

**Subject: Temporary Certification Policy****Item: Physical Presence Waiver for Certifications and Recertifications**

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**PURPOSE:**

To provide guidance on the Physical Presence waiver issued by United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) pursuant to waiver authority from the American Rescue Plan Act (ARPA). This temporary policy is effective until September 30, 2026, or as communicated by the California Department of Public Health, Women, Infants and Children Division (CDPH/WIC).

**POLICY:****I. Physical Presence Waiver**

- A. Local agency (LA) staff are allowed to complete certifications/recertifications (certs/recerts) for applicants who are not physically present at the appointment.
- B. The LA must submit a completed Pre-Approval Plan for In-Person Service Delivery Option And Data Collection to their Nutrition Consultant (NC) prior to implementing the presence waiver. The plan does not need to be re-submitted again unless the LA makes a change in their process/procedures.
- C. LA staff must make a concerted effort to collect and review the applicant's adjunctive eligibility documentation prior to the cert/recert.
- D. LA staff must make a concerted effort to obtain referral data or anthropometric and bloodwork measurements in advance of or at the time of cert/recert.
  1. If the information is not available at the time of cert/recert, LA staff may defer collection of anthropometric measurements no later than 60 days and bloodwork measurements no later than 90 days.
  2. LA staff must attempt to collect missing anthropometric measurements/bloodwork at each subsequent contact and make appropriate referrals to the health care provider (HCP) if the information is not available.
  3. LA staff must continue to provide WIC services and benefits even if the family representative (family rep)/caretaker is unable to provide or come in person for anthropometric measurements and/or bloodwork for the participant.
  4. After the measurements have been obtained, LA staff must follow up with the participant in a timely manner to provide meaningful education and support, food package tailoring, referrals, and resources.
- E. A Competent Professional Authority (CPA) must complete a nutrition risk assessment, which may be based on information available through online communication and/or referral data.

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- F. The LA must offer applicants the option of receiving in-person services for cert/recerts at a site that is reasonably convenient for their WIC appointments if the LA chooses to use the physical presence waiver.
- G. LA staff must maintain Separation of Duties (SOD) for all certs/recerts, regardless of whether the appointment is performed in-person or remotely. Refer to WPPM 210-16.

**PROCEDURES:**

- I. For certifications and recertifications performed entirely remotely, LA staff must:
  - A. Review any proofs of eligibility sent by the applicant prior to the appointment.
    - 1. Make a concerted effort to collect and review the applicant's adjunctive eligibility documentation prior to the appointment.
  - B. Verify the family rep's first and last name, date of birth, and mailing address zip code at the start of the remote appointment. This is to ensure that the correct applicant has been contacted. Refer to WPPM 220-10.
  - C. Follow standard procedures for completing the required WIC Web Information System Exchange (WIC WISE) screens for a cert/recert.
  - D. Perform SOD. Refer to WPPM 210-16.
  - E. Select "Presence Waiver" from the "Reason Not Present" drop-down menu on the "Cert Action" screen in WIC WISE.
  - F. Attempt to obtain anthropometric and bloodwork measurements.
    - 1. If the applicant has current anthropometric or bloodwork data from a HCP or state/medically trained health official (e.g., home visiting program nurse, trained Head Start staff), ask the applicant to submit the information electronically. To ensure security of Protected Health Information (PHI), refer to WPPM 220-30 for acceptable ways that a document can be transferred remotely. Alternatively, LA staff may contact the HCP or state/medically trained health official for the information if a consent form has been signed.
    - 2. Document the obtained information in WIC WISE.
    - 3. If the applicant is missing anthropometric measurements and/or bloodwork, provide a referral to the HCP and document on the Wt/Ht/Bloodwork screen:
      - a. Check the "Not Present" checkbox in the Anthropometrics grid if height/weight measurements are missing.
      - b. Check the "No Bloodwork" checkbox in the Bloodwork grid if bloodwork is missing. Select the appropriate reason from the "Reason" dropdown.

