

**West Virginia Department of Health
Office of Nutrition Services
Alternate Operating Procedures**

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I. Background

This Alternative Operating Procedure (AOP) document outlines the Continuity of Operations (COOP) priority for the Office of Nutrition Services (ONS), within the West Virginia Department of Health, which is to provide continued Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) services and a healthy and safe environment for participants and staff in the clinics, distribution sites, authorized grocery stores, and local, regional, and state offices. The AOP/COOP Plan is used as a guide to help ensure that all essential functions of ONS and its Programs will continue to be performed under all threats and conditions. ONS staff can achieve the latter while also minimizing the impact on its mission, participants, Programs, personnel, and information technology operations. Critical employees have been identified and understand what is expected of them during a public health emergency, natural disaster or supply chain disruption.

The ONS, in the event of an emergency or major disaster affecting large numbers of participants, will take those resources necessary to:

- A. Provide for the safety of personnel and equipment;
- B. Secure records, equipment, materials and supplies;
- C. Restore WIC Program operations and delivery of service as soon as possible;
- D. Support the emergency procedures of the West Virginia Office of Emergency Services.

The extent of disaster preparation depends on the type of disaster.

- E. When there is advance notice that a WIC clinic may be damaged by a flood, WIC personnel will attempt to remove vehicles, computer equipment, participant charts, medical supplies and equipment to a secure location.
- F. When a WIC clinic is struck by lightning which causes a fire, there is no time to make advance preparation. In this case, it is important that all people inside the building leave **immediately** and call the fire department.

When there is advance notice that a disaster may occur, the Local Agency Director will take immediate action upon receipt of the notice.

During a disaster, the mission of the West Virginia WIC Program remains the same:

To improve the health of women, infants and children in West Virginia through the provision of nutrition and breastfeeding counseling, health monitoring and the provision of nutritious supplemental foods.

This Office of Nutrition Services' Alternative Operating Procedure document will be reviewed and updated as required.

II. Coordination and Communication

- A. The following designated emergency contacts within the State Agency (SA) for disasters, emergencies, public health emergencies, supplemental food recalls and other supply chain disruptions to ensure that the appropriate entities (e.g., Regional

Offices, other State Agencies and Coordinating programs) are aware of the SA's designated contacts.

Area	Emergency Contact	Office Phone
State Agency Disaster Coordination	Office Director	304-352-0960
Administration/Nutrition Services	Deputy Director	304-352-0967
Vendor Management	Division Director	304-352-0964
Nutrition Services	Nutrition Services Coordinator	304-352-0967
Crossroads/MIS Services	Division Director	304-352-0958

- B. The above named individuals will be tasked with providing contact information for key SA staff on the SA's public website and to ensure that this information is kept up to date. They will also ensure that the appropriate entities (e.g., Regional Offices, or other State agencies, coordinating Programs) are aware of the SA's designated contact and to ensure that this information is kept up to date.

The Nutrition Services (NS) area will address the needs of participants with documented qualifying conditions receiving Food Package III. They will provide participants with a point of contact at their Local Clinic as well as the SA's public website for additional information. ONS will ensure this information is kept up to date.

- C. ONS will develop a plan that establishes a relationship with relief agencies responsible for disaster and public health emergency planning which includes the West Virginia Bureau for Public Health Continuity of Operations Plan (COOP) elements. The Office will coordinate with FEMA, relief organizations, State and local emergency operation centers and maintain a list of these agencies' contacts that is kept up to date. The State Agency Disaster Coordinator will identify WIC SA staff positions for full or partial deployment if needed through the duration of the disaster.
- D. ONS will develop a communication plan to keep FNS, State and Local Agency (LA) staff, authorized WIC vendors, WIC participants and the public informed during an emergency, food recalls or other supply chain disruption. ONS will maintain the Community Service Directory (ATT 1), utilize active vendor listing in Crossroads and FNS contact sheet (ATT 2), to keep those entities informed during the disasters. LAs through the SA will utilize Documentation of Disaster Problems and Resolutions (ATT 3), to keep FNS apprised of disaster related issues. Through the LA and SA websites participants and the general public will be advised of program changes that affect their area.
- E. The Local Agency Director will use the list of responsibilities and designated personnel on the Emergency Preparedness Meetings, Drills and Test Exercises form that was completed during a staff meeting to discuss the emergency plan as a check list for preparation.

- F. The Local Agency Director will: Maintain contact with SA, media and local sources of food assistance for information and maintain contact with WIC personnel for notification of preparedness and problems.
- G. The Local Agency Director will be responsible for the following:
 - 1. Assuring that annual pre-disaster preparation is completed;
 - 2. Maintaining communication with SA, WIC personnel, the media and local sources of food assistance during the initial disaster alert/activation phase, during the disaster and during the restoration/recovery phase; and
 - 3. Assuring that pre-disaster procedures and restoration/recovery procedures following a disaster are followed and documented according to the AOP

III. Continuation of Benefits

To meet requirement or implement waivers the SA must first determine if the disaster meets one of the following criteria:

- A. A presidentially declared major disaster as defined under Section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act, 42 U.S.C. 5121 et seq.)
- B. A presidentially declared emergency as defined under the Stafford Act
- C. A public health emergency declared by the Secretary of Health and Human Services under Section 319 of the Public Health Service Act (42 U.S.C. 247d)
- D. A renewal of such a public health emergency
- E. A supply chain disruption as declared by the Secretary of Agriculture.

