Plan of Alternate Operating Procedures

Purpose

To establish a plan to support the continuity of operations in the event of a disruption of the North Carolina Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) services, including disasters, emergencies, public health emergencies, supplemental food recalls, supply chain disruptions and other events negatively impacting provision of WIC program services. The WIC Program is not designed to be a disaster assistance program, nor is it considered a first response option for disaster survivors and as such, NC WIC aims to make use of resources available from State and local emergency offices as well as the Federal Emergency Management Agency (FEMA) to the maximum extent practicable during an emergency period.

Roles and Responsibilities (as applicable)

The North Carolina State Director for the Special Supplemental Nutrition Program for Women, Infants, and Children is the designated emergency contact for the North Carolina WIC program.

The local agency WIC Director is the designated emergency point of contact for WIC participants receiving Food Package III in that local agency. Local agency WIC Directors are responsible for communicating ongoing supply concerns to their Regional Nutrition Consultant who will coordinate communications with WIC Nutrition Services Unit Manager to ensure minimal disruption of services.

The WIC Nutrition Services Unit Manager coordinates support activities to ensure minimal disruption of services.

The Vendor Manager is responsible for communicating with authorized WIC vendors and evaluating vendor management requirements.

Process

Alternate Operating Procedures shall describe processes the State Agency will implement to minimize the negative impact of program disruptions to WIC operations and services to ensure the availability of authorized supplemental foods to the extent feasible.

In the event of a presidentially declared major disaster as defined under Section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act; a presidentially declared emergency as defined under the Stafford Act; a public health emergency declared by the Secretary of Health and Human Services under Section 319 of the Public Health Service Act; a renewal of a public health emergency; or a supply chain disruption as declared by the Secretary of Agriculture, the State Agency shall determine if a waiver is necessary to continue WIC services. Identified needs for waivers will be requested by the State Director to Southeastern Regional Office (SERO).

Coordination and Communication

Contact information for State agency staff is maintained on the NCWIC website in the NCWIC State Agency Directory. Additionally, NCWIC contact information is kept up to date through communications with the SERO for Food and Nutrition Service (FNS) and is available on the USDA website WIC Program Contacts.

In each individual emergency period, supplemental food recall, or other supply chain disruption, State agency staff will evaluate the needs for data collection, reporting requirements, updating internal and external stakeholders and develop a plan to coordinate communication to keep SERO, FNS, state and local agency staff, authorized WIC vendors, WIC participants, and the public informed. Upon evaluation of the need, necessary waivers will be requested to ensure WIC services continue.

- Communication between State and Local Agency staff:

  Following Governor-issued Executive Order declaring a State of Emergency, the NC WIC Program prepares a NC WIC Program Emergency and Disaster Situations Memo for distribution that summarizes policies, procedures, allowable flexibilities and reporting during a disaster. The memo is sent to Local WIC Directors/Local Health Departments and addresses:

  - WIC's role in responding to disasters
  - Minimizing disruptions to WIC operations
  - Verification of Certification and Transfer Information
  - Extension of Certification Period
  - Supporting Breastfeeding Women and Breast Pumps and/or Supplies
  - Replacement of Destroyed WIC Foods
    - (including *Affidavit Attesting to WIC Food Benefit Loss*)
  - Evacuees and Emergent Needs
  - Communication to State agency
  - Waivers granted

- Coordinated Communication with WIC Participants:

  Communication with WIC participants is coordinated by both the State Agency and Local Agencies. The State Agency strongly recommends local agencies use of the Teletask Platform for two-way texting and has provided instructions that include how to send Emergency Closing Messages that reference/cancel scheduled appointments.
  https://www.ncdhhs.gov/teletaskmessagingresource052022pdf/download?attachment

  In the event of issues that have a state-wide impact to the NC WIC Program, a state-wide message will be designed in English and Spanish by State staff to be sent to participants via the Teletask Platform. If a participant does not have a device that accepts text messages, the message is delivered to a landline/voicemail. Information will also be made available on the State agency website https://www.ncdhhs.gov/ncwic

  In situations that result in an interruption of services to participants, Local Agency WIC Directors notify their assigned Regional Nutrition Consultant of impacts to their clinic. The Regional Nutrition Consultant's provide technical assistance and support and coordinate communications between the Local Agency, the WIC Nutrition Unit Manager and the State WIC Director.

  Information regarding clinic situations, supplemental food recalls, supply chain disruptions and associated data will be reported to the SERO office staff by the State WIC Director as soon as possible.

- Communications with FNS and Relief Organizations

  Communications with FNS, SERO, local emergency operations centers and State and local relief organizations will be coordinated daily by the WIC State Director. Information to be shared will include clinic locations and closures, open shelters and requests for Program assistance.

Continuation of Benefits

During a disaster, Local agencies will be encouraged to continue to serve participants by providing or implementing were applicable:

Remote certification and benefit issuance, issue Verification of Certification (VOC), identify and operate at alternate clinic locations including mobile and satellite, extend clinic hours and availability.

Certification Signature requirements for Rights and Responsibilities are met when local staff read the statement to participants, request acknowledgement of understanding and sign on behalf of the participant.

When a participant is impacted by a disaster and is unable to provide proof of income, residency, or identity, an affidavit may be used attesting to these requirements.

Eligibility documentation such as collection of anthropometric data, bloodwork and medical documentation will be relaxed to allow for streamlining services. An example of this would be allowing medical documentation to be provided by phone from the authorized medical provider and document in the participant's file until written confirmation is received.

