



Alaska WIC Policy

Chapter 7: Nutrition Services and Administration Expenditures (NSA) and Local Agency Reports

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Policy Title	NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES AND REPORTS	Item	NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES AND REPORTS
Policy Number	NSAE 1.0	Effective Date	March 27, 2015

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Definitions
 - 246.2
 - page 353 (NSA)

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(a)(1) and (c)(1) through (d)
 - page 422-424

Purpose: Guidance on the expectations for SFY caseload Performance Standard (PS).

Each local WIC agency is expected to meet or exceed the assigned caseload for the current SFY. Caseload levels directly relate to not only the local agency grant but to the state’s overall funding allocation.

The WIC program is complying with the Department of Health and Social Service’s directive for Results Based Budgeting (RBB) and has, in FY 16, implemented a Mid-Year WIC Funding Reallocation process to equitably distribute program funds based on each local agency’s Performance Standards. Performance standard (target/assigned caseload according to the funding formula) will drive funding of local agencies and updated funding determined mid-year to reallocate funds accordingly. Grants will be adjusted dependent upon a six month average compared to the PS.

The State WIC Staff will provide technical assistance to local agencies to help achieve their PS expectations.



Alaska WIC Policy

Policy Title	NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES AND REPORTS	Item	NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES AND REPORTS
Policy Number	NSAE 1.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To present the WIC Nutrition Services and Administration (NSA) Expenditure and Reporting policies, which provide direction to Local Agency WIC Programs regarding required staffing, budgets, federal workplace requirements and reporting.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Definitions
 - 246.2
 - page 353 (NSA)

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(a)(1) and (c)(1) through (d)
 - page 422-424

Policy

Nutrition Services and Administration (NSA) Expenditures & Local Agency Reports

The NSA Expenditure policies provide direction for:

- Fund allocation
- Local Agency staffing requirements
- Budget management
- Nutrition education, breastfeeding and indirect costs
- Local Agency reporting



Alaska WIC Policy

Policy Title	ALLOCATION OF FUNDS	Item	ALLOCATION OF FUNDS
Policy Number	NSAE 2.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe how federal funding is provided to the State WIC Office, and in turn awarded to Local Agencies who then provide benefits to WIC Participants.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Distribution of Funds
 - 246.16(a)(1-6) and 246.16(b) through (c)(4)
 - page 425-429

Policy

Allocation of Funds

Funding for the Alaska WIC program is provided by the United States Department of Agriculture (USDA) to the State of Alaska as a food grant and a Nutrition Services and Administration (NSA) grant. The State WIC Office administers food funds. Local Agencies are awarded NSA funding through annual grants. The Department of Health and Social Services awards WIC funds through a Grant Agreement (GA) upon approval of an agency's grant application. Local Agencies apply for grant funding via a Request for Proposal or through a Request for Application in continuing years of a multi-year procurement process.

By entering into a grant agreement, the grantee agrees to comply with the provisions of the WIC Assurances, Local Agency Memos, as well as the WIC Policy and Procedure manual, as periodically updated for changes in the State statutes and Federal requirements, both of which are incorporated into the terms of the Grant Agreement.

Grantees shall meet the Performance Standard listed on the funding formula spreadsheet for their agency. If the Performance Standard is not met and maintained, after a term of six months, grant funding may be reduced in proportion to the actual caseload currently served.



Alaska WIC Policy

Policy Title	LOCAL AGENCY BUDGETS: ALLOCATION PROCESS	Item	LOCAL AGENCY BUDGETS: ALLOCATION PROCESS
Policy Number	NSAE 2.1	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe how the State WIC Office funds are allocated between the individual Local WIC Agencies.

Authority

State WIC Office based on available state funding:
Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Distribution of Funds
 - 246.16(d-e)
 - page 429-430

Policy

Local Agency Budgets: Allocation Process

The Local Agency budget will be determined by a funding formula. The funding formula has three category allocations. The first category is based on the Local Agency caseload. Rural / urban adjustment and travel costs are also used as factors in the funding formula



Alaska WIC Policy

Policy Title	REALLOCATION PROCESS	Item	REALLOCATION PROCESS
Policy Number	NSAE 2.2	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the method used to allocate additional funds after the Local Agency WIC grants have been awarded to Local WIC Agencies, when additional NSA funds become available for distribution.

Authority

State of Alaska GEMS system

State WIC Office based on:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Distribution of Funds
 - 246.16(e)(1)
 - page 430

Policy

Reallocation Process

If additional NSA funds for Local Agency use become available during the state fiscal year, Local Agencies will be notified of the availability of additional funds by email. The Local Agency will be directed to submit an amended budget through GEMS, the DHSS online grant system. An amended Grant Award (GA) will be issued by DHSS which must be signed by the Local Agency and returned to DHSS to be fully executed before expenditures may be claimed. Reallocation of existing or additional funds will be started in January of the current fiscal year and may be based upon the set Performance Standard for each local WIC agency.



Alaska WIC Policy

Policy Title	ACCESS TO SERVICES	Item	CLINIC HOURS AND STAFFING AVAILABILITY
Policy Number	NSAE 2.3	Effective Date	April 17, 2015

Purpose

To ensure participant access to WIC services.

Authority Federal Regulations: 7CFR Ch 246.7 and State WIC Office

Policy

Permanent and satellite clinics make up the composition of local agency WIC service sites for WIC participants. Permanent WIC clinics constitute a static clinic site, serving applicants/participants during standard times and days of the week. Satellite clinics are clinic sites that support the operation of the WIC local agency but are not considered primary clinics in the agency. The satellite clinics can be rotating in location, days and times available for WIC business. Examples of satellite clinics are sites visited during village travel, service provision to special populations such as the Infant Learning Program or a church serving primarily migrant populations.

To ensure that potential applicants and WIC participants have access to services, WIC local agencies serving greater than 500 clients / month are required to be open five days per week, eight hours/day. Satellite clinics can have reduced hours depending on caseload. Local agencies’ permanent and satellite clinics are encouraged to offer extended or weekend hours, if feasible, to accommodate the needs of working families or through appointments outside standard working hours, as needed.

Local agency/clinics are encouraged to be available (i.e. through staggered schedule) during lunch hours to accommodate applicants/ participants who are employed.

Key staff; WIC Coordinators, WIC Assistant Coordinators, CPAs and office assistant staff are expected to be on site at their designated office to facilitate WIC processes and clinic flow. On-site staffing is necessary to cover staff gaps during scheduled vacations and unexpected employee illnesses in addition to the day-to-day WIC duties. Any exception to this policy requires approval by the state WIC office prior to implementation.

Any local agency with more than one clinic site is responsible for updating those staff with policy changes, management findings and other information pertinent to the management and operation of the WIC program.



Alaska WIC Policy

Policy Title	LOCAL AGENCY STAFFING REQUIREMENTS	Item	LOCAL AGENCY STAFFING REQUIREMENTS
Policy Number	NSAE 3.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the staffing requirements Local Agencies must adhere to when hiring WIC staff; to assure WIC staff meet minimum personnel qualifications.

Authority

State WIC Office based on:

State Staffing Requirements:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(e-f)
 - page 356-357

Local Agency Staffing Requirements:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(2)
 - page 364

WIC Nutrition Services Standards: Standard 1(C-F), Staff Qualifications, Roles, and Responsibilities (October 2001, page 13-15)

Policy

Local Agency Staffing Requirements

When hiring WIC staff, Local Agencies must meet minimum qualifications set in the following related polices:

- Local Agency Coordinator
- Competent Professional Authority (CPA)



Alaska WIC Policy

Policy Title	LOCAL AGENCY COORDINATOR STAFFING REQUIREMENT	Item	LOCAL AGENCY COORDINATOR STAFFING REQUIREMENT
Policy Number	NSAE 3.1	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the qualifications a person must possess, in order to hold the position of Local Agency WIC Coordinator.

