

B. STAFFING AND TRAINING

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B.1. Minimum Staffing Required for WIC Agencies

Policy: Minimum Staffing & Responsibilities

- I. Each WIC Agency must have the minimum staffing listed below. See Section K for more details on minimum breastfeeding staff required.
 - a. Local Agency Administrator/Director
 - i. Oversees policy and staff
 - b. Registered Dietitian(s)
 - i. Must be certified to practice dietetics in the State of Utah.
 - ii. Assist in writing the annual Nutrition Education Evaluation and Plan.
 - iii. Write and coordinate nutrition care plans for high risk participants.
 - iv. Approve designated special formulas.
 - v. Serve as a preceptor for nutrition modules.
 - c. Breastfeeding Coordinator
 - i. Must be a CPA.
 - ii. Is trained as a Lactation Educator through a program approved by the Breastfeeding Coordinator at the State agency.
 - iii. Coordinates breastfeeding promotion and support activities including training staff on clinic breastfeeding procedures.
 - iv. Coordinates and approves distribution and inventory of breastfeeding equipment and aids.
 - d. Module Preceptor(s)
 - i. Must be an RD for nutrition, laboratory and VENA modules.
 - ii. Must be a Lactation Educator for breastfeeding modules.
 - iii. Assigned by the WIC director for the clerical module.
 - iv. Coordinates use of modules and grading exams.
 - v. Monitors completion of Module Completion Log.
 - vi. Maintains current modules, instructor's guide, and training files for staff.
 - vii. The State precepts the administrative modules.
 - e. Local Agency Nutrition Preceptor
 - i. Must be an RD or BS in Nutrition.
 - ii. Coordinates the agency/clinic's nutrition class outlines and reviewing and evaluating nutrition education materials.
 - f. Outreach Coordinator
 - i. Identifies and provides information about the WIC program to a network of organizations and programs that serve the low income population.

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- g. Vendor Coordinator
 - i. Communicates with and monitors local agency vendors.
- h. Breastfeeding Peer Counselor
 - i. Provides mom to mom breastfeeding support

B.2. Competent Professional Authorities

Policy: Competent Professional Authorities

Each local agency must have a Competent Professional Authority (CPA) who is responsible for determining if a person is at nutritional risk and prescribing the food package for that individual. The CPA is required by section 246.7 of the Federal WIC regulations.

- I. The following persons are authorized to serve as a Competent Professional Authority (CPA1) for the Utah WIC Program:
 - a. Physician
 - i. MD, D.O. A copy of their current license must be kept in the WIC employee's file or on file in the official personnel records.
 - b. Registered Dietitian (RD)
 - i. state certified (CD).
 - ii. graduated with a bachelor's degree from an accredited college/university in the field of nutrition.
 - v. completed the American Dietetic Association (ADA) approved course work.
 - vi. has practicum experience approved by the ADA.
 - vii. has successfully completed a national exam testing competency in the field of nutrition. Must have a current ADA registration card and a registration number. A copy of their current state license and registration card must be kept in the WIC employee's file or on file in the official personnel records.
 - c. Registered Nurse (RN)
 - i. RN, B.S.N., C.N.M., or N.P.
 - ii. Degree must be from an accredited college/university. A copy of their current license must be kept in the WIC employee's file or on file in the official personnel records.
 - d. Certified Physician Assistant
 - i. Certified by the National Committee on Certification of Physician's Assistants or the State Medical certifying authority.
 - ii. Degree must be from an accredited college/university. A copy of their current license must be kept in the WIC employee's file or on file in the official personnel records.
 - e. Nutritionist with one of the following Bachelor's or Master's Degree from an accredited college with a copy of the transcript on kept in the WIC employee's file or on file in the official personnel records.

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- i. Human Nutrition
- ii. Nutritional Sciences
- iii. Community Nutrition
- iv. Clinical Nutrition
- viii. Dietetics
- ix. Public Health Nutrition
- x. Home Economics with a minor in Nutrition
- xi. Integrated Studies with a minimum of 24 upper division hours in nutrition as one of selected disciplines and 2 health related fields as remaining 2 disciplines

Policy: Competent Professional Authority – CPA2

The following individuals may function as a CPA2 only under the direct supervision of a CPA1 (see previous page for definition of CPA1). All nutrition risk assessments and food package assignments must be reviewed and cosigned/approved by a CPA1. Each agency/clinic must have a consistent system for documenting approval by the CPA1.

- I. The following are authorized to function as CPA2:
 - a. Licensed Practical Nurse (LPN)
 - i. Degree must be from an accredited program including completion of Basic Nutrition and Lifecycle Nutrition courses with a passing score of B. A copy of current license and college transcripts must be on file at the WIC clinic.
 - b. Diet Technician, Registered (DTR).
 - i. Must have completed an ADA approved Dietetic Technician program. A copy of current registration and transcripts must be kept on file at the WIC clinic.
 - c. Associate or Bachelor degree from an accredited college/university in a health related field.
 - d. Clinical Assistants who have 6 months of full time work experience or 1 year of part time work experience.

