

## FINANCIAL MANAGEMENT

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**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.00  
Effective Date: October 1, 1990  
Revised Date: July 13, 2021**

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**SECTION: Financial Management**

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**SUBJECT: Overview of Financial Management**

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**A. Policy**

Financial Management of the Maryland State WIC Program and WIC local agencies that are funded by the Maryland State WIC Program is governed by applicable Federal regulations, State of Maryland regulations, and policies and procedures issued by the State WIC Office.

The regulations, circulars and policies that govern operations of the WIC state and local agencies are:

1. **Federal**

- a. Federal Register 7 CFR Part 246 WIC Program Consolidated Regulations;
- b. 2 CFR 200 Uniform Administrative Requirement, Cost Principals, and Audit Requirements for Federal Awards; and
- c. FNS Memo SFP 10-017, Updated Prior Approval Guidance.

2. **State**

- a. COMAR 10.54.02 Department of Health, Special Supplemental Nutrition Program for Women, Infants and Children;
- b. Local Agency Policy and Procedure Manual;
- c. WIC Conditions of Grant Award;
- d. WIC and BFPC Budget Package and WIC Budget Instructions; and
- e. Local Health Department Funding System Manual.

All of the above referenced federal and state regulations are available on-line and should be on file at the local agency.

The WIC Conditions of Grant Award and the WIC and Breastfeeding Peer Counselor (BFPC) Budget Package and WIC Budget Instructions are revised annually. These updated files are issued as attachments to the annual local agency grant award letter.

The applicable regulations and policies should be consulted whenever a question is raised concerning allowable costs or procedures. If further clarification is needed, the State WIC Office should be contacted. If necessary, the appropriate federal or state authority will be contacted for explanation or clarification.

## **B. Procedure**

### **1. Accountability / Program Costs**

#### **a. General**

Each WIC local agency must maintain an accounting system and separate records relating to the WIC grant which conform to all state and federal regulations as well as generally accepted accounting principles. Any expenditure charged to a WIC grant must be traceable to source documentation.

Federal regulations require that records be retained for at least three years from the filing of the final closeout report as outlined in section B.3 of this policy. USDA has the option of requiring a longer record retention period if it is felt to be justified, or if any of those conditions specified in Section 246.25 (a) (2) of the federal regulations exist.

WIC funds are divided into two broad categories: Food funds and Nutrition Services and Administration (NSA) funds. Local agencies are not awarded Food funds. NSA funds are further subdivided into the following cost categories

- i. Certification
- ii. Nutrition Education
- iii. Breastfeeding Promotion and Support
- iv. Breastfeeding Peer Counselor Support
- v. Program Operations

Separate accumulation of costs under each of these categories must be maintained. The WIC Budget Instructions provide further guidance on cost allocation. The WIC local agency shall not have expenditures that exceed the award for the current fiscal year. Expenditures in excess of the current fiscal year award will be disallowed and not reimbursed by the Program.

All expenditures must be allocable, allowable, reasonable, and necessary for the proper administration and operations of the WIC Program.

**b. Nutrition Education and Breastfeeding Spending Requirement**

At least 20% of NSA funds expended by each local agency must be for nutrition education. In addition, at least 5% of NSA funds expended by each local agency must be for breastfeeding promotion and support.

**c. Time Studies**

Local agency staff are required to perform time studies during the first month of each quarter of the State Fiscal Year (July, October, January and April) or on a daily basis under certain circumstances. See Policy and Procedure 6.01 (Time Study Requirements for Staff Paid with WIC or Breastfeeding Peer Counselor Funds) for further guidance. Salary and fringe cost expenditures for each quarter are allocated to the appropriate cost category based on the time study percentages.

**d. Other Costs**

Costs other than those for nutrition education and breastfeeding promotion and support must be allocated to the appropriate cost category on the monthly/quarterly expenditure report.

Indirect costs are those costs incurred for a common purpose benefiting more than one program and not readily assignable to the program benefited. The WIC Program limits indirect costs to a specified percentage of actual expenditures for eligible salary line items (not including fringe benefits). This is further explained in the WIC Budget Instructions that are included with the annual local agency grant award letter.

**e. Inventory Records**

Local agencies are required to maintain equipment inventory records for all equipment items that are purchased with WIC grant funds. These records should allow easy identification of each item and its location.

See Policy and Procedure 6.02 (Inventory Requirements) for further guidance.

**f. Items Requiring Specific State WIC Agency or USDA Approval**

Items purchased using WIC Program funds after the original budget was approved must be approved in writing by the State WIC Financial Officer. All requests are to be submitted via email. It is the responsibility of the Local Agency to retain approvals for recordkeeping purposes.

**Purchases Over \$250**

Written approval for purchases of sensitive equipment costing \$250.00 or more is required by the State WIC Financial Officer. Sensitive equipment includes capital or non-capital items including computer equipment such as laptops, tablets and notebook computers. Portable items such as tools, hand radios and cameras that are prone to theft and concealable in a handbag or briefcase are also considered sensitive items. Equipment items that are too large for concealment, such as typewriters and projectors, shall be considered sensitive items if there is a history of loss or theft within a particular local agency. Firearms and other law enforcement type weapons are always considered sensitive regardless of acquisition cost.

**Purchases Over \$500**

Written approval for purchases of non-sensitive equipment costing \$500.00 or more is required by the State WIC Financial Officer. Non-sensitive items are all other equipment that is not described above as sensitive equipment.

**Purchases Over \$5,000**

The USDA must be notified in writing by the State WIC Office of any automation services or equipment purchase totaling \$5,000 to \$99,999 within 60 days of the expenditure or contract execution.

USDA approval is required prior to the purchase of any non-computer equipment item with a unit cost of \$25,000 or greater.

WIC State Office and USDA approval is required prior to the start of any capital improvement project (including repairs) if the total cost is \$5,000 or greater. Refer to Policy and Procedure 6.07 (Clinic Construction or Renovation) for instructions.

### **Travel**

All travel reimbursement must be made in accordance with Policy and Procedure 6.10 Travel Reimbursement Requirements. Expenses for travel, lodging, meals, conference fees, etc. for agency staff that work for both WIC and another program must be approved in advance by the local agency WIC Coordinator. Travel requests for a local agency WIC Coordinator that works for both WIC and another program must be approved in advance by their supervisor.

### **Incentive/Outreach Items**

Prior written approval from the State WIC Financial Officer is required for the purchase of all incentive / outreach items if the unit cost exceeds \$8.00. See Policy and Procedure 6.05 (Outreach, Nutrition Education and Breastfeeding Promotion Items).

### **Documentation**

For the items that require approval, a copy of the approval from the State WIC Financial Officer must be maintained in the local agency files. When budget modifications are submitted, the approved items must be included in the modified budget.

### **Budget Line Item Modifications**

Any line item modification more than 10% above the original amount budgeted requires justification for the additional costs. The justification is to be submitted with the budget modification and requires prior approval from the State WIC Financial Officer.

### **g. Audits**

In accordance with the provisions in Federal Register 2 CFR 200, all non-federal entities that expend \$750,000 or more in a year in federal awards shall have a single or program-specific audit conducted for that year. WIC local agencies that are not operated by a local health department must submit a copy of the annual single audit report to the WIC State Office upon its completion.

To ensure that accurate reports and record keeping are in place in each local agency, an audit is performed by the Department of Health Audit Division during the regular audit of the Local Health Department or Local Provider. A separate audit report is issued for each WIC local agency. Should the audit result in funds being due to the State, the funds are collected and returned to USDA.

USDA and other Federal and State agencies reserve the right to audit a Local Agency's operations at any time.

**h. Financial Review**

The State WIC Program routinely performs Management Evaluations of local agencies. Prior to the start of the Management Evaluation, an electronic letter will be sent to the local agency fiscal staff and local agency coordinator requesting that documentation be submitted. The requested documentation is to include, but is not limited to, cost allocation plans, proof of payment, records for costs reported to the WIC program, spending approvals and records for time studies. Documents should be submitted in electronic or paper form in the timeframe stated in the letter. Expenditures may be disallowed if supporting documentation cannot be provided. Disallowed expenditures are subject to repayment to the state WIC office. WIC funds shall not be used for the repayment of disallowed expenditures.

During the Management Evaluation, the WIC financial management staff will schedule an on-site appointment with the local agency coordinator to perform a physical inventory of equipment. The on-site visit may also include a review of certain accounting records and procedures.

Individual training sessions on WIC financial management policies, recordkeeping, reporting and time studies are provided to all new agency coordinators and fiscal officers. Additional training will be provided to any local agency staff upon request.

**2. Funding, Caseload Assignments and Reporting Requirements**

**a. WIC Grant**

Local agency NSA funding is awarded on a State fiscal year basis (July 1st through June 30th). Funding is awarded using the caseload assigned to each local agency, the rate per participant

and base funding (based on caseload assignment). Funding rates may be adjusted annually and are subject to availability of funding.

NSA Funding formula (per participant rate x caseload assignment)  
+ Base Funding = SFY Award

1) Base funding

\$545,000 for a caseload up to 3,000 participants;  
\$605,000 for a caseload from 3,001 to 5,999 participants;  
\$835,000 for a caseload of 6,000 to 8,499 participants;  
\$805,000 for a caseload of 8,500 to 13,999  
\$595,000 for a caseload of 14,000 to 19,999 participants;  
\$315,000 for a caseload of 20,000 or more participants.

2) Per Participant Rate

\$122.50 per participant.

**b. Breastfeeding Peer Counselor (BFPC) Funding**

Local agency BFPC funding is awarded on a State fiscal year basis (July 1st through June 30th). BFPC funding acceptance is voluntary for local agencies. BFPC awards are determined by using the estimated number of pregnant and breastfeeding women participants in each participating local agency and the rate per participant. Funding rates may be adjusted annually and are subject to availability of funding.

Breastfeeding Peer Counselor Funding formula (per participant rate x estimated pregnant and breastfeeding women participants) = SFY Award

1) Per Participant Rate

\$79.50 per estimated pregnant women and breastfeeding women participant.

**c. Caseload Assignments**

Local agency caseload assignments are determined each year in April for the State fiscal year starting July 1<sup>st</sup>. Assignments are based on actual participation for the current year, special populations served, percent of target population being served, and any other relevant information that is available.

Caseload assignments and actual participation are reviewed on a monthly basis. Caseload assignments are normally adjusted once during the year, if indicated, based on actual participation but may be adjusted more frequently at the discretion of the State WIC Office.

Local agencies are required to serve an average of at least 97% of their caseload assignment during the year. If a local agency does not meet this requirement, their caseload assignment may be reduced for the following year.

**d. Local Agency Budgets**

Local agencies should refer to the WIC Budget Instructions when preparing their annual budgets and budget modifications. Local agency budgets are due at the end of May each year. Budget modifications are usually limited to one per year which is due with the third quarter expenditure report.

