

Section II: Local Agency Procedure Manual

V. Local Nutrition Services and Administration (NSA)

A. Local Agency Funding

Purpose

The State WIC Program contracts with local agencies to provide services to Montana eligible participants using Nutrition Services and Administrative (NSA) funds from USDA-FNS.

Policy

The Montana WIC Program will update local agency contracts annually and provide funding according to the current funding formula. Funding must be used in accordance with federal regulation and State policy.

1. Contract Process

- The Montana WIC Program operates on a Federal Fiscal Year (FFY), which begins October 1st and ends September 30th annually.
- Details of the contracting process may be found in Section III, V. State Nutrition Services and Administration, policy A.

2. Monthly Expenditure Report

- This report is used to list expenditures paid by the local agency, using WIC funding, under the terms of the contract.
- The Expenditure Report is to be completed for each month and submitted by the 28th of the following month to the State WIC Office unless an alternate date has been negotiated and written approval granted.
- DPHHS has no obligation to reimburse Expenditure Reports submitted beyond the contractual submittal date or any adjustment to expenses reported more than 90 days after actual expenditure.
- Expenditure reports are to be signed by both the preparer and the authorizing official (two separate people). This ensures that both parties are familiar with the financial status of the local program and improves integrity and accountability in the process.
- Required Documentation:
 - All expenses reported to, and reimbursed by, the State WIC Office must be maintained on file for auditing, monitoring, and/or ad hoc requests by State staff, Federal staff, or other auditors.

3. Allowable Expenses

Nutrition services and administration (NSA) funds are to be used for direct or indirect costs which are “necessary and reasonable” for the support and fulfillment of WIC program operations and objectives. All charges to the grant or contract must be actual and obligated within the appropriate contract period. Allowable expenses include:

- WIC personnel- includes salary and benefits for any WIC staff who are either providing clinical or administrative services or are involved in the administration of the program.
 - Includes staff employed by local agency or on contract.
 - Time may not be charged to WIC if it is also being reimbursed by another source (i.e., Medicaid billing, another grant or program).
- Operating expenses such as rent, utilities, telephone, internet, office supplies and furniture, postage, and travel.
- Nutrition and breastfeeding education, such as:
 - Holding classes demonstrating the preparation of WIC allowable foods and offering samples of what was prepared.
 - Items or resources for staff training and client education (e.g., model breasts, dolls, pamphlets, booklets, measuring cups, posters, etc.).
- Outreach materials and activities.
 - Items and messaging must include WIC contact information and the USDA civil rights non-discrimination statement to count as outreach.
- Travel and Training related to WIC program duties.
 - State Sponsored Travel or Training
 - If a staff member has signed up for a state-sponsored activity, but does not attend, the local agency will be responsible for reimbursing the State WIC Program. The reimbursement cannot be with WIC funding.
 - In State or Out of State Travel or Training
 - Any prior costs associated with travel or training will be expensed in the month they were incurred.
 - If the staff member does not attend the training, the reimbursed funds must be returned to the State WIC Program.
 - It is the local agency's responsibility to keep documentation/proof of attendance for the travel or training which will be verified during the monitoring process.
- Incentive items.
 - Must be of nominal value (\leq \$5 per item) and promote the purpose of WIC (health and nutrition related messaging).
- Memberships and dues.
 - Costs of professional (RD, IBCLC, etc.) certification/re-certification as part of an employee's professional development plan, or staffing requirements, that aligns with agency policies and procedures.
 - Costs of relevant subscriptions or memberships to business, professional and technical periodicals, or organizations. These dues or memberships must be for the non-federal entity level, and not for individuals. An individual may be the

representative on the account or membership for the entity, however the access and benefits must be for the entity and not only the individual.

4. Examples of expenses that are *not* allowed (this list is not all inclusive):

- Software which is provided by the State Agency (i.e. appointment scheduling/messaging/reminders, online education, shopping assistance, and language line services).
- Gift Cards.
- Items of nominal value that do not promote the purpose of WIC and are used for outreach, incentive, or nutrition education (personal hygiene items, facial tissues, toothbrushes, diapers, food, or beverages for staff, etc.). Items may be distributed if received or funded from another source.
- Costs that are not obligated in the current fiscal and contract year.