

## Section II: Local Agency Procedure Manual

### IV. Local Organization and Management

#### A. Local Agency Staffing

##### Purpose

To ensure that each local agency employs or contracts with adequate staff to ensure participants receive high-quality nutrition services.

##### Policy

Each Local Agency is required to have qualified staff to fulfill each required role.

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#### 1. Staffing

- Qualified staff must be employed or on contract to provide WIC services in accordance with the federal regulations, State Plan policy, and agency contracts.
  - Contract budget, participation, and local agency needs should be considered when determining staffing levels for WIC services.

#### 2. Local Agency Staff Training

- New local agency staff shall complete the training in the Staff Training Form (located in eLearn) overseen by their local agency Nutrition Coordinator (otherwise referred to as Education or Training Coordinator).
  - This form will be submitted to the State Nutrition Coordinator within 60 days of hire.
    - Exemptions to the trainings outlined will be made at the local agency discretion with explanation documented.
      - ❖ For example, a new employee may not need to complete WIC 101 if they had previously worked for WIC.
      - ❖ Exemptions shall only be made when it is confirmed the employee has the training or skill set already or has alternate training in the same area planned.
- All new staff must complete the Civil Rights training prior to being given SPIRIT access. Annual Civil Rights training is required thereafter within each federal fiscal year.
- Any WIC staff who provides direct clinic services must attend New Employee Training (NET) provided by the State Office within 12 months of hire. Contact the State Nutrition Coordinator to verify which sessions to attend based on role.
- Continuing education is required for all staff who provide direct clinic services to participants which includes some component of nutrition and/or breastfeeding education.

- Staff employed  $\geq 20$  hours per week are required to complete 12 credit hours per 12 months, staff employed  $< 20$  hours per week are required to complete 6 credit hours per 12 months.
- Continuing Education Credits (CECs) must be approved (pre or post event) by using the *Continuing Education Credit Approval Form*, which is submitted to the Nutrition Coordinator at the State Office.

### 3. WIC Director (required)

- A WIC Director is responsible for overseeing the administrative aspects of the WIC Program. Typical responsibilities include fiscal management, program planning, staff supervision, serving as a contract liaison and ensuring breastfeeding promotion and support activities within the local program.

### 4. Registered Dietitian Nutritionist (RD/RDN)/Competent Professional Authority (CPA) (Required)

- Local agency CPA's will be one of the following:
  - Registered Dietitian (RD) or Registered Dietitian Nutritionist (RDN)
    - Every local agency must have at least one RD/RDN
  - Nutritionist with a bachelor's or master's degree from any college/university which is accredited/approved by the Accreditation Council for Education in Nutrition and Dietetics (ACEND)
  - Diet Technician, Registered (DTR)
  - Registered Nurse (RN), Physician (MD or DO), Physician Assistant (PA), or Nurse Practitioner (NP). This category does *not* include licensed practical nurses (LPNs).
  - Other degreed professionals\* with adequate coursework in biology and nutrition (coursework must be completed within the past 10 years unless actively working in the medical or nutrition field) which will include, at a minimum:
    - Basic Nutrition;
    - Nutrition in the Life Cycle;
    - Anatomy/Physiology; and
    - One additional course in nutrition such as Community Nutrition, Weight Management, Culinary Nutrition, Nutrition in Chronic Disease, Motivational Interviewing or equivalent counseling class.

\* The State Office will consider other candidates on a case by case basis.
- Prior to hiring, documentation must be sent to the State Nutrition Coordinator for review and approval:
  - RD and DTR
    - Current state licensure as a Licensed Nutritionist with the Montana Board of Medical Examiners, or Commission on Dietetic Registration (CDR) card.