When using remote certification, information may be collected through secure website upload (MyNCWIC Portal), mobile device screen share, mail, secure email and video conference.

If a local agency is unable to access the MIS system, the Business Continuity Plan is implemented to ensure services are interrupted.

The NC infant formula cost containment contract allows for remedies during recalls and supply chain disruptions to allow for substitution of non-contract brand equivalent products available in the marketplace.

Benefit Issuance and Redemption

If a local agency is unable to access the Management Information System (MIS), State agency staff will assist with certification and benefit issuance as guided in the Business Continuity Plan, whereby information is conveyed to the State's customer service desk and entered into the MIS to ensure minimal disruption of services.

Participants may request replacement EBT cards through any local agency or through contacting the eWIC vendor. Participants may request replacement of supplemental foods that were damaged or destroyed during a disaster by contacting any local agency and completing the Affidavit Attesting to WIC Food Benefit Loss.

The Crossroads Management Information System (MIS) infrastructure is managed by the NC DHHS Information Technology Division (ITD), who maintains a datacenter disaster recovery plan. ITD's objective is to recover any Crossroads components impacted by a disaster within twelve (12) hours. This plan is tested by ITD every calendar year.

ITD utilizes a primary Eastern datacenter (EDC) managed by the Department of Information Technology (DIT) for normal Crossroads operations, and for hardware recovery ITD can repurpose server hardware in a secondary Western datacenter (WDC) to restore software and databases from backup copies. Transaction logs are backed up every two hours during the day, and full backups of Crossroads software and databases are taken nightly. DIT is responsible for providing backup power for our datacenters.

For situations where a Crossroads datacenter is fully available but Local Agencies (LA) are impacted by a disaster, the Crossroads MIS has functionality to perform State Assisted Issuance (SAI) on behalf of selected local agency. SAI enables Crossroads to place WIC benefits remotely onto participants' existing EBT cards,

with no action required by the local agency. This function has been successfully utilized in past years due to LA being impacted by inclement weather, malware, and the COVID-19 pandemic.

Vendor Management

To ensure WIC participants continue to have access to healthy nutritious foods and authorized vendors are not inadvertently penalized the state agency will request waivers to allow for certain flexibilities in the event of a disaster. The state agency will distribute all disaster waiver communications via our active vendor email distribution list through the creation of a memo.

To support vendors ability to maintain vendor authorization during disasters without facing sanctions outside of their control, the state agency will request a waiver for the requirement for minimum stocking requirements. These flexibilities are intended to limit or minimize the impact of sanctions/violations assessed against vendors during a time of disaster resulting from any supply chains issues or widespread disruptions until such issues are resolved.

Additionally, the state agency will request a waiver to adjust vendor authorization requirements during a disaster. All required vendor trainings will be conducted virtually via webinar or recorded presentation made available at www.ncdhhs.gov. At the expiration of any waivers impacting vendor authorization the State agency will reevaluate vendors authorized during the disaster.

In the event of a disaster the State agency will request a waiver for the annual vendor routine monitoring and compliance investigation requirements. In the absence of routine monitoring and compliance investigation requirements the state agency will rely on WIC participants and local WIC agency to report all issues experienced at WIC authorized retailers. The state agency may request to conduct virtual investigations or virtual routine monitoring when participant hardship is met, or participant access is determined to be in jeopardy, if the local agency and authorized vendor has the needed technological capabilities.

Nutrition Services

Breastfeeding is the safest infant feeding option during disasters. Breastfeeding support during a disaster includes communicating with families and emergency partners the importance of continued breastfeeding and how to preserve breastfeeding during disasters, raising awareness on the safety of and benefits of breastfeeding, educating on hand expression, the risks of unnecessary supplementation of infant formula and unsafe infant feeding practices.

To support breastfeeding participants during a disaster, local agencies are allowed to replace destroyed breast pumps and supplies, and shall continue to support with breastfeeding initiation, relactation and breastfeeding challenges, meeting the participant needs through in person or remote services.

As identified and necessary, orders for exempt infant formula and WIC eligible nutritionals can be coordinated by the Local agency WIC Director or designee through the State agency office to ensure participants receiving Food Package III continue to have access to products unavailable in their service delivery area. Distribution may be coordinated to provide direct delivery to local WIC clinics or participant's home, in partnership with health centers, emergency services locations or other providers.

In the absence of electricity, refrigeration, potable water and/or sanitary conditions, ready-to feed or concentrated infant formula may be recommended for infants not being breastfed.

Food package waivers for allowable substitutions will be requested by the State agency as needed to adjust to market conditions and availability of product. Food package adjustments will be tailored to meet individual family circumstances, considering access to electricity, refrigeration and sanitary conditions as well as circumstances that prevent the maximum food benefit from being offered.

Local WIC agencies will provide participant referrals to support services such as relief organizations, emergency food and other essential supplies, temporary housing, financial assistance, transportation, medical services, religious organizations, interpretive and immigration services.

As necessary, both the State and local agencies may purchase health and safety equipment needed during a disaster to ensure the continuation of services and protect the health of staff and participants.

Source Documentation (as applicable)

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Implementation of the Access to Baby Formula Act of 2022 and Related Provisions

Guide to Coordinating Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Services When Regular Operations Are Disrupted

USDA WIC Policy Memorandum #2024-3: Implementing ABFA Requirements in WIC State Plans, February 16, 2024

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