

11th Month Infant Food Package Issuance
Bureau of WIC and Nutrition Services
June 26, 2015

Situation

The Bureau of WIC and Nutrition Services (WICNS) allows the Competent Professional Authority (CPA) to issue either an infant or a child's food package when the infant is in their 11th month. MOWINS, the Missouri WIC Information Network System, has allowed this since it began in 2009. MOWINS is a State Agency Model (SAM), which means that it is shared with other states both within and outside of the USDA Mountain Plains Region (MPRO). MPRO recently issued WIC Policy Memo 2007-1, *Certification and Monthly Food Benefits Issuance Cycles and Reporting Monthly Participation on the FNS-798*, which requires the infant be issued the infant food package through the calendar month in which he/she turns one year old. The MPRO State WIC Agencies must submit a Corrective Action Plan to come into compliance with this change in order to have an approved 2016 State Plan.

Background

Previous to MOWINS, the LWPS were allowed to issue a child's food package to the 11th month infant at the CPA's or caregiver's discretion if the infant was developmentally ready for additional solids. When MOWINS was implemented, this same process was allowed. Instructions WICNS received from MPRO on February 02, 2015, are the following: *"for certification periods covering a participant's transition from infancy into childhood, the State agency must provide the participant with an infant food package and report her on the FNS 798 as an infant participant through the calendar month during which she reaches one year old". "Beginning with the following month, the State agency must change the category of the participant from infant to child and provide her with a child food package."*

State Agencies submitted a preliminary timeline of the Corrective Action Plan, which will be included in the State Plan. WICNS requested that Missouri WIC be given until October 1, 2016 to implement this change for the following reasons:

- the possible policy changes that needed to be made to come into compliance
- the necessary funding request for the MOWINS enhancement
- the training and technical assistance which will need to be conducted across the state
- the many USDA WIC Final Food Rule changes that were required to be implemented from June 2014 through October 2015, which required numerous State and Local staff hours
- writing the code change for the MOWINS enhancement, testing and implementing the MOWINS changes

WICNS also expressed concern because issuing an infant food package when an infant has transitioned to milk can encourage food waste and fraud and will be perceived as preventing the local WIC provider staff from tailoring the infant food package when the infant is developmentally ready for a child's food package in the 11th month. WICNS staff monitors

Craig's List, Facebook, etc., for selling of baby foods and formula. Our data show that the majority of formula sold online occurs when the infant is 11 months of age.

While USDA appreciated the challenges this poses, the implementation date of October, 2016 was denied. The system modifications needed were acknowledged, however a work around must be used until an enhancement can be made to MOWINS.

Assessment

The MOWINS computer system must be changed to comply with the new clarification to Federal Regulations to allow only an infant food package to be issued through the calendar month of the infant's first birthday regardless of the nutritional assessment or caregiver preference. The child's food package may not be issued earlier than the beginning of the following calendar month in which the infant turns 1 year of age. When most infants qualify for WIC, MOWINS will assign the infant food package throughout the first year of the certification including the child's food package for the 11th month. Because this is currently built into the system, it would require the local WIC provider staff to touch most of the infant records in MOWINS to physically delete the child food package from the participant record and issue an infant food package, which will take additional time at the LWPs. In the 11th month, if the parent or guardian prefers to have an infant food package issued vs. a child's food package, the local WIC provider staff deletes the child's food package and issues the infant food package.

WICNS is currently developing a workaround in MOWINS so that the LWP does not have to make the change in each infant MOWINS chart. The workaround will automatically delete all 11th month child food packages and issue the infant food package. This will be done on a nightly basis. By doing this, the agency will not have to touch each record.

Recommendation

WICNS requests that the DAC be informed of this issue, as we are aware of the potential controversy this may cause with LWP staff and participants. WICNS will develop and implement the workaround in MOWINS, which should limit the amount of infant records that must be touched at the LWPs. Training will be developed and delivered to LWPs. This change should be implemented by December, 2015.