

# FY 2025 State Plan Proposed Changes & Comments

SECTION I- GOALS AND OBJECTIVES				
POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
<b>I. Vendor Management</b>				
<b>II. Nutrition Services &amp; Breastfeeding</b>				
<b>III. Information System</b>				
<b>IV. Organization &amp; Management</b>				
<b>V. NSA Expenditures</b>				
<b>VI. Food Funds Management</b>				
<b>VII. Caseload Management</b>				
<b>VIII. Certification, Eligibility and Coordination of Services</b>				
<b>IX. Food Delivery and Food Instrument Accountability and Control</b>				
<b>X. Monitoring and Audits</b>				
<b>XI. Civil Rights</b>				

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SECTION II LOCAL POLICY AND PROCEDURES (P&P)				
POLICY CHANGE/CLARIFICATION	FED RQ? Y/N	POLICY SECTION(S)	LOCAL AGENCY & PUBLIC COMMENTS	STATE AGENCY RESPONSES / ACTIONS
<b>I. Vendor Management</b>				
Clarified who can enter complaints into Vision. Encouraging written complaints.	N	Complaints against vendors	Utah Co: Section I. Do we need to have any kind of signature for an email complaint? Do we need to scan in the written or emailed complaint, or just note it in the customer service log?	No signatures are needed for written complaints. You do not need to scan in the written complaints in to VISION if they have been emailed to the state when you notify the state vendor coordinator about the complaint you have added to the Customer Service Log.
Added who enters training/monitoring evaluations into Vision	N	State and Local Responsibilities		
Small wording change	N	Vendor Authorization		
Removed a form we no longer use	N	Vendor Monitoring		
Changed shopping guide to vendor guide for vendor training	N	Vendor training		
<b>II. Nutrition Services &amp; Breastfeeding:</b>				
Updated to plain language. Updated table formatting.	N	Anthro and Lab Procedures	Davis: The wording still is very confusing. In the Hematological Testing section V under section c, the policy states the “infant” test is for infants <12 months old. In section d the title is Hematological tests for children aged 12 to 24 months old. In section d under #2 the	We updated the section headers. They now include: 9-12 months 13-24 months 2-5 years  We clarified the entire section C.

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			<p>policy states standard practice is to test when the participant is 12 months old and again when they're 15 to 18 months old. It's confusing to say less than 12 months, then say at 12 months, especially since the "child" test includes 12 months.</p> <p>Also, in section d ii. Policy states 2 hematological tests must be completed before the participant is 24 months old if they were first enrolled in WIC as an infant (&lt;12 months old). So if they were enrolled at 12 months or 13 months they only need 1 test before 2 and are good for a year as long as that first one is normal?</p> <p>Utah County: c.ii. This specifies what to do if they are 9 months old. What about 10 and 11-month-old infants? Should this be 9-11 months old?</p>	
Added that hematological data is only good if 90 days from the WIC appt (to match the referral data form).	N	Anthro and Lab Procedures		

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Added section to clarify what to do with hematological testing for pregnant, breastfeeding, and postpartum women.	N	Anthro and Lab Procedures	<p>Weber-Morgan: Does this mean that if a Non-Breastfeeding woman tests low but not high risk we should; 1) Adjust our scheduling and schedule her before she terminates to have another hgb check? 2) Check her HGB at the infant midcert only if the woman has not terminated yet? Or 3) We don't worry about the Hgb check because her regularly scheduled next appointment would be past or very near the point where she is no longer certified?</p> <p>Utah County: Thank you. This is helpful.</p>	You should check Hgb for a Non-breastfeeding woman that test low, but not high risk, at the infant midcert (usually 6 months after certification) if she has not terminated yet. You don't need to alter your typical schedule to try to test sooner than 6 months if she is low, and not high risk.
Updated issuance wording to match online eWIC lingo. (issue to account rather than load to card)	N	Certification Health Assessment		
Removed the "Benefit pickup" section – no longer relevant with Online eWIC.	N	Nutrition Education	<p>Utah County: This section specifies that we need to document that the client declines to set a goal and the "reason". Often if a client is declining to set a goal, they are not willing to tell you why. Is it possible to make the</p>	We clarified the wording to "CPAs must document if the participant declines goal setting."