Authority

State WIC Office based on:

State Staffing Requirements:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(e-f)
 - page 356-357 and

WIC Nutrition Services Standards: Standard 1(C-F), Staff Qualifications, Roles, and Responsibilities (August 2013, page 13-21)

Policy

Local Agency Coordinator Staffing Requirement

A person must be designated by each Local Agency to be responsible for coordination, management, and operation of the WIC Program. Qualifications for the Local Agency Coordinator position requires the WIC Coordinator to have a professional degree in addition to extensive experience in performing a full range of administrative, management, including human resources, duties. The WIC Coordinator is the lead staff to provide program oversight and management. The WIC Coordinator’s position will be similar to the State of Alaska definitions for professional degree requirements and substitutions of a Public Health Specialist I. In addition to the professional degree requirements and substitutions listed below, the State will also allow a Registered Dietitian.

A bachelor's degree from an accredited college in public health, health administration, nursing, nutrition, epidemiology, health sciences, health education, family and consumer science with emphasis in nutrition, community health, the biological sciences, or a closely related field.

AND

Two years of professional experience administering or providing specialized health care or public health services or programs. The required professional experience includes work such as a Registered Nurse, Public Health Nurse, Nurse Consultant, Health Program Specialist or Manager, Health and Social Services Planner, Nutritionist, Health Practitioner, Advanced Nurse Practitioner, Physician’s Assistant.

Or:



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A Bachelor's Degree from an accredited college in addition to 5 years of current WIC administrative or managerial experience.

Prior to hiring this substitution must be approved by the State of Alaska WIC Program staff.

A waiver to the policy may be approved after careful consideration by the local WIC agency in conjunction with the State WIC office. The State WIC office has final approval of hires under this circumstance.

If a candidate does not meet the minimal Coordinator requirements and the local agency feels that their candidate is viable, follow the steps below:

1. Send copies of the job description and candidate's resume to the State WIC office.
2. Set up a meeting with the State WIC office to discuss the candidate's qualifications and consideration for the position.
3. The State WIC office must approve the Coordinator prior to hiring.
4. Upon hire, the Coordinator must test out of the Alaska WIC CPA Tests. If the Coordinator cannot pass the exam, completion of the CPA modules are required and passing the test must be completed prior to the end of the minimal probationary period.
5. Coordinators hired under this circumstance shall have a probationary period of not less than three months.

Substitution: A master's degree from an accredited college in one of the required fields above will substitute for two years of the required work experience.

When the WIC program is large enough to justify an Assistant WIC Coordinator, this person must meet the same qualifications as the WIC Coordinator position as described above.

Key Staff: WIC Coordinators, WIC Assistant Coordinators, CPAs and office assistant are expected to be physically present at the local agency or satellite clinic site to facilitate WIC processes, clinic flow and supervise staff, as needed. On-site staffing helps cover staff gaps during scheduled vacations and unexpected employee illnesses in addition to the day-to-day WIC duties such as seeing participants face to face. Any exception to this policy requires approval by the State WIC office prior to implementation.

Notification of Clinic Changes

Circumstances such as travel, meetings and illness may necessitate an occasional change to standard office hours. If your clinic or clinic staff have a temporary change in their availability, notification should occur which includes updating outgoing phone messages, email accounts and posting door signs of the closure or temporary absence from work. Alternate contacts should be included in the notifications so clients, other WIC agencies, vendors and state staff have a means to contact someone in cases of emergency.



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Local Agency Coordinator's phone messages should always include days of the week and times they are available and provide a contact name and number for immediate assistance in the event they are unavailable. Out of the office emails should include days of absence and a contact number for immediate assistance.

New WIC Coordinators must complete the required SPIRIT on-line training within 15 calendar days of hire. If the WIC Coordinator has had previous SPIRIT application experience, they need to read the SPIRIT scripts to understand Alaska business practices within 15 calendar days of hire.



Alaska WIC Policy

Policy Title	LOCAL AGENCY REGISTERED DIETITIAN STAFFING REQUIREMENT	Item	LOCAL AGENCY COORDINATOR STAFFING REQUIREMENT
Policy Number	NSAE 3.2	Effective Date	July 2013

Purpose

Local agencies must employ a Registered Dietitian as a permanent staff member, not a contractor.

Authority

State WIC Office based on:

State Staffing Requirements:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(e-f)
 - page 356-357 and

WIC Nutrition Services Standards: Standard 1(C-F), Staff Qualifications, Roles, and Responsibilities (October 2001, page 13-15)

Policy

WIC grantees must have a Registered Dietitian or Nutritionist as a permanent staff position in their WIC grant. This position does not have to be a full-time equivalent, but must have managerial and/or supervisory authority for WIC nutrition services. This position must be responsible for the following: training WIC staff, development & implementation of the nutrition education plan, selection of nutrition education materials, implementation of new and revised nutrition risk criteria, implementation of WIC policy changes at the state and federal level, breastfeeding promotion and support, approval of ENPR, development of high risk nutrition care plans and oversight of its implementation by the CPA.

Local WIC agencies are required to have an RD or licensed nutritionist on staff commensurate with program caseload. The RD/nutritionist may be a staff person or the WIC Coordinator. Agencies will be out of compliance if the person hired for this position is on contract or RD exam –eligible candidate.

If a staff vacancy for this position occurs, it is acceptable to temporarily hire a contract RD until the position is filled. Agencies must be proactive and begin recruitment as soon as a resignation letter is received from an incumbent.

Contracting with an RD should be a short-term solution to a vacancy while recruitment is ongoing. The contract must be approved by the State and contain, at minimum, the number of



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hours the contractor will work per week, scope of work, and budget. Local agencies are required to provide the State periodic updates on the status of their recruitment efforts, including the recruitment media used and agencies contacted.

Hiring of a contract RD is allowed temporarily for one quarter of the fiscal year. Any anticipated need beyond one quarter of the fiscal year requires a written request to discuss the situation further. The request must be sent to the State WIC office 15 days before the end of the quarter.

Contact the State WIC office when an agency's RD gives resignation notice for further guidance.



Alaska WIC Policy

Policy Title	COMPETENT PROFESSIONAL AUTHORITY (CPA) STAFFING REQUIREMENT	Item	COMPETENT PROFESSIONAL AUTHORITY (CPA) STAFFING REQUIREMENT
Policy Number	NSAE 3.3	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the qualifications a person must possess in order to hold the position of Local Agency WIC Competent Professional Authority (CPA).

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Definitions
 - 246.2
 - page 350 (CPA)

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(2)
 - page 364

WIC Nutrition Services Standards: Standard 1(C), Staff Qualifications, Roles, and Responsibilities (October 2001, page 13)

Policy

Competent Professional Authority (CPA)

A Local Agency must employ only competent professional authorities to determine nutritional risk through a medical and/or nutritional assessment. A competent professional authority (CPA) means an individual authorized to determine nutritional risk and prescribe supplemental foods. The following persons are the only persons the State WIC Office may authorize to serve as a competent professional authority: physicians, nutritionists (bachelor's or master's degree in nutritional sciences, community nutrition, clinical nutrition, dietetics, public health nutrition or home economics with emphasis in nutrition), dietitians, registered nurses, physician's assistants (certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority), or an Alaska WIC certified CPA who has passed the Alaska WIC Competent Professional Authority certification examination.



Alaska WIC Policy

Policy Title	LOCAL AGENCY HIRING FREEZES	Item	USDA MANDATE REGARDING FULL USE OF FUNDS
Policy Number	NSAE 3.4	Effective Date	October 1, 2010

Purpose

To address USDA-mandated staffing requirements during Local Agency hiring freezes.

Authority

Federal Regulations: 7CFR Part 246 Final Rule Summary, Section 361 which became effective 10/1/2010 in accordance with Section 445 of the HHFK Act. (6-26-11 Edition, page 37979)

Policy

Local Agency Hiring Freezes

If your agency has a “blanket” agency mandate for hiring freezes, work furloughs, and travel restrictions, WIC funds are not subject to these provisions.



