

HANDS – 30 Day Termination

To Move Forward, We Must First Look At The Past



WIC Policy Memo 2013-3

Income Eligibility Guidance – 4/26/13



Major Items to Note

- Adjunct Eligibility - only on day of cert
- Must terminate them if they fail to bring in income documents within 30 days.
 - Later clarification by USDA expanded that to identification and residency proof as well.
- AZ WIC State Staff disagreed with USDA and brought up concerns of clinic flow, barriers to service, etc.

HANDS

- HANDS Auto Terminates clients when they have “forgot documents” selected if they do not have the status changed to the actual proof within 30 days.
 - Applies to Identification, Income, Residency
- Previous bug
 - In some cases, it did not force staff to terminate clients
 - Fixed in October 2015 release
- Current bug in the system
 - Auto-termination of whole family instead of the individual when residency forgot doc is selected.
 - Fix is coming in December 2015 release

Reminder – Only mark it if it applies!

Income Eligibility

LA/Clinic
MPHC BASELINE

Family ID
150010700

Auth. Rep. Name
BERRY, BLUE

Phone
(602) 555-5555

Client ID
1341408790

Client Name
BERRY, PINK

Date of Birth 11/9/2013 Age 2 yrs, 0 mos

Cert. Period 8/13/2015 - 8/12/2016 Category C1

Term. Date N/A Due Date N/A

LDTU 11/12/2015 Weeks PG N/A

Next Appt. N/A Appr Thru N/A

BERRY, MOTHER
BERRY, PURPLE

Household

Income Date 11/9/2015 *Family Size 3 Unborn Counted

Adjunct Eligibility

Members	AHCCCS	FDPIR	SECTION 8	SNAP (FOOD STAMPS)	TANF
BERRY, MOTHER	REFERRED	N/A	N/A	PART. PROOF	N/A

Add

Zero Income
 Yes

*Income Provider
PRIMARY PROVIDER

*Amount
Income Averaging

*Interval
A - ANNUALLY

Hours Per Week

*Documentation

Family Members

Select options

Check all Uncheck all

BERRY, PINK

BERRY, PURPLE

BERRY, MOTHER



When they come in on day 31+

- Must be treated like a certification
 - Proof of residency, identification, income
 - Physical presence
 - Medical
 - Nutrition Assessment
 - Care Plan
 - Referrals
 - Food Package

Two Big Questions

- Do clients really have to come in again? - **YES**
 - Physical presence can only be waived in special circumstances as outlined in P & P Chapter 2.
- Do clients really have to do height, weight, and blood work again? - **YES**

Blood Work

- At time of certification or within 90 days of certification (7 CFR 246.7)
- Blood Work Policy – January 2000 (became part of the 7 CFR 246.7)
 - Reduced the bloodwork requirement
 - See Appendix A in AZ WIC Lab Manual for chart
- If bloodwork is not needed, you do not have to take it again. Use “not required” pending lab code in HANDS.

Appendix A - Blood Work Requirements, Options and Referrals

Category	Age Blood Work Required	Certification Blood Work Required	Exceptions to Certification Blood Work Required
Pregnant women	N/A	1 blood test taken during pregnancy	Prenatal women can be certified without blood work if: <ul style="list-style-type: none"> • at least one qualifying nutritional risk is present at certification and • blood test is obtained within 90 days of certification
Postpartum women	N/A	1 blood test taken 4-6 weeks after end of pregnancy	None
Breastfeeding women	N/A	For women 6-12 months postpartum, no blood test is required if 1 test was taken after end of pregnancy	For women 6-12 months postpartum, no blood test is required if 1 test was taken after end of pregnancy
Infants <9 months	Not Required	Not Required	Not Required
Infants 9 months or older	Blood work required once between 9-12 months	Blood work required for infants certifying between 9-12 months	Blood work taken between 12-13 months can be used when no other blood work is available for infant category
Children 12-24 months	Blood work required once between 12-24 months (6 months after infant test)*	Blood work required at initial certification	
Children 24-60 months	N/A	All children are required to have blood work on an annual basis unless previous blood work result demonstrated nutritional risk eligibility for low Hgb. In this case, blood work is needed every 6 months.	

*Blood work taken at or before the first birthday does not satisfy the requirement for both the infant blood work and the children's 12-24 month blood work. Separate blood work is required for each age range.

Height and Weight

7 CFR 246.7

- At a minimum, height or length and weight measurements shall be performed and/or documented in the applicant's file at the time of certification.....
- Weight and height or length shall be measured not more than 60 days prior to certification for program participation.

Complications with Using Old Data

- HANDS will not allow you to enter data twice on the same date
 - i.e. 10/2/2015 10 lbs 6 oz 25 3/8 inches
10/2/2015 10 lbs 6 oz 25 3/8 inches
 - This is standard practice for electronic health records.
 - If allowed to enter data twice for the same day, it would cause issues with graphing and WIC code calculations.

Why can't HANDS automatically use the data < 60 days old?

- Can't use pregnant data for a post partum certification.
 - Bug was identified by Arizona Local Agencies and the bug was corrected.
- We can't use old data on a regular basis per the federal regulations.

Federal Register Vol 64, Number 241, Page 70176, December 1999

- Final Rule – kept the 60 day allowance
 - Proposed rule would have removed the 60 days
- “These [height and weight] timely measurements and data are fundamental to the accuracy of nutritional risk assessment for all categories of applicants, but especially for infants and pregnant women applicants. Using weight and length data that were taken at 2 months of age as a basis to certify the same infant at 4 months of age represents questionable nutrition service standards.”

Federal Register Continued...

“The Department [USDA] wishes to stress that the anthropometric data must reflect current health and categorical status. Therefore, although data may be up to 60 days old, such data may not be appropriate for pregnant women, or infants and children during critical periods of growth. As such, state agencies should use appropriate judgment in using this option. The department will continue to monitor, via management evaluations, the appropriate use of this provision to insure the integrity of the nutrition assessment in the WIC Program.”

What We Know

- USDA is looking at 30 day terminations and proper procedures at ME's in other states to make sure clients are appropriately terminated and complete certs are being done when they come back in.
 - Guam, American Samoa, CNMI
- USDA is watching!
 - February – HAND Review (ME)
 - April – 2016 PC Extract
 - June – Certification and Enrollment ME

What about extenuating circumstances?

- Call the WIC Service Desk
 - They will contact one of the WIC Management Leads for you while the client is in the clinic to resolve the issue.

What are your recommendations to best help our staff and our clients with this 30 Day Termination Rule?