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			reason for declining the goal be removed or not mandatory? This could put CPAs in an awkward situation and cause clients to complain also if they feel we are pressuring them.	
Rewording of language and sentences throughout to clarify.	N	Nutrition Education		
Added definition of stated ordered formula.	N	Ordering formula from the state		
Clarified instructions of how to select and create correct food packages when issuing state ordered formula.	N	Ordering formula from the state		
Clarified that a clinic receiving and issuance “log” is required and what it is to be used for.	N	Ordering formula from the state		
Updated information regarding submitting and returning orders due to the new SharePoint processes.	N	Ordering formula from the state		
Clarified the methods used to prorate special formula or alter the issuance period.	N	Ordering formula from the state	<p>Weber Morgan: Can we get clarification on what to do if the amount prescribed exceed the amount allowed and we are prorating? Do we base proration on the allowed amount? Or the prescribed amount?</p>	<p>X.b.i. states: “The amount of formula issued to a participant shall not exceed the prescribed amount on their FAFAF or the USDA MMA.” Proration should always be based on the amount prescribed on their FAFAF, but if the calculated amount is above the USDA MMA, the MMA must still be followed. This is the</p>

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				same as when ordering formula. This may mean that you may not actually issue less than you would for the whole month if the prescribed amount is over the MMA. If the prescribed amount is 5 per day of a formula that's 8.45 fl oz per carton, the MMA only allows for 107 cartons for the month. If the family picks up formula late with only 24 days left in the month, 24 x 5 = 120 cartons. This is still over the MMA, so you would still issue 107 cartons. Even though that would be the same amount you'd issue if they picked up on the first day of the month.
Updated wording for clarity.	N	Ordering formula from the state		
State RD approval no longer needed before SharePoint order is submitted on orders for individuals not yet certified on the Utah WIC program. Staff must follow steps specified still prior to ordering formula (Xii. b, c). State RD approval will come once order form is submitted.	N	Ordering formula from the state.	Davis: Unable to find this, not sure what it is referring to.	Added more details to the policy change column to help you understand where the change was.
Added clarification on when to check the box High Risk Follow Up Appointment box.	N	High Risk Protocol		

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<p>Provided clarity and added more examples of what can be included in the high-risk SOAP note.</p>	N	High Risk Protocol	<p>Weber Morgan: Is this section requiring these components to be added to the care plan or providing suggestions on what to include in the care plan? For example, we record our referrals under family referrals and do not always note in the care plan the referrals provided.</p>	<p>We updated the wording to be “Any referrals that need to be followed up on.”</p> <p>Any data that needs to be assessed at the next follow-up visit needs to be included in the Plan. If a referral was given that the CPA doesn’t feel a need to follow up about at the next WIC visit, that doesn’t need to be included in the care plan.</p>
<p>Updated Breast pump form wording. Clarification on what is needed for serialized and non-serialized items.</p>	N	Breastfeeding Aids	<p>Utah County: Page 5 – xiii: Suggest to change order for subcategories to a, e, c, d, b to make more sense with process/ flow when issuing items, following up, and when returned.</p> <p>Propose for SNS follow-up to change to call within the next business day instead of within 24 hours – page 11. In case SNS was issued on a Friday or the day before a holiday, etc.</p> <p>Page 15 – Section F – We previously were not able to</p>	<p>We can change the order to a, e, c, d, b.</p> <p>We changed it to 24 hour or the next business day to account for Fridays and holidays.</p> <p>We will remove the word child.</p>

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			give pumps to clients with children.....can we now with this new policy? The mom would no longer be an active WIC participant since child is over 12 months. If it's approved, how will this work? Or should the word "children" be removed from this policy?	
Updated Single User Pump policy.	N	Breastfeeding Aids		
All pump contacts to be documented in Comment/Alerts section, unless a PC.	N	Breastfeeding Aids	Weber Morgan: Can we add Care Plan as an acceptable location to record pump contacts?	During the breastfeeding coordinators call, they decided that pump contacts were best made in the comments section in VISION. This decision was made to have a consistent location statewide. The comments section can be edited to include an update each time a contact is made, which makes it easier for staff to ensure they are making all required contacts.
Added that pump cleaning must be documented in VISION in the BF Equipment screen in the comments section.	N	Breastfeeding Aids	Weber Morgan: Is there a reason this is changing? We have a quick, efficient process for documentation of pump cleaning outside of VISION.	We will add the following wording: "Documentation should be done in VISION in the BF Equipment screen under comments or in an electronic log



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			The person that cleans the pump is not usually the one that previously checked the pump in. Pump cleaning is usually done with end of day cleaning not right when it is checked in. It will be much more time consuming and cumbersome to then to find the family in VISION and mark the pump cleaned.	that can be shared with the state office when requested.”
Added table on personnel and compensation for PC program. Added clarification on who can be a PC/DBE.	Y	BF Positive Peer Influence		
Added policy on how to document PC contacts.	N	BF Promotion and Support		
Updated structure of document for easier readability.	N	Tailoring Food Packages	Utah County: XII. It would be nice here to have information about tofu. (Or refer to or combine with XIII. c. )	Per FNS policy, tofu requires documentation for milk substitution and issuance; however, cheese and yogurt do not. This is why it is included in XIII c.ii subsection. Cheese and yogurt follow different rules than tofu for substitution.
No longer require to exclude certain foods due to lack of refrigeration or storage.	N	Tailoring Food Packages	Weber Morgan: Would it be possible to include the ability of issuing low-fat yogurt to 1 year olds per CPA discretion with the same requirements for	This is not possible with current food rules. It will be possible with the new food rule. State agencies cannot choose to implement parts of food packages. The entire food