- RN, NP, MD, DO, or PA
  - Current Montana State Licensure
- All others - Transcripts documenting Nutrition coursework and Anatomy/Physiology coursework
- The role of the CPA in WIC clinic includes, but is not limited to:
  - Assessing and documenting nutrition risks;
  - Prescribing and issuing supplemental foods;
  - Providing participant-centered, up to date, and culturally sensitive nutrition education and breastfeeding support;
  - Working with the participant to develop health-related goals, monitoring progress toward achieving them and documenting their outcome, or setting new goals as appropriate;
  - Developing and documenting individual care plans at certification and mid-certification appointments;
    - Only an RD/RDN may develop and implement care plans for high-risk participants as identified in the *High-Risk Referral* attachment
    - Low-risk care plans may be developed and implemented by non-RD CPAs
  - Referring participants to other health and social services as appropriate, and documenting follow-up to referrals
- All local agencies must\* have at least one Montana licensed Registered Dietitian/Nutritionist (RD/RDN) on staff or contract. The role of the RD in WIC is:
  - To perform all functions of a CPA;
  - To coordinate with Healthcare Provider or other specialists when participants are being followed for nutritional issues that WIC can support;
    - A release of information will need to be on file for this coordination to take place
  - To complete supplemental foods assessment for Food Package III prescriptions when deferred to by the Healthcare Provider (HCP) on the prescription form;
  - Provide consult, as requested, on formula changes for infants;
  - Promote and support breastfeeding as the normal and ideal feeding for infants;
  - Accept referrals by non-RD clinic staff for participants identified as high-risk, or when the participant needs are such that the clinic staff feel they cannot serve them within their scope of practice;
  - Fill the role of local **Nutrition Coordinator** for the agency, which includes:
    - Ensure training needs are satisfied for all clinic staff who provide direct nutrition services to participants.
    - Review nutrition education materials provided from the clinic and ensure they are current, accurate, and appropriate for the population served.

- Lead the agency effort on development and implementation of the Nutrition & Breastfeeding Plans in coordination with the Breastfeeding Coordinator/Designated Breastfeeding Expert

\*If an agency is unable to recruit or hire an RD/RDN for their local agency, the local agency is required to request approval from the State Office to contract with an RD for remote service. At a minimum, the remote RD will provide the services identified in the attachment *Registered Dietitian Scope of Services*. The first priority for contracting with an RD will be with an RD co-located within the agency and readily available to WIC, or with another WIC agency who is able to contract out their WIC RD services.

#### **5. Breastfeeding Coordinator/Designated Breastfeeding Expert (DBE) (required)**

- Each local agency will designate a Breastfeeding Coordinator/DBE. This individual will be trained to promote and support breastfeeding. This person will:
  - Meet qualifications for CPA status.
  - Have breastfeeding training and knowledge by one of the following:
    - One year of experience in counseling women about how to breastfeed successfully; and,
    - Hold credentials of International Board-Certified Lactation Consultant (IBCLC) as granted by the International Board of Lactation Consultant Examiners; or
    - Within one year, be a Certified Lactation Counselor (CLC), or have attended comparable training in lactation management
  - An IBCLC can provide specialized breastfeeding support and clinical lactation management.
  - Know both State and Local breastfeeding policies; oversee planning, implementation and evaluation of breastfeeding activities (including pump issuance); oversee training of Local Agency staff on task appropriate roles of breastfeeding promotion and support and monitor breastfeeding rates.
  - Identify, coordinate and collaborate with community breastfeeding resources.

#### **6. Local Agency Retail Coordinator (LARC) (required)**

- Each local agency will select a staff member to act as a LARC. This position is the primary local contact for WIC Authorized Retailers. The WIC State Office may delegate vendor monitoring, pre-authorization visits, compliance buys, and vendor training to LARCs.
- Training of the LARC will be provided by the State office vendor team.

#### **7. Nutrition Aide (optional)**

- A Nutrition Aide, Nutrition Assistant or similar job title is responsible for a variety of duties dependent upon the local agency.

- Typical job duties include, but are not limited to:
  - Gathering demographic information
  - Screening and determining categorical, residential and financial eligibility
  - Gathering height, weight and biochemical information
  - Describing food delivery system and food list
  - Issuing benefits and explaining use
  - Scheduling appointments
  - Making referrals to community services
  - Providing excellent customer service to participants
  - Performing general clerical duties
  - Providing program outreach
- Per the Clinical Laboratory Improvement Act regulations, staff performing biochemical tests must possess a high-school diploma or the equivalent.
- After completing appropriate training, as documented by the local agency Nutrition Coordinator, Nutrition Aides may collect participant health information and provide low-risk, basic nutrition and breastfeeding education.