Procedure

- I. Approval of CAs to function as CPA2
 - a. Must receive State agency approval to hire.

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- b. Submit a copy of transcripts from an accredited college/university, including degree conferred, to the State WIC Nutrition Coordinator. A copy of transcripts must be kept in the WIC employee's file or on file in the official personnel records.
- c. Must receive written approval from State WIC Nutrition Coordinator (verbal approval may be documented pending written approval.)
- d. Approval letter must be kept on file at the local agency.
- e. Satisfactorily completed a life cycle nutrition course from an accredited college/university, or completed training in life cycle nutrition approved by the State WIC Nutrition Coordinator.
- f. Life cycle nutrition class/training must cover nutritional needs assessment and management of pregnant and postpartum women, infants, and children. The State WIC Nutrition Coordinator must approve all courses. A copy of their transcripts or documentation of completion of life cycle nutrition course or training modules must be kept in the WIC employee's file or on file in the official personnel records.

Policy: Competent Professional Authority Functions

- I. The CPA on staff at the local agency has the following responsibilities:
 - a. Nutrition assessment following VENA guidelines
 - b. Assigning food packages and food package changes
 - c. Determining ineligibility based on nutritional risk
 - d. Issuing supplemental formula to breastfeeding women
 - e. Assigning appropriate education/follow-up
 - f. Approving noncontract and hydrolysate formulas (Nutramigen, Alimentum, Pregestimil). RD must approve all other special formula requests.
 - g. Teaching classes

Policy: Chart approval waiver process

- I. Chart approval may be waived once the following 3 conditions have been met:

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- a. CPA2 has had all charts and/or computer work reviewed and cosigned by a CPA1 in the computer system:
 - i. 6 months for employees who work in the WIC Program full time
 - ii. 1 year for employees who work in the WIC program part time
 - iii. Must have satisfactory review of charts during this time period.

- b. CPA2 has shown satisfactory performances in all of the following areas as reviewed by the Registered Dietitian. RD to perform:
 - i. QA review on CPA2's charts including evaluation of non-contract and hydrolysate issuance.
 - ii. Observe nutrition risk assessment and counseling at certifications
 - iii. Observe teaching classes

- c. Initial evaluation by RD must be kept on file. CPA2 must also have annual evaluations of the above factors by an RD kept on file.

- d. Letter of recommendation from the clinic supervisor to the State Nutrition Coordinator based on RD evaluation.

- e. Grandfather clause:
 - i. Individuals who do not meet the above qualifications, but were approved by the State agency as a CPA prior to 7/97 are authorized to function as a CPA 1.
 - ii. An approval letter from the State agency must be on file at the local agency. Transcripts are not required for CPAs who were hired prior to 7/97.

B.3. Clinical Assistants

Policy: Clinical Assistants

The objective of using Clinical Assistants in the Utah WIC Program is to create an intermediate level of functioning professional which should ease the work flow in local agencies and assure that quality care is provided to WIC participants.

The following individuals are eligible to apply and qualify as a WIC CA:

1. Midlevel professional (person with associate or bachelors degree); or
2. Have completed at least 2 years of a nutrition program at an accredited college/university; or
3. Carefully selected clerical staff, who have worked for WIC for a minimum of one year.

Policy: CA functions

The CA on staff at the local agency may perform the following duties:

- I. Teach basic nutrition classes.
- II. Perform laboratory procedures.
- III. Graph growth grids.

Policy: Requirements to become a WIC CA

- I. Status Requirements Application Process:
 - a. New employees must possess an Associate or Bachelor Degree, OR
 - b. Have completed at least 2 years of a nutrition program at an accredited college/university.
 - c. Must submit a copy of their transcripts from an accredited college/university with a designation of the degree (if appropriate) given to the State WIC Nutrition Coordinator.
 - d. A copy of their transcripts must be kept on file at the WIC clinic or on file in the official personnel records.

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- e. The State WIC Nutrition Coordinator will send an approval letter to the local agency.
 - f. Approval letter must be kept on file at the local agency.
- II. In-house clerical applicants
- a. Must have graduated from high school, or passed equivalency exam
 - b. Worked in the WIC program for at least one year
 - c. Have a strong recommendation of the supervising dietitian and/or administrator
 - d. Completed all nutrition modules and other modules appropriate for duties assigned
- III. Submit the following information to the State WIC Nutrition Coordinator:
- a. Letter of recommendation from administrator/supervising dietitian,
 - b. Formal application (see Forms section in this manual),
 - c. Copy of completed and graded module exams and application checklists (if relevant to module).
- IV. The State WIC Nutrition Coordinator will send an approval letter to the local agency.
- V. Approval letter must be kept on file at the local agency.

