ARPA Physical Presence Waiver FAQ (v.10-18-2023)

The ARPA physical presence waiver guidance is available on the WIC Coordinator Resources page. This FAQ is a "living document." That means it will be updated when there are changes to processes or new questions are added. The version date will be updated when information changes. Local agencies will be notified by email of changes to this document.

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How often do we need to offer remote services?

The purpose of this physical presence waiver is to provide more flexibility in how services are delivered to WIC participants and improve accessibility and equity for WIC Services across Oregon. The requirement is that every agency is able to, and has a plan for, offering remote services to WIC participants. Your local agency decides the boundaries within which you provide remote services. The needs of participants and staff resources vary from agency to agency. Make choices that best meet the needs of the participants in your community. It is a good idea to revisit this decision over time to see if adjustments need to be made.

Do we need to continue to document a reason for providing a remote appointment as we did before COVID?

You no longer need to say why a person is receiving services remotely. It is a good idea to find a way to track it for your own purposes. We will work on updating policies to reflect the changes to physical presence. Please remember to document the type of appointment in TWIST.

Do I need to document the appointment is remote?

Yes. The waiver guidance states remote appointments need to be documented in the Progress Notes (ARPA Waiver Guidance page 4). It may be easier to ask staff to document how all appointments are being done (for example, document "in person" or "remote" in the Progress Notes). Do what works best for your agency. When no note is recorded, the assumption is it was an in-person appointment. This will help everyone keep track of the requirements for each type of appointment.

What is the expectation for getting participant signatures on the Rights and Responsibilities and Voter Registration forms?

Please attempt to get participant signatures **before** the certification appointment. Here are some ways that can happen:

- Participants can sign the *Rights and Responsibilities* and *Voter Registration* documents in person at the clinic at, or before the appointment.
- The local agency can mail, email, documents or text a link to documents to the participant. The participant will need to then print, if needed and
    - sign, scan, and email or text them back
    - sign, take a photo, and email or text them back.
    - sign and fax them back to the local agency.

    - send an email or text stating:
      "I have read and understand the Rights and Responsibilities form and agree to receive WIC services."
- The signed document or the participant response needs to be documented in writing, text, or be a photograph or scanned copy of their acknowledgement that you can save and file based on your agency policies.

What if the participant has not provided a signature or written acknowledgement for the Rights and Responsibilities form before the certification appointment?

Agencies must have a signature or written acknowledgement to provide services (before a certification). If a signature or written acknowledgement is not received at or before the certification appointment, the certification cannot be completed and must be rescheduled.

The purpose of signatures and written acknowledgement is to have documentation that the participant agrees to receive WIC services and is aware of their rights and responsibilities for the program, therefore, we cannot provide any WIC service **before** we get that acknowledgement. Do your best to obtain this written acknowledgement or signature by text, email, fax, or in-person before services are provided to avoid rescheduling and certification delays.

What is a "written acknowledgement"?

Written acknowledgement is when a participant responds in a specific way to make a decision that require a signature when done in person. It is important to be clear with the participant they are making a decision. There are many ways to get written acknowledgement including fax, email, and text. The most common is text. Below are descriptions of how to receive a written acknowledgement for receiving WIC services. When done in person, this is done by signing the "Participant Signature Form."

Written acknowledgement using email

Getting a written acknowledgement using email can be done in a number of ways.

- Ask the participant to download, sign, scan, and re-attach the signed document to an email.
- Send a fillable pdf form the participant can download, sign digitally, save, and attach to an email reply.

- Ask the participant to provide information similar to a text message (see [written acknowledgement using text message](#))

An example is below

To: Betty.Broccoli@gmail.com

From: Cecelia.Certifier@WIC.Local.Agency.gov

Hello Betty,

Welcome to WIC! The first step to enroll is to make sure you know your Rights and Responsibilities as a WIC participant.

Please read the WIC Rights and Responsibilities to learn more about participating in the WIC program. https://www.oregon.gov/oha/PH/HEALTHYPEOPLEFAMILIES/WIC/Documents/630-engl.pdf

When you have finished reading this document, please answer this question:

> Do you agree with the following statement,
> "I have read my rights and responsibilities and agree to participate in Oregon WIC"?

Please respond in your email reply with "yes" or "no" and type your name.

In good health,

Cecelia Certifier

Written acknowledgement using fax

Getting a written acknowledgement using fax is similar to getting participant signatures in person. It is important any faxes received by participants are secure. Follow your agency policies for maintaining confidentiality.

Written acknowledgement using text message

Getting written acknowledgement using text message is usually done with more than one text message. Examples of text message content that can be used for Voter Registration and Participant Rights and Responsibilities were created for the Teletask program. Instructions for using the sequences of texts are in the job aid "ja-templates_for_Voter_Reg_and_R-R.pdf"

Here is an example of a conversation using the template for getting a written acknowledgement by text for Rights and Responsibilities.

Please read the WIC Rights and Responsibilities to learn more about participating in the WIC program. https://www.oregon.gov/oha/PH/HEALTHYPEOPLEFAMILIES/WIC/Documents/630-engl.pdf

Please let me know when you have finished reviewing the WIC Rights and Responsibilities.
I am happy to answer any questions.

I am done. I don't have any questions.

Do you agree with the following statement, "I have read my rights and responsibilities and agree to participate in Oregon WIC." Please respond yes or no and type your name.

Yes. Betty Broccoli

How do we keep track of signatures we get electronically?