Alaska WIC Policy

Policy Title	LOCAL AGENCY BUDGET MANAGEMENT	Item	LOCAL AGENCY BUDGET MANAGEMENT
Policy Number	NSAE 4.0	Effective Date	June, 2018

Purpose

To describe the required steps that a Local Agency must take when preparing, submitting and maintaining their WIC budget and financial reports to the State WIC Office.

Authority

State of Alaska GEMS system

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(8)
 - page 365

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Financial Management Systems
 - 246.13(b)
 - page 421

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Financial Management Systems
 - 246.13(j)
 - page 422

Alaska Administrative Code: 7 AAC 78

Policy

Local Agency Budget Management

Local Agencies are required to prepare and submit an annual budget as part of their application for a Grant Agreement with the Alaska Department of Health and Social Services. In the area of budget management, Local Agencies are responsible for all financial, audit, records management, and retention requirements identified in 7 AAC 78, as well as the provisions of the Grant Agreement, which include, but are not limited to:

- Maintenance of records which adequately identify the source and use of funds for program activities.
- Implementation of procedures which ensure prompt and accurate billing for allowable costs.



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- Implementation of procedures which accurately identify obligated program funds at the time obligations are made.
- Implementation of procedures which ensure timely and appropriate resolution of claims and other matters resulting from audit findings.

The Alaska state WIC Program receives federal funding each year on October 1. However, the state fiscal year starts July 1; therefore, WIC Grants are paid from two federal funding sources. To ensure that all federal funds are spent according to the appropriate federal fiscal year, we have the following funding procedures:

- a) WIC grantees **should** obligate 25% of the FY grant award between July 1 and September 30th.
- b) If 25% of the current FY grant award is not obligated in the first quarter (July 1 to September 30th) it **may** be reduced from the FY grant award as the State WIC office will offset the under expenditure with new federal fiscal year funding.
- c) **Annual grant Special Conditions will outline how grantee under or over expenditures during the first quarter will be handled.**

The State will accept amended Cumulative Fiscal Reports (CFR) for July, August, and September until November 30. Grantees must ensure that expenses are reported against the month's CFR in which they were incurred.

Funds may be moved into the travel line item for direct client services and upon state approval, for staff to attend WIC-related training opportunities to support state WIC goals and objectives. However, travel funds may not be moved from the travel line to any other line in the budget.

The State WIC Office will notify grantees if additional funding is available or if funding reductions must occur as an outcome of caseload distribution and/or funding restrictions.

Absences during state agency-sponsored meetings or required teleconferences may be cited as program non-compliance. Additionally, LAs may be asked to reimburse the State agency for a prorated portion of the cost of a mandatory training meeting that an LA Coordinator or representative fails to attend. It is the LA's responsibility to inform the State agency in a timely manner of irregularities or unforeseen circumstances that may impact required attendance of State agency-sponsored meetings.

WIC grantees may be allowed to purchase supplies and distribute them to other WIC grantees for that program's use, as long as:

- a. The expenditure is approved in the grantee's budget.
- b. There is a letter or written documentation of the approval from the State WIC office for the DHSS' and the grantee's files.
- c. If a LIBR is needed to move funds to the "Supplies line" item, there is sufficient budget narrative to clearly explain the purpose for which the funds will be used.



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Local agencies may use WIC funds to send staff to pertinent, applicable college-nutrition courses with pre-approval from the State WIC office. The course must have a direct relationship to the staff's current WIC duties. WIC funds cannot be used to pay for employee salary to take the course or to study for the course during WIC time. Staff may be asked to submit documentation of course completion.

WIC Coordinator must have regular access to the WIC budget and be assigned permissions from the grantee Agency's Power User for regular access at a minimum to "read" capacity in the GEMS system.



Alaska WIC Policy

Policy Title	ALLOWABLE LOCAL AGENCY COSTS	Item	ALLOWABLE LOCAL AGENCY COSTS
Policy Number	NSAE 4.1	Effective Date	June 30, 2012 (re-formatted)

Purpose

To list the specific costs that are allowed and considered necessary costs for fulfilling WIC Program objectives.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(a)(1) through (f)
 - page 422-424

Alaska Administrative Code: 7 AAC 78.160

Policy

Allowable Local Agency Costs

Costs necessary for the fulfillment of program objectives are considered allowable costs. They are operational or administrative costs, direct and indirect, as defined by OMB Circular A-133 and may be further restricted by the provisions of 7 AAC 78 as well as other specific conditions of grant award.

Specific allowable costs include:

- The cost of nutrition education. During each fiscal year 1/6 or approximately 17 percent of the funds expended for NSA costs must be used for nutrition education. Costs which can be applied to the one-sixth minimum amount are:
 - Salary and other costs for time spent on nutrition education consultations, whether with an individual or group.
 - Procuring and producing nutrition education materials including handouts, DVDs/CDs, thumb drives, food models or other teaching aids, and mailing nutrition education materials to participants. This also includes equipment such as kiosks, video conferencing tools, TV/DVD players, etc.
 - Training nutrition educators, including costs related to conducting training sessions and purchasing and producing training materials.
 - Conducting evaluations of nutrition education, including contractor involvement and time spent in the design of data collection forms and compilation and analysis of data.
 - Salary and other costs incurred in developing and evaluating Local Agency nutrition education plans.
 - Monitoring nutrition education, including related travel costs.



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- Interpreter and translator services to conduct nutrition education.
- The cost of certification procedures including:
 - Laboratory fees incurred for tests conducted to determine the eligibility of persons to participate in the program.
 - Expendable medical supplies necessary to determine the eligibility of the persons to participate in the program.
 - Measuring boards, skin fold calipers, equipment for testing for anemia, and scales used for determining the eligibility of persons.
 - Salary and other costs for time spent on certifications.
 - Hemocue cuvettes, gloves, lancets, and other medical supplies previously provided by the State WIC office. Grantees who do not comply with this requirement can be determined non-compliant and can have program funds with-held until corrective actions have been instituted and will incur all costs associated with not using the correct cuvettes.
 - State WIC-approved MICR printer toner cartridges. For new MICR printers: Source Technology Cartridge 10K Page Yield MICR Toner for 9620 MICR PR (A2461711).
 - Cost of relocating clinics, including WAN line installment.
- The cost of outreach services.
- The cost of vendor training and monitoring.
- The cost of translators for program materials and interpreters.
- The cost of fair hearings, including the cost of an independent medical assessment of the applicant, if necessary.
- The cost of transportation of rural participants to clinics with prior approval from the State WIC office to use WIC funds to provide such transportation and documentation that such service is considered essential to assure program access. Direct reimbursement to participants for transportation cost will be considered on a case-by-case basis and may not always be considered an allowable cost.
- The cost of monitoring and reviewing program operations.
- Local Agency federally negotiated indirect costs: See State Regulations 7 AAC 78.160 (p) and (q).(Alaska Administrative Code)
- Purchase computer equipment, hardware, and software using the State WIC Office specifications and requirements to ensure standardization in all clinics to adequately support and maintain WIC services.
- Providing IT support, maintenance, software security, and internet service costs following the roll-out of SPIRIT.
- Funds may be moved into the travel line item for direct client services and upon state approval.
- Cost to send one WIC employee to the Alaska Breastfeeding Coalition meeting. Sending additional WIC staff to the ABC meeting requires State approval. The request for additional training should be related to increasing caseload.



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Other costs that are allowable but require prior approval by the USDA through the State WIC Office, are costs for capital expenditures over \$5,000.00 and management studies performed by agencies or departments other than the State WIC Office or Local Agency.



Alaska WIC Policy

Policy Title	LOCAL AGENCY COSTS NOT ALLOWED	Item	LOCAL AGENCY COSTS NOT ALLOWED
Policy Number	NSAE 4.2	Effective Date	June, 2018

Purpose

To provide Local Agency guidance on what costs are not allowed.

