

MONTANA WIC PROGRAM COOP

Montana Department of Health and Human Services Women,
Infants, and Children Program
Continuity of Operations Plan

2024

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FOREWORD

The Montana (MT) Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), a program of the MT Department of Public Health and Human Services (DPHHS) has adopted this Continuity of Operations Plan (COOP) to ensure the capability to support employees, participants, local agencies, vendors, and other impacted parties during emergencies. Key objectives accomplished by the adoption of this COOP include:

- Minimize disruption to normal WIC services.
- Mitigate the extent of disruptive events and damage.
- Minimize fiscal impacts of disruptive events to the state, local agencies, and participants.
- Prepare personnel to implement emergency procedures.
- Establish an alternate method to continue service delivery.
- Provide for the rapid and efficient restoration of services.

This COOP presents a continuity strategy intended to assure the resilience and operational capacity of MT WIC.



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Continuity of Operations Plan



Chapter 1: Introduction

WIC Program Overview

WIC provides supplemental nutritious foods, nutrition education, breastfeeding promotion and support, and referrals to health and other social services for low-income pregnant, breastfeeding, and postpartum women, and to infants and children up to age five who are found to be at nutritional risk.

The United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers the WIC Program at the Federal level. WIC is not an entitlement program, i.e., Congress does not set aside funds to allow every eligible individual to participate in the program. Instead, Congress annually authorizes a specific amount of funding for program operations. Distribution of funds to state agencies like the MT DHHS occurs via a federal grant. FNS provides these funds to MT WIC to pay for WIC foods redeemed via electronic benefit transfer (EBT) cards, nutrition education, breastfeeding promotion and support, and administrative costs.

Thirty-four (34) lead agencies, granted funds from the MT WIC Program, provide EBT cards to participants. The cards allow participants to purchase foods, specifically chosen to improve or maintain their nutritional health at critical periods of growth and development, at over 300 authorized vendors.

Nationally, the WIC Program operates in every state, the District of Columbia, five Territories, and 34 Indian Tribal Organizations (ITOs). These agencies make program services available through an estimated 1,800 local agencies and 10,000 clinic sites.

Chapter 2: Operational Disruptions

Operational disruptions include any wide-scale interruption to normal state WIC operations lasting for an extended period. Disruptions may include, but are not limited to, disasters, emergencies, and infant formula recalls. For the purposes of this COOP, a disaster or emergency is defined as a sudden, calamitous event that seriously disrupts the functioning of a community or society and causes human, material, and economic or environmental losses that exceed the community's or society's ability to cope using its own resources. Though often caused by nature, disasters can have human origins. Recalls are defined as any infant formula manufacturer choosing to remove or correct a distributed product for any reason and under any circumstance.

Natural Disasters

Natural disasters take different forms, such as a tornado, flood, fire, etc. A natural disaster has the potential to disrupt WIC operations and cause the relocation of WIC participants. Regardless of the disaster, MT WIC state and local agencies are expected to take reasonable measures to continue providing benefits to participants. The next chapter of this guide includes WIC program flexibilities regarding WIC operations for participants and/or newly eligible applicants.

Human Pandemic

During a pandemic event, like COVID-19, the key public health intervention to slow the spread of the disease may be social distancing. Schools and day care centers may be closed for extended periods of time, leaving many parents absent from work to care for their children. MT WIC may not be able to certify applicants for WIC at local WIC clinics due to restrictions on social gathering and will need to operate under alternate procedures. In addition, staff may face an increased workload as many state, local, and clinic employees and their families may also be impacted by the pandemic and unable to work.

Biological

Bioterrorism is the intentional release or dissemination of biological agents. These agents are bacteria, viruses, or toxins, and may be in a naturally occurring or manmade. Since the response to a biological disaster will be coordinated at a higher level than the WIC Program, state WIC staff will consult with the rest of DHHS on what, if any, biological procedures should be followed. In such situations, external agencies, like the Centers for Disease Control and Prevention (CDC), will focus on the identification and containment of the outbreak.