The State WIC Office requires an agency Cost Allocation Plan for each budget line item that is a shared cost. The cost allocation sample format in attachment 6.00A can be modified, as needed, to meet this requirement.

**e. Monthly/Quarterly Expenditure Reports**

The State WIC Office requires the submission of expenditure reports on a quarterly or monthly basis (as agreed upon with the State WIC Office). The format for the monthly/quarterly expenditure report is included in the WIC Budget Instructions and WIC Budget Package. Expenditure reports must be submitted electronically to the State WIC Office within 30 days after the end of the month/quarter being reported. If this deadline cannot be met, a request for an extension, with justification stating the reason for lateness, must be made to the State WIC Financial Officer or the State WIC Director in advance of the 30 day deadline. The State WIC Financial Officer or the State WIC Director will approve or deny the request in writing.

It is essential to report expenditures in the appropriate month/quarter. For example, all expenditures that were applicable to the quarter ending in September (July 1 – September 30) must be reported on the quarterly expenditure report for the quarter ending September 30<sup>th</sup>.

The 1<sup>st</sup> quarter expenditure report is critical because it closes out

the Federal Fiscal Year. If 1<sup>st</sup> quarter charges are not charged appropriately, they cannot be charged to the remaining quarters in the State Fiscal Year and will be disallowed for not maintaining fiscal year integrity.

**f. Compliance**

1) Adherence to all instructions and due dates listed in the WIC Program Budget Package is required to maintain compliance with the terms and conditions of the Federal Award. If found non-compliant, one or more of the following actions will be taken in accordance with the 2 CFR 200.338 Remedies for Noncompliance:

- i. Temporary withholding of cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency;
- ii. Disallowance of all or part of the cost of the activity or action not in compliance:
  - a. Costs determined unallowable will be charged back to the agency;
  - b. Late submissions will have a portion of funding disallowed according to the following formula:  
Disallowed Cost = (Total budgeted Indirect Cost ÷ number of business days in the fiscal year) × (number of business days past the assigned due date) × 15%.
- iii. Wholly or partly suspending or terminating the Federal award;
- iv. Initiating suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations;
- v. Withholding further Federal awards for the project or program;
- vi. Other remedies that may be legally available.

**g. Local Agency Payments**

Local Agency payments will be made upon receipt and verification of a monthly/quarterly expenditure report. Payments are made in

accordance with the Local Health Department Funding System Manual and/or the Local Agency's contract (for non-profit LA's).

**h. Dietetic Internship**

- 1) In the event an Intern does not fulfill the requirements of the memorandum of understanding for the dietetic internship program and must repay the Program, a payment plan for can be requested. Written approval of the payment plan shall be obtained from the State WIC Director.
- 2) A copy of the signed agreement between the intern and the local agency outlining the payment plan shall be sent to the State WIC Financial Officer.
- 3) Repayment shall be sent to the State WIC Finance Office within 30 days of receipt.

**3. Record Retention Schedule**

Program records must be retained for at least three (3) years following the date of filing the final closeout report for the period to which the report pertains. For example, the closeout report for Federal Fiscal Year 2010 was filed at the end of January 2011. All records for FFY 2010 must be retained for a period of three (3) years after the filing date. The following dates indicate when program records may be destroyed for each of the applicable Federal Fiscal Years:

<b><u>Federal Fiscal Year</u></b>	<b><u>Dates Records May Be Destroyed</u></b>
FFY 2017 (10/16 – 9/17)	March 15, 2021
FFY 2018 (10/17 – 9/18)	March 15, 2022
FFY 2019 (10/18 – 9/19)	March 15, 2023
FFY 2020 (10/19 – 9/20)	March 15, 2024
FFY 2021 (10/20 – 9/21)	March 15, 2025
FFY 2022 (10/21 – 9/22)	March 15, 2026
FFY 2023 (10/22 – 9/23)	March 15, 2027
FFY 2024 (10/23 – 9/24)	March 15, 2028
FFY 2025 (10/24 – 9/25)	March 15, 2029
FFY 2026 (10/25 – 9/26)	March 15, 2030

Litigation, claim, negotiation, audit, or other action involving records may **extend** the three (3) year requirement. If any of the above mentioned actions occur, the program records must be retained until all issues have been resolved or until the end of the three (3) year period, **whichever is later**.

Attachments:

6.00 A Cost Allocation Plan

References:

1. 7 CFR Part 246 WIC Program Consolidated Regulations
2. 2 CFR 200
3. COMAR 10.54.02 Department of Health, Special Supplemental Nutrition Program for Women, Infants and Children
4. Local WIC Agency Policy and Procedure Manual
5. WIC Conditions of Grant Award
6. Local Agency Budget Instructions
7. SFP 10-017, Updated Prior Approval Guidance
8. Local Health Department Funding System Manual

Revisions:

10/01/10 Revised to agree with Budget Instructions

10/01/12 Revised B.3. Record Retention Schedule

10/01/13 Revised to delete WIC Budget Package and WIC Budget Instructions as an attachment.

10/01/2014 Revised Financial Review section to include information on the submittal of all documents to the State finance office in an electronic or paper format by the date specified in the electronic letter. Increased threshold for audits in B. 1. G. and the retention dates in B.3.

10/1/2015 Changed federal citations, Clarified financial review information and requirements for purchases needing state approval.

3/29/2016 Added Compliance protocol to Funding, Caseload Assignments and Reporting Requirements

6/28/2016 Removed References #2-5 and replaces with 2 CFR 200 and renumbered #6-9 to #3-6.

11/15/16 Added Section 2 to include funding formulas for the WIC Grant and the Breastfeeding Peer Counselor Grant.

1/10/2017 Added reference #7 SFP 10-017, Updated Prior Approval Guidance and #8 Local Health Department Funding System Manual. Corrected the statement in B1.f to state non-computer equipment. Added section B.2.g for Local Agency Payments.

6/12/2017 Updated B.3. to include litigation, claim, negotiation.

8/22/2018 Added intern repayment, removed dates for base funding, update base funding figures, updated record retention dates, updated the Department name.

09/24/2019 Updated base funding, record retention dates and minor clarifications.

05/04/2020 Updated base funding, record retention dates, added WIC expenditure language & increased individual cost per item to \$8 to be consistent with 6.05.

4/26/2021 Updated base funding, record retention dates

**Attachment 6.00A WIC Local Agency Cost Allocation Plan**

AGENCY:  
SFY:

Line Item #	Line Item Description	Sample of suggested methodologies to use to calculate WIC's portion of costs incurred.
0301	Postage	Actual WIC costs
0305 SFY: ____	<b>Telephone</b> # WIC employees: _____ # of total employees: _____	<b>Actual WIC costs or shared cost based on budgeted FTE's. Phone costs can not be based on square footage of the facility.</b>
0405	In-state Travel	Actual WIC Employee costs
0409	Out-of-State Travel	Actual WIC Employee costs
0415	Training	<b>Actual WIC Employee costs for training necessary to operate the WIC Program only.</b>
0420	Stipend/Tuition	Actual WIC Employee costs
0604	Electricity	Costs based on WIC's square footage used in the facility or actual WIC costs if facility is only used by WIC.
0613	Water	Costs based on WIC's square footage used in the facility or actual WIC costs if facility is only used by WIC.
0615	Utilities - Combined	Costs based on WIC's square footage used in the facility or actual WIC costs if facility is only used by WIC.
0701	Gas and Oil	Actual WIC costs
0703	Insurance & Title	Actual WIC costs
0705	Vehicle Maintenance & Repair	Actual WIC costs
0801	Advertising	Actual WIC costs
0812	Personnel Investigations	Actual WIC costs
0814	Contractual Labor	Actual WIC costs
0834	Photocopier Rental	Actual WIC costs
0833	Equipment Repair & Maintenance	Actual WIC costs
0835	Equipment Service Contracts	Actual WIC costs
0838	Software	Actual WIC costs
0839	Software Maintenance	Actual WIC costs
0853	<b>Maintenance</b>	<b>Actual WIC costs. Shared space cost by square footage. Floor plans provided each year with WIC spaces highlighted</b>
0854	<b>Housekeeping</b>	<b>Actual WIC costs. Shared space cost by square footage. Floor plans provided each year with WIC spaces highlighted</b>
0856	Indirect Cost	Actual WIC Employee salary costs
0869	Photography (Commercial)	Actual WIC costs
0873	Printing	Actual WIC costs
0885	Trash Disposal	Actual WIC costs
0899	Special Projects	Actual WIC costs
0909	Cleaning Supplies	Actual WIC costs

**Attachment 6.00A WIC Local Agency Cost Allocation Plan**

AGENCY:  
SFY:

Line Item #	Line Item Description	Sample of suggested methodologies to use to calculate WIC's portion of costs incurred.
0919	Educational Supplies	Actual WIC costs
0957	Medical Supplies	Actual WIC costs
0965	Office Supplies	Actual WIC costs
0986	Other Supplies	Actual WIC costs
1060	Computer Equipment *	Actual WIC costs of WIC approved purchases per policy
1073	Office Equipment *	Actual WIC costs of WIC approved purchases per policy
1180	Personal Computer Equipment *	Actual WIC costs of WIC approved purchases per policy
1192	Medical Equipment *	Actual WIC costs of WIC approved purchases per policy
1193	Office Equipment *	Actual WIC costs of WIC approved purchases per policy
1331	Dues & Memberships	Dues and Memberships directly associated with the WIC program are assigned to WIC @ 100%. WIC is only charged for dues and memberships that directly relate to the operation of the WIC Program.
1332	Insurance	Workers Compensation by % of budgeted WIC FTE's. General liability cost by square footage of WIC clinics. All other insurance costs based on budgeted WIC FTE's.
1334	Rent	Actual WIC costs. Shared space cost by square footage. Floor plans provided each year with WIC spaces highlighted.

**MARYLAND STATE DEPARTMENT OF HEALTH AND MENTAL HYGIENE  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number 6.01  
Effective Date: July 1, 2004  
Revised: October 1, 2012**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Time Study Requirements for Staff Paid With WIC or  
Breastfeeding Peer Counselor Funds**

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**A. Policy**

Time studies shall be performed at least quarterly by all State and local WIC agency staff persons who have any portion of their salary paid with WIC funds. Time studies shall document the percentage breakdown of WIC salaries charged to nutrition education, breastfeeding promotion and support, client services, and program operations. Examples of activities that should be reported in each of these cost centers are shown on Attachment 6.01A Definition of Activities.

In addition, under certain conditions, employees whose salaries are split between various funding sources may be required to complete daily time studies.