Authority

State WIC Office

Policy

Local Agency Costs Not Allowed

The following costs are not allowed:

- Employee housing subsidies
- Employee severance pay
- Out-of-state travel unless authorized by WIC Director
- Professional membership and licensing fees such as membership in the American Dietetic Association, Alaska RD licensing fees or International Board Certified Lactation Consultant.
- Employee accrued leave if not already covered in the employee’s compensation such fringe benefits
- Hiring incentives
- Allowable under certain conditions. For example, if AKWICA meeting is in the hotel where everyone has lodging there, a car would not be necessary as there would not be driving back and forth to the meeting venue. If a WIC staff is traveling to Galena, Chitina, and other villages along the way to provide WIC services, use of a rental car or reimbursement for gas and mileage would be considered allowable expenditures.
- Paper plates, cups, bowls, plastic utensils, and coffee or creamer used for staff purpose.

Travel funds may not be moved from the “Travel Line Item” to any other line in the budget.



Alaska WIC Policy

Policy Title	PERSONAL USE OF COMPUTERS	Item	PERSONAL USE OF COMPUTERS
Policy Number	NSAE 4.2.1	Effective Date	June 30, 2012 (re-formatted)

Purpose

To provide Local Agencies guidance, regarding use of WIC computers for business versus personal use.

Authority

State WIC Office

Policy

Personal Use of Computers

WIC staff are prohibited from directly or indirectly using, or allowing the use of, WIC computer equipment and software for other than officially approved activities.

Some examples of unofficial use are:

- Computer games
- Personal Internet use
- Personal correspondence
- Personal diaries
- Book publication
- Hacking
- Personal record keeping

Grantees must ensure that WIC equipment such as computers, laptops, cell phones or other electronic equipment, etc., shall not be used/removed from the clinic for personal purposes to safeguard unauthorized access to participants' personal/private information.

Grantees are responsible for providing IT support, maintenance, software security, confidentiality, and internet service costs for the WIC IMS.



Alaska WIC Policy

Policy Title	SPIRIT SECURITY	Item	SPIRIT SECURITY & ELECTRONIC INFRASTRUCTURE
Policy Number	NSAE 4.2.2	Effective Date	December 22, 2014

Purpose

To ensure consistency of the system, maximize operational efficiencies and maintain data integrity.

Authority

State WIC Office

Policy

I. Use of the SPIRIT System for Supporting WIC Program Operations

Policy: Grantees are required to use the Alaska WIC “Successful Partners in Reaching Innovative Technologies” (SPIRIT) system to provide WIC Program services in their designated service area. Grantees are required to provide and maintain hardware and software in all their WIC clinics in accordance with specifications provided by the State of Alaska as Special Conditions in annual grant agreements. Grantees must provide and support a secure and reliable local area network in each clinic location.

Procedures:

a. Software/Hardware

Grantees are responsible for installing and maintaining in each WIC clinic location an internet connection sufficient to connect to SPIRIT and conduct WIC Program business, based on specifications provided by the State of Alaska.

1. Grantees will provide all software and hardware needed to use the WIC Information System. This includes computers, routers, firewalls, offline servers, printers, scanners and signature pads. An adequate inventory of hardware must be maintained to provide for new staff and replacement of failed equipment.
2. Grantees will provide computers with the State-specified version of the Windows operating system, the Alaska WIC SPIRIT desktop software, MS Word and Excel in a version compatible with the SPIRIT application as specified by the State of Alaska, hard disk encryption, and anti-virus software (real time/on-access).
3. Grantees will install the Alaska WIC SPIRIT desktop software only on computers designated for WIC business.
4. Grantees will keep all computers used to access Alaska WIC SPIRIT patched within one week of the vendor’s release of the patch. This includes security patches



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- for the operating system and all applications on the computers, as well as the SPIRIT desktop thick client.
5. Grantees will ensure that the operating system and the anti-virus software and virus definitions are regularly updated.
 6. Grantees may use their sponsoring agency's local standard anti-virus software and hard disk encryption, or any other product that encrypts other possible locations of WIC data, subject to approval by the State.
 7. Computers designated for WIC business may be configured as needed to connect to the local network.
 8. The State of Alaska will provide a list of software which has been determined by the SPIRIT User Group source code contractor to be incompatible with the WIC SPIRIT application. Grantees are advised not to allow incompatible software to be loaded onto computers used to access SPIRIT.
 9. Grantees must maintain a reliable list of all Alaska WIC SPIRIT users and computers on which the SPIRIT desktop software is installed.
 10. Grantees are required to report IP subnet ranges used for WIC Program services. This information will be placed within the State's firewall system to prevent unauthorized access to SPIRIT.

b. Support

1. SPIRIT is a web-enabled system which grantees connect to from their own network environment via a standard broadband internet connection. The State supports the application which is hosted in the State's environment. The database is centralized.
2. SPIRIT user accounts will be created by the SPIRIT Help Desk. Contact information for the Help Desk will be provided at a later date.
3. The grantee organization must provide a Local Area Network (LAN) in the grantee's WIC clinics as needed to operate the Source Technologies MICR benefit printers. The LAN must meet State-specified standards for security, firewall protection, and maintaining updates and patches on all equipment as necessary to protect confidential health information.
4. Grantees must provide technical support for initial set-up, maintenance and support of the local area network necessary to provide WIC Program services, including any ongoing connectivity issues. The support can be from local IT staff, contractors or Internet Service Providers. IT support must be available, responsive, and effective.
5. The State will not provide any desktop or network support to grantees. State IT staff are not able to "remote into" the grantee's environment without a State Wide Area Network connection. If a Grantee experiences difficulty with their internet connection or a computer becomes non-functional, or a computer won't print as expected, the office will need to get help with those problems from their own organization's IT staff.



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6. Cost of WIC office IT support from the grantee organization must be covered from the Local Agency WIC grant; if IT support is directly charged to the grant, the grantee's business office must provide sufficient detail about the organization's federally approved indirect rate methodology to demonstrate that direct-charged costs are not included in the indirect rate.
7. The State will not purchase any computer equipment for grantees. Grantees will buy all WIC computer equipment out of their grant funds in accordance with specifications provided by the State for desktop operating system, hard disk encryption standards, minimum computer memory, brand and model of check printer.
8. All previously-provided State equipment (except the Source Technologies 9620 PR MICR printers provided by the State in 2010 and the clinics' report printers) will be removed from the grantee's WIC office when SPIRIT rolls out. This includes all routers, switches, servers, desktop and laptop computers and any other equipment owned by the State (i.e., on the State inventory). The State will provide one-time funds in FY14 grants for grantees to replace the State-owned computers and for the initial purchase of signature pads and scanners necessary to use SPIRIT. The State will not provide direct technical support to users for MICR printers; however, grantees will be able to access warranty service for MICR printers until the end of the existing State-purchased extended warranty.
9. The SPIRIT software includes an online Help feature for most data fields. The WIC Program State Office will provide technical assistance on WIC policy issues related to use of SPIRIT. During the initial setup of SPIRIT, the State will provide resources and training to help with equipment and telecommunications set up. For ongoing support, the State will provide training to grantee IT staff and WIC staff to have onsite support. In the event that more help is needed, the State will have a SPIRIT Help Desk to offer assistance to grantees with the SPIRIT problems specifically related to the State hosting environment.

II. SPIRIT System Security

Policy: Grantees must ensure the security of networks used to access and operate the Alaska WIC SPIRIT Information System, and the security of data and computer equipment through an appropriate mix of technical, administrative, and managerial controls. Information obtained from individuals applying for, or participating in the WIC Program is considered private and may not be disclosed to any unauthorized person(s). **WIC Clinics are restricted from using client information for purposes other than providing WIC services and as outlined in the signed client Rights and Responsibilities form.**

Purpose: To prevent fraud, avoid theft, and ensure data privacy and integrity.

