

Q & A: WIC ARPA Waivers

UPDATED AUGUST 2, 2023

Implementation of ARPA Waivers Guidance

See the ARPA Waivers Guidance documents:

[Implementation of WIC ARPA Waivers](#)

[Suggested Process for Implementing ARPA Waivers](#)

Timeline

May 11, 2023: The U.S. Department of Health and Human Services Federal Public Health Emergency expired.

August 9, 2023: Minnesota WIC waivers, including in-person services, expire.

August 10, 2023: The American Rescue Plan Act (ARPA) Waivers go into effect. Height and weight measurements and bloodwork are required per federal regulations.

Q: Does state WIC have updated guidance or recommendations regarding COVID Infection Control Precautions?

A: Each local agency WIC program should follow their local agency specific policies/procedures for COVID mitigation.

Q: Will we need to get a participant signature if a WIC card is mailed? Or can we continue to initial the signature pad and write “mailed”?

A: It depends on whether it is an initial issuance of a card or if it is a replacement.

- [Section 8.3: Issuing WIC Cards](#) requires a participant signature when setting up or changing the WIC Card’s Primary Cardholder. If mailing a card in those circumstances, staff should indicate reason “mailed” with staff initials and obtain a participant signature, most likely an eSignature.
- [Section 8.5: Replacing WIC Cards](#) addresses mailing replacement cards. If mailing a replacement card, simply indicating the reason “mailed” with staff initials is adequate.

Q: If we obtained a verbal Release of Information (ROI) for a participant, do we need to request a signature now? If a verbal ROI has expired, do we still need to obtain a signature?

A: If the verbal ROI is still current, replace the current verbal ROI with a written ROI when participant comes to clinic in-person. All future ROIs will require a signature.

- A verbal ROI will no longer be allowed as of August 10, 2023. A signed ROI will be required before any private data is released.

Q: When we received measurements that were deferred at the appointment, how do we document the measurements? Do we need to plot them?

A: If you are deferring measurements at certification because the participant has an upcoming medical appointment, indicate Deferred Measurement for bloodwork and Unknown for height/weight with the date of the certification appointment. When measurements are received, enter them into Health Benefits Real Time (HuBERT) with the actual date of the measurements.

- The measurement date of deferred data will most likely be a date after the certification. Therefore, you should enter the actual date of the measurements into HuBERT. HuBERT will plot the measurements.
- There may be some unusual circumstances when you have data that is prior to the certification date, and you will be unable to enter them in HuBERT. In those cases, document the measurements in a note. You will not be required to plot the height/weight measurements on the growth chart.

Additional Questions and Answers added below on June 28, 2023

Q: For appointments that are done remotely, the guidance says we need to get signatures within 30 days after the certification. What happens if signatures are not obtained in 30 days?

A: If the Rights and Responsibilities and the Primary Cardholder signatures are not obtained within 30 days, continue issuing one month at a time until signatures are received.

For a Release of Information form, do not release any private data until a signature is obtained. It is not necessary to issue only one month at a time when waiting for a Release of Information signature.

Best practice for obtaining electronic signatures during a remote certification is to send the request for signatures at the end of the appointment, while the participant is still on the phone/video with WIC staff, via DocuSign or the [Participant Signature Form](#).

Q: On page 2 of the “Implementation of WIC ARPA Waivers” document, it states that “Remote Option using deferred measurements does NOT pertain to mid-certifications.” So, this means all mid-certifications need to either have all measurements in advance or take place in person at the appointment?

A: The ARPA waiver pertains to physical presence during the initial or recertification appointments. Mid-certifications do not have a physical presence requirement, therefore the ARPA waiver for physical presence doesn't apply and measurements cannot be deferred. If you are unable to obtain measurements in advance and the participant is unable to attend the WIC clinic in person, staff may issue one month of benefits and reschedule the mid-certification appointment for the following month. This is consistent with current policy, [Section 5.10, Mid-Certification](#).

Additional Questions and Answers added below on July 12, 2023

Q: When a signature for the certification (Rights and Responsibilities) is obtained remotely, what are the expectations for completing the participant signature line on the signature pad and for explaining the Rights and Responsibilities (R & R).