**B. Procedure**

1. Quarterly time studies shall be conducted during the first month of each quarter; i.e. July, October, January, and April.
2. Time study data shall be entered into the appropriate time study screens in the management information system.
3. All types of leave (annual, sick, personal, administrative, furloughs) shall be entered into the appropriate time study screens in the management information system.
4. Definitions of Standard and Non-Standard work schedules.
  - A. Standard Work Schedule: an employee who works the same number of days in the applicable programs each pay period and the number of days never varies.
  - B. Non-Standard Schedule: an employee who may work a different

number of days and/or hours in the applicable programs each pay period.

5. Listed below are the time study frequency requirements for employees paid with WIC or Breastfeeding Peer Counselor (BFPC) Funds.
  - A. No time studies are required for employees who:
    - a) work only in the BFPC Program providing only BFPC services and whose salaries are charged entirely to the BFPC budget
  - B. Quarterly time studies are required for employees who:
    - a) work only in the WIC Program; or
    - b) work in both the WIC Program and the BFPC Program on a standard schedule; or
    - c) work in both the WIC Program or BFPC Program and another state funded program on a standard schedule.
  - C. Daily time studies are required for employees who:
    - a) work in both the WIC and BFPC Program on a non-standard schedule; or
    - b) work in both the WIC or BFPC Program and another state funded program on a non-standard schedule; or
    - c) work in both the WIC or BFPC Program and another federally funded program, regardless of their work schedule.
6. The employee shall certify that the time study data entered into the management information system is complete and correct.
7. The Local Agency shall review and approve that the time study data that each employee has entered into the management information system is complete and correct.
8. The Local Agency shall complete the Salary Calculations Worksheet in WOW using the calculations from the Daily Time Study Percentages Report for all employees who are required to complete daily time studies.
9. The Local Agency shall use the percentages calculated at the bottom of the Quarterly Time Study Percentages Report to allocate salary and fringe expenditures as well as expenditures in other appropriate line items (see Local Agency Budget Instructions for additional detail) to the Nutrition Education, Breastfeeding Promotion and Support, Client Services, and Program Operations cost centers when preparing the quarterly expenditure reports.
10. During the Management Evaluation, or any other time deemed appropriate

by the State WIC Office, individual time study data may be reviewed and compared against time sheets and payrolls.

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Attachments:

6.01 A      Definition of Activities

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References:

1.      FNS Instruction 807-3

Revisions:

1.      10/01/08      Changed Category Administration to Program Operations
2.      4/1//11      Modified to include incorporation of time study data in the management information system.
3.      10/01/12      Deleted 6.01A, B, and C; now included in WOW. Renamed 6.01D to 6.01A

## DEFINITIONS OF ACTIVITIES

The following are examples of activities reflected on the Weekly Time Study Record.

### **Nutrition Education:**

- < Individual counseling - providing a participant with information about nutrition for women, infants, and children or related topics, including information about why the WIC foods are prescribed and how to store, prepare, and use them during certification or a high risk counseling session. Contact may be face-to-face or a telephone consultation.
- < Group nutrition education sessions in which information, as described above, is provided to participants or their caregivers during benefit distribution or at other local agency events, such as community fairs.
- < Discussing nutrition information with participant's health care providers and WIC vendor staff to reinforce consistency of nutrition messages to participants or their caregivers.
- < Preparation for individual and group nutrition counseling/education/training sessions, including the research and writing of lesson plans and individual nutrition care plans; the research and evaluation of, procurement or design and development of written nutrition education support materials; audiovisual aids such as transparencies, or videotapes, procurement of foods, and room arrangements for sessions.
- < Training related to nutrition education for WIC and non-WIC in-kind staff.
- < Monitoring of nutrition education activities, including individual participant record reviews and participant satisfaction surveys.
- < Copying, ordering, mailing, stocking, and organizing WIC support materials and aids such as written nutrition education materials, posters, videotapes, audiovisual equipment, food models, nutrition games or puzzles, and incentives for use in WIC clinics.
- < Mailing of nutrition education materials to participants as a follow up of individual counseling or group sessions.
- < Attending nutrition education workshops, conferences, and professional meetings and in-services at staff meetings; reading of nutrition books, journals, newsletters, and related materials as well as preparations for or procurement of these items; state and local committee activities.
- < Design, procurement of materials for, development, and installation of nutrition education displays, including bulletin boards, posters, and banners.
- < Development of the annual nutrition education program plan.
- < Research related to WIC authorized foods and formulas to better educate WIC participants regarding allowed foods.
- < Travel time and documentation of travel and expenses related to nutrition education activities, prorated according to time spent exclusively on nutrition education.

**Breastfeeding Promotion and Support:**

- < Individual counseling of pregnant or breastfeeding participants conducted during certification or in high risk counseling sessions. Contact may be face-to-face or a telephone consultation.
- < Group sessions provided to participants or their caregivers during benefit distribution or at other local agency events, such as breastfeeding baby showers or community events.
- < Copying, ordering, mailing, stocking, and organizing of breastfeeding promotion and support materials and aids such as written materials, posters, videotapes, audiovisual equipment, breastfeeding aids such as pads, shells, supplemental nursing systems, breast models, or breastfeeding dolls, or incentives for use in WIC clinics.
- < Discussing breastfeeding issues with participant's health care providers to reinforce consistency of care to participants.
- < Preparation for individual and group breastfeeding counseling/education sessions, including the research and writing of lesson plans and individual nutrition care plans; record reviews; the research and evaluation of, procurement or design and development of written materials; audiovisual aids such as transparencies, or videotapes, procurement of foods, and room arrangements for sessions.
- < Mailing of breastfeeding materials to participants as a follow up of individual counseling or group sessions.
- < Attending breastfeeding workshops, conferences, and professional meetings, including networking meetings and in-services at staff meetings; reading of professional books, journals, newsletters, and related materials as well as preparations for or procurement of these items; state and local committee activities.
- < Training of WIC and non-WIC in-kind staff who will provide breastfeeding promotion and support to participants, including research, preparation of materials for, conducting, and evaluation of activities.
- < Organizing and preparing the WIC clinic to promote a breastfeeding-friendly atmosphere, including the design, procurement of materials for, development, and installation of breastfeeding displays, including bulletin boards, posters, and banners, and the procurement of furniture.
- < Arranging for rental or procurement of breastfeeding equipment, such as electric breast pumps.
- < Monitoring and evaluation of breastfeeding activities.
- < Community breastfeeding promotion activities such as fairs and breastfeeding walks, radio or television interviews, including preparation, conducting, and evaluation.
- < Development of the breastfeeding component of the annual nutrition education program plan.
- < Travel time and documentation of travel and expenses related to breastfeeding activities, including home visits, prorated according to time spent exclusively on breastfeeding promotion and support.

**Client Services:**

- < Completing demographics information in WOW.
- < Weighing and measuring participants entering the data into the WOW system, cleaning, checking, and calibrating equipment.
- < Taking and processing blood samples from participants, reading the result, entering the data into the WOW system, cleaning, checking, and calibrating equipment.
- < Entering nutrition history and medical information into the WOW system.
- < Ordering, photocopying, mailing, and stocking of certification materials and supplies; ordering and arranging for repair of equipment used in WIC clinics.
- < Explaining program information, including how to use WIC benefits, rights and responsibilities to participants or their caregivers.
- < Training of staff related to the above certification activities, including annual blood-borne pathogens training.
- < Explaining to or assisting participants in completing WIC forms.
- < Travel time related to certification activities.
- < Distributing benefits.
- < Time spent prescribing food packages during certification.

**Program Operations:**

- < Completing time sheets and other administrative forms.
- < Program reporting.
- < Performing general management.
- < General supervisory duties.
- < Accounting and audits.
- < Outreach, explaining general WIC program information, such as income eligibility.
- < Preparing identification folders.
- < Scheduling appointments, appointment reminders.
- < Ordering, receiving, and organization of general office supplies and equipment, including communications and computer equipment.
- < Vendor monitoring, price checks, compliance buys.
- < Attending general management in-service training and staff meetings.
- < General telephone duties.
- < Arranging for translators.
- < Issuing Farmer's Market Nutrition Program coupons.
- < Training related to above administration activities.
- < Travel time related to program operations activities.

**Revisions:**

1. April 1, 2011 – change cost center entitled “Certification” to “Client Services” in accordance with instructions from USDA
2. October 1, 2014 – added “Time spent prescribing food packages during certification” under Client Services.
3. February 3, 2017 – changed references to checks to benefits.

**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.02  
Effective Date: July 1, 2004  
Revised Date: August 22, 2018**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: INVENTORY REQUIREMENTS**

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**A. Policy**

All inventory items (including vehicles) purchased with WIC Program funds, either directly by the State WIC Office or by a local agency through their award from the State WIC Office, are the property of the State WIC Office. With the exception of hospital grade electric and multi-user breast pumps, all inventory items must have an inventory label assigned and affixed to them. An inventory label is not to be removed unless an item is being surplusled. If an item is transferred out of the local agency, the county property inventory label is to be removed according to county policy, but a state or WIC property label should remain on the item. Purchases, surpluses, or transfers of all inventory items must be approved in writing by the State WIC Financial Officer. Once the equipment has been purchased and received, surplusled or transferred, a completed Attachment 6.02A, WIC Inventory Status Change Form and a copy of the original approval must be submitted to the State WIC Office via email.

**B. Procedure**

1. When any non-consumable inventory item costing \$50.00 or greater is purchased with WIC Program funds (see Policy and Procedure 6.00), an inventory label must be assigned. The inventory label is supplied by the State WIC Finance Office. Inventory labels display an assigned number and read "Property of Maryland WIC Program" or "MDH Property of the State of Maryland."
  - a. Once an item has been purchased and received, local agencies must submit a completed attachment 6.02A, WIC Inventory Status Change Form, within 30 days after receipt via email. An item description, source of the item, company purchased from, serial number (if applicable), clinic and room location, acquisition date and item cost must be provided in order for the State WIC Office to update the agency's inventory records. For vehicle purchases, local agencies are required to contact the State WIC Office for additional information needed.
  - b. Upon receipt of the completed attachment 6.02A, the State WIC Finance Office will update the agency's inventory record with both the inventory information received and an assigned inventory number. The revision will be emailed to the local agency coordinator within 30 days of receiving a complete and accurate 6.02A form.

- c. The assigned inventory label and a copy of the attachment 6.02A form, signed by the State WIC Financial Officer, will be mailed to the local agency coordinator within 30 days. Once received, the label is to be attached to the approved item.  
Non-consumable inventory are items that do not need to be replaced regularly because they do not wear out. Examples include vehicles, shredders, cameras, chairs, children's toys, stadiometers, scales, utility carts, etc.

**\*Note:** Items such as PC desk tops, laptops, towers/modems, servers, monitors, MICR's and bought with funds from the State WIC Office and bearing a MDH inventory bar-code will be on a separate inventory list maintained by the State WIC IT unit.