Infant Formula Recalls

An infant formula recall is defined as any suspension of the sale, distribution, and/or production of infant formula, usually voluntarily, by the manufacturer to protect the public's health. Recalls may also be issued by the Food and Drug Administration (FDA). Recalls vary in scope and impact and should be evaluated individually for scope, potential impact, and remediation.

Chapter 3: WIC's Role

WIC During a Disaster or Infant Formula Recall

An immediate and critical component for disaster or recall response teams is ensuring access to nutrition assistance for disaster survivors. USDA Foods and the Disaster Supplemental Nutrition Assistance Program (D-SNAP) are the primary methods FNS uses to respond to the nutrition needs of disaster survivors. Unlike USDA Foods and D-SNAP, WIC's role in responding to disasters is minimal, as WIC is neither designed nor funded to meet the basic nutritional needs of disaster survivors not otherwise eligible for WIC benefits. Since there is no additional funding designated for WIC disaster relief, MT WIC must operate within its current program context and funding level even in disaster circumstances.

However, there are many ways state WIC personnel can contribute to disaster relief efforts by minimizing disruptions to WIC operations and ensuring that eligible participants continue receiving benefits. WIC regulations provide flexibility regarding physical presence, certification periods, and mailing food instruments and/or issuing EBT cards, including:

- Persons with a serious illness that may be exacerbated by coming into the WIC clinic may be exempt from the physical presence requirement (this would also apply if applicants/family members are under a voluntary quarantine)¹.
- MT WIC may extend the certification period for breastfeeding women, infants, and children, up to 30 days, to accommodate difficulty in scheduling appointments².
- MT WIC may issue electronic benefits to persons not scheduled for nutrition education or a second or subsequent certification³.
- When WIC participants are unable to use their food instruments because they or another family member are under quarantine (voluntary or involuntary), they have the option to designate a proxy to redeem WIC benefits on their behalf⁴.

During a disaster, MT WIC works to maintain regular benefit delivery to participants. State WIC staff may also focus on coordinating program outreach to potentially eligible individuals. Some individuals may be newly income eligible if their employment was affected by the disaster or if they now receive D-SNAP. Receiving D-SNAP confers adjunctive income eligibility for WIC.

To help communities prepare for disasters, WIC local agency staff can educate participants on food preparation and food safety concerns during disaster conditions as part of routine nutrition education services.

Formula recalls necessitate a robust and immediate WIC response. WIC is designed and funded to meet the basic nutritional needs of infants and access to infant formula is essential. During a formula recall MT WIC works to ensure the uninterrupted delivery of infant formula benefits to participants. State staff focuses on identifying alternatives, coordinating with local agencies and vendors, and working with FNS on waivers and fiscal operations

1. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246>
2. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246>
3. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246>
4. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246>

Chapter 4: WIC Operations

In the event of a disaster declaration or infant formula recall by national or state authorities, product manufactures, or others in a position of authority, the State WIC Director will initiate this COOP and its incorporated or referenced policies and procedures immediately.

Mission Essential Workforce

The following staff are essential to support WIC operations or are assigned a critical response role during a disaster or recall. In the event of a disaster or other operational disruption, staff will be contacted according to the SA communications plan in Appendix B.

