# Louisiana WIC Program Disaster Plan



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# **Background**

In the event of a disaster or emergency, the Louisiana Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) will implement these procedures if WIC services have been disrupted. The State Agency (SA) will focus on providing support to WIC Contract Agencies (CA), regional clinics, and authorized vendors affected by the disaster.

WIC is a federally funded program that serves a specific population with special nutritional needs. WIC is not designed or funded to meet the basic nutritional needs of disaster victims who would not otherwise be eligible under the program. Unlike the distribution of commodities or the emergency issuance of food stamps, there is no legislatively mandated role for WIC in disaster relief, nor is there legislative authority for using WIC food funds for purposes other than providing allowable food benefits to categorically eligible participants. WIC must operate in disaster situations within its current program context and funding. For these reasons, WIC is not to be considered a first line of defense in responding to nutritional needs of disaster victims, including the provision of infant formula.

## SA staff disaster responsibilities:

- Bureau of Nutrition Services (BONS) Director overall responsibility for implementing the WIC Program's disaster management plan.
- Nutrition Operations Manager— coordination of SA staff activities and clinic operations guidance and requirements resulting from the disaster.
- Vendor Operations Manager responsible for issues related to retail grocery stores and the redemption of WIC food benefits.

Disclaimer: The guidance provided in the entirety of this document shall only be used with impacted participants following a declared disaster when implementation is expressly approved by the Louisiana WIC State Agency.

# **WIC Clinical Operations Protocol**

## State Agency Responsibilities

- 1. The SA will develop a plan for continuation of WIC services to the best of our ability.
- 2. The SA will communicate with the MIS Vendor that clinics will be utilizing disaster mode.
- 3. The SA will assess statewide inventory including EBT cards.
- 4. As necessary, the SA will coordinate communications and services with other state and federal programs, and all WIC business partners.
- 5. The SA will notify Regional Nutritionists, CAs, and clinic staff via email of disaster operations and changes to policy during a declared disaster.
- 6. The SA will document all closures and modifications to clinic schedules. Updates will be posted on the Louisiana WIC website, communicated through the 1-800-251-BABY telephone line, and communicated through the Louisiana Department of Health social media pages as necessary.
- 7. Targeted text messages will be sent to participants (either statewide or specific to clinic location) via LAWIN to notify them of clinic closures, options for benefit redemption,

- instructions on how to find the nearest operable clinic location, and (if applicable) instructions on obtaining a Verification of Certification (VOC) in case of transfer or displacement.
- 8. As necessary, the SA will work with the Louisiana Department of Health to issue any press and/or media releases and update the Louisiana WIC website.

# Region/Clinic Responsibilities

- 1. WIC clinics, Parish Health Units (PHUs) and CAs will follow all procedures listed below.
- 2. WIC clinics will post all signage with correct clinic phone numbers according to Louisiana Department of Health/SA direction.
- 3. Regional/clinic staff will notify the SA by phone (504-568-8229) or email to the Nutrition Operations Manager of all closures and modified clinic schedules due to the disaster.
- 4. WIC staff at designated clinics will process WIC participants per policy during modified schedules/operations and if in Tier II, via the phone and designated express lanes.
- 5. WIC staff at designated clinics will refer applicants/participants to any available food assistance or expedited SNAP benefits.

# Safety and Security Protocol During Epidemics/Pandemics

# Tier I Definition

Tier I is defined as follows: Clinics are operating on modified schedules and have implemented Family or Clinic level Disaster Mode operations in LAWIN.

#### Tier II Definition

Tier II is defined as follows: Clinics have closed to the public and services are provided through outdoor express lanes. This method will help to expedite services and reduce exposure for both staff and the applicants/participants. The physical presence requirement is waived for applicants/participants, but an endorser or proxy must be present to complete the appointment.

Additional precautions are implemented to ensure the protection and safety of WIC staff and WIC families during epidemics/pandemics. When in Tier II operations for epidemics/pandemics, clinic services will be provided as follows:

- 1. Signage will indicate that the building is closed to the public, but the WIC office will continue services. The sign must include clear directives for applicants/participants to call and let staff know they are 'in the designated express area'.
- 2. When speaking to the applicant/participant on the phone, staff will ask if they are experiencing symptoms of declared epidemic/pandemic.
  - a. If the applicant/participant says 'yes', staff will ask to reschedule or assign a proxy to come to the appointment.
  - b. If 'no', staff will ask the applicant/participant to have their EBT card and ID ready.
- 3. Staff will utilize the TIER II Checklist for Screening Applicants/Participants to answer LAWIN required questions to process the appointment.
- 4. Prior to exiting the clinic and approaching participant vehicles, staff must put on unused gloves and appropriate Personal Protective Equipment and ensure that equipment is sanitized (signature pad, card reader, etc.).