2. When closing or opening a clinic, the 6.02A form should be submitted for all items being moved, procured, or disposed. All inventory should be accounted for before and after any move.
3. When inventory purchased with WIC Program funds is in working order but no longer needed, complete attachment 6.02A, WIC Inventory Status Change Form. The inventory item(s) must then be offered to other programs in the following order:
  - a. Another local WIC Program
  - b. Another federally funded program
  - c. A non-federally funded program
4. When inventory purchased with WIC Program funds is broken, obsolete or cannot be economically repaired, it can be disposed of after acquiring written approval from the State WIC Financial Officer.
  - a. Complete attachment 6.02A, WIC Inventory Status Change Form to acquire approval for disposal.
  - b. An update to the agency's inventory records will be made by the State WIC Office. A copy will be sent to the local agency coordinator for their records.
5. When inventory purchased with WIC Program funds is stolen:
  - a. Follow local procedure to contact authorities.
  - b. Complete attachment 6.02A with an explanation of the event.
  - c. An update to the agency's inventory records will be made by the State WIC Office. A copy will be sent to the local agency coordinator for their records.
6. When hospital grade and multi-user breast pumps are purchased with WIC Program Funds:
  - a. Complete attachment 6.02A using the manufacturer's serial number.

- b. An update to the agency's inventory records will be made by the State WIC Office. A copy will be sent to the local agency coordinator for their records.
- c. Refer to Policy and Procedure 5.11 for instructions on documenting serial numbers of hospital grade and multi-user breast pumps in the WOW system.

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Attachments:

6.02A WIC Inventory Status Change Form

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References:

1. 2 CFR 200.313 Equipment (a) Title

Revisions:

10/2013 Revised the dollar threshold for items that are considered inventory and listed samples of different categories.  
Clarified the process flow for disposing of equipment and the approvals needed from the State office.

10/2014 Revised the policy to include label removal.  
Clarified that an inventory label should include a number  
Removed breast pumps from the list in the \*Note section.

12/2014 Revised procedures to follow order of approval process for inventory requests.  
Replaced or removed the word "should" from procedures.  
Removed sample lists of different non-consumable categories that were added 10/2013 and replaced with definition.

10/1/2015 Added information about Breast Pumps and approvals required for sensitive and non-sensitive purchases.

08/22/2018 Added multi-user breast pumps, dates for receipt of 6.02A form and inventory stickers being mailed, and need for 6.02A when closing or opening a new clinic.



MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGIENE  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL

Policy and Procedure Number: 6.03  
Effective Date: October 1, 2005  
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SECTION: FINANCIAL MANAGEMENT

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SUBJECT: Allowable Costs for Program Support Materials

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**A. Policy**

USDA allows Nutrition Services and Administration (NSA) funds to be spent on incentive items and other goods and services that directly and indirectly support outreach, nutrition education, and breastfeeding. Program *incentive items* refer to a class of goods of nominal value that are given to applicants, participants, potential participants, and/or WIC staff persons for the purpose of outreach, nutrition education, or breastfeeding promotion. To be allowable, incentive items and other goods and services must be both *necessary* and *reasonable* for the proper administration of the WIC Program; that is, they are necessary to carry out essential Program functions, provide a benefit commensurate with the cost incurred, be consistent with the costs of similar items from other vendors, be a priority expenditure relative to other demands on available administrative resources, and have a proven or intuitive positive impact.

**B. Procedure**

1. Incentive items and other goods and services shall be intended primarily for participants or potential participants. Incentive items may not be given during a certification to participants' family members who are not enrolled in the WIC Program. Incentive items can, on occasion, be provided to WIC staff provided they contain a WIC outreach, nutrition education or breastfeeding message and can be widely seen by the general or target population.
2. Local agencies shall follow these additional guidelines when purchasing program support materials:
  - a. **Outreach:** Items shall be intended to encourage and increase participation in the WIC Program, contain a WIC-specific message that targets the potentially eligible population, normally be seen in public, include the WIC contact information such as the State or local agency name, address, and/or telephone number, and constitute an innovative or proven way to encourage WIC participation.
  - b. **Nutrition Education, including Physical Activity:** Items shall be targeted to participants and be distributed to the appropriate participant category in conjunction with a relevant nutrition education contact to reinforce nutrition and physical activity messages. Items shall include messages that link nutrition and physical activity and, where possible, use or adapt existing

materials such as the Eat Smart Play Hard or Fit WIC materials available through the WIC Works Resource System.

*Examples of allowed incentive items include: an infant weaning cup or infant spoon provided to the caregiver of an infant participant at the mid-certification visit; a wall calendar with important nutrition messages; a MyPlate refrigerator magnet; a water bottle or ball given to participants to promote physical activity.*

- c. **Breastfeeding Promotion:** There are two types of program support materials for breastfeeding—breastfeeding incentives and breastfeeding aids.
    - 1) Breastfeeding incentives shall be targeted to participants and, when applicable, be distributed to the appropriate category of participant (for example, water bottles to pregnant or breastfeeding women or diaper wipe containers to breastfed infants). If a dual nutrition education and breastfeeding message is present, the incentive shall be provided at an appropriate time for the participants' usefulness and in conjunction with relevant nutrition education.
    - 2) Breastfeeding aids directly support the initiation or continuation of breastfeeding (for example, breast pumps or nursing pads). They cannot be provided to participants solely as an inducement to consider or continue breastfeeding, yet should be offered to breastfeeding participants based on established need. Refer to both Policy and Procedure 5.11 and 5.12 for more detail regarding allowable breastfeeding aids and the established need for each.
  - d. **Reading Readiness:** Books may be provided to participants or potential participants as an incentive item in support of the WIC Healthy Children Ready to Read partnership. The State WIC Program may purchase inexpensive books that contain a clear, age-appropriate nutrition education or health promotion message.
3. Local agencies shall describe how they use or plan to use incentive items in their Annual Nutrition Services Plan.

References:

1. SFP 91-061, Allowable Costs for the Promotion and Support of Breastfeeding and the Reporting of Allowable Nutrition Services Expenditures
2. SFP 95-040, Allowability of Costs for Program Incentive Items
3. SFP 03-052, Purchasing Books with WIC Program Funds for the WIC Healthy Children Ready to Read Initiative
4. SFP 94-110, Direct/Indirect Breastfeeding Aids
5. SFP 03-127, Allowable Costs of Physical Activity Promotion

Revisions:

10/11 B.1. Added stipulation that incentive items may not be given during a certification to WIC

participants' family members who are not enrolled in the WIC Program.

B.2. Changed wording in first paragraph to more clearly describe nutrition education incentive items.

10/13 B.2.b. Changed Food Guide Pyramid to MyPlate refrigerator magnet as an example of allowed incentive items.

B.3. Removed text in d. referring to reading programs partnerships.

**MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGIENE WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.04  
Effective Date: December 7, 2006  
Revised Date:**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: REIMBURSEMENT FOR COSTS OF TEMPORARY STAFFING**

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**A. Policy**

WIC temporary services staff will be paid for hours worked at a local agency by Anne Arundel County. After the employee has been paid, the payroll costs attributed to the employee will be charged to the local agency where employee was assigned.

**B. Procedure**

1. The employee will complete the DHMH Special Payments Payroll time sheet at the end of each day that they work in a local agency. Completed time sheets will be signed by the local agency coordinator or their designee and faxed to the Training and Temporary Services Center. The original of the signed time sheet will be retained by the local agency. The faxed copy of the time sheet will be signed by the Training Center staff and sent by courier to the Anne Arundel County Health Department payroll office for processing.
2. Time sheets are to be submitted either bi-weekly by the time sheet due date established by Anne Arundel County or at the end of assignment if the assignment is completed before the time sheet due date. Anne Arundel County will pay the employee in accordance with County payroll policy.
3. After the employee has completed their work assignment at the local agency and has received their final check from Anne Arundel County, the payments made by Anne Arundel County will be charged back to the local agency where the employee worked. If the temporary assignment is longer than two weeks, the charge back will be completed on a monthly basis.
4. For local agencies who use FMIS (the state's accounting system), the chargeback to the local agency will be made via journal adjustment initiated by the State WIC Office.
5. For private agencies or for agencies who do not use FMIS, the charges will be transferred from Anne Arundel County to the State WIC Office via journal adjustment initiated by the State WIC Office. The State WIC Office will then issue an invoice to the local agency. If the temporary assignment is longer

than two weeks, the transfer of charges to the State WIC Office and the invoice to the local agency will be completed on monthly basis.

6. Upon receipt of the invoice, the local agency will submit payment to the Department within the time frame stated on the invoice.

**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.05  
Effective Date: July 1, 2010  
Revised Date: July 1, 2020**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Outreach, Nutrition Education, and Breastfeeding Promotion Items**

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**A. Policy**

WIC Program outreach or promotional items refers to a class of goods, usually of a nominal value, that are given to applicants, participants, potential participants, or persons closely associated with the WIC Program (such as staff) for the specific program purposes of outreach, nutrition education, and breastfeeding promotion.

The local agency shall determine whether an item meets the criteria for a specific program purpose as outlined below. They shall also give careful consideration to the public perception of program funds spent on items even when the connection to outreach, nutrition education, and breastfeeding promotion and support is clear.

**B. Procedure**

The local agency shall purchase and distribute outreach or promotional items according to Policy and Procedure 6.08 (Procurement) provided they meet the guidelines in one of the following categories:

1. **Outreach** means promotional efforts to encourage and increase participation in the WIC Program. Outreach efforts must be consistent with the goals of the WIC Program. Outreach may be a local or statewide effort, directed at increasing the number of participants at a local agency or reaching a group of potential participants who are unaware of the WIC Program or unsure how to access it.

Program outreach items for outreach shall:

- a. contain a WIC specific message that targets the potentially eligible population;
- b. normally be seen in public;
- c. contain the USDA nondiscrimination statement on publications or other printed materials that include program information;

- d. have value as outreach devices that equal or outweigh other uses;
- e. include WIC contact information such as the state or local agency name, address and/or telephone number;
- f. constitute or show promise of an innovative or proven way of encouraging WIC participation; and
- g. be reasonable and necessary costs with a total cost per item of less than \$8.00.

If you are unsure if an item is allowable or if the cost per item exceeds \$8.00, please contact the State WIC Financial Unit before the item is purchased for their review and approval.

2. **Nutrition Education** means “individual or group education sessions and the provision of information and educational materials designed to improve health status, achieve positive change in dietary habits, and emphasize relationships between nutrition and health, all in keeping with the individual’s personal, cultural, and socio-economical preferences” (7 CFR 246.2).