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- c. If anthropometric measurements are missing, schedule the next appointment not more than two months after the cert/recert and limit the first issuance of benefits to two months. This is to allow for the collection of the data within the required 60-day timeframe.
- d. After the 60-day timeframe, LA staff are permitted to issue up to three months of food benefits while the anthropometric measurements are still pending (as long as other criteria for triple issuance are met). Refer to WPPM 330-10. Staff must attempt to obtain anthropometric measurements and/or bloodwork at each subsequent contact.
- e. After measurements have been obtained, LA staff must:
  - i. Follow-up with the participant in a timely and appropriate manner to make any necessary adjustments to the food package and nutrition education plan (including breastfeeding promotion and support).
  - ii. Offer to schedule a follow-up with a Registered Dietitian (RD)/Degreed Nutritionist (DN) if the measurements trigger a high risk for a participant who was not previously high risk and provide any necessary referrals/resources.
- G. Ensure that the family rep/caretaker has read the Rights & Responsibilities (R&R) form, watched the R&R section of the Welcome to WIC video, or had the R&R form read by LA staff over the phone or videoconferencing platform. Refer to WPPM 260-40. LA staff must:
  - 1. Verbally verify that the family rep/caretaker understands and agrees to the R&R.
  - 2. Write "telehealth" in the WIC WISE e-signature box.
- H. Ensure that the family rep/caretaker understands and verbally agrees to the content of any document that requires a signature (e.g., Self-Declaration Statement (SDS), consent form for obtaining information from HCP, etc.). LA staff must:
  - 1. Write "telehealth" in the WIC WISE e-signature box.
  - 2. If the applicant requires a SDS or Notice of Action (NOA), provide a copy of the form to the family rep/caretaker. Refer to WPPM 220-30 for acceptable ways to transfer a document remotely.
- I. Provide any necessary educational materials via mail, email, or by directing participants to online materials, if applicable.

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- J. Schedule the next appointment and issue the appropriate month(s) of benefits remotely using “Remote Cert/Recert” from the “Reason for Remote Benefit Issuance” dropdown.
- II. LA staff may collect pertinent information in person and then perform the cert/recert appointment remotely.
  - A. During the in-person interaction, LA staff must:
    1. Verify the presence of each applicant to be certified/recertified if present.
    2. Gather pertinent information, if not already provided electronically. This includes taking anthropometric and/or bloodwork measurements, proofs of eligibility, if available, and household size. Gather information on ethnicity and race (for initial certifications only) by using the Ethnicity and Race Data Collection form, which is available on the Local Agency SharePoint Site (LASS).
    3. Record the gathered information onto the WIC Certification/Recertification Data Collection template provided by CDPH/WIC, available on LASS.
    4. If a LA chooses to modify the CDPH/WIC Certification/Recertification Data Collection template or create their own, the LA template must contain a place to document the following information at minimum:
      - a. Individual name and ID
      - b. Checkbox for presence
      - c. Height/weight and bloodwork
      - d. Income information – household size, proof of income (source, interval, amount), and a checkbox indicating whether income eligibility was determined,
      - e. Other required proofs (if available) – ID, residency, pregnancy
    5. Scan the form into WIC WISE at the family level. Choose “Remote Cert Doc”. Destroy/shred the form after scanning.
    6. Avoid entering certification information into WIC WISE screens until the actual cert/recert is being performed.
    7. Offer voter registration.
    8. Assign a WIC Card if needed.
    9. Inform the family rep/caretaker that the cert/recert will be done remotely. Attempt to schedule the remote appointment as soon as possible, ideally

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within five (5) business days and keeping in mind the family's next Benefit Start Date (BSD).

10. Provide clear details and instructions for the following:

- a. Appointment date and time.
- b. Method of communication (phone or videoconference).
- c. Other required documents, if not already provided (e.g., proof of income, ID, residency, pregnancy). Provide clear instructions on how to submit these documents electronically. Refer to WPPM 220-30 for acceptable ways that a document can be transferred remotely.