In conjunction with the State's Emergency Operation Center, if SA determines one these events exist, the SA will request a waiver to continue WIC services.

Waivers may be requested to address:

- A. Physical presence for participants such a remote/virtual certification appointment
- B. Separation of duties
- C. Vendor and local agency monitoring

Alternate operating procedures are already available:

- A. Certification/serving applicants and participants from an alternate WIC clinic and providing nutrition assessment and referral to other organizations
- B. Set up mobile or satellite clinic to certify/serve applicants and participants and providing nutrition assessment and referral to other organizations
- C. Allowing temporary certifications for applicants who are missing only one proof
- D. Collection of anthropometric and bloodwork data for participants through alternate means such as the West Virginia Health Information Network
- E. The collection of eligibility documentation (secure website upload, mobile device screen share, mail, secure email and video conference)
- F. The collection of signatures on required documents

G. Replacement of EBT cards and destroyed supplemental foods, See WV Policy & Procedures 1.10.F & 3.07.A

H. Mailing of EBT Cards

If an EBT card is mailed, clinic should use first class mail with one of the following phrases included on the envelope: “Do Not Forward, Return to Sender” or “Do Not Forward, Address Correction Requested.” The exterior of the envelope will not mention WIC or “Women, Infants, and Children” including on the return address and will not use envelopes with windows.

I. Verification of Certification (VOC) Issuance – See WV Policy and Procedure 1.10.E

The SA and LA will update their public web pages/social media accounts with instructions for obtaining an up-to-date VOC and to notify neighboring State agencies of where a VOC may be obtained by displaced participants. This policy should help to expedite the certification process and ease transition to another SA.

IV. Benefit Issuance and Redemption

The Crossroads WV databases are backed up nightly and the servers have failover if one server goes down. WV is looking at Cloud and hosted solutions. WV has only had one day that the system was down in the past 10 years and clients could not be certified. Clients with benefits could still redeem their benefits at the store during that time. If a clinic has infrastructure issues, other clinics can sign into the affected clinic and serve clients remotely.

The EBT system ensures robust telecommunications redundancy by utilizing commercial networks and available commercial POS terminals, or FIS-installed WIC-only stand-beside hardware, for benefit redemption. To enhance system reliability, the system includes backup host processing capabilities that conform to federal regulations, national standards, and specified WIC State Office performance standards. These measures ensure continuous service availability and data integrity, even in the event of network or system failures.

Remote benefit issuance will be available for all appointments excluding an appointment to determine eligibility for a second or subsequent certification period.

A. WIC participants may require a change in food package during a disaster.

1. Ready-to-feed infant formula may be issued when water sources are not safe.
2. Formula in supply at the WIC clinic may be distributed to WIC participants, as necessary.
3. There are no exemptions or exceptions allowed when medical documentation is required for the issuance of certain supplemental foods, including exempt infant formulas during disasters.
4. A homeless food package may be issued to WIC participants with no storage and/or electricity.
5. WIC personnel will provide nutrition counseling and handouts about safety when cooking, eating and drinking following a disaster, as necessary.

B. EBT Card Replacement

1. EBT card replacement and benefit transfer will be completed on a daily basis as ONS is made aware. If needed, these replacements can be completed from an alternate location.
2. In areas where mail could be unreliable in a disaster or emergency, they could be picked up at the clinic.
3. If an emergency clinic is in place, an EBT card could be allocated to the client and later linked to the EBT account once the staff is connected to Crossroads.
4. The WIC Program will not replace food lost in a mass disaster where community emergency feeding services are provided. WIC personnel will be aware of locations of emergency feeding services and sources of clean water to be able to refer those who contact WIC for this type of assistance.
5. In the case of a natural disaster affecting large numbers of people in a regional or State nature where emergency declarations initiate action by Federal and State public and private disaster assistance providers, participants are not required to provide proof of disaster for food benefit replacement.
6. The State Agency will provide guidance on the replacement of benefits based on the situation.

The state agency will ensure they have enough funds before replacing lost EBT purchased supplemental foods. If the state agency does not have the funds, they will contact FNS for assistance.

V. Vendor Management

A. Alternative Procedures for Vendor Monitoring and Compliance Investigations

During a declared disaster affecting food supply chains or distribution networks, the State Agency activates its disaster recovery plan, which includes provisions for adjusting authorization requirements for new vendor applicants and authorized vendors. This adjustment allows expedited processing of new vendor applications and streamlines the renewal process for existing vendors to ensure continued access to supplemental foods by Women, Infants, and Children (WIC) program participants.

In this scenario, the State Agency may temporarily waive certain documentation or procedural requirements, prioritize essential inspections, or utilize electronic submission methods to facilitate swift authorization adjustments. These measures aim to maintain a robust vendor network capable of meeting increased demand during the disaster while adhering to program integrity and participant access standards.