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			<p>documentation as 2% milk for 1 year olds?</p> <p>Utah County: XV. Clarification on when we can use 64 oz juices for women, especially on b. It is not explicit that the line b. or c. really only pertain to women.</p>	<p>package must be updated simultaneously per category. We plan to include the new food rule updates for FY26 (October 1, 2025).</p> <p>Clarification on this was added and can be found in XV. b. i.</p>
Capitalization and grammar updates.	N	Foods Authorized		
Moved FAFAF information from the Food Packages P&P to a new policy called Formula and Food Authorization Form.	N	Formula and Food Authorization Form (new)		
New risks added. Table of contents added.	Y	Nutrition Risk Manual		
<b>III. Information System</b>				
<p>Policy updated to require that the Active WIC staff report be run by the last business day of each month.</p> <p>Local WIC Directory Excel sheets in SharePoint must be updated by the end of each calendar month.</p>	N	Required Reports	<p>Davis: Clarification on what must be uploaded to scanned documents to VISION from Teletask–R&amp;R signatures must be, but receipt of benefits signatures are not required to be uploaded...Is this correct and can this information be put</p>	<p>The R&amp;R signed on Teletask was added to the table of items to be scanned into Vision. Thanks for catching this.</p>

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			<p>in the documentation section in the table possibly so it can be found more easily as to what is required to be scanned?</p> <p>Weber Morgan: With remote appointments we are required to upload the R&amp;R signature captured to Document Scan. We expected to see this added to the examples of Forms &amp; Letter to be Scanned into VISION system.</p>	
Scans should be uploaded to VISION promptly (within 10 business days)	N	Documentation		
Approved Teletask system uses added.	N	Documentation		
<b>IV. Organization &amp; Management</b>				
State owned equipment updated to add magstripe readers. Card readers removed.	N	Computer Hardware, Equipment Inventory		
Added requirement for WIC staff to complete both the DTS Security Awareness Training and the DHHS Privacy Awareness Training or a local security and privacy training annually.	N	Staff Training	<p>Weber Morgan: Hard to access. This has not been fun with our new employee.</p>	<p>DTS assured us that this wouldn't be an issue for local WIC staff to access. We are sorry this was difficult. If there are more issues in the future, please let the help desk know.</p>

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Updated headers and footers of both policies in the Staffing and Training Requirements folder.	N	Staff Training Staffing Requirements		
Added requirement for staff to document in-services on required topics in the Other Training Tracking table in VISION starting Oct 1, 2024.	N	Staff Training		
Added “and nipple shields” in the table to mirror policies in the BF Aids P&P.	N	Staff Training		
<b>V. NSA Expenditures</b>				
<b>VI. Food Funds Management</b>				
<b>VII. Caseload Management</b>				
<b>VIII. Certification, Eligibility and Coordination of Services</b>				
Requirement added to request an email address for the family. It is needed to register for the participant portal, but an email address is not required for certification.	N	Steps for Certification		
Policy added that: WIC staff must save the records they entered into VISION and exit the family before another staff person opens the family and adds or edits any records.	N	Steps for Certification		
Structure updated.	N	Steps for Certification		

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Clarification added that the applicant's current physical address must be entered into the VISION system. If the mailing address is different from the physical address, the mailing address should also be entered. Both addresses must be kept current. If the mailing address is no longer used, an end date can be entered. The Zip Code from the mailing address is sent to WIC Direct to be used for setting the card PIN and other card services.	N	Proof of Residency		
Clarification added that staff must verify the address listed on the proof of residency matches the address listed for the family in the Physical Address section. If not, a new address record must be entered there,	N	Proof of Residency		
Policy added regarding a Safe at Home substitute address as required by state law to protect victims of abuse or domestic violence.	N	Proof of Residency		
Utah WIC Newborn Identification Form removed as an acceptable proof of ID.	N	Proof of Identity	Utah County: Now that the PIN is not needed, do we need to do anything special with the card to use it as ID?	We do not require anything special in order to use the WIC card to use for ID for recertifications or benefit issuance.
Added ID proof type: Personal Utah Immunization Record/USIIS record (can be obtained on the Docket app or from a medical provider).	N	Proof of Identity		