Program outreach items for nutrition education shall:

- a. be targeted to participants;
- b. contain the USDA nondiscrimination statement on publications or other printed materials that also include any program information;
- c. have a clear and useful connection to particular WIC nutrition education messages;
- d. either convey information to be considered educational or be utilized by participants to reinforce nutrition education contacts;
- e. have value as nutrition education aids that equal or outweigh other uses;
- f. be distributed to the audience for which the items were designed for (e.g. sippy cups distributed to mothers of infants who are learning or will be learning to drink from a cup during a relevant nutrition education contact); and
- g. be reasonable and necessary costs with a total cost per item of less than \$8.00.

If you are unsure if an item is allowable or if the cost per item exceeds \$8.00, please contact the State WIC Financial Unit before the item is purchased for their review and approval.

3. **Breastfeeding promotion** means strategies, initiatives, and services to encourage and increase the initiation and support the duration of breastfeeding among WIC participants.

Program outreach items for breastfeeding promotion and support shall:

- a. contain the USDA nondiscrimination statement on publications or other printed materials that also include any program information;
- b. have a clear and useful connection to promoting and supporting breastfeeding among current WIC participants;
- c. either convey information that encourages and supports breastfeeding in general, informs participants about the benefits of breastfeeding, or offers support and encouragement to women to initiate and continue breastfeeding;
- d. have value as breastfeeding promotion and support that equal or outweigh other uses;
- e. be distributed to the audience for which the items were designed; and
- f. be reasonable and necessary costs with a total cost per item of less than \$8.00.

If you are unsure if an item is allowable or if the cost per item exceeds \$8.00, please contact the State WIC Financial Unit before the item is purchased for their review and approval.

### C. **Examples of Allowable and Unallowable WIC Program Outreach or Promotional Items**

The determination of an allowable item is more dependent upon the context of an item's use and the message it conveys than the item itself. Using the criteria listed in the preceding paragraphs for specific Program purposes, the following are some examples of allowable and unallowable program outreach or promotional items.

#### 1. **Examples of Some Allowable Items**

- a. **Outreach** – T-shirts, buttons, bibs, toothbrushes, pens, cups or other items of nominal value with reasonable opportunity for public display that contain a WIC promotional message;
- b. **Nutrition education** – books, calendars that contain important nutrition education messages, refrigerator magnets picturing the food pyramid, and sippy cups that are provided to mothers of infants who are learning

how to drink from a cup as reinforcement of a relevant nutrition education session.

- c. **Breastfeeding promotion and support** – t-shirts, buttons or other items of nominal value with a breastfeeding promotion or support message printed on the item (e.g. “Breast Fed is Best Fed”).

## 2. **Examples of Some Unallowable Items**

- a. celebratory items or items designed primarily as staff morale boosters, generally for the personal use of the staff, with minimal public display;
- b. items of nominal value which have no outreach, nutrition education, or breastfeeding message;
- c. any program outreach item intended for persons who are not participants, potential participants or their parents/guardians, or for persons with no connection to the WIC Program, such as staff and cooperating agency representatives; and
- d. items not of nominal value such as diaper bags, infant slings, or ponchos (regardless of any outreach, nutrition education, or breastfeeding promotion messages). These items would not meet the “reasonable and necessary” test.

If you are unsure if an item is allowable or if the cost per item exceeds \$4.00, please contact the State WIC Financial Unit before the item is purchased for their review and approval.

## D. **WIC Program Staff and Outreach Items**

Recognizing that program staff travel throughout the general community and participate in various cooperative functions with the target WIC population or agencies that also service the WIC target population, it may occasionally be appropriate to provide some types of program incentive items to program staff. The items must present a WIC outreach, nutrition education or breastfeeding message and contain the local WIC agency name and contact information (telephone number or web site) as opposed, for example, to an agency logo and must be items that would be widely seen by the general population or the target population. Items whose exposure will likely be limited to the office surroundings of the staff members will generally not be allowable costs. Items purchased specifically for staff must meet the criteria above.

## E. **Monitoring**

Purchase of outreach items will be reviewed during the management evaluation process. If the State Agency determines through a review of the local agency’s reports, program or financial analysis, monitoring, or audits that an outreach or promotion item fails to

meet the criteria outlined in this policy, or the purchase did not comply with Policy and Procedure 6.08 (Procurement) a formal claim may be assessed against the local agency in accordance with & CFR 246.23 (a) (1).

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References:

1. SFP 95-040 Allowability of Costs for Program Incentive Items
2. 7 CFR 246.2 and 246. 23 (a) (1)
3. SFP 03-127 Allowable Cost for Physical Activity Promotion
4. SFP 03-127 Allowable Costs for physical Activity Promotion

Revisions:

- 10/01/2013 Added reference to Policy and Procedure 6.08 to sections B and E.
- 02/14/2020 Increased individual cost per item to \$8.00 and removed diapers as an allowable outreach item.

**MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGIENE WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.06  
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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: ALLOWABLE ADMINISTRATIVE / FISCAL SUPPORT SALARIES**

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**A. Policy**

All salaries charged as a direct cost in the WIC budget must be for staff that provide direct services to WIC participants and are administratively responsible to and supervised by the local WIC Coordinator. The salary of the local WIC Coordinator for the time spent providing and supervising the provision of direct WIC services is an allowable direct cost in the WIC budget. All salaries for other staff that provide administrative or fiscal support and/or oversight to the WIC Program are reimbursed as part of the indirect cost rate that is allowed in the WIC budget.

**B. Procedure**

1. When submitting the annual WIC budget or any budget modification/supplement/reduction, the local agency shall list all staff that provide direct services to WIC participants and are supported in whole or in part with WIC funds on the appropriate supplemental salary schedule(s).
2. All staff that provide administrative support, fiscal support, or oversight to the WIC Program may not be listed on the salary schedules and may not be charged as a direct cost in the WIC budget.
3. Administrative support, fiscal support and program oversight may be reimbursed as part of the indirect cost that is allowable in the WIC budget. There is no requirement for any details on how a local agency chooses to use the indirect cost that is allowed in the WIC budget.

**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

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Revised Date: August 15, 2019**

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**SECTION: Financial Management**

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**SUBJECT: Clinic Location, Leases, and Construction or Renovation**

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**POLICY**

All clinics and leases shall meet the requirements identified in this policy. All capital improvements where the total cost of the project is \$5,000 or greater require the approval of State WIC Director and USDA. No work can begin until written approval is received from the State WIC Office.

**PROCEDURE**

**A. General Criteria for a Clinic**

The local agency shall ensure that the following criteria are considered when selecting a site for a WIC clinic.

1. Location The clinic should be in an area of highest need where potential eligible WIC populations reside.
2. Accessibility
  - a. The clinic should be readily accessible to the general population via public and private transportation.
  - b. Preference should be given to space located on the ground floor to allow easier access for participants with disabilities, strollers, and multiple children.
  - c. If the clinic is not located on the first floor there should be a sufficient number of elevators to allow WIC clients and other building tenants to reach their offices without unnecessary delay.
  - d. The clinic must be accessible to people with disabilities. If a clinic is

not accessible to and usable by eligible people with disabilities, the local agency must have alternative arrangements. The local agency may, as an alternative, refer the person with a disability to another clinic that is accessible.

### 3. Parking

Parking facilities should be available for applicants, participants, and staff. There should be enough parking spaces to accommodate the number of families scheduled for the largest nutrition education class plus 50%. Special parking spaces shall be designated for people with disabilities.

### 4. Human Services Agencies

Since referrals are frequently made to other human service agencies such as hospitals, clinics, etc., consideration should be given to locating near these agencies.

### 5. Combined Local Agency and Clinic

There are distinct advantages and disadvantages to locating the local agency and the clinic in the same building. The advantages slightly outweigh the disadvantages, and when this practice is followed, the two should be physically separated.

### 6. Physical Environmental

#### a. Exterior Lighting

Proper lighting is necessary for ease of identification and security for the premises and will help in accident prevention if the clinic is open in the evening.

#### b. Maintenance

The clinic should present a clean, orderly, and well-maintained appearance in public and staff areas.

#### c. Signage

A sign system adequate to facilitate participant orientation and movement should be present outside and within the facility.

#### d. Patterns of Participant Flow

The physical layout and organization of participant movement should be conducive to efficient participant flow through the clinic especially at nutrition education classes for benefit distribution. There should be no bottlenecks when classes are scheduled back to back for participants entering the class room and participants leaving the class room and waiting for WIC staff to assign them their next WIC appointment.

e. Privacy

Provisions must be made to assure respect for the privacy and dignity of participants during interview process to determine eligibility, medical tests, and nutrition and breastfeeding consultation.

f. Provision for the Disabled

Provisions must be made for the safety and comfort of an applicant with a disability and for the person(s) accompanying the applicant.

g. Safety

There should be procedures specifying actions to be taken in case of an external or internal disaster or other emergency.

h. Fire Safety

There should be an organized fire safety program.

i. Adequacy of Facilities

There should be sufficient space for appropriate and convenient placement of computer equipment.

Physical facilities of the clinic should be structurally sound and sufficient in size to provide the required range of WIC services in a safe environment both for staff and participants, especially patient flow at nutrition education classes that are scheduled back to back.

j. Rest Rooms

There should be at least one accessible toilet room and a washbasin with hot and cold running water. It is preferred that a separate toilet room located in an area that is not in the participant

flow be designated for staff only.

k. General Storage

Adequate space including space for growth for storage of WIC records and materials, clinic supplies and storage of miscellaneous items.

l. Security

Appropriate security must be available to protect audiovisual and computer equipment.

m. Internet Connectivity

There should be a mechanism for all users to connect to the internet. There must be an electrical/wiring closet included for computer network equipment.

**B. Leases**

1. The local agency shall ensure that the lease:

a. Includes language that states:

- i. The tenant is leasing the space to provide WIC services funded by a contract awarded by the State of Maryland;
- ii. If the tenant is not awarded a subsequent contract by the State of Maryland, the landlord shall allow the space to be leased to the private or public non-profit health care agency that is awarded a contract by the State of Maryland to continue providing WIC services in the area (successor contractor);
- iii. If renovation costs are incurred, the lease will be extended until WIC has received full benefit from the cost of the construction or renovations; or if the landlord cancels the lease or the tenant is forced to vacate the space during the lease then the tenant will be refunded the dollar amount representing the portion of the renovation cost for which the contract has not yet received full benefit; and
- iv. The WIC Program is a federally-funded program receiving its funds from the United States Department of Agriculture (USDA). If the USDA fails to appropriate funds or if funds are not otherwise made

available to the State of Maryland to administer a WIC Program, the tenant can terminate the lease within the agreed terms of the lease. The State will not assume any on-going lease or other contractual arrangements that may have obligated the contractor.

- b. Is negotiated for a minimum period of five years with an option for an additional five-year renewal, if agreed to by the lessor, that can be invoked by the tenant or a successor contractor.
  - c. Is submitted for review and approval by the State WIC Office for any lease in excess of five years or any lease that has an expiration date after the end date of the contract with the State to administer a WIC Program.
2. Space that is not specifically leased as WIC clinic space and/or space that is owned and/or operated by a WIC service provider is not subject to the above conditions.