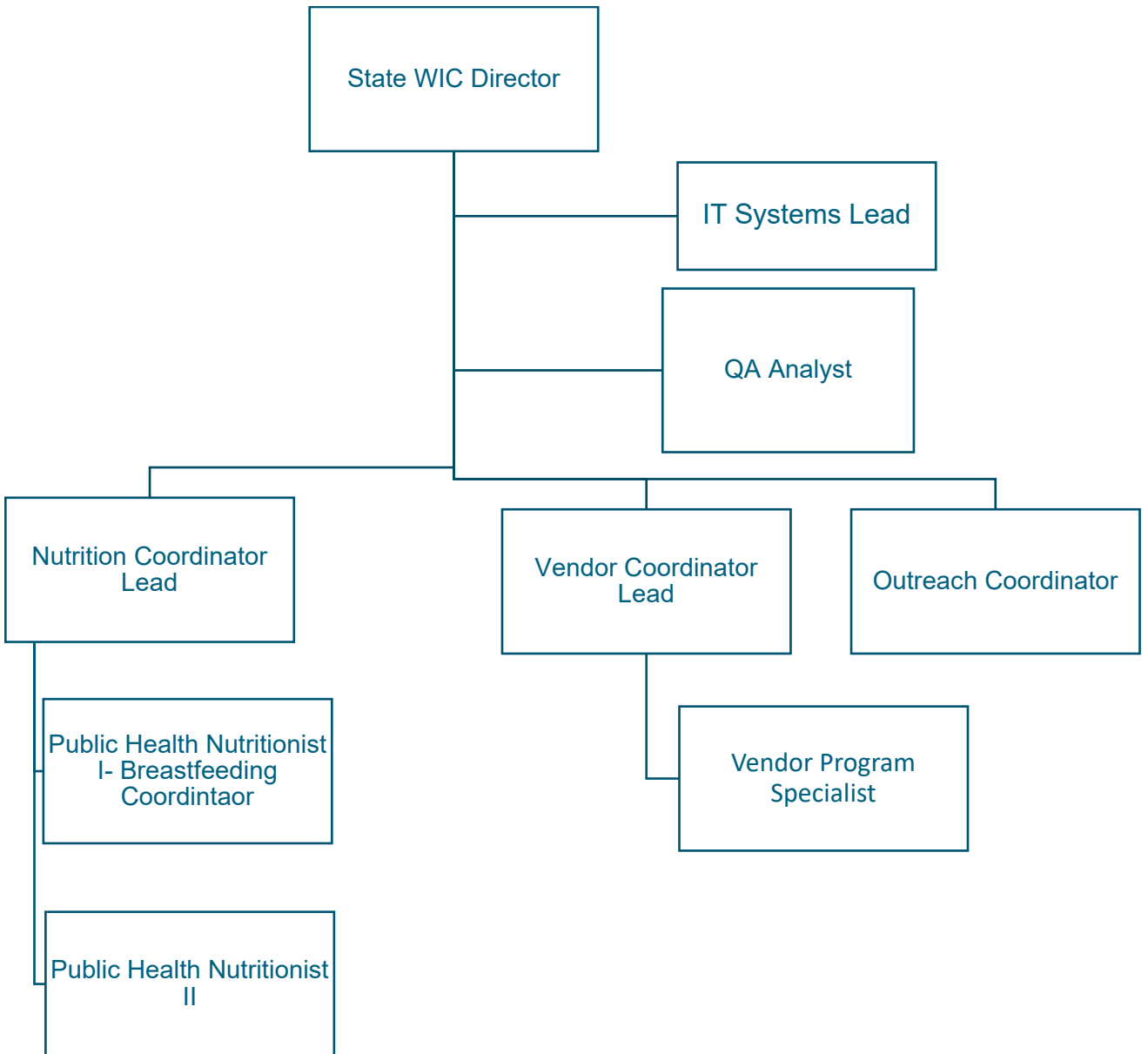


Figure 1

Mission Essential Workforce

To maintain essential WIC operations, each key role is staffed by a member of the MT WIC program. The order of succession (figure 1) should be used in all instances of a disaster or formula recall. The QA Analyst, IT Systems Lead, Vendor Coordinator, Nutrition Coordinator and Outreach Coordinator serve in support roles for the Director and other staff. If a staff member is incapacitated, or otherwise unable to fulfill their duties, proceed to the next individual in the chain. Contact information for all individuals can be found in Appendix A.

