

## Food and NSA Expenses

- I. Food Cost. The term *food cost* relates to all prescribed food items, infant formula and breast pumps purchased with WIC food money.
  
- II. Nutrition Services and Administration (NSA). The state will reimburse local agencies for allowable operational costs up to but not exceeding the grant for NSA funds. All operational costs are subject to the terms of the WIC grant, ~~and Federal Management Circulars 7 CFR 246.14, Uniform Guidance 2 CFR 200, Part 3016~~ and other guidelines followed by the Utah Department of Health and Human Services and local agencies.
  - a. The grant amount is determined by the WIC Funding Formula Committee, (See Funding Committee).
  - b. All expenditures claimed on the reimbursement form should have appropriate time and documentation for the claims.
  - c. The local agencies must have a system for documenting the time spent on the program and this system will be monitored every year as part of the single audit. Regular audits will be performed to assure proper classification, documentation and reimbursement.
  - d. Reimbursement will be processed upon receipt of the local agency's Monthly Expenditure Report (MER).
    - i. Of these NSA allowable expenses, at least 1/6 of expenses must be spent on Nutrition Education activities.
  
- III. Local Agency Monthly Expenditure Report (MER). The approved invoice to be used for the reimbursement is the State Health Department of Health and Human Services Monthly Expenditure Report (MER).
  - a. The claim for reimbursement contained on this report should cover a specific calendar month.
  - b. There must be five columns filled in for the WIC Program for NSA expenditures on the monthly expenditure report, and one column for Peer Counseling grant expenditures:
    - i) WIC LOCAL PROGRAM MANAGEMENT (Administration) – All costs (direct or indirect) generally considered being 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:
      1. Salaries/benefits, travel, and training costs for WIC staff involved in the management and oversight of the program

2. Costs necessary to conduct outreach
  3. Food benefit reconciliation, monitoring and payment
  4. Vendor monitoring and training
  5. Fraud prevention
  6. Creating and retaining administrative records
  7. Preparing and maintaining fiscal and program management reports
  8. General management clerical support
  9. Cost of payroll and personnel systems
  10. Accounting and bookkeeping
  11. Audits and other financial services
  12. Legal services
- ii) WIC LOCAL CLIENT SERVICES – All costs expended to deliver food and other client services and benefits. Examples include:
1. Salaries/benefits travel, and training costs for WIC staff who conduct general client services such as intake, food instrument instruction, charting, scheduling, and data entry.
  2. Medical supplies and equipment necessary to conduct diet and health assessments required in the certification process
  3. Other costs necessary to:
    - a. Refer clients to other health care and social services
    - b. Coordinate services with other programs
    - c. Participate in activities which promote a broader range of health and social services for participants
    - d. Conduct and participate in surveys/studies which evaluate the impact of WIC on its participants.
- iii) WIC LOCAL NUTRITION EDUCATION – All costs directly related to general nutrition education. Examples include:
1. Salaries/benefits, travel and training costs for WIC staff who plan or conduct nutrition education counseling
  2. Costs to develop/procure, print and distribute nutrition education materials
  3. Cost of equipment required to conduct nutrition education training/counseling
  4. Interpreter and translator services to facilitate training/counseling
  5. Costs associated with evaluating and monitoring nutrition education
  6. Developing the Nutrition Education/Evaluation Plan (NEP)
  7. Creating nutrition education plans
- iv) WIC LOCAL BREASTFEEDING PROMOTION – All costs expended for promotion and support of breastfeeding. Examples include:

1. Salary/benefits, travel, and training of WIC staff who plan or conduct educational training and counseling to promote or support breastfeeding,
  2. Salary/benefits of peer counselors and individuals hired to undertake home visits and other actions to encourage continuation of breastfeeding,
  3. Costs to develop/procure, print and distribute educational materials related to breastfeeding promotion and support.
- v. WIC LOCAL TECHNOLOGY SERVICES – All costs related to maintaining or improving WIC technology. Examples include:
1. Computer Hardware Replacement,
  2. Local IT Support,
  3. Any software purchases outside of the WIC Information Operating System.
- vi. WIC LOCAL PEER COUNSELING – All costs used only to develop or expand activities necessary to sustain a successful Peer Counseling Program. Examples include:
1. Salaries/benefits, travel, and training for Peer Counselors and designated Peer Counselor managers/coordinators,
  2. Related costs such as:
    - a. Computers, telephones and associated cost solely used by Peer Counselors,
    - b. Travel for home and hospital visits,
    - c. Recruitment of peer counseling staff,
    - d. The purchase of demonstration materials (e.g. breast pumps for demonstration purposes, videos).
    - e. Overhead cost related solely to the Peer Counselor program.
  3. Items and materials to be used or distributed to WIC participants (e.g., breast pumps, breastfeeding aids, and written materials) are not allowable costs under this funding, and should instead be purchased using regular NSA funds under the breastfeeding promotion and support category.

