

Procedure for Completing Certifications when Physical Presence is Waived

Certifications can be completed utilizing virtual technologies. Telephonic communication with standard documentation in clients' records are acceptable practices. Should both the contractor and the client have the use of a mobile technology, the IDPH encourages contractors to utilize technologies with end-to-end encryption such as FaceTime (iPhone compatible) and Signal (Android compatible). Security requirements for equipment and applications used must meet requirements in the local agency's contract. Per 7 CFR 246.26 (d)(1)(i), applicant and participant confidentiality must be maintained no matter how the information is provided. Contractors and their subcontractors shall comply with contract requirements and USDA and IDPH policies and procedures to protect client confidentiality and assure security of the client information, including electronic files.

Complete certification appointments as you would in clinic keeping in mind the following points:

Modify Certification End Date

- When there is difficulty in scheduling appointments, the certification end date (CED) may be extended by a period not to exceed 30 days for infants and children. When completing this, the CED will be set to the last day of the month selected. An adjustment cannot exceed the child's categorical eligibility date.

Documentation of physical presence, identity, address and income

- Physical Presence
 - When asked if the participant is physically present, choose "No". For the reason, choose "Public Health Disaster/Emergency".
- Identification
 - If the certification is being completed by a video conference, proof of identity can be viewed via the video.
 - If the certification is being completed over the phone, proofs can be submitted electronically.
 - Per Policy 220.10, proof of identity must be implemented in a manner that does not constitute a barrier to participation, particularly to applicants who may have been victims of theft, loss or disaster.
- Address
 - If the certification is being completed by a video conference, proof of address can be viewed via the video.
 - If the certification is being completed over the phone, proofs can be submitted electronically.
- Income
 - If the certification is being completed by a video conference, proof of income can be viewed via the video.
 - If the certification is being completed over the phone, proofs can be submitted electronically.
 - Medicaid Number - This may be provided by electronic proof. It can also be taken verbally to verify in Iowa Medicaid Portal Access (IMPA). If the participant already has a

Medicaid number in Focus, please verify this number with the participant and verify in IMPA.

- Contractors and their subcontractors shall comply with USDA and Department policies and procedures to protect client confidentiality and assure security of the client information, including electronic files.

Voter Registration

- Staff should ask participants if they would like to register to vote.
 - If they say “yes”, staff should ask if they would like a voter registration form mailed to them. Staff should document their response on a declination form and document something like “Participant not present on ‘date’ due to disaster” and initial it.
 - If they say “no”, staff should document their response on a declination form and document something like “Participant not present on ‘date’ due to disaster” and initial it.
 - Note: You may have a sheet of paper with multiple declination sections printed off on it for staff to use in these types of situations.

Assessment

- Anthropometrics
 - If possible, obtain measurements from the health care provider if they were seen in the past 60 days. If this is not possible, obtain a verbal report of the participant’s height and weight, document it as an inaccurate measurement using the “physical presence waived” reason in the drop down box and obtain the measurements at the next in person visit.
- Bloodwork
 - If bloodwork is needed, if possible, obtain hemoglobin results from the health care provider. Per policy 215.72, document by selecting “Appointment with provider” for the data system field, “No test performed reason”.
 - If you are unable to obtain a hemoglobin result from the health care provider, choose the option “No Test Performed” in the Blood Work panel and select the reason “Physical Presence Waived.”

Rights and Responsibilities Form

- Ask the participant if they have access to read the Rights and Responsibilities form on the Iowa WIC website. If so, have them read the form. If not, read the entire form to the participant.
- The Rights and Responsibilities document can be emailed or texted to the participant for them to read. The participant should read the form or staff should read the entire form to the participant.
- If the participant agrees to the form, choose the following reason in Focus that a signature could not be captured: “R & R Verbally Confirmed-Disaster”.

Issuing Food Benefits

- Issue food benefits.
- When issuing benefits, mark the “No Signature Available” check box in the Signature Capture to User Pop-up. Select “No physical presence - disaster”.

Separation of Duties

- Separation of Duties must still be maintained when certifications are completed when participants are not present. See Policy 225.50 for more information about Separation of Duties.

Interpreters

- **Interpreters must be used when needed.**

Proxies

- Per Policy 225.70, when a proxy attends a certification appointment, the proxy must present proof of identity.
 - If the certification is being completed by a video conference, identification can be viewed via the video.
 - If the certification is being completed over the phone, identity can be submitted electronically.
- For a participant to designate a proxy, please document the proxy in the data system and either
 - have the participant email the agency proxy information and scan into the record OR
 - place an alert in the system that a proxy card must be filled out and scanned at the next in person appointment.

Termination Notices or Ineligibility Notices

- If applicable, mail the notice to the participant.
- Place a comment/alert in the data system that the notice was mailed.

VOCs

- VOCs Coming In
 - If the appointment is being completed by a video conference, the VOC can be viewed via the video.
 - If the appointment is being completed over the phone, VOC information can be submitted electronically.
- VOCs Going Out
 - Mail the VOC if possible.

Signed Statements, Request for Information, forms, etc.

- Signed statements: Have the participant document on a piece of paper the requirement components of the form, sign and date, take a picture and e-mail or text the picture to the WIC agency. The picture can then be uploaded into the Focus system.
- Request for Information Forms: Have the participant document on a piece of paper the information required from the form, that they authorize the WIC agency to contact the

documented entity, sign and date, take a picture and e-mail or text the picture to the WIC agency. The picture can then be uploaded into the Focus system. If you are unable to follow this procedure, the contents of the form can be read to the participant and if the participant gives verbal permission for you to contact the healthcare provider, you can. The CPA should document in the participant's record that the participant gave verbal permission for the WIC agency to contact the healthcare provider.

eWIC Card PIN Numbers

- The participant will need to set up their PIN remotely.

Mailing eWIC Cards

- Mail eWIC cards, an Approved Foods Booklet, "Using your Iowa eWIC card" brochure, "How to Use the WIC Shopper App" brochure, information about WIC approved stores, and any other items that may need to be mailed to a new participant.
 - Mail eWIC cards separately from other documents.
- If mailing eWIC cards, to help ensure the return of food instruments if the participant no longer resides or receives mail at the address to which the food instruments were mailed, the following steps should be taken:
 - If possible, use first class mail with one of the following phrases included on the envelope "Do not forward. Return to sender.", or "Do not forward. Address correction requested.", or "Return Service Requested".