WIC Director

Alternate 1: Vendor Coordinator

Alternate 2: Nutrition Coordinator

Essential tasks to perform:

- Lead response activities with FNS, DPHHS, local agencies (LA), vendors, and others as required.
- Create guidance for LA's and state staff.
- Oversee internal and external communication.
- Lead situational briefings for LA's and state staff.
- Submit required FNS waivers.
- Financial Management

Authority to be delegated:

- Guidance creation: Nutrition Coordinator
- Waiver completion and submission: Vendor Coordinator
- Financial Management: WIC Budget Analyst

Vendor Coordinator Lead

Alternate 1: Nutrition Coordinator

Alternate 2: Vendor Program Specialist

Essential tasks to perform:

- Create and provide communication with local vendors
- Create guidance for LA's and state staff on vendor system changes
- Assist WIC Director on FNS communications
- Assist WIC Director on FNS waivers.

Authority to be delegated:

- Communication to LA's to other team members
- Communication to local vendors to other team members

Nutrition Coordinator Lead

Alternate 1: WIC Director

Alternate 2: Public Health Nutritionist I, Breastfeeding Coordinator

Essential tasks to perform:

- Provide guidance for LA's
- Coordinate Nutrition Services Team activities
- Assist WIC Director on program duties

Authority to be delegated:

- Communication to LA's to other team members

Public Health Nutritionist I- Breastfeeding Coordinator

Alternate 1: Nutrition Coordinator

Alternate 2: Public Health Nutritionist II

Essential tasks to perform:

- Manage the program email MONTANAWICPROGRAM@MT.GOV
- Create and provide guidance to LA’s regarding Breastfeeding services
- Assist Nutrition Coordinator Lead with nutrition services activities
- Assist with clinic coverage
- Assist with WIC help desk

Authority to be delegated:

- NA

Public Health Nutritionist II

Alternate 1: Vendor Coordinator

Alternate 2: Nutrition Coordinator

Essential tasks to perform:

- Manage the program UPC email WICUPC@MT.GOV
- Provide assistance to the Nutrition Coordinator Lead with nutrition activities
- Assist Vendor Coordinator Lead with vendor activities
- Assist with clinic coverage
- Assist with WIC help desk

Authority to be delegated:

- NA

Outreach Coordinator

Alternate 1: Nutrition Coordinator Lead

Alternate 2: Public Health Nutritionist II

Essential tasks to perform:

- Create and provide communication for WIC families utilizing WIC’s Marketing contractor
 - Messaging through WIC messaging platform
 - Social media posting
- Communicate with staff to manage and update the WIC Website

Authority to be delegated:

- Posting information to the DPHHS WIC webpage
- Posting information to DPHHS social media

Vendor Program Specialist

Alternate 1: Vendor Coordinator

Alternate 2: Public Health Nutritionist II

Essential tasks to perform:

- Duties outlined by Vendor Coordinator Lead
- Create and provide guidance to Farmer’s Market Nutrition farmers

Authority to be delegated:

- NA
-

IT Systems Lead

Alternate 1: QA Analyst

Alternate 2: BSO Bureau Chief

Essential tasks to perform:

- Develop and communicate with IT contacts
- Develop and communicate with LA staff
- Provide updates to BSO Bureau Chief and WIC Director
- Assist WIC director on program duties
- Assist WIC QA Analyst as needed

Authority to be delegated:

- Communication to IT contacts
- Communication to LA staff

QA Analyst

Alternate 1: WIC IT Systems Lead

Alternate 2: BSO Bureau Chief

Essential tasks to perform:

- Provide support to LA staff via WIC Help Desk
- Assist WIC IT Systems Lead with program activities

Authority to be delegated:

- NA

Essential Systems and Software Applications

MT WIC relies heavily on variety of technology systems. Participant certification or recertification, benefit issuance and redemption, and more rely on technology. These systems may be inoperable or inaccessible during a disaster, emergency, or recall. Hardware and software applications must be documented to assist recovery operations.

