policy regarding store brand/private label modified. Requires stores to carry store brand/private labels for certain food items.	N	Definitions in Food Delivery, Food Inventory Requirements		
EBT requirements added. Moratorium on new vendor applications during EBT rollout. Changed requirements to store hours and days of operation. Added requirements that gasoline sales may not exceed 50% of total store sales; and alcohol, tobacco, and e-cigarette/vaping supplies combined sales may not exceed 25% of total store sales (unless the store is needed for participant access). Updated vendor application process.	N	Vendor Authorization		
Minor wording changes	N	Vendor Monitoring		
Minor wording changes and added a table of violations with point values. Maximum Civil Money Penalties increased according to federal regulations.	N, Y	Vendor Violations and Sanctions		
USDA FNS Fill-in Form to be updated	Y	I. Vendor and Farmer		

FY 2019 State Plan Proposed Changes & Comments

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POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
		Management.		
II. Nutrition Services & Breastfeeding				
III. Information System				
IV. Organization & Management				
V. NSA Expenditures				
VI. Food Funds Management				
VII. Caseload Management				
VIII. Certification, Eligibility and Coordination of Services				
USDA FNS Fill-in Form to be updated	Y	VIII. Certification, Eligibility, & Coordination of Services.		
IX. Food Delivery and Food Instrument Accountability and Control				
X. Monitoring and Audits				
XI. Civil Rights				
Other Comments:				