Procedures:



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a. User Authentication

1. Each grantee staff member must use her/his own username and password when accessing the system. The system tracks all activities by username. A computer should never be used without entering a unique user name and password.
2. SPIRIT passwords will expire every 90 days. Grantees must enforce the following strong password requirements when their employees set SPIRIT passwords:
 - i. Passwords must have a minimum length of 8 characters
 - ii. The password must contain a combination of the following character sets: lower-case alphabet letters, upper-case alphabet letters, numbers, and special characters (such as \$, (, %, @).
 - iii. The password cannot be a word that would appear in a dictionary and must not be based on personal information (e.g., a pet name) or other identifiers (e.g., a social security number).
 - iv. A user must immediately change the password if there is any reason to think that it could have been compromised.
 - v. The user must select a new password each time a change is made; a password should never be reused for SPIRIT.
 - vi. SPIRIT users may not share their password with anyone else, including supervisors.
 - vii. SPIRIT users must contact the SPIRIT Help Desk immediately in the event of compromised, lost or stolen passwords.
3. SPIRIT will lock out a user after seven invalid attempts to login. Any user experiencing lockout due to invalid ID or password must immediately contact the SPIRIT Help Desk to reestablish access to the system.
4. Terminating grantee personnel access to SPIRIT: Grantees are required to immediately notify the SPIRIT Help Desk to delete access of any employee involuntarily terminated from the WIC Program, and to notify the SPIRIT Help Desk in advance of the expected last day of work/access to SPIRIT when an employee voluntary leaves the WIC Program. The WIC Program Service Provider Computer Security Agreement (Attachment #6) will be used for this notification.

b. Security Breach

1. If there is a breach of security such as infection of grantee equipment with a computer virus, or stolen computer equipment or media with participant data, grantees must immediately contact the SPIRIT Help Desk and provide the following information:
 - i. List of missing or compromised equipment
 - ii. Agency name and number
 - iii. Location where infection, loss or theft occurred
 - iv. Date and time infection/loss/theft occurred (actual if known, or estimated)
 - v. Circumstances involved



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- vi. Provide a copy of the police report information if applicable

c. Physical Security

1. Local Agencies must secure WIC computer equipment and software at all times including during transport and storage; storage facilities must be adequately secured.
 - i. When transporting equipment: computers, portable printers, scanners signature pads and should not be left in automobiles overnight. Bring equipment indoors to protect it from theft and extreme temperature changes.
2. Grantees must secure any copies of the Alaska WIC SPIRIT desktop software.
3. Grantees must maintain an inventory of their organization's WIC Program computer equipment and verify its accuracy.
4. Grantees must protect the security of electronic and hard copy WIC data maintained on the grantee's premises and on grantee computer equipment:
 - i. Grantees must maintain written procedures to ensure that unauthorized individuals cannot read, copy, alter, or steal printed or electronic WIC information.
 - ii. Grantees must maintain written procedures for ensuring that only authorized SPIRIT users receive or deliver input and output information.
 - iii. Grantees must maintain written procedures for shredding or otherwise destroying hard copy WIC data when it is no longer needed for WIC Program purposes.
 - iv. Grantees must maintain written procedures and controls for transporting or mailing media or printed output.
 - v. Grantees must maintain written procedures for sanitizing grantee-owned computer equipment and electronic media used for WIC Program service delivery for reuse or disposal, consistent with the provisions of the Grant Agreement Appendix J (DHSS Privacy & Security Procedures for Grantees).
 - vi. Grantees must enable an operating system screen saver with passwords on all computers used to deliver WIC Program services. Desktop timeout must occur after no longer than 15 minutes. This protects the confidentiality of participant data and protects the logged-in user from other staff entering data, making modifications, or printing vouchers.
 - vii. A workstation should also be locked when not in use or when left unattended. Press Ctrl + Alt + Del and click the Lock Workstation button. The logged in user's password will need to be entered to unlock the computer.
5. Grantees must protect the physical security of check stock provided to the grantees for issuance of WIC Program benefits as specified in the Alaska WIC Policies & Procedures and must report lost or stolen check stock immediately to the WIC Program State Office.

d. Removable Storage:

1. Storage of data on removable media or devices is meant for short-term use only and should be removed immediately after its use.



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2. All removable storage that contains ANY participant information should be encrypted at the same level as other WIC Program computer equipment.
 3. When not in use, store the removable storage media and devices in a locked location, such as a locked desk or locked file cabinet.
 4. All removable storage media and devices should be treated as if they contain private information even after they have been erased.
 5. WIC associated CD or DVD material, which contains participant data, should be securely erased, broken, or shredded before disposal.
- e. **Training:**
1. Grantees must provide training on security policies and security awareness to each WIC employee prior to first use of the Alaska WIC SPIRIT system and document such training in the employee's personnel file.
 2. Grantees must provide update/refresher training on security policies annually to each WIC employee and document such training in the employee's personnel file.
- f. **Compliance:**
1. Grantee compliance with SPIRIT security policy terms and conditions will be included in Management Evaluations conducted by WIC State Office personnel.
 2. Grantees will be subject to on-site technical audits by State of Alaska personnel at any time during normal business hours.
 3. All WIC SPIRIT users must sign the Alaska WIC SPIRIT User Agreement prior to receiving login credentials to the SPIRIT system (Attachment #6). Signed copies of the document must be maintained in the users' personnel file for the retention period specified in the grantee's personnel policies for personnel documents.
 4. The State reserves the right to implement additional access/authentication/enforcement tools such as Network Access Controls to enforce WIC SPIRIT security policies.



Alaska WIC Policy

Policy Title	REPORTING AND REVIEWING EXPENDITURES	Item	REPORTING AND REVIEWING EXPENDITURES: BUDGET REVISIONS AND GL
Policy Number	NSAE 4.3	Effective Date	June, 2018

Purpose

To describe the process the State WIC Office uses to review Local Agency line item and cost category expenditures and process Line Item Budget Revisions (LIBR).

Authority

State Office based on:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart G- Miscellaneous Provisions- Records and Reports
 - 246.25(a) through (b)(1)(E)
 - page 450

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Financial Management Systems
 - 246.13(b)
 - page 421

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart F- Monitoring and Review- Management Evaluation and Monitoring Reviews
 - 246.19(b)(1-3)
 - page 445-446

Alaska Administrative Code: 7 AAC 78.260 (f)

Policy

Reporting and Reviewing Expenditures

Expenditures will be reviewed in accordance with the approved grant budget. Requests for Line Item Budget Revisions (LIBR) may be required prior to changes to the approved budget in order to qualify for payment.

Local agencies must submit all LIBRs through the GEMS system. Additionally, Cumulative Fiscal Report(s) (CFR's) are submitted monthly through GEMS, the DHSS online grant system. Local Agencies are reimbursed based directly on this report. The report must be received by the State WIC Office no later than the 30th day of the following month. NSA funds may be withheld for late submission of an expenditure report. When the grantee anticipates changes to the budget for any line item they should refer to: The Alaska Administrative Code; 7 AAC 78.260 (f) for more information. Further information can also be obtained from the Grants and Contracts contact person for WIC.



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State WIC Office staff conducts on-site management evaluation (ME) reviews of Local Agency administrative expenditures every two years in addition to the monthly review of expenditure reports submitted or other claims submitted for reimbursement.

Budget Revisions

A Line Item Budget Revision (LIBR) must be submitted through the GEMS electronic system.

General Ledger

The purpose of the General Ledger (GL) is to ensure control and accountability for Program grants and funds. A review of actual items purchased or a check to confirm items were allowable and categorized correctly is the intent of requiring a GL be submitted along with each month's CRF.

Grantees should submit monthly GL through the state Grants and Contracts system, GEMS. The GL provides detail of how funding is spent by budget categories. Each budget category total within the GL should match the total for the line item budget category listed on the CFR. Details on the GL should reflect approved WIC budget items and that they are categorized correctly.



Alaska WIC Policy

Policy Title	ACCESS TO FUNDS	Item	ACCESS TO FUNDS
Policy Number	NSAE 4.4	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the process used by the State WIC Office to reimburse Local Agencies for approved WIC expenditures.

Authority

State of Alaska

Policy

Access to Funds

The State WIC Office reimburses Local Agencies for approved expenditures on a monthly basis. Local Agencies are provided with funds in advance only under extraordinary circumstances, which must be pre-approved by the State WIC Office subject to the submission of required supporting documentation.