Essential Hardware				
Equipment Description	Manufacturer	Model No.	Serial No.	Vendor/Support Contact Info
Director’s laptop	Dell	N/A	F0M68C3	DPHHS
Director’s cell phone	iPhone	MT622LL/A	F2LXH94JKPHK	DPHHS, FirstNet
Director’s desk phone	Avaya	9611GD02B	16N5201079G1	DPHHS

Application and Software Inventory			
Manufacturer/Vendor	Application Name	Version #	Application Interfaces/Dependencies
CDP	SWEB-MIS	3.3.0.1	
JPMA	WIC Shopper App	1.6	
Solutran	EBT Processor	3.45D.A	

IT Essential Records and Data			
Record Type	Data Type	Offsite Backup	Backup Frequency

Participant Records	Journey File	None	N/A
Authorized Vendor List	Journey File	DHHS Network Server – Nutrin FNS-FDP	Annually

IT Contacts			
Hardware or Application	Vendor Name	Contact Email	Contact Phone
DPHHS Laptops, phones, and applications	SITSD	Login - Montana (servicenowservices.com)	444-9500
SWEB-MIS	CDP- Barry Burris	Barry Burris barry.burris@sugpmo.com	580-272-2503 Ext 62572
EBT	Solutran	Samatha Bailey sbailey@solutran.com	763-519-7214
	Teletask	Brian Rees Brian@teletask.com	888-484-9911 Ext 109
WIC Shopper App	JPMA	wicshopper.support@jpma.com	303 232 3700

Alternative Worksites

An event like a pandemic, fire, or tornado may render state offices inaccessible or unusable. Such an event necessitates the transfer of operations and relocation of personnel to an alternate worksite (AWS). The WIC Director, or their designee, is responsible for determining if the facility is safe to access and equipment suitable for use. Directions from DPHHS leadership, or their designees, may impact AWS decisions.

WIC staff must be prepared to transfer operations to an alternate or backup worksite. WIC requires an AWS that supports timely activation with limited preparation efforts. An AWS could be an alternative state office site, a local agency, a disaster response organization site, working from home, or another site as needed. As events progress, the AWS may change. All decisions regarding AWS will be communicated by the WIC Director or their designee.

Equipment and Supplies Needed for AWS

- | | |
|--|--|
| <input type="checkbox"/> Laptop and charger | <input type="checkbox"/> Keyboard and mouse |
| <input type="checkbox"/> Work cell phone and charger | <input type="checkbox"/> Headphones/headset |
| <input type="checkbox"/> Desk or table | <input type="checkbox"/> Chair |
| <input type="checkbox"/> General office supplies | <input type="checkbox"/> VPN and Internet Access |
| <input type="checkbox"/> Mobile Hotspot | <input type="checkbox"/> Vital record storage (network access, flash drives, etc.) |

Chapter 5: Incident Management

Most disaster and recall events are of short duration with limited impact on WIC. However, significant events may require the activation of this COOP. The WIC Director will continue operating using the normal organizational structure until, and unless, an alternate command and control structure is implemented by DHHS or its designee.

COOP Activation

The WIC Director or their designee are authorized to active this COOP in response to a disaster, emergency, or significant formula recall.

Incident Management Team

The Incident Management Team (IMT) concept is used to coordinate the response to an event that disrupts normal operations. The members of the IMT will be selected from WIC staff members based upon their roles and technical expertise.

MT WIC will utilize its normal organizational structure to manage the response for short-term disaster or recall events. Complex or long-term events or recalls require the IMT to convene and coordinate on response efforts.

Core members of the WIC IMT include:

- State WIC Director
- Vendor Coordinator
- Nutrition Coordinator
- Breastfeeding Coordinator
- Outreach Coordinator
- WIC IT: QA Analyst and IT System Lead

Additional IMT members will be incorporated as needed based on the incident, staffing levels, and technical expertise.

