Remote Certification with Waivers for Physical Presence

- **Purpose** To provide flexibility with the purpose of building on modernization of remote services to WIC agencies related to physical presence, anthropometric and bloodwork requirements for certification and mid-certification appointments and benefit and card issuance. Remote appointments may also be needed for maintaining social distancing and/or in response to emerging/eminent disasters/pandemics when directed by the State Agency or by request to the State Agency.
- **Policy** Local agencies shall be allowed to complete certification and midcertification appointments remotely in StarLINC. Remote appointments are not allowed for initial/new certifications and are not to be used sequentially (there will be at least 1 in-person appointment/year) or when measurements were waived at a previous cert or mid-cert appointment and were not obtained. Participants/applicants must be provided the option of an inperson appointment vs remote per their preference.

Program staff/Nutritionist/ Competent Professional Authority (CPA) completes the appointment using an agency landline, cell phone or HIPPA compliant video platform, following the StarLINC Certification guide/ Mid-certification guide.

When necessary the Program staff/Nutritionist/CPA shall use an interpreter/language line/TTY for participants with Limited English Proficiency (LEP) or needing TTY service. Document the use of interpreter/TTY services in the participant's Admin Notes

- Authority American Rescue Plan Act of 2021 (P.L. 117-2; ARPA) Section 1106 USDA/FNS Memo February 1, 2023 "Additional WIC Flexibilities to Support Outreach, Innovation, and Modernization Efforts through ARPA Nationwide Waivers – Supporting Remote WIC Operations"
- **Procedure** For allowed remote re-certifications/mid-certifications:

1. Program Staff

A. When scheduling a remote appointment will:

Inform the participant what proofs are needed and arrange to send a copy of the Rights and Rules (RR) document to be read.

Inform the participant that current measurements of height/length, weight and bloodwork will be required (as determined).

Anthropometric measurements may be 60 days before the WIC re-cert /mid-cert appointment or may be deferred up to 60 days after the appointment. Agencies shall make a concerted effort to obtain anthropometric measurements taken up to 60 days prior to the appointment whenever possible.

Hematological/ bloodwork data may be deferred up to 90 days of the re-cert /mid-cert appointment when needed. Agencies shall make a concerted effort to obtain bloodwork (when needed) that follows the Centers for Disease Control and Prevention anemia screening timetable. (Refer to Hemoglobin and Hematocrit Screening policy).

Measurements can be shared with the agency via email, fax, patient portal (copies of screen/screenshot) or referral document.

- B. On the day of the appointment, or date that has been determined for the documentation of proofs and RRs review, program staff (or 2nd staff person) will review and add documentation into StarLINC accordingly.
 - Informs the participant that questions about income and other potentially personal information will be asked so they can decide if they're in an area they can answer these questions.
 - Informs participants that the information will be entered into a computer so they're aware of what is occurring during this interaction.

Refer to Remote Work Guidance for WIC Staff document. * See Section C for adjustments made to certification/mid-Cert as appropriate to position.

2. Nutritionist/CPA

A. Gives a brief description of the program and

certification/mid-certification process. Let the participant know the information is confidential and the appointment will take about 30 minutes.

- Informs the participant that questions about health and other potentially personal information will be asked so they can decide if they're in an area they can answer these questions.
- Informs participants that the information will be entered into a computer so they're aware of what is occurring during this interaction.

Refer to Remote Work Guidance for WIC Staff document.

B. Documents all required information in StarLINC as required for certification/mid-certifications (x = required field/condition)

| | Certification | Mid- certification |
|-------------------------|------------------|-----------------------|
| Separation of Duties | x | |
| Demographic Screen | x | Update |
| Race/Ethnicity | If needed | |
| Dual participation | Х | |
| Proofs of Income/ | x | |
| Residency, ID* | | |
| Income* | X | |
| Rights and Rules (RRs)* | X | |
| Anthropometrics* | Х | x |
| | If documentation | If documentation |
| | available from | available from |
| | HCP/referral | HCP/referral |
| | source | source |
| Bloodwork* | Х | Х |
| | When needed | When needed |
| | and if | and if |
| | available | available |
| Health Interview Screen | X | Х |
| ATOD as applicable | Х | Update |
| | PG/BF/PP | |
| Risk Code* | X | X |
| Nutrition Education— | X | Х |

