
300.20**Contract Agency Policies and Procedures****Overview**

Introduction WIC contract agencies are required by federal and state regulations to develop agency policies and procedures for a variety of issues. This policy provides information about some of the policies and procedures required.

General guidelines Follow these general guidelines for your agency policies and procedures:

- Review policies and procedures annually and revise if necessary.
- Note an effective date on each policy and procedure.
- Make policies and procedures available to appropriate staff.

In this policy This policy contains the following topics.

Topic	See Page
Property Management and Records	2
Clinic Sites	3
Personnel Policies	4

Property Management and Records

Equipment records

Maintain current inventory lists for all equipment. See Policy 340.10 for guidelines.

Required insurance

Agencies must have insurance coverage for:

- Personnel,
 - Financial resources, and
 - Physical resources, including data processing equipment.
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Physical requirements

Maintain policies and documents that ensure:

- Compliance with the local fire code,
- Compliance with OSHA standards and regulations,
- Adequate security for participant records and food **instruments**, and
- A filing system that permits easy access to clinic, contract and financial records for review.

Note: Maintain one year of **clinic services records that are not electronically filed in the WIC data system** in an accessible, centralized WIC office or a permanent WIC clinic site. **Clinic services records** older than one federal fiscal year may be placed in long term storage. (See Policy 300.30.)

Voter registration

Maintain policies and documents that ensure compliance with record-keeping provisions of the National Voter Registration Act of 1993 (see Policy 245.90).

Clinic Sites

Clinic accessibility

Appoint a coordinator to review all new clinic sites using Section 504 Self-Evaluation guidelines in the WIC clinic access survey located in Policy 300.55. Reviews must be completed before the site is used as a clinic, and written evaluations must be retained in agency files.

Clinic Signage

Clinic entrances **must** clearly identify WIC and clinic hours

It is strongly encouraged for signs to be posted:

- Indicating where the participant needs to go (example: Check-in, etc.),
 - In the primary languages spoken in the clinic.
 - In a positive favor (example: Enjoy your food and drink outside), and
 - Indicating available breastfeeding areas.
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Appointment management

Clearly post your clinic's policy on:

- Walk-ins and late arrival for appointments,
- Clinic cancellations, and
- Missed appointment or Food Instrument pickup (see Policy 225.75).

Note: Missed appointment or Food Instrument pickup may be communicated in a written notice at certification in lieu of posted signage. (see Policy 225.75)

No smoking

No smoking is allowed in clinics. Clearly post a sign to this effect.

Federal policy reference: MPSF:WC-00-03-P: Implementation of Public Laws 103-227, Section 246.6 and 103-227.

Complaint information

Display the poster *And Justice for All* in a prominent place to remind participants of complaint procedures. See Policy 320.40 for more information on discrimination complaints.

Personnel Policies

Personnel documents

Your agency should have the following personnel documents:

- Written contracts for individuals or organizational contractors (see Policy 315.58),
 - Organizational chart or table,
 - Salary schedules,
 - Employment application form, and
 - Job descriptions, including:
 - Duties and responsibilities, and
 - Education and experience required.
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Personnel policies required

Written personnel policies must include:

- Conditions of employment,
 - Leave and absence policies,
 - Grievance procedures,
 - Employee performance evaluation,
 - Nondiscrimination clause,
 - Section 504 and ADA compliance provisions,
 - Employee orientation program,
 - Provisions for career development or continuing education, and
 - Fringe benefits.
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Americans With Disabilities Act of 1990

Local agencies must appoint a coordinator for the Americans With Disabilities Act of 1990 (ADA) and take necessary steps toward compliance with ADA.

This includes but is not limited to:

- Review and revision of personnel policies and practices for compliance,
 - Revision of job descriptions in terms of essential duties,
 - Review and revision of agency forms such as employment application forms,
 - Provision of reasonable accommodations upon request, and
 - Orientation of all supervisors to the tenets of ADA.
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Continued on next page

Personnel Policies, Continued

Affirmative Action

Revised Order No. 4 of Executive Order No. 11375 requires any agency employing 15 or more people and holding a contract exceeding \$50,000 to develop an affirmative action program and plan. The agency must:

- Appoint an individual to be in charge of the affirmative action program;
 - Adopt a Board-approved statement forbidding discrimination;
 - Examine recruiting, hiring, and promotion policies; salaries, and all other conditions of employment;
 - Develop data on all job classifications;
 - Compare the demographics of its employees to that of the population and labor force of its service area;
 - Identify areas of under-representation and develop a plan to correct them;
 - Develop measurable goals, objectives, action steps, and timetables; and
 - Update the plan as the timetables dictate, including:
 - Assessing progress in meeting goals and developing new goals, objectives, action steps, and timetables; and
 - Developing new goals, objectives, action steps, and timetables.
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Employment advertising

All advertisements for employment must carry an equal employment opportunity statement. All qualified persons must receive consideration for employment.

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