### **C. Relocation or Renovation Process**

#### **1. Written Justification**

The local WIC coordinator shall submit a written request to the State WIC Director that includes:

- a. Justification that the local agency needs to renovate space at an existing WIC clinic, relocate to a new clinic site or provide WIC services at a new location. Justification may include but not be limited to the following:
  - i. Redesigning the clinic would improve patient flow and improve the quality of services provided;
  - ii. The clinic has outgrown the current space and there is no adjacent space available to expand the clinic;
  - iii. The lease will expire and relocating to a larger space would allow the local agency to:
    - (1) Accommodate the increased caseload; or
    - (2) Conduct outreach to potentially eligible participants in the service area;
  - iv. Clinic caseload is at the maximum of 10,000 participants; and

- v. The lease is expiring and the owner or manager of the building will not renew the lease.
    - vi. The new clinic will provide WIC services to an underserved area of the local agency where a larger number of potentially WIC-eligible reside.
    - vii. The estimated annual WIC Program operational costs of the relocated or new clinic and a statement that the estimated annual WIC Program operational costs are included in the local agency's annual WIC Program budget.
  2. An estimate of the total cost of the project.
  3. If the request is approved by the State WIC Director for submission to USDA, the local agency shall:
    - a. Solicit and submit at least 3 bids to the State WIC Office. If the project changes the existing floor plan of the clinic, a copy of the revised floor plan must also be submitted.
    - b. Provide the estimated time to complete the project and to occupy the space and begin providing WIC Program benefits; and
    - c. Submit the completed Federal form Attachment A (Attachment 6.07C) when the proposal includes purchasing real property or Attachment B – Worksheet for Requests to Renovate or Repair Real property (Attachment 6.07D).
    - d. Submit the completed Civil Rights Impact Analysis form (Attachment 6.07E) when the renovation request involves a new or a relocation of a clinic or local agency. Submit the moving notice to participants with the full USDA Nondiscrimination statement.
  4. The State WIC Office will submit the bids, floor plan, and Attachment A or B (whichever is applicable) to USDA for their review and approval of the proposed project. Allow a minimum of sixty (60) days for this process. **Work may not begin until written approval is received from the State WIC Office stating that USDA has approved the proposed project.**
  5. Actions after Request is Approved by USDA

- a. The State WIC Office will send an award letter to the local WIC agency

coordinator stating that the project was approved. The letter will contain:

- i. The name of the construction company that was approved for the project;
  - ii. The amount of funding that was approved based on the bid/quote received from the company that was submitted by the local agency;
  - iii. A statement that if the total cost of the project is less than the approved amount, the local agency can only pay the contractor for the work completed; and
  - iv. A statement that if the State WIC Office approved an advance to the local agency for the funds and the total cost of the project was less than the amount approved, the local agency must return the excess funds to the State WIC Office.
  - v. A statement that if the total cost of the project is projected to exceed the amount approved by USDA, the local agency must contact the State WIC Office for further guidance as soon as they become aware of the possibility that the cost will exceed the amount approved by USDA.
- b. After receiving the approval letter from the State WIC Office for the project, the local agency can sign a contract with the approved vendor and work can begin.
  - c. If the contractor with the lowest bid is no longer able to accomplish the project as specified in the bid submitted and for the quote submitted, the local agency must notify the State WIC Director. The construction may not be performed by another company without the written consent from the State WIC Office.
  - d. The State WIC Office may conduct site visits to ensure that the work is being done according to the request received and the approval granted.
  - e. The local agency shall submit, upon the request of the State WIC Office Financial Unit, quarterly reports on the progress of the work and the actual amount of funds paid to contractors.
  - f. Upon completion of the project, copies of all paid invoices associated with the project must be submitted to the State WIC Office. The total of all invoices must agree with the expenditures reported on the quarterly expenditure report.

Attachments:

6.07A Sample Cost Allocation Plan

- 6.07B Project Proposals for WIC Operational Adjustment and Infrastructure Funding
- 6.07C Federal Form Attachment A – Worksheet for requests to Purchase Real Property
- 6.07D Federal Form Attachment B – Worksheet for Requests to Renovate or Repair Real Property
- 6.07E Civil Rights Impact Analysis Document

References:

Revisions:

- 10/2011 Added section D. Actions after Request is Approved
- 10/2013 Added to section A justification for new clinics and the estimated annual operating costs.
- 2/2017 Changed reference of checks to benefits and added attachment 6.07E.
- 5/2018 Updated the timeframe from 30 days to 60 days. Updated the Department Name
- 8/2019 Renamed policy, added to the Policy section clinics and leases shall meet these requirements, and reorganized the procedures.

## Sample Cost Allocation Plan

1. Name and location of space to be renovated.

ABC Building  
123 Orange Street, Suite 228  
Anywhere, Maryland 21111

2. Total square footage of space to be renovated: 20,000

Program/Office	Square Footage of Program/Office	Percentage of Program/Office of Total Square Footage	Percentage of Cost for Renovation
WIC Program	8,000	40.0%	\$94,289.60
MCH	5,500	27.5%	64,824.10
Dental clinic	6,500	32.5%	76,610.30
<b>TOTALS</b>	<b>20,000</b>	<b>100.0%</b>	<b>\$234,724.00</b>

3. List and explain any additional costs, if any, to the WIC local agency that is not included in number 2 above.

Plumbing and sinks for WIC laboratories                      \$335.75 X 4                      \$1,343.00

4. Provide allocation of shared space, ex: waiting room, classroom, etc.

WIC will have their own waiting room. There will be no charge in the event that WIC participants need to use the general waiting room.

Additional comments:

FY 20XX PROJECT PROPOSALS FOR WIC OA FUNDING

STATE:

INITIATIVE TITLE:

INITIATIVE PREVIOUSLY FUNDED WITH: OA:  INFRASTRUCTURE:  N/A:

IF YES, PLEASE INDICATE YEAR(S): \_\_\_\_\_

INITIATIVE (Narrative Summary):

WHAT RESULTS WILL BE ACHIEVED AS A RESULT OF THIS INITIATIVE?:

WHAT MAKES THIS INITIATIVE OUTSTANDING, INNOVATIVE OR "STATE OF THE ART?" Is it transferrable to Other State Agencies? What is the critical need?

ACTION PLAN/TIME FRAME FOR COMPLETION OF THE INITIATIVE  
(Specific, detailed time-table must be included):

FISCAL BUDGET/TOTAL COST OF INITIATIVE (including salaries and benefits, materials, equipment and supplies, computers, etc.): \*\* It is critical that a detailed budget be included. Evaluation points will be lost for incomplete/non-detailed budget information.\*\*

## WORKSHEET FOR REQUESTS TO PURCHASE REAL PROPERTY

### I. Absence of Other Options

1. How has the State agency determined the necessity for locating the site in the proposed area?
  
2. Has the State agency attempted to locate State/local government-owned or donated space in the proposed area? Please provide documentation.
  
3. Please provide documentation from some authority which affirms the absence of adequate rental property in the proposed area?
  
4. Has the State agency attempted to use State and/or local monies to fund the purchase of the proposed site? Please provide documentation.
  
5. Has the State examined the cost of alternative sites? If so please list.
  
6. Has the State explored the practicality of expanding nearby sites or purchasing a mobile site?

### Acceptability of a Site

1. Is the proposed site centrally located in the area which it is intended to service?
2. Is the proposed site with located in proximity to a hospital and/or local health agency? To public transportation?
3. Is the proposed site large enough to house adequate staff and equipment to accommodate the numbers of participants it is anticipated to serve?
4. Will the proposed site provide easy access for pregnant women, children, and handicapped persons?
5. Can the proposed site handle the program's automation needs (e.g. telephone lines, electrical outlets, and security)?
6. How does the projected purchase cost of the proposed site compare to the cost of equal size-rental space in the proposed area (over a 5-year period of time)?
7. Can the proposed site be easily adapted/renovated into an adequate clinic setting?

### WIC's Fair Share of Costs

1. What programs or offices will be located in the building to be purchased?

2. What methodology is being used to calculate each party's fair share of the projected purchase cost? Does this methodology assign to WIC a portion of the cost reasonably commensurate with the benefit WIC receives from the use of the space?

#### Conditions

1. Requests for current fiscal year funds must be submitted to FNS by July 1 to ensure consideration.
  
2. If approved, the State must agree that in the event that the WIC Program vacates the site that it will be responsible for contacting FNS for disposition instructions in accordance with 7 CFR 3016.31.

## **Federal Form Attachment B**

### **WORKSHEET FOR REQUESTS TO RENOVATE OR REPAIR REAL PROPERTY**

#### Absence of Other Options

1. Provide documentation demonstrating that the landlord will not renovate or repair the building as part of the rental agreement.
2. Provide documentation to establish that there is insufficient State and/or local monies available to fund the cost of the proposed renovation or repair.
3. Provide three estimates for the projected cost of the proposed renovation or repair.
4. What is the availability and cost of alternative sites that do not require renovation?
5. How does the projected purchase cost of the proposed site compare to the cost of equal size rental space in the proposed are (over a 5-year period of time)?

#### Acceptability of a Site

1. Is the site centrally located in the area which it is intended to serve?
2. Is the site located in proximity to a hospital and/or local health agency? To public transportation?
3. Is the proposed site large enough to house adequate staff and equipment to accommodate the numbers of participants it is anticipated to serve?
4. Does the site provide easy access for pregnant women, children, and handicapped persons?

5. Can the site handle the program's automation needs (e.g. telephone lines, electrical outlets, and security)? Are the costs of any such upgrades included in the renovation costs?
  
6. Is the proposed renovation or repair to address unsafe clinic conditions?

WIC's Fair Share of Costs

1. What programs or offices will be located in the building to be renovated or repaired?
  
2. What methodology is being used to calculate each party's fair share of the projected renovation or repair cost? Does this methodology assign to WIC a portion of the cost reasonably commensurate with the benefit WIC receives from the use of the space?

Attachment B

Conditions

1. Requests for current fiscal year funds must be submitted to FNS by July 1 to ensure consideration.
  
2. If the property is publicly owned, the State must agree that in the event that the WIC Program vacates the facility that it will pay, from State monies, the Federal Government the non-depreciated value of the renovation/repair paid for with WIC Program funds.

Check box to indicate agreement with this condition

Not Applicable

3. If the property is privately owned, the landlord must agree to extend the lease until the WIC Program has received full benefit from the renovation, or the landlord must amend the lease agreement to provide for a refund to the local agency the dollar amount representing the portion of the renovation cost from which the local agency has as yet received no benefit.