11. Inform the family rep/caretaker that benefits will not be loaded onto the WIC Card until the remote appointment has been completed.

B. When completing the appointment remotely, LA staff must:

1. Complete the actual cert/recert (i.e., marking onsite and entry of cert/recert information into WIC WISE) using the information collected during the in-person interaction in one single day instead of over separate days.
2. At the start of the remote appointment, verify the family rep's first and last name, date of birth, and mailing address zip code to ensure the correct applicant has been contacted.
3. Follow standard procedures for completing the required WIC WISE screens for a certification or recertification.
4. Perform SOD. Refer to WPPM 210-16.
5. If the applicant was not physically present during the in-person interaction, select "Presence Waiver" from the "Reason Not Present" dropdown menu on the "Cert Action" screen.
6. When entering weight, height, and/or bloodwork into WIC WISE, document the actual date that measurements were obtained.
7. Ensure that the family rep/caretaker has read the R&R form, watched the R&R section of the Welcome to WIC video, or has the R&R form read by LA staff over the phone or videoconferencing platform. Refer to WPPM 260-40.  
LA staff must:
  - a. Verbally verify that the family rep/caretaker understands and agrees to the R&R.
  - b. Write "telehealth" in the WIC WISE e-signature box.

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8. Ensure that the family rep/caretaker understands and verbally agrees to the content of any document that requires a signature (e.g., SDS, consent form for obtaining information from HCP, etc.). LA staff must:
    - a. Write “telehealth” in the WIC WISE e-signature box.
    - b. If the applicant requires a SDS or NOA, provide a copy of the form to the family rep/caretaker. Refer to WPPM 220-30 for acceptable ways to transfer a document remotely.
  9. Provide any necessary educational materials via mail, email, or by directing participants to online materials, if applicable.
  10. Schedule the next appointment and issue the appropriate month(s) of benefits remotely using “Remote Cert/Recert” from the “Reason for Remote Benefit Issuance” dropdown.
- C. If the family rep/caretaker does not pick up the phone or attend the videoconference at the designated appointment time, LA staff must:
1. Try making contact again within the designated appointment time.
  2. If still unsuccessful, leave a message telling the family rep/caretaker to call back to reschedule the appointment.
  3. Document the attempt(s) to establish contact in WIC WISE Notes.
- III. For certifications and recertifications performed entirely in person, LA staff must:
- A. Follow all policies for performing an in-person cert/recert and standard procedures for completing the required WIC WISE screens for a cert/recert.
  - B. Perform SOD. Refer to WPPM 210-16.
  - C. If the LA is using the physical presence waiver, the cert/recert may be performed in person even if the individual being certified is not physically present at the appointment.
- IV. Mid certifications
- A. Mid-certifications may be completed remotely or in-person, depending on the participant’s preference.
  - B. If the participant is not present for the mid-certification, LA staff must attempt to get anthropometric measurements from referral forms or other allowable sources to assess growth and/or weight status, and a nutrition assessment must be completed. Refer to WPPM 240-30.

**AUTHORITY:**

[H.R.1319 - American Rescue Plan Act of 2021](#)

# CERTIFICATION

WPPM #200-00

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[USDA Memo Additional WIC Flexibilities to Support Outreach, Innovation, and Modernization Efforts through ARPA Nationwide Waivers – Supporting Remote WIC Operations](#)

## **RESOURCES:**

Pre-Approval Plan for In-Person Service Delivery Option And Data Collection  
Ethnicity and Race Data Collection Form on LASS WIC WISE Resources  
WIC Certification/Recertification Data Collection template on LASS WIC WISE  
Resources

## **CROSS REFERENCE:**

WPPM 210-16 Separation of Duties  
WPPM 220-30 Telehealth Privacy and Confidentiality  
WPPM 240-30 Mid-Certification Nutrition Assessment  
WPPM 260-40 WIC Participants Rights and Responsibilities  
WPPM 330-10 Single/Double/Triple Food Instrument Issuance