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Removed a participant violation regarding use of a card reported lost or stolen since this will not be needed with online eWIC.  Updated guidance for handling participant violation sanctions.	N	Participant Violations		
Added clarification that: Participants who arrive at a Utah clinic with a valid VOC must be transferred and allowed to continue participating through the end of their current certification period, even if the participant does not meet Utah WIC's nutritional risk, priority or income criteria.	Y	Transfers	If a client comes with a VOC and they bring their income showing they are over-income or even disclose they are over-income and don't qualify– we just follow the VOC even if they are reporting they are over-income? This contradicts the Utah R&R stating they will self-report when they are over-income.	We agree that the federal memo requiring us honor VOCs for the entire cert period contradicts other policies and regulations. We hope to receive clarification from FNS when they review this.
Updated income guidelines effective July 1, 2024	Y	Income Guidelines		
Updated signature capture methods for the R&R	N	Right and Responsibilities Procedures	Can this be included in the Teletask training? Show staff how to do this between Teletask and Vision. Thanks!	This was demonstrated in the July 9 <sup>th</sup> webinar.
<b>IX. Food Delivery and Food Instrument Accountability and Control</b>				
Removed policies related to card checkout and check in. Removed requirement to use the Vault Outside Cards screen.	N	Card Inventory		

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Removed policies relating to smart cards and replaced them with online card policies. i.e, removed card replacement wait period, replaced “hot card” term with “deactivate”, etc. Removed the requirement to offer a Tyvek sleeve. PIN set up and change information updated. Card balance correction term changed to account balance correction.	N	Card Inventory, E-WIC Card Issuance, Instructions to Participants, Lost Cards and Hot Carding		
Card functions available on the ebtEDGE website and the eWIC customer service phone line are listed.		E-WIC Card Issuance		
Lost Cards and Hot Carding Section renamed Replacing Cards.		Lost Cards and Hot Carding		
<b>X. Monitoring and Audits</b>				
<b>XI. Civil Rights</b>				
Added clarifications and requirements related to marking the preferred spoken language and printouts language.	N	Limited English Proficiency		
The assurance of civil rights contract language was updated to the latest revision from USDA.	Y	Nondiscrimination Statement		
<b>Additional Changes</b>				
<b>Other Comments:</b>				

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SECTION III- STATE OPERATIONS				
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<b>I. Vendor Management</b>				
Not to Exceed (NTE) settings adjusted for WIC Direct	N	Reimbursement and Claims		
Updates made based on online WIC processing conversion from smartcard.	N	Definitions in Food Delivery, File Transmissions, Food Delivery System and Transaction Procedures, Names of Companies in Food Delivery, Vendor Authorization.		
<b>II. Nutrition Services &amp; Breastfeeding</b>				
Updated capitalization, spacing, and outdated info.	N	Participant screening and assessment docs		
Updated Nutrition Risk Manual to current version.	N	Nutrition Risk Manual		
Updated capitalization, spacing, and outdated info.	N	Nutrition education and counseling docs		
Added this document to reflect the certification health assessments doc in the local policies section.	N	Certification Health Assessments (new to state plan section III)		
Updated doc title from “Staff Requirements and Training” to “State Staffing Requirements and Training.” Updated language to mirror current language in 7 CFR 246.3.	N	Staff Requirements and Training		
Updated wording and where to find available statewide services.	N	Health Care Referrals		

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Updated to reflect current agreement between Medicaid and WIC.	N	Medicaid		
Updated capitalizations, spacing, and outdated info.	N	BF promotion and support docs		
Updated language from food instruments to reflect online eWIC	N	Food Packages		
Changes to the cost section.	N	Foods Authorized		
Removed outdated information.	N	Foods Authorized		
Added allowed food specifications.	N	Foods Authorized		
Updated name of food booklet to current name: Utah WIC Program Shopping Guide	N	Foods Authorized		
<b>III. Information System</b>				
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<b>X. Monitoring and Audits</b>				
<b>XI. Civil Rights</b>				
<b>Other Comments:</b>				
			<p>Weber Morgan: We found several policy changes that were not listed in this document. Which could make them easier to miss for comments and for staff training. We would love to see all changes listed in this document.</p> <p>Weber Morgan: It would be helpful if this document showed all the section headings that need to be opened to find the specific policy. For example, to find Anthro and Lab Procedures we need to open Nutrition Services- Breastfeeding, then Certification, Screening, and Assessment. But in this document it is directly listed under Nutrition Services &amp; Breastfeeding. Newer employees especially, struggle to navigate the P&amp;P.</p>	<p>Could you point out which ones that we missed listing? It could have been that we are rewording things to use plain language.</p> <p>There is a table of contents that has a hyperlink to every policy that was added last year. It shows the section headings that need to be opened to find the specific policy. The footer of each policy also includes the pathway to find that policy. Next year we can do the same on this document.</p>

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