A: Section 1.7, Data Privacy states that local agency staff must allow time for the participant/caregiver to read (or be read to) the Rights and Responsibilities; inform them how information might be used (Exhibit 1-K); and obtain signature from participant/caregiver regarding their acceptance of the Rights and Responsibilities.

Ideally, the CPA should send the eSignature document to participant at the end of the appointment, allow time for the participant to review the R & R and ask questions, and assist the participant with signing and returning the document. If the eSignature document is not sent during the appointment, other options for reviewing the R & R should be provided such as viewing the R & R on the My Minnesota WIC app or another electronic means during the appointment.

The CPA should indicate “Phone cert” with their initials on the signature pad.

Q: If a parent/caregiver doesn’t bring the child for an appointment, can we do the appointment, defer the measurements, and obtain the measurements at the WIC clinic at another time? Or do we reschedule the entire appointment?

A: The Implementation WIC ARPA Waivers guidance limits deferral of measurements to when it is anticipated measurements will be obtained from a health care provider or in specific special circumstances. Not bringing a child to the appointment is not one of the special circumstances. In this instance, the certification period for the child can be lengthened by a period not to exceed 30 days, one month of benefits provided, and the appointment rescheduled to the following month. If the certification period has already been extended, reschedule the appointment for the same benefit issuance period. Section 5.2, Certification Procedures (https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_2all.pdf)

Additional Questions and Answers added below on August 2, 2023

Q: Our agency would like to have “walk-in” clinics for height/weight/hemoglobin measurements and then complete the appointment remotely later. Is that ok?

A: Walk-in clinics for measurements with remote completion of appointments can be one of the methods an agency uses for serving participants. However, the methods offered must meet the needs of the individual participant. Give participants a choice. Create appointment scheduling that accommodates participant work schedules and transportation needs. A scheduled time for an appointment must be provided for working families if needed, per federal regulations. Minnesota WIC policy is being updated to include this expectation.

Offer flexible scheduling with a combination of appointment methods which should include:

- Same or next day appointments.
- Scheduled appointments in the future.
- Walk-in appointments as time allows.
- Early morning, lunchtime, and late day appointments.

Q: We will continue to provide some WIC services remotely after August 9th. What are best practices when responding to phone calls?

A: Local WIC agencies should have staff available to answer phone calls, schedule appointments, and answer questions at the time participants contact their WIC clinic.

Keep in mind that working participants may have limited break time to connect with WIC. Establish a phone procedure which limits participant attempts to try and connect with the WIC program. To minimize staff and participant time spent on calls, and to reduce potential loss of benefits:

- Address participant needs at the time of their call.
- Respond to voicemail messages the same day unless there are special circumstances.
- Indicate when the participant can expect a call back in the WIC clinic's voice mail message.

Use Participant Centered Services and support participants as needed. For more tips on phone interactions, see the topic of the month, [Communication and Counseling Over the Phone](#).

Please submit your questions about the ARPA Guidance to your state consultant.

Reference – Complete Listing of Hyperlinks

Implementation of WIC ARPA Waivers

(<https://www.health.state.mn.us/docs/people/wic/localagency/arpaguide.pdf>)

Suggested Process for Implementing ARPA Waivers

(<https://www.health.state.mn.us/docs/people/wic/localagency/arpaprocess.pdf>)

Section 8.3: Issuing WIC Cards

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch8/sctn8_3.pdf)

Section 8.5: Replacing WIC Cards

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch8/sctn8_5.pdf)

Participant Signature Form (<https://redcap.health.state.mn.us/redcap/surveys/?s=TD4P4PEJPT>)

Section 5.10, Mid-Certification

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_10.pdf)

Data Privacy

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_7.pdf)

Exhibit 1-K, WIC Rights and Responsibilities

(<https://www.health.state.mn.us/people/wic/rights.html>)

Section 5.2, Certification Procedures

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_2all.pdf)

Communication and Counseling Over the Phone

(<https://www.health.state.mn.us/docs/people/wic/localagency/wedupdate/2021/topic/0602phone.pdf>)

Minnesota Department of Health - WIC Program, 625 Robert St. N, PO BOX 64975, ST PAUL MN 55164-0975; 1-800-657-3942, health.wic@state.mn.us, www.health.state.mn.us; to obtain this information in a different format, call: 1-800-657-3942.