Local Agencies receive reimbursement through the Electronic Deposit Interchange (EDI). The State of Alaska Electronic Payments Program uses the Financial EDI process to enable the electronic transfer of payments directly to a bank account. Grantees who wish to enroll for electronic deposit should refer to the instructions posted by the Alaska Department of Administration, Division of Finance at http://fin.admin.state.ak.us/dof/electronic_payments/index.jsp.

Grant payments may be withheld pending receipt of required documents including but not limited to: signed assurances, disaster plan, inventory, nutrition services plan, logic models, quarterly reports, annual surveys, corrective action plan (CAP) approval, and contingency plan. If CAPs are late and findings continue to be unresolved, local agency (LA) will also be added to the following year's on-site Management Evaluation (ME) list again rather than receiving an ME every two years, depending upon the severity of the findings and the degree to which the LA is perceived to be unresponsive to the state's request for information or technical assistance.

Contingency plans must include back up plans on how an agency will be managed and operated in the event that staff are out of the office for greater than five business days. The plan should include contact information, who will answer the phones, receive/give out applications, make appointments, complete certifications, issue benefits, provide nutrition education and or high risk referrals and counseling, complete and submit financial and quarterly reports, etc. The plan should also address days and hours of operation and alternate contact (with name and telephone number) if days and hours of operation are reduced due staff absences. The State agency must be notified prior to a known absence of 10 business days or more. Updates to contingency plans must be forwarded to the state for review and approval.



Alaska WIC Policy

Policy Title	NUTRITION EDUCATION AND BREASTFEEDING PROMOTION COSTS	Item	NUTRITION EDUCATION AND BREASTFEEDING PROMOTION COSTS
Policy Number	NSAE 5.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the proportion of funds that must be spent in the area of nutrition education activities and breastfeeding promotion.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(c)(1)
 - page 423

WIC Nutrition Services Standards: Standard 1, Staff Qualifications, Roles, Responsibilities (October 2011, page 11)

Policy

Nutrition Education and Breastfeeding Promotion Costs

During each fiscal year, approximately 17 percent of NSA expenditures must be for nutrition education activities and breastfeeding promotion and support activities. In addition, an amount will be set each year by the USDA targeted specifically for breastfeeding promotion and support activities. Expenses for these activities must be reported in the Monthly Expenditure Report.



Alaska WIC Policy

Policy Title	PARTICIPANT AND VENDOR COLLECTIONS	Item	PARTICIPANT AND VENDOR COLLECTIONS
Policy Number	NSAE 6.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the process for which the State WIC Office may use funds collected from participants and vendors.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(e)(1-5)
 - page 424

Policy

Participant and Vendor Collections

The State WIC Office may use funds collected from participants and vendors in the fiscal year in which the initial obligation was made, in which the funds are collected, or after the funds are collected, provided certain conditions are met. Before the State WIC Office may credit such recoveries, it must provide vendors and participants with a means to appeal the claim action. For vendor claims, the State WIC Office must provide vendors with an opportunity to justify or correct the claim; for participant claims, the State WIC Office must provide participants with an administrative hearing. Because regulations do not require the State WIC Office to provide the Local Agency with a full administrative review for Local Agency claims, unless a claim affects the Local Agency's participation, the State WIC Office has the discretion to determine the level of review provided for Local Agency claims.



Alaska WIC Policy

Policy Title	INDIRECT COST	Item	INDIRECT COST
Policy Number	NSAE 7.0	Effective Date	December 19, 2012

Purpose

Timely notification regarding any changes to current indirect cost rate agreement.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Program Costs
 - 246.14(a)(1)(ii)
 - page 422

Policy

Indirect Cost

The State requires that any updates to the current negotiated indirect rate agreement must be forwarded to DHSS' Grants and Contracts by the WIC local agency.



Alaska WIC Policy

Policy Title	AUDITS	Item	AUDITS
Policy Number	NSAE 8.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the process the State WIC Office uses for auditing Local Agency financial statements.

Authority

State WIC Office based on:
Alaska Administrative Code: 7 AAC 78.230 and

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart F- Monitoring and Review- Audits
 - 246.20
 - page 446

Policy

Audits

Under 7 AAC 78.230, at least once every two years, DHSS requires that all grantees have a fiscal audit of the program performed by an independent certified public accountant. In lieu of that audit, DHSS will accept either a State or Federal Single Audit. For more clarification contact Grants and Contracts or see 7 AAC 78.230 for further details.

Local Agencies are required to forward copies of their audited financial statement, as well as any federal single audit compliance report, to the DHSS Chief Auditor.

Local Agency corrective action plans that address audit findings must also be sent to the DHSS Chief Auditor with a copy to the WIC Director. The State WIC Office will track audits to determine if the same problems are recurring from year-to-year. The State WIC Office will take action to ensure that all amounts owing are recovered. Recovered claims amounts from a prior fiscal year are returned to the FCS. Recovered claims amounts are reallocated if collected within the same fiscal year.



Alaska WIC Policy

Policy Title	FEDERAL FUND REQUIREMENTS	Item	FEDERAL FUND REQUIREMENTS
Policy Number	NSAE 9.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To list the conditions Local Agencies are required to follow when receiving federal WIC funds.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(b)
 - page 356

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(1-4)
 - page 364-365

Policy

Federal Requirements

The following are conditions required of agencies expending federal WIC funds:

- Debarment and Suspension
- Drug Free Workplace
- Lobbying Restrictions
- No Smoking Policy



Alaska WIC Policy

Policy Title	DEBARMENT AND SUSPENSION	Item	DEBARMENT AND SUSPENSION
Policy Number	NSAE 9.1	Effective Date	June 30, 2012 (re-formatted)

Purpose

To provide Local Agencies with guidance on the federal requirement regarding non-procurement of goods and services from entities which had been debarred or suspended from entering into contracts with grantees of federal funds.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(b)
 - page 356

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- State Plan
 - 246.4(a)(23)
 - page 361

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(1)
 - page 364

Policy

Debarment and Suspension

The State WIC Office as well as Local Agencies comply with the requirements of 7 CFR part 3017 regarding non-procurement of goods and services from entities which have been debarred or suspended from entering into contracts or agreements with grantees and sub-grantees of Federal funds. The State WIC Office requires grantees or contractors to submit a signed Federal Certifications and Assurances form as part of the annual WIC grant application. Contractor compliance must be ascertained prior to award of any contract expending state or federal funds. The State WIC Office checks for grantee compliance during on-site monitoring reviews.

The State WIC Office may suspend a person or agency from consideration for a contract if there is probable cause for debarment and compelling reasons require suspension to protect state and federal interests. The suspension may not exceed three years.



Alaska WIC Policy

Policy Title	DRUG-FREE WORKPLACE	Item	DRUG-FREE WORKPLACE
Policy Number	NSAE 9.2	Effective Date	June 30, 2012 (re-formatted)

Purpose

To state the policy that Local Agencies must maintain a drug-free workplace.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(b)
 - page 356

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- State Plan
 - 246.4(a)(24)
 - page 361

Policy

Drug-Free Workplace

The State WIC Office and Local Agency comply with the requirements of 7 CFR part 3018 regarding maintenance of a drug-free workplace. A signed certification regarding a drug-free workplace is included in the Federal Certifications and Assurances that must be attached to the Local Agency's grant annual application.

The State of Alaska provides a drug-free workplace. All employees, at orientation, are issued drug-free workplace statements informing them of the 1) dangers of drug abuse in the workplace; 2) the state's policy of maintaining a drug-free workplace; 3) any drug counseling, rehabilitation, and employee assistance programs that are available; and 4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace. A Drug-Free Workplace Certification must be posted in work areas.



