

Section III: State Agency Procedure Manual

IV. State Organization and Management

C. Disaster and Security Procedures

Purpose

To provide direction for assessment of an emergency or disaster situation and options for delivery of WIC services.

Policy

The state agency will continue to provide services in the event of a disaster or emergency.

1. Definition of Disaster

- Disaster means a sudden, calamitous event that seriously disrupts the functioning of a community or society and causes human, material, economic or environmental losses that exceed the community's or society's ability to cope using its own resources. Examples: Natural disaster (tornado, flood, wildfires), pandemic, bioterrorism
- The state agency will determine if an emergency period or supply chain disruption exists by verifying with the State Disaster and Emergency Services Division.

2. WIC's Role in an Emergency or Disaster

- The WIC Program serves a specific population with special nutritional needs. The WIC Program is not designed or funded to meet the basic nutritional needs of disaster victims who would not otherwise be eligible for the Program. WIC is not to be considered a first-line defense to respond to the nutritional needs of disaster victims, including the provision of infant formula.
- There are important ways the WIC state and local agency personnel can contribute to a disaster relief effort. The primary functions are:
 - a. Continued benefit delivery to WIC participants
 - b. Outreach to potentially eligible individuals
 - c. In addition, the WIC Program may serve as an information and communication source for WIC families and an ongoing source of referrals to other emergency services.
- This procedure outlines the processes to follow when a disaster or other emergency situations may interrupt WIC services.

3. Replacement of WIC Food Instruments and Foods Destroyed During a Disaster

- WIC is currently unable to replace food or formula that has been purchased and destroyed during a disaster but will follow the guidelines from USDA WIC Disaster Guidance Coordinating during WIC Services Disaster
 - o Replacement of food benefits redeemed but destroyed may only occur if:
 - The replacement of redeemed food benefits does not result in the replacement of prior month(s) benefits.
 - If the participant has benefits remaining in a 3-month issuance cycle, the State agency has the option to issue the remaining benefits to replace the lost/destroyed food.

- Referrals should be made to other disaster assistance resources such as food banks, Red Cross, SNAPD, etc.

4. Disaster Procedures and Contact Lists

- All State WIC staff will review the developed plan annually.
- The State Agency and Local Agencies will maintain current contact lists for the primary contacts for each Agency.
- The State Agency list should include contacts for:
 - State Agency staff and DPHHS points of contact
 - USDA Regional office contacts
 - Local WIC Agencies primary contacts
 - Infant formula manufacturers
 - WIC Vendors
- Designated emergency contacts within the state office will be communicated with the RO and local agencies
 - Vendor coordinator lead will serve as the main emergency contact
 - Nutrition services lead will serve as the emergency contact to address the needs of participants receiving food package III

5. Notifications and Requirements

- The State Agency will contact the USDA Regional Office to keep them informed of disaster situations in Montana.
- Local Agencies should contact the State Agency as soon as safely possible after a disaster and provide a report on the following:
 - the impact of the disaster on the local agency
 - status of staff safety
 - damage to locations
 - damage to equipment
 - clinic and Agency scheduling changes and updates,
 - other action taken to ensure continued services
 - updates to Agency primary contact information.
- The State Agency will work with the USDA RO on necessary waivers or adjustments needed to WIC procedures.
- The USDA Regional Office must be contacted prior to suspending WIC operations.

6. Communication & Outreach Plan

- Local Agencies will receive regular and ongoing communication from the State Agency through email, conference calls, and video calls.
- Information for WIC clients will be posted on the State WIC webpage, through social media sites, text messages, and other available media. Local Agencies should post information on their own websites or other social media sites.
- State Agency guidance and changes to WIC procedures for Local Agencies that must be communicated with urgency will be sent via email
- Local Agencies should develop lists of local resources to refer families to, such as food banks, pantries, other USDA programs including SNAP, community resources, health providers/departments for disease related issues.

- The state agency will coordinate with relief organizations and state emergency operation centers as necessary.