B.4. Training Modules

Policy: Training Modules

The Utah WIC Program has developed several self-paced, competency based modules used to standardize training of new staff. Modules contain reading assignments, activities and evaluation components (progress checks and/or post tests). Copies of modules may be obtained from the State agency.

- I. Types of modules include:
 - a. Administrative Module(s):
 - i. Civil Rights
 - ii. Participant Violations
 - iii. Vendor Management
 - b. Breastfeeding Module(s):
 - i. Grow & Glow Modules
 - iii. Breastfeeding Promotion & Support Guidelines - Section K, of the Policy and Procedure Manual (through K.8.2)
 - c. Clerical Module
 - d. Laboratory Module(s): 
 - i. Anthropometric Assessment
 - ii. Laboratory Screening
 - e. Nutrition Module(s):
 - i. Basic Nutrition
 - ii. Life Cycle Nutrition * (obtain from State Nutrition coordinator)
 1. Maternal Nutrition
 2. Infant Nutrition
 3. Child/Adolescent Nutrition
 4. *Note: Life Cycle Nutrition module may be omitted if a copy of their transcript states they have successfully completed a Life Cycle Nutrition course at an accredited college/university. A copy of the transcripts must be kept in the staff member's file.
 - f. VENA Module(s):
 - i. Stages of Change
 - ii. VENA Module II

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Policy: Module Preceptor

Each agency must have a designated Module Preceptor. A State RD can act as local module preceptor if the preceptor position is vacant. The preceptor is responsible for: coordinating use of modules and grading exams; monitoring completion of application checklist; and maintaining current modules, instructor's guide, and training files for staff. Answer keys for most modules can be requested from the State WIC office.

Policy: Preceptor for Each Module

- I. A Registered Dietitian grades nutrition, laboratory and VENA modules.
- II. A Lactation Educator grades the breastfeeding modules.
- III. The local agency WIC Director assigns a staff member to grade the clerical module.
- IV. The State Vendor Coordinator grades Vendor Management and Participant Violations.
- V. The State Operations Coordinator grades Civil Rights.

Policy: Completion of Modules

- I. New staff must complete all assigned modules within 3 months of their hire date or as otherwise indicated by the State agency. Within 3 months means that completion can be done at 1 or 2 months after hire date. Civil Rights training must be completed within 60 days of employment.
- II. Existing WIC staff need to complete new and revised/updated modules within three months of notification of development or as otherwise indicated by the State agency.
- III. The Civil Rights training and test must be completed yearly by all staff members.
- IV. Local Agency Vendor Coordinators must complete the Vendor Management Module annually.
- V. New staff must be scheduled adequate work time to complete the assigned modules.
- VI. New staff must not be expected to complete them on their own time.

Policy: Documentation of module completion

Each staff member must have a file containing all completed activities and evaluation components (progress checks and/or post tests) for each assigned module. Exams must be numerically graded, dated, and signed by the module preceptor. Post test exams must have a score of pass or $\geq 80\%$ to pass. If a staff member fails a post test, the module must be read again and the test repeated until a passing grade is achieved. Preceptors should assess passing status for progress checks and activities to determine if additional training is needed.

Policy: Modules to be Completed

Assigned modules depend on what functions the staff member will be performing in the clinic. Staff should complete modules as their responsibilities in the clinic expand. See table entitled "Minimum Training Recommended for Each WIC Function" for a breakdown of assigned modules.

Policy: Exemption for RDs

Registered Dietitians are exempt from completing all nutrition modules with the exception of VENA modules. Registered Dietitians are required to complete VENA modules.

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B.5. Minimum Training Recommended for Each WIC Function

Policy: Minimum Training Recommended for Each WIC Function

Minimum training recommended for each WIC function and assigned based on the employee's predominant type of work in the WIC clinic.

* All RDs are exempt from completing nutrition modules (VENA modules are required)