New Hampshire WIC Policy & Procedure Manual

Chapter 8. CERTIFICATION, ELIGIBILITY & COORDINATION OF SERVICES A. Eligibility Determination & Documentation

| topic*, handout, goals* | | |
|----------------------------------------------|---------------|-----------|
| Referrals | Х | Х |
| Immunizations (infants | 0-2yo | 0-2yo |
| /children = 2 years)</td <td></td> <td></td> | | |
| Complete Certification | Х | |
| and documentation of | | |
| physical presence * | | |
| Food package | Х | Х |
| assignment/benefit | | |
| issuance | | |
| eWIC card issuance* | As needed | As needed |
| Basic Contacts | As applicable | |
| Next appointment | Х | Х |

* See Section C for adjustments made to certification/mid-cert

C. The following adjustments are made for remote certifications/mid-cert appointments.

Separation of Duties

- Remote Single Staff Certification (SSC) is allowed when approved through State agency and required tracking follow-up.
- Under no circumstance may staff certify oneself, close family member or friends/acquaintances.

Proofs for remote certification/mid-cert

• Income and residency proofs such as but not limited to verified adjunctive eligibility on Medicad, SNAP or TANF shall be obtained and documented in StarLINC; they may be sent via email, text, faxed, or mail.

 $_{\odot}$ If PO Box used in NH Easy—a different residency proof with an address would be required.

- Picture of income, residency and/or ID proofs shall be obtained and documented in StarLINC; they may be sent via email, text, faxed, or mail.
- Staff may use "proof pending" for missing proof of income or residency. This option is not allowed in two back-back certification appointments.
- Staff shall follow regular procedure for self-declared and/or

no proofs:

- Documentation of self-declared proofs for residency, identity or caregiver ID forms is captured on the proofs and contact history screens. Manual signature reason is not identified in Starlinc via a picklist.
 - ✓ Staff shall inform the participant/applicant that they (staff) are signing the self-declared form for them (participant/applicant) and that by doing so they (participant/applicant) are attesting that the information provided is truthful.
 - ✓ Staff shall document "manual signature remote appointment" in the ADMIN notes for any self-declared proof.
- Documentation of self-declared income reason is captured via picklist.
 - ✓ Staff shall inform the participant/applicant that they (staff) are signing the self-declared income form for them (participant/applicant) and that by doing so they (participant/applicant) are attesting that the information is truthful.
 - ✓ Staff shall select the reason from the picklist for self-declared income. Documentation is saved in StarLINC.
 - ✓ Staff shall shred the manual self-declared signature forms.

Rights and Rules for remote certification/mid-cert

 Staff shall ask the participant if they have read the NH Rights and Rules (RRs) form on the NH DHHS WIC webpage, WICShopper App or the copy that was sent to them before the appointment. If they have not, staff shall redirect them to the RRs on the website, WICShopper App or the copy that was sent to them and provide time for them to read it. If neither of these options are possible, staff shall read the entire Rights and Rules form to the applicant/participant

Revision date:

- For applicants/participants who need the information in a different language other than English or Spanish, staff shall use an interpreter or language line services.
- Once confirmed that the RRs was read, staff ask if there are questions, answer questions and informs the applicant/participant that they (staff) are signing the RRs form for them (the participant/applicant) and that by doing so, they (the participant/applicant) are indicating that they (the participant/applicant) have read, understand and agree to abide by the NH WIC Rights and Rules. Select Manual signature in StarLINC. Documentation is saved in StarLINC, shred the manual signature form.

Measurements for remote certification/mid-cert

 Height/length/weight--- Anthropometric measurements shall be entered only for documented referral measurements within + or - 60 days of the certification or mid-certification appointment, if not available, skip this field. Staff shall document as "Anthro measurements needed" in the Admin notes.

Staff may complete the re-cert/mid-cert appointment without anthropometric measurements however, measurements w/in the 60 days of the appointment allow for the best service in completing a thorough assessment. Staff must update risks codes, education, follow-up appts if designated high risk and food packages once measurements are received. Staff may also update the measurements after the 60 days. Certifications/mid-certs do not need to be terminated for inability to collect measurements within the 60 days. Agencies shall strive to obtain measurements in a timely manner.