IV. The following are also allowable NSA costs with prior approval from the state WIC office:

Activity	Special notes . . .
Transportation of rural participants	<ul style="list-style-type: none"> <li>• Must be considered essential to assure program access.</li> <li>• Direct reimbursement to participants for transportation is not allowed.</li> </ul>

<p>Capital expenditures over \$5,000.00 (purchases over \$5,000.00 must be approved by State agency/USDA)</p>	<p>This includes:</p> <ul style="list-style-type: none"> <li>• cost of facilities</li> <li>• equipment (including medical and computer equipment)</li> <li>• other capital assets</li> <li>• any repairs that materially increase the value of useful life of capital assets.</li> </ul>
<p>Management studies</p>	<ul style="list-style-type: none"> <li>• Performed by agencies or departments other than WIC, or</li> <li>• Outside consultants under contract with WIC.</li> </ul>

- VI. Reallocation/Discretionary Funds. Additional funds received by the State Agency through the federal reallocation process or other sources may be distributed to LHDs through one or both of the following methods, at the discretion of the State Agency.
- a. The State Agency will use the WIC Funding Formula to distribute the amount of funds allocated to all LHDs, including the additional federal reallocation funding. Individual local agencies may request to receive no additional funds during this distribution process.
  - b. The State Agency will distribute funds based on individual local agency need, according to criteria (i.e. caseload growth, clinic service needs, etc.) determined by the State Agency. LHDs may be asked to submit written funding request to the State Agency during this distribution process.
- VII. Start-up Funds. Funds may be provided when creation of a new local WIC agency is warranted. New local agency applicants must demonstrate the need as well as cost effectiveness to successfully begin operation of a local agency. A new agency will remain funded for 3 months of operation or until the local agency reaches its projected caseload level, whichever comes first. This may include any funds needed to be advanced to the qualifying agency. The amount of the start-up grant will be determined from the local agency's application, availability of local administrative funds, and shall be subject to any current caseload management considerations.
- VIII. Local Agency Claims. Funds collected through the recovery of local agency claims will only be spent to cover allowable expenditures.
- IX. Summary Statement of Expenditures.
- a. Wages and Salaries Certification. Compensation for personnel services rendered during the period of performance.

- i. Compensation follows and appointments made according to State and local government laws and rules which meets Federal merit system or other requirements.
  - ii. Wages and salaries charged to the programs will be based on payrolls documented and approved in accordance with the generally accepted practice of the state or local agency.
  - iii. Payrolls must be supported by time and attendance or equivalent records for individual employees. The wages and salaries of employees chargeable to more than one program will be supported by appropriate time distribution records.
  - iv. Registered Dietitians working for WIC may not bill Medicaid or any other public or private health program(s) for nutrition assessment services rendered while working for, and billing time to WIC. If a Registered Dietitian is employed by WIC as a full-time equivalent employee working 40 hours per week, that dietitian may not accrue billable hours to any other program while working on WIC time. If a Registered Dietitian is assigned to WIC less than 40 hours per week, additional work hours may be billed to another program as long as the Registered Dietitian provides all nutrition education and counseling outside of the scope of the WIC Program and outside of time billed for WIC services. The separation of duties must be indicated in the way the employee codes his/her time sheet.
- b. Fringe Benefits. Employee benefits in the form of employers' contribution or expenses for social security, employees' life and health insurance plans, unemployment insurance coverage, workman's compensation insurance, pension plans, and the like, provided such benefits are granted under approved plans and are distributed equitably to all related programs.
- c. Travel Expenditures. Expenditures for transportation, lodging, and related items incurred by employees who are in travel status on official business. Such costs may be charged on an actual basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip, and results in charges consistent with those normally allowed in like circumstances in non-program sponsored activities.
- d. Current Expenditures. Expenditures necessary for the operation of the program that are not properly classified as wages and salaries, fringe benefits, travel, or capital outlay. Examples include utilities, supplies, contracted services, maintenance, etc.
- e. Capital Outlay. Costs of facilities, equipment, other capital assets, and repairs which materially increase the value or useful life of capital assets. Property that has a useful life of more than one year and an acquisition

cost of \$1000 or more per unit (unless otherwise specified). Prior approval from the State WIC office is needed for some other items specified in the local agency contract.