- 5. When approaching participant vehicles, staff will use precautionary measures to ensure personal safety.
- 6. To the best extent possible, staff will maintain the greatest distance between them and the applicant/participant.
- 7. Staff will collect the applicant/participants' EBT card (if available), view ID, and inform the participant to remain in their vehicle, and that they will return with their card as soon as possible.
- 8. Staff will return to the clinic and process the appointment according to the Procedures for Processing Affected Disaster Applicants/Participants as outlined in this document.
- 9. Using the same safety precautions outlined above, staff will return the participant's EBT card and Shopping List to the vehicle.

Upon re-entry to the clinic, staff will remove gloves and immediately wash their hands according to best practices. Staff will ensure that all surfaces that were touched are wiped down (i.e. signature pad, card reader).

# Best Practices for Preventing Illness

For best practices for preventing illness and the spread of the virus, please refer to <a href="www.cdc.gov">www.cdc.gov</a>. In addition, after any contact with an applicant/participant, equipment such as card readers and signature pads, and/or EBT cards, staff must immediately wash their hands. After applicants/participants leave the office, staff are to clean countertops, chairs, equipment, etc. prior to calling the next person up to their workstation.

# Expedited Processing of Disaster-Related Evacuees

Disaster-related evacuees who seek WIC benefits shall be considered as special nutritional risk applicants and receive expedited certification processing. As stated in Section 246.7(f)(2)(iii)(A) of the WIC Program regulations, special nutritional risk applicants must be notified of their eligibility or ineligibility within 10 days of the date of the first request for Program benefits.

#### Obtain a Verification of Certification (VOC)

When possible, a VOC shall be obtained for evacuees from out-of-state. For participants on formula, the name of the formula shall be requested with the VOC. When applicable, request a copy of prescription documentation for exempt formula. If unable to obtain exempt formula prescription documentation, follow Exempt Formula Guidance section below. Contact numbers for out-of-state VOC requests are located in the WIC Library home page link titled "WIC State Agencies – Alphabetical."

## Procedures for Processing Affected Disaster Applicants/Participants (LAWIN Guidance)

The following policies and procedures will be implemented to expedite services, ensure continuity of care, and minimize physical interaction during declared disasters. Refer to the MOSAIC Louisiana WIC Training Handbook for additional guidance.

## New Certifications or Recertifications

<u>Note:</u> During epidemics/pandemics, staff must clean card with sanitizing wipes prior to entering the card into the card reader. For applicants that have a card in hand, staff must read the card to open the Family record.

Staff shall utilize disaster mode at either the family or clinic level as directed by SA to allow expedited processing even for families who may not have all proofs available. Family disaster mode helps speed up the processing of certifications/recertifications. The LAWIN Disaster Mode function allows an applicant/participant to be provisionally certified for 90 days with only a <u>risk code</u> and <u>food package</u> and verbal declaration of residency and income. When federal legislation is in place that allows for approved waivers, all other requirements for a certification/recertification, such as anthropometrics, blood work, health history, and VENA are waived. The SA will notify clinics when this option is available.

Family Disaster Mode should not be used for families that have benefits available or who have all proofs available for certification. These families should be marked at the participant level for the event.

**Note:** All LAWIN (\*) required fields will still need to be entered on each page in order to move forward with the abbreviated certification.

# **Endorsers/Proxies:**

Staff must ensure that an authorized individual (endorser, additional endorser, proxy) is present prior to signing any documents and should view the ID of the person to whom they are providing benefits.

When WIC participants/caregivers are unable to pick up or use their benefits, they have the option to designate a proxy to pick up or use WIC benefits on their behalf. Staff will make every effort to ensure all documentation is captured. If a proxy form is unable to be signed, staff can take verbal permission over the phone from the primary endorser. The proxy name must be entered under the endorser field on the Family page, and documentation of the verbal permission must be entered in the Notes field on the Endorser/Proxy page.

#### Disaster Mode (Family):

Upon selecting Disaster Mode (Family Page) for the applicant, staff will document the Disaster information. Staff must have the applicant/participant sign the Disaster Self-Declaration form. If disaster mode is indicated by SA to be used at the clinic level, the disaster self-declaration form is not used.

## Income/Residency:

Staff will document the verbally declared monthly household income in the notes field on the family page. If the participant is adjunctively eligible, staff will also enter adjunct eligibility type. Staff will also verify and note that the applicant/participants physical address has been verified and/or updated.