Staff may ask the participant/applicant/parent /caregiver for the most recent weight measurement and date—record as caregiver reported in the Nutrition Education notes field; ask to send in/share documentation of the measurement.

• Birth measurements, pre-pregnancy and delivery weights are recorded as verbal measurements as is

the current practice.

• **Bloodwork**—may be deferred for 90 days when needed – document in bloodwork screen note field reason for deferring. Staff shall document as "Bloodwork measurement needed" in the Admin notes.

Staff may complete the re-cert/mid-cert appointment without bloodwork measurements however, bloodwork measurements when needed w/in the 90 days of the appointment allow for the best service in completing a thorough assessment. Staff must update risks codes, education, follow-up appts if designated high risk and food packages once measurement are received. Staff may also update the measurements after the 90 days. Certifications/mid-certs do not need to be terminated for inability to provide measurements w/in the 90 days. Agencies shall strive to obtain measurements in a timely manner.

Risk Code assignment for remote certification/mid-cert

Staff shall to the best of their ability assess nutrition risk based on the information available through the remote appointment when anthropometric and bloodwork measurements are not available at certification/mid-certifications. When measurements are not available and a risk is not determined, the risk "presumed dietary" risk code will be assigned---staff shall enter "ruled out INP" in the reason/note filed. A full nutrition assessment will be completed at the next in-person appointment.

Nutrition Education Topic for remote certification/midcert

• Staff shall document "REMOTE appointment" for any remote certification or mid-certification, in addition to any topics discussed.

Nutrition Education Goal for remote certification/mid-cert

• Staff shall document in the note "remote cert/re-cert or mid-cert" as applicable, along with other nutrition ed goals mutually agreed upon with the participant.

eWIC card issuance for remote certification/mid-cert

- eWIC card shall be issued and mailed to families needing one, staff shall refer to mailing NH PPM Chapter 9C Mailing eWIC card policy.
- Inform the participant you are signing the eWIC card issuance documentation form for them.
- Select Manual signature for the eWIC card in StarLINC. Documentation of "manual signature" is saved in StarLINC; shred any printed manual signature form.
- Document in Admin notes reason as "Remote" appt.
- Update mail eWIC card log
- Staff shall review with participant how to activate the PIN for the eWIC card via IVR.
- Staff shall direct participant to the eWIC Guide at the NH DHHS WIC website and/or offer to send a copy (via email or mail) if needed/requested.

Food Package Assignment for remote certification/midcert

- Staff shall review/tailor food package assignment and issue benefits for up to 3 months.
- Staff shall offer a copy or direct to an electronic copy of the NH WIC Food list and authorized NH WIC store list.

Food Package Assignment—Special Formulas and medical documentation for remote certification/mid-cert.

- Staff shall follow the requirements of Food Package III and Medicaid formula policies, specifically qualifying medical reasons and required documentation elements.
- For the purpose of remote certification/mid-certs, medical documentation for special formula may be provided by telephone (verbal orders) in addition to an original written document, electronically, or by facsimile (prescription or on a healthcare provider's letterhead).
- Staff shall document verbal formula orders using the Request for Special Formula (RSF) form noting "verbal" on the form and including to whom the verbal order was obtained from at the doctor's office. File in the special formula folder.

- Staff shall obtain the written RSF from the healthcare provider or the participant within the next 30 days/1 month period.
- One (1) month of benefits may be provided at a time with a valid verbal order.

Certification completion screen for remote certification/mid-cert

- **Physical presence**--staff shall select "no" for physical presence and document the reason in the note field.
- Length of certification-staff shall inform the participant of their length of certification and that re-application is necessary to re-certify at that time.

Staff shall follow up by mailing or emailing any documents as requested by the participant and offered by staff (i.e. nutrition education, Rights and Rules, eWIC guide, Local Agency referral sheet).

All other fields are to be completed as would be done for typical certification/mid-certification.

Exceptions Refer to Chapter 8.A. Physical Presence policy.