Incident Communication

The WIC Director is responsible for coordinating information during an emergency or recall. WIC internal communications procedures utilize a combination of phone, text, and email to communicate with staff. The crisis communications plan addresses the following:

- Staff notification and communication procedures
 - WIC Director responsible
- Coordination with LA's
 - Nutrition Coordinator responsible
- Coordination with vendors
 - Vendor Coordinator Lead responsible
- Public information
 - Outreach Coordinator responsible with DPHHS PIO approval
- Media relations via the DPHHS Public Information Officer (PIO)

Personnel Safety and Accountability

A continuity event can affect the health and safety of MT WIC staff. When a disruptive event occurs, personnel may be working in the office, remotely, or traveling outside of the area. The WIC Director must account for all employees during and after the occurrence of a continuity event. The emergency notification process will involve documenting the employee's location, their health and safety status, and availability to report for work. The WIC Director will use a dedicated telephone number to aid in monitoring personnel status. Staff members will use the number to report their status and receive instructions and assignments. Personnel assigned to monitor the phone will maintain a log of staff contacts and document the status of each employee. A digital emergency contact list for personnel is maintained separately in Workday. Each staff member should review and update emergency contact information annually.

Chapter 6: Recovery and Reconstruction

Post-incident recovery involves evaluating the status of WIC resources following a disruptive incident and reorganizing to maintain operational capacity. Reconstitution is the process of resuming normal operations at the primary work site, AWS, or temporary/permanent replacement facility. Recovery and reconstitution activities will be implemented to restore the operational capacity of WIC. The organization will be prepared to support recovery on two levels. The first level, continuity of operations, involves the human and physical resources necessary to provide services to local agencies. The second level, disaster recovery, involves the recovery of IT equipment, systems, applications, and networks. The recovery process involves establishing and prioritizing short-term and long-term objectives. Examples of short-term recovery objectives include:

- Provide for the needs and well-being of WIC staff
- Continue operations at the AWS
- Restore essential systems and services
- Recover data
- Assess damages to the facility and assets
- Communicate with stakeholders.

Examples of long-term recovery objectives include:

- Replace equipment
- Recruit and hire permanent staff
- Restoration of the primary PSAP facility
- Establish long-term operations at an interim worksite(s) as needed

Chapter 7: COOP Training

WIC staff will review the COOP Plan annually.

Chapter 8: Plan Administration and Maintenance

This COOP Plan contains sensitive information that is restricted from public access. Distribution of this COOP Plan is limited to essential personnel and authorized representatives of partner agencies.

8.1 Maintenance

The MT WIC Director is responsible for assuring that this COOP Plan is maintained. The COOP Plan will be reviewed and updated annually.

8.2 Records and Reports

Records related to the activation of this COOP Plan must be maintained in compliance with applicable USDA-FNS rules and regulations, state law, and MT DPHHS record-retention policies.

Appendix A

State WIC Staff Contact Information

Main Phone: 1-800-433-4298

WIC Emails:	Website
<ul style="list-style-type: none"> • montanawicprogram@mt.gov • WIChelp@mt.gov 	<ul style="list-style-type: none"> • https://dphhs.mt.gov/ecfsd/wic/

NAME	EMAIL	OFFICE	CELL
Lacy Little- WIC Director	lalittle@mt.gov	406-444-5923	406-594-5984
Kevin Moore- Vendor Coordinator Lead	Kevin.moore@mt.gov	406-444-5530	
Aimee Duncan- Nutrition Coordinator Lead	Aimee.duncan@mt.gov	406-444-0909	406-594-5981
Lori Reed- Public Health Nutritionist II	Lori.reed@mt.gov	406-444-2740	406-439-5773
Nicole Hungerford- Breastfeeding Coordinator	nhungerford@mt.gov	406-439-5592	406-439-5592
Alex Bostrom- Outreach Coordinator	Alex.bostrom@mt.gov	406-444-5285	
Glade Roos- Vendor and Farmer's Market Coordinator	groos@mt.gov	406-444-2841	
Andrew McKeever- IT Systems Lead	Andrew.mckeeper@mt.gov	406-444-2739	
Chelsea Giguere- QA Analyst	Chelsea.giguere2@mt.gov	406-444-7015	