B. Vendor Minimum Stocking Requirements (MSR) for Continuous WIC Food Distribution

To ensure uninterrupted distribution of supplemental foods to Women, Infants, and Children (WIC) program participants during disasters, this policy outlines procedures for

adjusting vendor Minimum Stocking Requirements (MSR). The State Agency will assess and communicate MSR adjustments promptly to vendors, ensuring adequate food supply in times of crisis. The plan also involves modifying state-specific minimum requirements for the variety and quantity of supplemental foods that vendors must stock to be authorized. For instance, this could involve lowering minimum stocking requirements to match federal standards when state-specific requirements are excessive or implementing a federal waiver. State agencies should consider variety and quantity when developing a plan to meet minimum stocking requirements. The State Agency will assess and communicate MSR adjustments promptly to vendors, ensuring adequate food supply in times of crisis.

1. Responsibilities:
 - a. The State Agency monitors and assesses food supply disruptions.
 - b. Establishes and communicates adjusted MSR procedures to vendors.
2. Procedure:
 - a. Activate the disaster recovery plan upon disaster declaration.
 - b. Assess disaster impact on food availability and adjust MSR accordingly.
 - c. Communicate adjusted MSR requirements promptly to vendors.
 - d. Vendors implement adjustments and provide inventory updates.
3. Monitoring and Evaluation:
 - a. Monitor effectiveness of adjusted MSR during disaster recovery.
 - b. Conduct regular evaluations for continuous improvement.
4. Review and Revision:

Annually review and update policy as necessary.

C. Adjusting Vendor Authorization Requirements During Emergencies

1. The State Agency will implement alternative procedures to meet annual vendor routine monitoring and compliance investigation requirements under 7 CFR 246.4(a)(14)(iv). These measures aim to maintain program integrity and ensure continued access to supplemental foods for WIC program participants.
 - a. Remote Monitoring: Use electronic methods for vendor compliance monitoring.
 - b. Prioritized Investigations: Focus on critical vendors for food distribution.
 - c. Flexible Documentation: Adjust documentation requirements temporarily for quicker compliance assessments.
 - d. Communication and Coordination: Maintain regular communication with local agencies and vendors about adjusted procedures.
 - e. Monitoring and Evaluation: Assess effectiveness of alternative procedures during disaster recovery and conduct post-disaster evaluations.
 - f. Review and Revision: Annual review and update of policies to align with regulatory changes and best practices.

VI. Nutrition Services

A. Food Delivery Procedures

1. Establish a Disaster Response Team
2. Designate a Disaster Coordinator within the WIC State agency to lead the response efforts.
3. Establish a working relationship with the State's emergency management agency and other relevant organizations (e.g., FEMA, American Red Cross).

The WIC Program will not replace food lost in a mass disaster where community emergency feeding services are provided. WIC personnel will be aware of locations of emergency feeding services and sources of clean water to be able to refer those who contact WIC for this type of assistance.

In the case of a natural disaster affecting large numbers of people in a regional or State nature where emergency declarations initiate action by Federal and State public and private disaster assistance providers, participants are not required to provide proof of disaster for food benefit replacement.

- a. The State Agency will provide guidance on the replacement of benefits based on the situation.
 - b. WIC participants may require a change in food package during a disaster.
 - i. Adjust food packages and authorized food lists to accommodate participants with limited access to food storage or preparation facilities.
 - c. Ready-to-feed infant formula may be issued when water sources are not safe.
 - d. Formula in supply at the WIC clinic may be distributed to WIC participants, as necessary.
 - i. Develop a schedule for food distribution to minimize congestion and ensure orderly access.
 - e. There are no exemptions or exceptions allowed when medical documentation is required for the issuance of certain supplemental foods, including exempt infant formulas during disasters.
 - f. A homeless food package may be issued to WIC participants with no storage and/or electricity.
 - g. WIC personnel will provide nutrition counseling and handouts about safety when cooking, eating and drinking following a disaster, as necessary.
4. Maintain up-to-date contact information for key staff members and partners.
 5. Develop a communication strategy to keep staff, participants, and partners informed about changes in WIC services during a disaster.
 - a. Use multiple communication channels, including websites, social media, email, and local media, to disseminate information.

B. Special Formulas

1. Strengthen partnerships with healthcare providers and hospitals to facilitate rapid collection of medical documentation needed to issue special formulas.

2. Special formula will be provided by the State contracted distribution center. The distribution center will ship requested special formulas to either the Local Agency clinic or the participant's home considering which one is more appropriate.

C. Breastfeeding Support for Participants

1. Utilize Pacify services to provide remote/virtual breastfeeding support as able.
2. Ensure trained breastfeeding peer counselors can provide support and assistance during emergencies. Peer counselor staff will educate breastfeeding participants on the importance of safe and adequate water consumption to maintain milk supply.
3. Distribute breastfeeding supplies, such as breast pumps and nursing pads, through WIC clinics and emergency distribution points.
4. Deploy breastfeeding peer counselors to emergency shelters and community centers to provide in-person breastfeeding support.