

# m e m o

**DATE:** June 17, 2020  
**TO:** WIC Coordinators  
**FROM:** Nutrition & Clinic Services Unit  
**SUBJECT:** Physical Presence Requirements/Exceptions when In-person Clinics Resume

The document [WIC In-Person Clinic Operations During COVID-19](#) describes best practices for maintaining the safety of WIC staff and participants and for limiting the spread of COVID-19 in the community. One recommended practice is to complete appointments remotely, when possible, to limit the number of in-person appointments.

When the waivers end, staff are encouraged to triage each applicant/participant to determine whether the appointment can be remote or if the applicant/participant needs an in-person appointment. Base the need for an in-person appointment on Physical Presence requirements and height, weight, and hemoglobin requirements.

## **When is Physical Presence required?**

- At Certifications and Recertifications. It is not required at Midcertifications if height/weight/hemoglobin measurements are available.

**Federal Regulations include Exceptions to Physical Presence.** When the waiver for Physical Presence ends and in-person appointments resume, staff should use an exception whenever applicable to limit the number of in-person appointments. Carefully review the Physical Presence Exceptions in the **WIC In-Person Clinic Operations During COVID-19** document.

## **Physical Presence Requirements/Exceptions Q and A:**

**Q:** If a participant meets the criteria for a Physical Presence Exception, can height/weight/hemoglobin be deferred?

**A:** Once the Physical Presence waiver ends, height/weight/hemoglobin measurements will be required for cert/recert. Obtain measurements from the Health Care Provider or in WIC clinic.

**Q:** What if measurements are not available from the Health Care Provider and the parent/caretaker is unwilling to come in to WIC clinic due to risk of COVID-19?

**A:** Reassure the family of the safety precautions used in WIC clinic to reduce risk of COVID-19 transmission. Explore other options such as:

- Have the family come in for only height/weight/hemoglobin check and complete the remainder of the appointment remotely. Brief interactions of less than 15 minutes may have lower risk of COVID-19 transmission. [Responding to and Monitoring COVID-19 Exposures in Health Care Settings](#). This brief interaction for height/weight/hemoglobin counts as Physical Presence.

- If the parent/caretaker is at risk of complications from COVID-19, ask if a lower-risk proxy could bring the child in for the appointment.

**Q:** Can we use a Physical Presence exception when a participant is not at risk of complications from COVID-19, but a household member is at risk?

**A:** During the COVID-19 response, the exception “A Serious Illness that may be exacerbated by coming in to the clinic” has been expanded to include members of the household who are at risk of complications from COVID-19, rather than just the participant. Also use this reason if a participant or member of the household has COVID-19, or is in isolation after exposure.

**Q:** Is pregnancy an exception reason for physical presence?

**A:** If a pregnant woman feels she is at risk of complications from COVID-19, use the exception “A Serious Illness that may be exacerbated by coming in to the clinic”.

**Q:** Physical presence exceptions for infants and children include “Was present at their first certification appointment and who is receiving ongoing health care”. What is “ongoing health care”?

**A:** The child is receiving well-child care, following the American Academy of Pediatrics schedule for screenings and assessments. [AAP Schedule of Well-Child Care Visits](#).

**Q:** How do I document an exception for Physical Presence?

**A:** Select the appropriate exception from the Physically Present “Reason Not Present” dropdown in the Information System. A new reason has been added **Other – see notes**. If this reason is selected, write a note to explain the exception, e.g. “receiving ongoing health care”.

For additional information, see [Physical Presence, MOM 5.2.5](#).

Questions? Contact your State WIC Consultant.

### **References – Complete Listing of Hyperlinks**

#### [WIC In-Person Clinic Operations During COVID-19](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/wedupdate/moyr/2020/topic/covid19reopen.pdf>)

#### [Responding to and Monitoring COVID-19 Exposures in Health Care Settings](#)

(<https://www.health.state.mn.us/diseases/coronavirus/hcp/response.pdf>)

[AAP Schedule of Well-Child Care Visits](#) (<https://www.healthychildren.org/English/family-life/health-management/Pages/Well-Child-Care-A-Check-Up-for-Success.aspx>)

#### [Physical Presence, MOM 5.2.5](#)

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_2\\_5.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_2_5.pdf))