Use a secure system consistent with your agency processes so you will be able to find the records if needed. Options include, but are not limited to:

- If using Teletask Texting Platform: Save the information from the texting platform by downloading the document electronically
- If using an alternative Texting Platform: Screen capture or print the text or save the email with the acknowledgement and file with your agency's participant signature forms.
- Print the text or email and file with your agency's participant signature forms.

Document where the written acknowledgement is saved in the participant's record.

Can we use measurements taken before the certification appointment?

Yes. FNS is encouraging agencies to work toward getting measurements before the certification appointment. Measurements taken up to 60 days before the appointment can be used. Please see "Options to obtain anthropometrics and blood tests" in the ARPA Waiver Guidance document.

Can we use bloodwork that was taken before the certification appointment?

Yes. FNS is encouraging agencies to work toward getting bloodwork data before the certification appointment. Bloodwork taken up to 90 days before the appointment may be used, but must be reflective of the woman applicant's current category and CDC's anemia screening schedule for infants and children (see Policy 626: Hemoglobin and Hematocrit Screening in WIC). Please see "Options to obtain anthropometrics and blood tests" in the ARPA Waiver Guidance document.

What do I do if I don't have measurements 60 days after certification?

If measurements are not received by 60 days after the certification, you must continue to attempt to get them. FNS requires WIC staff to ask about measurements when they are not available during the 60- or 90-day window after the appointment and to continue to ask about them until they are obtained. We recognize the amount of work this is for staff.

Best practice for this FNS requirement is to ask participants about these measurements monthly using the missing measurement report as a guide. The State office will look to see a request was made at each participant contact for review purpose

You must document your attempts to get measurements until they are obtained or the certification ends. See Documenting attempts to get measurements.

Here's how participant reminders might be offered:

- Remind participants each time you have contact with them that measurements are needed.
- Remind participants once a month to send measurements until they are received.
- Reminders can be in-person, text, email, or US mail.

Please remember this requirement does not affect the participant's ability to continue to receive WIC services. If they are unable to provide a measurement it does not result in ending WIC services. It is a requirement for the local agency to continue to ask for measurements.

What do I do if I don't have Hemoglobin 90 days after certification?

If bloodwork is not received by 90 days after the certification, you must continue to attempt to get them. You must document your attempts to get measurements until they are obtained or the certification ends. See Documenting attempts to get measurements.

Here's how reminders might be offered:

- Remind participants each time you have contact with them that measurements are needed.
- Remind participants once a month to send measurements until they are received.
- Reminders can be in-person, text, email, or US mail.

Please remember this requirement does not affect the participant's ability to continue to receive WIC services. If they are unable to provide a hemoglobin value it does not result in ending WIC services. It is a requirement for the local agency to continue to ask for hemoglobin values.

What do I do if a measurement for height and weight is documented in TWIST for the certification, but one is not available at the mid-certification appointment?

Best practice is to get measurements for the mid-certification health assessment. Do ***not*** enter "999s" in the data system for unavailable measurements at mid-certification appointments. Please ***only*** record measurements you are able to get for mid-certification health assessments.

You do *not* need to continue to ask for missing mid-certification appointments if one is entered into the data system for the initial certification.

You *do* need to continue to ask for missing height and weight measurements if one was not entered at certification.

Is there a way to track missing data for measurements and bloodwork in TWIST?

WIC programmers created a report to assist tracking missing heights, weights, and hemoglobin values for a selected date range. Details about this report are available in the 10-13-2023 TWIST Update (TWIST Missing Ht-Wt-Hgb-Report-documentation v2.pdf).

How do I document attempts to get measurements?

Your local agency should have a plan for getting missing measurements that includes a plan for making attempts to get measurements. (See ARPA Waiver Guidance, page 13).

There are two methods for documenting attempts to get missing measurements. Choose the process that works best for your agency. It may include a combination of both methods.

Method One:
Document attempts in TWIST

Document your attempts to obtain the missing data in TWIST. Follow the process your agency outlines in the plan for getting missing measurements. Two options include using the WIC Notes section on the Enrollment screen or making a note in the Progress Notes.

The WIC Notes section allows all staff to document and view attempts in TWIST. Progress Notes are limited to Certifiers. Use a method that is consistent, easy to track, and works for your clinic flow. Notes should include the method of contact.

Method Two:
Use the Missing Ht/Wt/HGB report to document attempts to get missing measurements

FNS has approved using the "Missing Ht/Wt/HGB Report" to document the attempts to get missing measurements. It is recommended you run the report monthly to stay current with attempts to get missing measurements. Here are the steps for using the report to document attempts.

- Run the report. Identify the certification dates to focus on for follow-up.
- Document which participants were contacted on the report.
  - You can document on paper or electronically.
- Documentation should include the date and method of the attempt such as text, email, or phone.

During the local agency review, the reviewer will be looking to see that your agency has a plan and is using the plan to document follow-up for missing heights, weights, or hemoglobin. Please include at least one attempt to get missing measurements within the 60-days (or 90-days) and quarterly attempts thereafter.

What do I do when I receive measurements outside of an appointment?

When data is received for one of the measurements, enter the value in the participant's record in TWIST with the date of measure and the source of the measurement such as, doctor office, electronic health record, or visiting nurse. Once data is entered, the participant will no longer appear on the "Missing Ht/Wt/HGB Report." When entering the measurement, change the "collection date" in TWIST to match the date the measurement was taken.

Once entered, a Certifier or WIC Nutritionist should assess the information to determine if there are additional nutrition risks assigned and adjust the follow-up plan with the participant as needed.