7. Operating during an MIS Outage, Partial or Statewide

- If the MIS were to become unavailable statewide, and is not immediately recoverable, the SA will provide guidance to continue operations in an alternative manner.
- Accessing program records in the event of MIS outage
 - o SA will notify IT stakeholders
 - Recover most recent MIS backup
 - Initiate new MIS environment
 - o SA will provide alternate procedures to issue benefits when an MIS recovery is not possible

8. Serving Disaster-Related Evacuees and Applicants

- The State Agency will follow all guidance from USDA-FNS related to serving disaster-related evacuees. Those who seek WIC benefits shall be considered special nutritional risk applicants and receive expedited certification processing.
- Federal regulations require applicants/participants who have been designated as special nutritional risk applicants be notified of their eligibility or ineligibility within 10 days of the date of the first request for program benefits. These individuals should be served ahead of others seeking benefits.
- The Local Agencies must make every effort to certify these individuals immediately or within 10 days of their request for WIC benefits.
- Applicants/participants who are victims of an emergency or disaster must be served ahead of others receiving WIC benefits and receive expedited certification processing.

9. Providing WIC Services

- The SA will follow USDA-FNS guidance for providing WIC services and education during a disaster/emergency.
 - o WIC Benefit Issuance
 - o Nutrition Education
 - o Mid-certification visit
 - o Breastfeeding support
- VOC Issuance
 - o VOC documentation will be provided to WIC participants if requested when a disaster-related evacuation is anticipated
 - o Participants will be notified of VOC options as needed
- Local agencies shall continue to provide services per remote certification policies
- Local agencies shall submit requests to the SA for health and safety equipment as necessary

10. Benefit Issuance and Redemption

- Benefit Redemption
 - o SA will monitor and publicize the availability of WIC approved vendors.
If there are no vendors within Montana that can redeem eWIC benefits, the SA may temporarily authorize a vendor outside of Montana upon special determination.
- Food instruments (ie- EBT cards) will be issued via clinic pickup or certified mail

11. Nutrition Services

- Nutrition point of contact: State Nutrition Coordinator
- Breastfeeding point of contact: State Breastfeeding Coordinator
- Adjusting food packages
 - o The SA will allow food package substitutions based on availability of options from APL as approved by FNS
 - o The SA will apply for any needed food package waivers if available
- Food Package III
 - o In the event of a disaster or emergency, verbal orders for medical formula or nutritionals will be accepted for 30 days until a written order can be received
- Infant formula distribution
 - o To limit the disruption of infant formula benefits in a disaster or emergency, direct distribution of formula or delivery to the participant's home may be allowed if necessary

12. Retail Viability

- In a pandemic situation, most retail stores should remain open, however quantities of WIC foods available on store shelves may be limited or unavailable at certain times based on the public's shopping patterns. The State Vendor Management Coordinator and local vendor managers will work to assess product availability and work with WIC families to find products as necessary. Specific attention will be paid to the availability of infant formula.
- Following a natural disaster, the state agency will establish and update a list of retail grocery stores that remain in operation following the disaster, their operating hours, and an overview of their available stock of WIC approved foods, to the best of the SA ability. The State and Local Agencies will coordinate efforts to share this information with the participants.
- Retail purchase is considered nonviable when a significant number of clients are unable to purchase WIC approved foods. The state agency will work directly with individual vendors and corporate offices in the affected chain stores for the status of their outlets in the affected area.

Vendor Management

- Temporary suspension of vendor requirements
 - o Annual vendor monitoring, training, and compliance inspections may be temporarily suspended with notification from the SA. Instructions to LA staff and vendors will be provided as needed. Minimum stocking requirements may be adjusted as needed, per vendor.
 - Vendors will be required to continue to stock at least two varieties of fruit, three varieties of vegetables, and at least one whole grain cereal.
 - Vendors will be required to only source infant formula from the SA's list of approved infant formula suppliers.
 - o Selected vendor application criteria may be temporarily waived, and authorization timelines expedited if new vendors are required for emergency participant access.