

Section II: Local Agency Procedure Manual

IV. Local Organization and Management

D. Security and Disaster Recovery Plans

Purpose

To have a written plan of guidance to recover from natural and/or man-made disasters which disrupt or interfere with the regular delivery of program services.

Policy

All WIC local agencies will have a written plan for system security, continuity of operations and disaster recovery that will be updated as needed.

1. Emergency Preparedness

- Each local agency shall have a plan in place to address potential disruption in services due to a disaster, including a pandemic situation.
- Local agencies will notify the State WIC Office if they have a situation that affects their ability to deliver services.
 - The local agency has the primary responsibility of managing the situation, however, the State office will provide guidance and resources as able and available.

2. Plan Content

- The local agency is required to have a written plan for system security and disaster recovery. Each plan will address the following topics:
 - Designation of an agency Security Manager
 - Emergency preparedness
 - Contingency plans to meet critical processing needs in the event of short or long-term interruption of service.
 - Physical security of computer resources
 - Protection of equipment from theft and unauthorized useIncorporation by reference, “Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Guide to Coordinating WIC Services During Disaster”.

3. WIC Service Delivery During Disaster or Pandemic

- During an emergency situation USDA may be granted waiver authority to allow State and Local agencies to continue providing services
- Flexibilities which are currently authorized in regulation and may be exercised at the discretion of the State Agency to ensure WIC participants are provided services include the following:
 - Remote service, including follow up education and benefit issuance, may be done on any currently certified participant

- Bloodwork may be delayed up to 90 days for any participant currently certified in the event that remote service is being used and healthcare provider referral data is not available
- Certification periods may be extended for up to 30 days with State Office support and guidance
- Physical presence requirements (anthropometric data and eligibility proof must be available) may be waived in the following situations:
 - Infants under 8 weeks of age may have self-reported data from birth;
 - For infants and children who are already on the program and need a subsequent certification if they were physically present during their initial certification and receiving ongoing healthcare or have one or more parents who work and were present at their most recent appointment
 - For those with disabilities, if there is confinement to bed rest, a serious condition that requires equipment that is difficult to transport, or an illness that may be contagious or exacerbated by coming into the WIC clinic. Healthcare provider documentation is required for this exemption.
- Electronic proof of income, and health data, may be accepted by the local agency. It is required that the means used to transmit data are secure to protect confidentiality.
 - Staff may delay scanning into MIS for up to 30 days to serve participants in an efficient time.
- EBT card replacements may be mailed by certified mail (signed receipt) if in-person pick up is not possible.
 - New EBT cards must be provided in person.

4. Waivers

- Waiver authority for any regulatory or policy provision for WIC may be provided by congressional order. When waiver authority is provided to USDA, States may request individual waivers that are relevant and responsive to the current situation.
- When waivers are approved, the State Office will provide process documentation to all local clinics, retailers and interested parties to describe implementation of any said waiver.