Alaska WIC Policy

Policy Title	RESTRICTIONS ON LOBBYING	Item	RESTRICTIONS ON LOBBYING
Policy Number	NSAE 9.3	Effective Date	June 30, 2012 (re-formatted)

Purpose

To state the policy that Local Agencies may not use federal funds for lobbying.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart A- General- Administration
 - 246.3(b) and (c)(2)
 - page 356

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(1)
 - page 364

Policy

Restrictions on Lobbying

The State WIC Office and Local Agencies comply with the requirements of 7 CFR part 3018 regarding anti-lobbying restrictions. The State WIC Office requires grantees/contractors to submit a signed DHSS Assurances form, as well as the Federal Certifications and Assurances form, stating that state or federal funds may not be used for the purpose of influencing legislative action. “Influencing legislative action” means promoting, advocating, supporting, modifying, opposing or delaying or seeking to do the same with respect to any legislative action, but does not include the provision or use of information, statistics, studies, or analyses in written or oral form or format.

Grantee/contractor compliance is determined during on-site monitoring reviews. Expenditures and related records are reviewed for indications of lobbying activities, publications, or other materials intended for influencing legislation or similar type costs. Personnel and payroll records are reviewed to identify persons whose responsibilities or activities involve political activity.



Alaska WIC Policy

Policy Title	NO SMOKING POLICY	Item	NO SMOKING POLICY
Policy Number	NSAE 9.4	Effective Date	June 30, 2012 (re-formatted)

Purpose

To state the policy that Local Agencies must have and follow a smoke free workplace plan.

Authority

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart B- State and Local Agency Eligibility- Agreements with Local Agencies
 - 246.6(b)(4)
 - page 365

Policy

No Smoking Policy

The State WIC Office and Local Agencies comply with the legislative mandate prohibiting the allocation of funds to any clinic providing WIC services if the clinic allows smoking within the space used to perform WIC program functions.

Each local WIC agency and/or clinic must have an announced public policy against smoking in any area where WIC program functions are performed. At a minimum, this requirement is satisfied by having “No Smoking” signs prominently displayed in the clinic(s).

The prohibition against smoking applies only during the times that the WIC Program is actually operating at a clinic site. For example, a satellite clinic site such as church basement or community health center where WIC services may only be offered once or twice a week, is not required to implement the no smoking policy for those times when the WIC Program is not operating.



Alaska WIC Policy

Policy Title	LOCAL AGENCY REPORTS	Item	LOCAL AGENCY REPORTS
Policy Number	NSAE 10.0	Effective Date	June 30, 2012 (re-formatted)

Purpose

To list the reports that the Local Agency is required to complete and submit to the State WIC Office.

Authority

State WIC Office

Policy

Local Agency Reports

The following reports must be completed by the Local WIC Agency:

- Time Study
- Local Agency Equipment Inventory
- Quarterly Reports
- Logic Model
- Results Based Budgeting
- Vendor Reports (verbal clarifications & email)

A table showing required reports and due dates may be found at the end of this policy.

Local Agency Report Schedule

WIC LOCAL AGENCY REPORT SCHEDULE

Reporting Month	Date Due: 30 Days after the Reporting Month	Title of Report- Reports are submitted into GEMS unless indicated otherwise
January		
	March 2nd	WIC Cumulative Fiscal Report (CFR)
	March 2nd	Time Study Summary Report
	March 2nd	General Ledger
	March 2nd	WIC Quarterly Narrative, Results Based Budgeting (RBB) & Vendor Reports
February		
	March 30th	Time Study Summary Report
	March 30th	WIC Cumulative Fiscal Report (CFR)
March	April 30 th	WIC Cumulative Fiscal Report (CFR)
	April 30 th	Time Study Summary Report
		February Inventory Reports: Computer equipment and other WIC Equipment
April		
	May 30 th	WIC Cumulative Fiscal Report (CFR)
	May 30 th	Time Study Summary Report
		General Ledger
	May 30th	WIC Quarterly Narrative, Results Based Budgeting (RBB) & Vendor Reports
	May 30th	Annual Survey Results (paper)
May		
	June 30 th	WIC Cumulative Fiscal Report (CFR)
	June 30 th	Time Study Summary Report
June	July 30 th	WIC Cumulative Fiscal Report (CFR)
	July 30 th	Time Study Summary Report
July		
	August 30 th	WIC Cumulative Fiscal Report (CFR)
	August 30 th	Time Study Summary Report
		General Ledger
	August 30 th	WIC Quarterly Narrative, Results Based Budgeting (RBB) & Vendor Reports
August		
	September 30 th	WIC Cumulative Fiscal Report (CFR)
	September 30 th	Time Study Summary Report
September	October 30 th	WIC Cumulative Fiscal Report (CFR)
	October 30 th	Time Study Summary Report
October		
	November 30 th	WIC Cumulative Fiscal Report (CFR)
	November 30 th	Time Study Summary Report

		General Ledger
	November 30th	WIC Quarterly Narrative, Results Based Budgeting (RBB) & Vendor Reports
November		
	December 30 th	WIC Cumulative Fiscal Report (CFR)
	December 30 th	Time Study Summary Report
December	January 30 th	WIC Cumulative Fiscal Report (CFR)
	January 30 th	Time Study Summary Report



Alaska WIC Policy

Policy Title	TIME STUDY	Item	TIME STUDY: DAILY LOG, STUDY SUMMARY, COST CATEGORIES
Policy Number	NSAE 10.1	Effective Date	June 2018

Purpose

To describe the process Local Agencies must use when completing and submitting required time studies to document WIC personnel cost categories to the State WIC Office.

Authority

State WIC Office

Policy

Time Study

Time studies are used to calculate personnel costs for all WIC funded staff. Local Agencies must conduct time studies during the first week of every month, summarize the information, and report totals to the State WIC Office.

Time studies also collect information on supplies and commodities purchased for breastfeeding promotion, nutrition education expenditures and client services. Expenses to include on the time study:

- supplies to educate participants in understanding the importance of nutrition to health,
- supplies to help participants to achieve positive change in dietary habits,
- printing costs associated with nutrition and breastfeeding materials,
- travel costs to conferences associated with nutrition education and breastfeeding promotion and support,
- breastfeeding aides
- hematological equipment and supplies
- anthropometric equipment

Document on the time study items purchased from the previous month's expenditures. Local agency Coordinator's may need to confer with their financial staff to help identify total costs to document on the time study.

Time studies must be documented by Local Agencies on the Time Study Daily Log and Time Study- Summary forms found at: <http://dhss.alaska.gov/dpa/Pages/nutri/wic/localagencies/laforms.asp>. The completed Time Study Summary forms for each staff person must be received by the state Grants and Contracts office in Juneau no later than the 30th of each month. Time study logs and summaries must be kept on file at the Local Agency for three years after the end of the federal fiscal year (October 1 through September 30) during which they were made.

Time Study Daily Log



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Local Agency staff, whether full-time or partially funded as a part of NSA costs must keep daily Time Study Daily Logs for each work day the first week of every month. If an employee is on annual leave during the first week period, the Log should be kept for a similar number of days **normally worked**, prior to the due date of the 30th of each month. **If an employee takes less than 5 hours of unexpected leave during the time study week, they may use that time study for their monthly time study.**

A Time Study Daily Log covering a consecutive 5 day period must be completed by each WIC staff person and other Local Agency staff being paid part-time with WIC funds. Each Daily Log covers a one-day period worked excluding vacation or leave time taken. Days with typically normal work functions should be selected. Time Study Daily Log forms are kept on file at the Local Agency. **Time study's that include days with personal or sick leave should reflect only the time worked. Annual and sick leave are not counted towards the four cost categories.**

Time Study Summary

At the end of the one week period, using the completed Time Study Daily Logs, a Time Study Summary for each staff person is completed by the Local Agency. The hours are totaled and the percentages calculated (column hours are divided by the total hours in order to calculate the percentage). The Salary and Benefits Calculation by Cost Category total must be completed by the Local Agency.

Cost Categories for Time Studies

Time studies require staff to categorize work time in each of four areas: general administration, nutrition education, breastfeeding promotion, and client services. Examples of tasks related to each of the four areas are included on the Time Study Cost Category information sheet with the time study forms at the end of this policy. Each staff person filling out time study logs should be given a copy of this information sheet.