Check box to indicate agreement with this condition

Not Applicable

**State Agency Reviewing Official:** \_\_\_\_\_  
**Date:** \_\_\_\_\_

## Civil Rights Impact Analysis

A Civil Rights Impact Analysis (CRIA) is required before closing or relocating a local agency. This template provides guidance on the information to be gathered. It should be provided to USDA-FNS at least 60 days prior to closure or relocation. Additional pages may be included if needed.

1. When will the move occur?	
2. Distance from the old clinic to the new clinic?	
3. Amount of advance notice to participants?	
4. Will the clinic remain non-smoking?  Provide assurance.	
5. Demographic assessment comparing old and new location. Include available information.  Demographic map  Racial composition of affected neighborhoods  Census data	
6. Is the new location in an area where at risk populations or low income housing are located?	
7. Participation  By category  Women Infants Children  By race/ethnicity  White American Indian/Alaska native Hispanic/Latino Asian Black/African American Native Hawaiian Pacific Islander  Average participation for last 6 months	

## Civil Rights Impact Analysis

A Civil Rights Impact Analysis (CRIA) is required before closing or relocating a local agency. This template provides guidance on the information to be gathered. It should be provided to USDA-FNS at least 60 days prior to closure or relocation. Additional pages may be included if needed.

8. Availability of other community resources including other local agencies	
9. Consideration of Affirmative Action Plan Information  The relative position of the area or special Population served in the Affirmative Action Plan  How much of the current need is met at each priority level and participant category?  The potentially eligible individuals in the area	
10. Place in local agency priority system	
11. Public notification	
12. Cost effectiveness	
13. Develop participant access criteria  Consider availability of authorized vendors and geographic barriers to them.	

**MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGIENE WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.08**  
**Effective Date: October 1, 2013**  
**Revised Date: October 1, 2015**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Procurement**

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**A. Policy**

The local agency shall adhere to the Department of Health and Mental Hygiene's Prevention and Health Promotion Administration procurement manual (<http://fhaweb/fha-procurement.aspx>) or the local health department regulations if they are stricter, unless those regulations conflict with USDA Regulations. A minimum of three bids must be obtained for all purchases exceeding \$2,500.00. The objective of soliciting bids or proposals is to foster competition in obtaining needed items in a cost effective manner. A current state contract or preferred provider must be used, if available. If none are available or if those available do not have the ability to complete the procurement, the lowest acceptable bid must be used in purchasing items or services. Any single purchase over \$5,000.00 must obtain approval from the State WIC Financial Officer. If the purchase price of an item or service is under \$2,500.00, bids are not required. However, local agencies shall utilize the most acceptable if not the lowest cost to the WIC Program. It is encouraged that the local agency researches the cost in order to do so.

**B. Procedure**

1. The local agency shall:
  - a. Develop a "script" or bid board notice describing the item in detail or by an identification number or the service to be purchased using Attachment 6.08A, Procurement Solicitation Log. The script or bid board notice must include instructions to the bidder to submit their bid by e-mail or fax on or before a preset date and time including their contact information. After obtaining approval from the State WIC Financial Officer, you may utilize the local county health department procurement forms provided they contain the same information as Attachment 6.08A and shows that the agency has obtained three bids.
  - b. Contact and solicit a minimum of three bids when purchasing an item or service and send the script or bid board notice to each potential bidder either by e-mail or fax.
  - c. Examine and evaluate the item or service proposed to determine if it meets the item identification number or the

- description of the item or service in the script or bid board notice.
- d. Purchase the item or service from the vendor whose item meets the description in the script or bid board notice and who submitted the lowest bid price.
  - e. Contact the State WIC Financial Officer if unable to obtain three bids or if the item the agency is considering to purchase is a sole source. A sole source justification may be required to comply with state and federal regulations.
2. Preference for procurements must be given to vendors that are classified as an Minority Business Enterprise (MBE) and/or Small Business Reserve (SBR).
  3. If a vendor has a question or requests information that is not provided in the script or bid board notice, all potential bidders notified must be contacted by e-mail and provided with the question and the response.
  4. List all equipment items to be purchased that will be assigned an inventory number on the Schedule of Equipment Costs (4542G) in the WIC Program Budget Package. Purchases that are needed but not listed on Schedule of Equipment Costs may be approved by contacting the State WIC Financial Officer. Purchases as stated in policy 6.02 that do not require approval, will not be listed on the equipment sheet (4542G).
  5. Records must be maintained according to the Records Retention Schedule as stated in the Financial Management Policy and Procedure section 6.00.

References:

1. COMAR 21.05.07.06
2. WIC Program Budget Instructions
3. <http://fhaweb/fha-procurement.aspx>

Revisions:

10/1/15 Clarification on scheduling equipment that does not need approval and the approval threshold of \$5,000.

**MARYLAND WIC PROGRAM  
PROCUREMENT SOLICITATION LOG  
LOWEST BID PRICE METHOD – OVER \$2500.00**

**TO BE READ OR FAXED SEPARATELY TO THE VENDOR**

Anticipated Start Date: \_\_\_\_\_ Expected End Date: \_\_\_\_\_  
Description of Service(s) (or attach copy of any scripts which have been used): \_\_\_\_\_

**SOLICITATION DETAILS**

Retain this form as backup documentation for a Lowest Bid Price Purchase.

Name of Vendor \_\_\_\_\_ Phone Number \_\_\_\_\_  
Address \_\_\_\_\_  
Fax Number \_\_\_\_\_ Read script or faxed? \_\_\_\_\_  
MDOT Certified MBE? \_\_\_\_\_  
NOTES: \_\_\_\_\_  
TOTAL COST: \_\_\_\_\_

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Name of Vendor \_\_\_\_\_ Phone Number: \_\_\_\_\_  
Address \_\_\_\_\_  
Fax Number \_\_\_\_\_ Read script or faxed? \_\_\_\_\_  
MDOT Certified MBE? \_\_\_\_\_  
NOTES: \_\_\_\_\_  
TOTAL COST: \_\_\_\_\_

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Name of Vendor \_\_\_\_\_ Phone Number \_\_\_\_\_  
Address \_\_\_\_\_  
Fax Number \_\_\_\_\_ Read script or faxed? \_\_\_\_\_  
MDOT Certified MBE? \_\_\_\_\_  
NOTES: \_\_\_\_\_  
TOTAL COST: \_\_\_\_\_

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If fewer than three telephone solicitations were made, explain in detail: \_\_\_\_\_

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\_\_\_\_\_  
Name of FHA CPC Cardholder

\_\_\_\_\_  
Date

**MARYLAND DEPARTMENT OF HEALTH AND MENTAL HYGIENE WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.09  
Effective Date: October 1, 2013  
Revised Date: October 1, 2015**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Mileage Reimbursement Requirements**

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**A. Policy**

All travel in a local WIC agency, county, company, or privately owned vehicle in order to conduct WIC Program business, must be documented as to the site visited and the miles traveled. Vehicles are to be used only to conduct official WIC Program business. Whenever possible, trips should be planned to coincide with other authorized travel requirements so that vehicles are used efficiently and economically.

**B. Procedure**

**1. Vehicle Mileage Log for Use of State, County or Company Vehicles**

- a. A Vehicle Mileage Log will be maintained in each vehicle on a monthly basis.
- b. All drivers must complete a Vehicle Mileage Log, indicating all destinations by official business mileage. Agencies are required to maintain these logs for audit purposes. A Vehicle Mileage Log template is included as attachment **6.09A**. After obtaining approval from the State WIC Office, you may utilize the local county health department Vehicle Mileage Log provided that it contains the same information.
- c. Pool vehicles must include attachment **6.09A**.
- d. Employees, who take their car home, must show commute miles.

**2. Reimbursement for Use of Privately Owned Vehicles**

- a. An employee may be required to use his or her privately owned vehicle in order to carry out assigned duties if a vehicle is not available or if the employee does not satisfy the eligibility criteria or if his or her privilege to drive a vehicle is suspended.
- b. The local agency is not required to provide a vehicle to employees who refuse to use their private vehicles to perform their assigned duties.
- c. Authorized drivers who use privately owned vehicles for official WIC Program business should be reimbursed in accordance with the Department of Budget and Management (DBM) approved rate, except as noted below.
  - i. An authorized driver who chooses to use a privately owned

- vehicle for official business when a State, county or company vehicle is available shall be reimbursed at one-half the ordinary standard rate for the use of privately owned vehicles.
- ii. A driver who does not meet assignment criteria or whose privilege to drive a vehicle has been suspended by the local agency shall be reimbursed at one-half the ordinary standard rate for the use of privately owned vehicles.
  - d. A driver who leaves the office to conduct business in the field and returns to the office may be reimbursed for all mileage directly connected with the business trip (i.e., mileage from the office to the field site and back to the office) because the driver will have driven his normal daily commute to and from the office by the end of day.
  - e. A driver who conducts WIC Program business prior to coming into the assigned office or on the way home from the assigned office may be reimbursed for all mileage in excess of the daily round-trip commute miles normally traveled.
  - f. A driver who leaves home to conduct business and returns home without stopping at the assigned office may be reimbursed for all mileage directly connected with the business trip in excess of the round-trip commute miles normally traveled.
  - g. In no event shall a driver be reimbursed for commuting to and from his or her assigned office.
  - h. All drivers must complete and submit with their request for reimbursement. If the DHMH expense report form (DHMH-1) is not available then Attachment 6.09A the Vehicle Mileage Log must be used. All destinations by official business mileage should be documented. Agencies are required to maintain these logs for audit purposes.
  - i. Only mileage traveled to perform duties necessary for the operation of the WIC Program are allowable.

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Attachments:

6.09A      Vehicle Mileage Log

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References:

1. Department of Budget and Management, Fleet Management Services  
<http://dbm.maryland.gov/agencies/Pages/FleetManagementServices.aspx>
- 2, State Finance and Procurement Article §3-503 of the Annotated Code of Maryland.

Revisions:

10/1/2015      Added i. to state mileage is only allowable when it relates to the operation of the Program.



**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.10  
Effective Date: October 1, 2014  
Revised Date: September 25, 2018**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Travel Reimbursement Requirements**

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**A. Policy**

An employee traveling on official business is expected to exercise the same care incurring expenses as would a prudent person traveling for personal reasons. Travel for business should be conducted at a minimum cost for achieving the success of the mission. Travelers shall request reservations as far in advance as possible and shall utilize the lowest logical air/rail fares available. Travel in first class is not allowable unless documented evidence clearly indicates the travel is in the best interest of the WIC Program. An employee may not participate in any promotional plan, such as frequent flyer program, when this participation entails foregoing a more favorable fare rate. Travel awards accrued under a promotional plan as a result of State business travel shall be applied to State business travel expenses. Baltimore Washington International Airport, as the State's preferred airport, should be used whenever convenient and cost effective.