The Competent Professional Authority (CPA) must then complete all required fields in the Family and Participant pages as necessary.

#### Participant Type:

The CPA must change 'Participant Type' to the appropriate term for the event such as "evacuee" or "disaster" on each applicant/participant being certified.

#### Risk Code:

The CPA must assess nutrition risk to the extent feasible and, if no other Risk Codes are auto assigned, manually enter the following Risk Code according to Participant Profile:

- Pregnant: RC 401: Failure to Meet Dietary Guidelines for Americans
- Breastfeeding/Nursing: RC 401: Failure to Meet Dietary Guidelines for Americans
- Postpartum: RC 401: Failure to Meet Dietary Guidelines for Americans
- Child 12-23 Months: RC 428: Dietary Risk Associated with Complementary Feeding Practices
- Child 24-59 Months: RC 401: Failure to Meet Dietary Guidelines for Americans
- Infant: RC 428: Dietary Risk Associated with Complementary Feeding Practices

In the Notes section of the Participant Risk Code page, staff must document the following:

- Disaster Cert [INSERT NAME OF DISASTER]
- Example: Disaster Cert COVID-19 or Disaster Cert Hurricane Laura

# Standard Food Package:

The CPA must assess and tailor the food package as necessary according to current policies. The SA will send out additional guidance if the situation changes and additional food package customizations are recommended.

#### Referrals:

Staff shall continue to provide applicants/participants with the WIC-21 Referral Pamphlet and other referrals as necessary.

#### Counseling:

Staff will inquire and provide nutrition counseling as requested by the applicant/participant. Health History Questionnaires/VENA are not required to complete disaster provisional certification.

## Completing the Certification:

After the Disaster certification requirements are met, the CPA must certify the participant/applicant and complete the Rights & Responsibilities document in LAWIN prior to benefit issuance. When applicable during Tier II services, staff will use the remote clinic support and have documents signed using the Gateway or if the applicant/participant chooses not to use the Gateway, staff will write 'Verified ID' in place of the participant signatures on both signature lines.

# Benefit Issuance/Scheduling:

Staff will issue the maximum benefit periods allowable within the certification period.

**Note**: If there are current month benefits on the card, they will load the next three months as usual. If staff need to load four months, it's a two-step process as documented in the training document.

Staff will encourage participants to complete online nutrition education. If appropriate and when the SA notifies clinics that this option is available, staff will defer all required nutrition education contacts

**during this disaster timeframe**. For the next appointment, staff will schedule all families certified in 'Disaster Mode' for a 'Provisional Follow-up'.

If staff need to modify current month benefits for a family in disaster mode that has redeemed some of their benefits, follow the instructions in the training document carefully to prevent over issuance. Refer to Disaster Recovery procedures for follow up scheduling when Louisiana WIC returns to normal operations.

All Other Appointments (FBI, Midcert, Midpoint, All Counseling, etc.)

<u>Note:</u> During epidemics/pandemics, staff must clean card and ID with sanitizing wipes prior to entering the card into the card reader. For applicants that have a card in hand, staff must read the card to open the Family record.

WIC Staff will change the 'Participant Type' to the appropriate term for the event such as "evacuee" or "disaster" on each participant being served.

# **Lactation Counseling:**

In order to continue supporting breastfeeding/nursing parents during Tier II operations, staff are encouraged to contact participants prior to their appointment and complete counseling over the phone if possible. If in-person, staff are to inquire and provide appropriate counseling.

# Other Counseling:

Staff will inquire and provide nutrition counseling as requested by the participant. Staff will encourage and remind participants to complete online Nutrition Education classes at Wichealth.org. Staff may utilize existing nutrition education handouts/brochures/tear-offs as needed.

## Midcert/Midpoint:

Midcert and Midpoint appointments including collection of anthropometric and blood work data will be skipped until Louisiana WIC returns to normal operations. Staff will inquire and provide nutrition counseling as requested by the participant.

# Prescriptions

Staff shall follow current WIC policy related to prescription formula. Every effort should be made to obtain the prescription form (i.e. fax or scanned and emailed). If clinics are having difficulty with prescription approvals, they must contact the SA for assistance.

# Breastpumps

Participants that need a breast pump during the time of disaster will be issued ONLY a single-user or manual pump. Staff must remind participants that these pumps are for <u>individual use only</u>. All participants issued a pump should be given a copy of the CDC's guidelines for cleaning pumps in order to protect themselves and their infant. The handout, in both English and Spanish, can be accessed at the following link:

https://www.cdc.gov/healthywater/hygiene/healthychildcare/infantfeeding/breastpump.html.

Staff will follow current WIC policy related to breast pump issuance. Multi-user breastpumps will be considered on a case-by-case basis following guidance from the SA. Any additional guidance and

updates on multi-user breast pumps will be sent by email to WIC staff from the State Breastfeeding Manager.

# Transfer the Participant and Prescribe Benefits

Prescribe and issue Louisiana benefits beginning at the end of last benefit redemption. For out-of-state transfers, thirty (30) days of benefits may be issued, as this may be a temporary displacement. In-state transfers may be issued up to three months of benefits.

#### Issue a VOC to Evacuees

A VOC shall be issued by Louisiana WIC to all participants who declare they are evacuating, regardless of their previous place of residence.

#### Standard Formula Issuance

Applicants/participants evacuating from another state who are on standard formula shall be prescribed the current Louisiana contract standard formula equivalent.

# Issuing Ready To Feed (RTF) Formula

During disaster responses, if the family/participant is certified in disaster mode and the CPA/RD has assessed that the participant does not have access to running water and/or refrigeration, then they can issue standard formula in RTF for ONE MONTH ONLY. All subsequent months should be issued standard formula in powder or concentrate. The staff must be providing services in storm impacted areas or in areas sheltering evacuees. If the family/participant is staying in a shelter or a hotel serving as a shelter, the homeless risk code should be assigned. The CPA/RD must document that they assessed refrigeration/water supply and that they are providing RTF based on their assessment findings. They will not need Regional Nutritionist approval for the above.

If the family is still residing at the shelter for more than thirty days and needs additional months of RTF formula, the Regional Nutritionist would need to approve the continuation of RTF formula and provide a note in LAWIN that it was approved.

To provide just one month of RTF formula, staff would need to add two *formula line items* – then choose RTF for line item 1 and concentrate and/or powder for line item 2. For the RTF, they would complete the amount needed for current month/month desired and then zero out the future months. For the powder/concentrate, staff would zero out the current month (or month desired to offer RTF) and then fill in the amounts for future months.

## Medical Documentation for Exempt Formula and WIC-Eligible Nutritionals

Staff may provide, with appropriate medical documentation, exempt formula or WIC-eligible nutritionals for applicants/participants with qualifying medical conditions.

## Exempt Formula Guidance

- Participant was not on WIC before the disaster: Evacuee applicants seeking WIC benefits who
  were not on WIC prior to the disaster may be issued up to thirty (30) days of exempt formula
  benefits and referred to a local Provider to obtain medical documentation. After the maximum
  issuance, current Louisiana policy shall be followed for exempt formula issuance.
- Participant received Louisiana WIC exempt formula before the disaster: Louisiana participants evacuating to another part of the state, who were approved to receive exempt formula prior to

- the disaster, may be issued the exempt formula according to current Louisiana policy guidance for issuance. If the prescription recently expired, no more than one month of exempt formula shall be issued. After the one-month issuance, current Louisiana policy shall be followed for exempt formula issuance.
- Participant (Louisiana or other state) has a valid exempt formula prescription: Evacuee
  applicants/participants who are able to provide required documentation for exempt formula
  may be issued food benefits for the specified item up to the end of their certification period, or
  through the expiration of the prescription, and according to current Louisiana policy guidance
  for issuance. Note: as stated above, in assessing status for out-of-state transfers, thirty (30)
  days of benefits may be issued, as this may be a temporary displacement.
- Participant does not have a valid exempt formula prescription: Applicants/participants
  evacuating from another state, who cannot provide documentation of exempt formula that was
  issued in the other state, may be issued a maximum thirty (30) days benefit for that specific
  item. After the one-month issuance, current Louisiana policy shall be followed for exempt
  formula issuance.

# Documentation and Reporting

These saved views will be used during disaster recovery to follow up for certification completion and scheduling.

# State Agency Responsibilities

The SA Nutrition Operations staff will run the following views and save in the SA Shared Drive:

- 'Participants Certified in Disaster Mode'
- 'Participants with Participant Type Disaster'

#### Disaster Recovery (Return to Normal Operations)

## State Agency Responsibilities

- 1. As necessary, the SA will coordinate communications and services with other state and federal programs and all WIC business partners.
- 2. The SA will work with the Louisiana Department of Health to issue any press and/or media releases and update the Louisiana WIC website as necessary.
- 3. The SA Nutrition Operations staff will run the following views as needed to monitor progress of participants being certified in normal settings and save in the SA Shared Drive:
  - 'Participants Certified in Disaster Mode'
  - 'Participants with Participant Type Disaster'

#### Region Responsibilities

Regional Nutritionists will run the following views upon direction of the SA and will email to the Nutrition Operations Manager:

- 'Participants Certified in Disaster Mode'
- 'Participants with Participant Type Disaster'

## Clinic Responsibilities

- As scheduled participants come in, staff will change the 'Participant Type' from the event category to either Standard, Migrant, Military, or Homeless as necessary.
  - **Note:** Staff are not to change Participant Type until participant is physically in the clinic.
- 2. If within the 90-day period, staff <u>do not</u> have to click 'Start-Recertification' to extend the certification, but they must complete all 'normal' certification requirements that were waived during disaster mode.
- 3. For non-certification appointments, staff will perform and enter, any anthropometric or bloodwork data that was deferred during the disaster.
- 4. All clinics will return to normal operations including scheduling.

# **WIC Vendor Operations Protocol**

# State Agency Responsibilities

- 1. The SA will develop a plan for continuation of WIC services to the best of our ability.
- 2. The SA will communicate any changes to vendor operations policy and procedures via email to all authorized vendors.
- 3. As necessary, the SA will coordinate communications and services with other state and federal programs, and all WIC business partners.
- 4. The SA will notify vendors via email to contact the state by phone (504-568-8229) or email (<a href="mailto:LAWICVendor@la.gov">LAWICVendor@la.gov</a>) if there is any disruption in normal business operations that directly impact WIC families (i.e. cannot meet minimum stocking requirements or have a change in business hours). The SA will document any vendor correspondence.
- 5. The SA will document all closures for WIC authorized vendors. Updates will be posted on the Louisiana WIC website and communicated through the Louisiana Department of Health social media pages as necessary.
- 6. As necessary, the SA will work with the Louisiana Department of Health to issue any press and/or media releases and update the Louisiana WIC website.
- 7. Following a disaster, the SA will coordinate with USDA to establish the viability of retail groceries that remain in operation, including their operating hours and their available supplies of WIC approved foods.
- 8. Targeted text messages will be sent to participants (either statewide or specific to clinic location) via LAWIN to notify them of options for benefit redemption, any temporary changes to the authorized food list, and instructions on how to find the nearest operable WIC authorized vendor.
- 9. Retail purchase is considered nonviable when a significant number of clients are unable to purchase WIC approved foods. The SA will work directly with the corporate office of affected chain stores for the status of their outlets in the affected area. The SA will reach out to vendors to verify if their locations are open for business and their current food supply levels. To a lesser extent, the SA will also coordinate with Sanitarian Services to determine the status of stores in an affected area. This could be due to the closing of many vendors, the inability of many participants to get to vendors, or the disruption of the supply of food to stores. Participants should be referred to Red Cross or food pantries.

10. In coordination with the SA, vendors may provide ready to feed formula and/or shelf-stable food items when these benefits are assigned to the participant and on the EBT card.

# **Vendor Responsibilities**

- 1. WIC vendors will continue to follow all policies and procedures as outlined in the current Vendor Guide.
- 2. WIC vendors will notify the SA by phone (504-568-8229) or email to <a href="mailto:LAWICVendor@la.gov">LAWICVendor@la.gov</a> of all closures, damage, and changes in operations.

#### **WIC Vendor Accommodations**

When agreements (written statement via email) are in place with other State WIC Programs, Louisiana WIC authorized vendors may have the option to accept out-of-state EBT Smart Cards.

When agreements (written statement via email) are in place with other State WIC Programs, displaced Louisiana WIC participants may have the option to use their Louisiana WIC EBT Smart Cards at select out-of-state WIC authorized vendors.

# Temporary Authorization of Out-of-State Vendors

Louisiana WIC has the discretion to temporarily authorize out-of-state vendors to transact Louisiana WIC Benefits issued to Louisiana WIC participants. Out-of-state vendors must meet the following criteria:

- 1. The vendor applicant must be part of a national or regional chain of retail stores that is authorized by both Louisiana WIC and the out-of-state WIC agency
- 2. The vendor applicant must use the same EBT processor as Louisiana WIC (Solutran)
- 3. The vendor applicant must be in good standing with the out-of-state WIC agency. A vendor applicant is in good standing when
  - a. The vendor applicant is currently authorized to transact WIC Benefits by the out-of-state WIC agency, and
  - b. The vendor applicant meets the monitoring and investigation requirements of the outof-state WIC agency.

# References

- Guide to Coordinating WIC Services During Disasters (2017)
- WIC Policy Memorandum 2007-5: WIC Program Response to a Human Pandemic
- WIC Policy Memorandum 2003-4: Allowable Costs of Bioterrorism Preparedness (referenced in above document)
- WIC Program Questions and Answers on Human Pandemics