The examples listed on this information sheet are not all inclusive. These examples are merely intended to illustrate typical functions for each area.

TIME STUDY COST CATEGORY INFORMATION SHEET

A time study must be completed every first week of the month excluding vacation or scheduled leave time taken. This is to provide the U.S. Department of Agriculture a thorough breakdown of utilization of funds by program area. Weeks that are typical of the way the clinic normally functions should be selected.

To do this, each Local Agency staff person should carefully record using the Time Study form, exactly how time is spent in a one week period in the following areas of operation:

1. GENERAL ADMINISTRATION – All costs (direct or indirect) generally considered as overhead or management costs. General management costs include those costs associated with program monitoring, prevention of fraud, general oversight and food instrument accountability. Examples include WIC administrative salaries/benefits and other costs necessary to conduct outreach, food instrument reconciliation, monitoring and payment, vendor monitoring, to keep administrative records and to prepare and maintain fiscal and program management reports.

Other examples include general management clerical support, the cost of payroll and personnel systems, accounting and bookkeeping, audits and other financial services and legal services. Additional examples include cost of staff training, general oversight and supervision, preparation of time cards, and travels costs related to the above activities.

2. NUTRITION EDUCATION – All costs directly related to general nutrition education activities. Annually, 1/6th or 17% of a grantee's grant must be spent in this category. Examples include salaries/benefits, travel and training costs for WIC staff who plan or conduct nutrition education, costs to develop/procure, print and distribute nutrition education materials, cost of equipment required to conduct nutrition education training, interpreter and translator services to facilitate training, and costs associated with evaluating and monitoring nutrition education. Providing individual or group education sessions, including planning and preparation time, and space costs.
3. BREASTFEEDING – All costs expended for promotion and support of breastfeeding. Annually, FNS determines the target amount that each State must spend in this area. Examples include salary/benefits of WIC staff who plan or conduct educational and other services to promote or support breastfeeding, and other actions to encourage continuation of breastfeeding, costs to develop/procure, print and distribute educational materials related to breastfeeding promotion and support, clinic space devoted to breastfeeding educational and training activities including space aside for nursing. Costs to train staff in breastfeeding activities. Costs for monitoring and evaluating breastfeeding activities, purchasing breastfeeding aids, including breast pumps. Travel costs including authorized per diem, related to the above activities.
4. CLIENT SERVICES – All costs expended to deliver food and other client services and benefits. Examples include WIC staff salaries/benefits and medical supplies and equipment necessary to conduct diet and health assessments required in the certification

process, salary/benefits of WIC staff who issue food instruments and explain their use, WIC staff salary/benefits and other costs necessary to refer client to other health care and social services, to coordinate services with other programs, to participate in activities which promote a broader range of health and social services for participants, and to conduct and participate in surveys/studies which evaluate the impact of WIC on its participants. **Additional costs include cost of staff training, identity, residency, income eligibility determination, clinic preparation, participant phone calls, evaluating effectiveness of client services, immunization activities, voter registration activities, and travel costs, including authorized per diem, related to the above activities.**

Note: The examples listed for each functional cost category are not all inclusive. These examples are merely intended to illustrate that when cost are reported by functional category, salaries/benefits, data processing, supplies and equipment, communications, postage and freight, travel, rent and utilities, etc. must be provided to the applicable functional category.

Financial Forms

The Time Study Master, Daily Log Time Study – Summary, Quarterly Narrative Report and Property Inventory Report are available at:

<http://dhss.alaska.gov/dpa/Pages/nutri/wic/localagencies/laforms.asp>.



Alaska WIC Policy

Policy Title	LOCAL AGENCY EQUIPMENT INVENTORY REPORT	Item	LOCAL AGENCY EQUIPMENT INVENTORY REPORT AND DISPOSITION
Policy Number	NSAE 10.2	Effective Date	November 19, 2015

Purpose

To define items considered to be equipment and describe the process for inventorying and disposing of that equipment.

Authority

State WIC Office based on:

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart G- Miscellaneous Provisions- Procurement and Property Management
 - 246.24(d) and 246.25(a)(3)
 - page 449 and 450

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart G- Miscellaneous Provisions- Records and Reports
 - 246.25(a)(1)
 - page 450

Federal Regulations: 7CFR Ch. II (1-1-12 Edition)

- Subpart E- State Agency Provisions- Financial Management Systems
 - 246.13(a)
 - Page 421

Policy

Local Agency Equipment Report

All equipment purchased with WIC funds by Local Agencies is State of Alaska property. A Local Agency inventory of this equipment must be completed once a year. All equipment must be tracked on the Local Agency Controlled Property Inventory form included at the end of this policy and should be completed mid February and submitted into GEMS along with other February reports. The form is located at:

The form is located at:

<http://dhss.alaska.gov/dpa/Pages/nutri/wic/localagencies/laforms.aspx>.

“Equipment” means non-expendable items such as hemocue and Pronto machines, multi-use electric breast pumps, computer equipment, television sets, audio-visual equipment, projectors, printers, signature pads, video teleconferencing equipment, iPads, vehicles, copy machines and kiosks.



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All Local Agency equipment with a purchase price of \$5,000 or more which was purchased with WIC funds must be shown on the Local Agency Controlled Property Inventory. Serial numbers and State of Alaska property tag numbers, if the items have State tags, must be shown on the inventory report. State of Alaska property tag number tags are affixed in all equipment with a purchase price of \$5,000 or more, such as copy machines or kiosks, purchased by the State of Alaska for Local Agency use.

Disposition of Equipment

Any equipment with state tags must be returned to the state or disposed of according to state regulations, with prior approval of the State WIC Office in Juneau. Local Agencies must consult with the State WIC Office in Juneau prior to the disposition of any other equipment originally received from the State WIC Office, or purchased with WIC funds by the Local Agency. **The disposition form “Property Salvage/Destruction Request” is found at:** http://dhss.alaska.gov/dpa/Documents/dpa/programs/nutri/downloads/Admin/Forms/outdated_WIC_equipment.pdf.

Reporting on Real Property

The Federal awarding agency or pass-through entity must require a non-Federal entity to submit reports at least annually on the status of real property in which the Federal Government retains an interest, unless the Federal interest in the real property extends 15 years or longer. In those instances where the Federal interest attached is for a period of 15 years or more, the Federal awarding agency or pass-through entity, at its option, may require the non-Federal entity to report at various multi-year frequencies (e.g., every two years or every three years, not to exceed a five-year reporting period; or a Federal awarding agency or pass-through entity may require annual reporting for the first three years of a Federal award and thereafter require reporting every five years).

Attached are the Office of Management and Budget’s links to related areas discussed in the policy. Please review and familiarize yourself of the provisions that relate to your program if applicable.

Definitions and Processes: <http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1>

Depreciation: http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#se2.1.200_1436

Equipment: http://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#se2.1.200_1439

Policy Title	QUARTERLY REPORTS	Item	QUARTERLY REPORTS
Policy Number	NSAE 10.3	Effective Date	June 30, 2012 (re-formatted)

Purpose

To describe the process Local Agencies must use when completing and submitting the WIC Local Agency Quarterly Report.

Authority

State WIC Office

Policy

Quarterly Reports

Local Agencies are required to submit written quarterly narrative progress reports to the State WIC Office. The original should be sent to Grants and Contracts personnel identified in your current grant agreement, by phone, facsimile or through mail in care of the identified contact to the Grants and Contract Support Team, PO Box 110650 Juneau, AK 99811-0650. The reporting schedule is included in the terms of the Grant Agreement. The reporting schedule is also located on the WIC LOCAL AGENCY REPORTING SCHEDULE FORM. Please note that the quarterly narrative report must be on the form located at:

<http://dhss.alaska.gov/dpa/Pages/nutri/wic/localagencies/laforms.aspx>. The appropriate Expenditure Report must be submitted on GEMS 30 days after the reporting month.