** All CPA1s are exempt from completing the Life Cycle Nutrition module

WIC Function	Recommended Modules	Applicable Staff
Breastfeeding Peer Counseling	USDA Best Start Using Loving Support Breastfeeding Peer Counseling Curriculum	Breastfeeding Peer Counselor
Breastfeeding Promotion and Support	<ul style="list-style-type: none"> • Using Loving Support to Grow and Glow in WIC • Section K (through K.8.2) 	All Staff
Income Screening, Intake and Vouchering	<ul style="list-style-type: none"> • Applicable Computer Training • Clerical 	Intake Staff
Laboratory Screening	<ul style="list-style-type: none"> • Anthropometric  • Laboratory Screening 	Intake/Lab Staff
Nutrition Risk Assessment Food Package Assignment Nutrition Counseling	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* • Life Cycle Nutrition** • VENA Modules 	<ul style="list-style-type: none"> • CPA
Teaching Classes	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* • Life Cycle Nutrition** • VENA Modules 	<ul style="list-style-type: none"> • CPA • Health Educators
Teaching Classes	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* 	<ul style="list-style-type: none"> • CA • Health Educators
Writing or Approving High Risk Care Plans	<ul style="list-style-type: none"> • Laboratory Modules • VENA Modules 	<ul style="list-style-type: none"> • RD

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Approving Special and Non-contract formula prescriptions	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* • Life Cycle Nutrition** • VENA modules 	<ul style="list-style-type: none"> • RD required for authorization of all special formulas • RD required for authorization of Nutramigen, Alimentum, or Pregestimil only in high risk cases • RD or CPA required for non-contract formula approval.
Preparing Nutrition Education Evaluation and Plan	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* • Life Cycle Nutrition** 	<ul style="list-style-type: none"> • RD in conjunction with Administrator and Breastfeeding Coordinator
Nutrition and Breastfeeding Module Preceptor	<ul style="list-style-type: none"> • Laboratory Modules • Basic Nutrition* • Life Cycle Nutrition** • VENA Modules 	<ul style="list-style-type: none"> • RD.
Participant Violations	<ul style="list-style-type: none"> • Participant Violations 	<ul style="list-style-type: none"> • Yearly, for staff as assigned by clinic
Vendor Coordination	<ul style="list-style-type: none"> • Vendor Management 	<ul style="list-style-type: none"> • Yearly, for staff as assigned by clinic
General Training	<ul style="list-style-type: none"> • Civil Rights (yearly) 	<ul style="list-style-type: none"> • All staff

B.6. Staff Competencies Required

Policy: Staff Competencies Required to Conduct a Quality Nutrition Assessment

Assess and develop CPA staff competencies based on USDA VENA Guidance listed below. (Refer to Risk Factor Manual for further details.)

Procedure

- I. Foundational knowledge of nutrition
 - a. Understanding of the basic concepts of nutrition
 - b. Technical knowledge in maternal, infant, and child nutrition, and breastfeeding promotion and support
- II. Understanding of the components of WIC nutrition assessment
 - a. Familiarity with the WIC nutrition risk criteria
 - b. Good technique in anthropometric measurement and drawing blood
- III. Strong communication skills to build rapport and partnering
 - a. Active listening
 - b. Sensitive questioning
 - c. Writing clearly and concisely
- IV. Critical thinking skills
 - a. Using a systematic approach to collecting information
 - b. Ability to organize, synthesize, analyze, and evaluate information collected
 - c. Drawing appropriate conclusions and relationships from the information collected
 - d. Using appropriate open-ended questions to gather needed information
 - e. Ability to identify solutions and prioritize the issues discovered
- V. Practicing concise and meaningful documentation
 - a. Cultural competency

B.7. Nutrition In-Services and Continuing Education Hours

Policy: Nutrition In-services and Continuing Education Hours

Each CPA and CA must obtain 12 hours nutrition education annually. The local agency must provide nutrition in-services to all their CPAs/CAs at least quarterly. Additional in-service hours may be obtained through State agency provided training. In-services must be directly related to WIC nutrition education and be coordinated by a dietitian or other qualified staff. Each year, one in-service must be devoted to familiarizing local agency staff to their yearly Nutrition Education Plan. One in-service per year must also address a breastfeeding topic.

Policy: Staff Requirements

Nutrition in-services are mandatory for all staff that provide nutrition education for WIC participants. All clinic staff must attend the yearly breastfeeding in-service. If a staff member is absent during an in-service, they must make up the time by attending in-services at other clinics, watching professional videotapes, or reading pertinent nutrition articles. Document excused absences and make-up exercises from in-services in staff member's training file.

Policy: Evaluation of In-services

All in-services must be evaluated using the state "Nutrition In-service Evaluation form" (see Forms Section). An in-service file must be kept current at each local agency. This file will be reviewed during the annual management evaluation visit.

Policy: Staff Documentation of Nutrition Education Hours

- I. Each CPA and CA must keep a log of continuing nutrition education hours acquired. RDs do not need to keep a record of their CEUs. Appropriate education includes:
 - a. local agency nutrition in-services;
 - b. any conference/course/workshop that is approved for CEUs by the American Dietetic Association;
 - c. nutrition related workshops or lectures sponsored by Universities, hospitals or other credible organizations;
 - d. time spent completing WIC nutrition training modules;
 - e. any State agency sponsored nutrition/breastfeeding conference/workshop.