Facilities owned or maintained by state, county or local agencies shall be used for in-State meetings whenever available, unless the use of outside facilities is more cost effective, or the local agency coordinator or a designated authority certifies that the outside facility is more appropriate for completing the business mission.

Expenditures for official travel may be considered as reimbursable only if incurred in accordance with the regulations set forth by Department of Budget and Management. <http://www.dbm.maryland.gov/Pages/MealTipReimbursement.aspx>

**B. Reimbursable Expenses**

**1. General**

- a. The WIC Program shall reimburse employees for authorized necessary travel and related expenses incurred by the employee. The WIC Program will not reimburse an employee for transportation, lodging, meal expenses, or any other costs incurred by a spouse, child, or other person not essential to the business mission, who accompanies the employee on an official business trip.

- b. Travel expenditures shall be reported on quarterly expenditure reports as follows:
  - i. Conference registration fees shall be charged and reported in the quarter and fiscal year when the registration expenditure occurs.
  - ii. Hotel reservation and air travel shall be reported in the quarter and fiscal year in which the travel occurs. If the expenditure occurs in a prior quarter or fiscal year, the expenditure should be moved to the correct quarter and fiscal year to ensure period performance integrity.
  - iii. Travel expenditures (meals, tip, lodging, mileage, etc.) shall be reported in quarter and fiscal year in which the travel occurs.

## **2. Taxi, Bus, and Airport Limousine**

- a. Fares incurred while on travel status are reimbursable when traveling to and from the airport, train station, or bus station, or when otherwise incurred while conducting official business. Employees shall use the mode of public transportation that results in the lowest logical cost to the WIC Program.

## **3. Rental Cars**

- a. Subject to approval by the local agency coordinator or by a designated authority, employees may rent cars while on travel status when other means of transportation are unavailable, more costly, or impractical. The lowest cost vehicle necessary to achieve the traveler's mission shall be reserved. In addition to the cost of the rental when receipts are provided, the employee shall be reimbursed for necessary and reasonable expenses incurred for the following items:
  - i. Gasoline, oil, and emergency repairs;
  - ii. Parking
  - iii. Toll charges

## **4. Lodging**

- a. Reimbursement shall be in an amount equal to the actual cost of the least expensive available rate for reasonable accommodations based on single occupancy.
- b. In cases of double occupancy by two employees, each employee shall be reimbursed 50 percent of the total room charge.
- c. In cases of double occupancy when one of the occupants is not on WIC business, lodging reimbursement shall be on the basis of the least expensive available rate for reasonable accommodations based on single occupancy.

## 5. Meals

- a. Meal allowances for employees while in travel status are reimbursable at the rates established by the Department of Budget and Management as published at <http://www.dbm.maryland.gov/Pages/FleetTravel.aspx> All meal rates are inclusive of taxes and tips.
- b. Employees shall be reimbursed for actual amounts based on itemized receipts, not to exceed limits set forth by Department of Budget and Management.
- c. Tip shall not exceed 20% of the meal cost. Meal cost, tax, and tip will only be reimbursed up to the limit set forth by the Department of Budget Management.
- d. Reimbursement shall not be made for the cost of alcoholic beverages.
- e. When an employee is in travel status involving absence from home overnight, all meals are reimbursable. The cost of breakfast is reimbursable when an employee in travel status has to leave home on official business 2 hours or more before the beginning time of the employee's assigned office. The cost of dinner is reimbursable when an employee in travel status cannot get home within 2 hours after the employee's normal quitting time. In both cases, the 2 hours are in addition to the normal commuting time.
- f. Except as provided in 5(e) above, an employee may not be reimbursed for the cost of lunch. If the registration fee for a conference, convention, seminar, or training meeting includes the cost of meals, the WIC Program shall not reimburse the employee for any of the meals included in the registration fee. If the employee chooses not to partake of the meals included in the registration fee, the employee cannot request reimbursement of the meals from the WIC Program.
- g. Meal reimbursement above the standard limits is allowable for employees conducting business in high cost areas designated by the Department of Budget and Management. Employees shall be reimbursed for actual amounts based on receipts, not to exceed limits set forth by Department of Budget and Management. <http://www.dbm.maryland.gov/Pages/FleetTravel.aspx>

## 6. Conference Registration Fees

- a. When a registration fee is charged, participating employees will be reimbursed upon submission of a receipt; a copy of the itinerary must be included.

## 7. Porter Fees and Hotel Tips

- a. Porter fees and hotel tips per each bag carried at common carrier

- depots and hotels respectively are reimbursable at the rates established by the Secretary.
- b. The same per bag tip is reimbursable when checking into and checking out of a hotel.
  - c. The State will not reimburse for tips for hotel housekeeping services.

## **8. Telephone and Postage Expenses**

- a. Telephone and postage expenses incurred in the performance of official duties when travelling are allowable. Receipts are required for these expenses.

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### References:

1. Department of Budget and Management, Fleet Management Services

<http://www.dbm.maryland.gov/Pages/FleetTravel.aspx>

### Revisions:

10/1/14 Revised to add the requirement for itemized meal receipts for standard and high cost areas.

Clarified that the maximum reimbursement rates include taxes and tips

Added the requirement to include a copy of the itinerary with the conference registration fee.

Added that the State will not reimburse for tips for hotel housekeeping services.

Changed that the porter and hotel tip rates are set forth by Secretary not the Department of Budget and Management.

10/1/2015 Revised page number formatting

09/25/2018 Added tip reimbursement limit. Updated DBM links. Updated the Department name. Clarified which quarter and fiscal year to post charges against.

**MARYLAND DEPARTMENT OF HEALTH  
WIC PROGRAM  
POLICY AND PROCEDURE MANUAL**

**Policy and Procedure Number: 6.11  
Effective Date: July 28, 2020  
Revised Date: July 28, 2020**

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**SECTION: FINANCIAL MANAGEMENT**

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**SUBJECT: Breastfeeding Peer Counseling Program Expenditures**

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### **A. Policy**

Breastfeeding peer counseling funds are to be used to develop and/or expand activities necessary to sustain the Breastfeeding Peer Counseling (BFPC) Program. The primary purpose of the Program and funding is to provide direct breastfeeding support services through peer counseling to WIC participants. All expenditures shall be allowable, allocable, reasonable, and necessary to the operation and implementation of the BFPC Program. The use of BFPC funds for expenditures that are not supported by the WIC Breastfeeding Model for Peer Counseling are not authorized.

### **B. Procedure**

1. BFPC funds can only be used for services and activities related directly to breastfeeding peer counseling.
2. Each WIC local agency must maintain separate records relating to the BFPC grant. Any expenditure charged to the BFPC grant must be traceable to source documentation. Records must be retained for at least three years from the filing of the final closeout report per policy 6.00.
3. Expenditures shall not exceed the award for the current fiscal year. Expenditures in excess of the current fiscal year award will be disallowed and not reimbursed by the State WIC Office.
4. Local Agencies may choose to support Breastfeeding Peer Counseling (BFPC) program expenditures that exceed the BFPC grant with their NSA grant. BFPC salary expenditures paid for with NSA funds must be documented following Policy & Procedure 6.01 Time Studies Requirements for Staff Paid with WIC Funds.

### **C. Examples of Allowable and Unallowable BFPC Expenditures**

This is not an exhaustive list of allowable or unallowable costs. Please call or email the state office for questions about allowable costs.

1. Allowable

- a. Furniture, computers/laptops, and office equipment for the exclusive use of peer counseling services and training services;
- b. Phone lines, internet service, cell/smartphones, pagers and answering machines for the exclusive use of contact between peer counselors and mothers;
- c. Breast pumps and breastfeeding aids used exclusively for **demonstration** purposes only by BFPC Program staff;
- d. Salaries and compensation for BFPC Program staff: ie: peer counselors, designated peer counselor coordinators, and designated breastfeeding experts (DBE). All staff must meet BFPC Program staff definitions and receive appropriate training and supervision as outlined in the WIC Breastfeeding Model for Peer Counseling.
- e. BFPC portion of salaries and compensation for dual-role staff, i.e., part-time WIC Nutrition Assistant and part-time peer counselor (follow Policy & Procedure 6.01 for daily or quarterly time study requirements). The “dual-role” staff must receive approval to be designated as dual-role staff per Policy and Procedure 5.13;
- f. Recruitment efforts related to hiring BFPC Program staff;
- g. Staffing and expenses related to WIC breastfeeding hotlines and call centers. Other expenses related to the hotline/call center such as phone lines or equipment are allowable for any portion of those expenses that are for the purpose of a peer counselor providing participant contacts through the hotline/call center;
- h. Travel for State-required trainings of peer counselors/DBE and peer counseling staff/managers developed by FNS or State developed approved comparable trainings;
- i. Travel expenses for home and hospital visits (if allowed) by BFPC Program staff;
- j. Continuing education for DBE’s if it relates to servicing peer counseling programs, i.e., mentoring, serving as a referral;
- k. Breastfeeding resources for BFPC Program staff if the resources are related to peer counseling, i.e., training materials for peer counselors;
- l. Pamphlets and similar materials to promote the BFPC program;
- m. Media campaigns, ie bus placards, to advertise BFPC programs. However, there should not be a disproportionate amount of the BFPC funds spent at the expense of providing direct services to participants;
- n. Indirect costs related to providing a BFPC program; and

- o. Monitoring and tracking of program effectiveness. Funds may be used to monitor and track program components (ie, contacts, referrals, training) to determine effectiveness and where improvements are needed. However, evaluation studies may not be paid for using BFPC funds.

## 2. Unallowable

- a. Portable scales to weigh infants outside of the WIC clinic;
- b. Breastfeeding educational materials for mothers such as pamphlets and DVDs;
- c. Breast pumps and breastfeeding aids for mothers i.e., nursing bras, nipple shields, and supplemental nursing systems;
- d. Incentive items to distribute to WIC participants to encourage breastfeeding;
- e. Salaries and compensation for lactation management experts in disproportion to peer counselors.
- f. Multi-purpose use items; i.e., diaper bags, baby carriers or ponchos;
- g. Males as breastfeeding peer counselors;
- h. Breastfeeding resources for WIC staff not related to peer counseling;
- i. Training and coursework for peer counselors to become IBCLCs or Certified Lactation Counselors (CLCs), exams, renewals or membership fees;
- j. Media Campaigns that promote breastfeeding in general;
- k. Second nutrition education contacts;
- l. Childcare;
- m. Cribs or other materials and equipment for infants of peer counselors who bring their babies to work;
- n. Breastfeeding coalitions;
- o. Peer counseling services to non-WIC participants; and
- p. Travel for attendance at state/national breastfeeding conferences not meeting the criteria under C.1.h above.

References: FNS Allowable Costs for Breastfeeding Peer Counseling Programs

Revisions: