

Subject: Telehealth WIC Services

Item: Video and Phone Appointments

PURPOSE:

To ensure that local agencies (LAs) perform services in accordance with WIC program requirements when using telehealth technology (phone and/or videoconferencing) as a mode of service delivery.

POLICY:

- I. LAs must comply with WIC program requirements, policies, and procedures as described in the California WIC Policy and Procedures Manual (WPPM) regardless of whether WIC services are provided in person or using telehealth technology. Staff must maintain the same responsibilities of ensuring participant confidentiality, obtaining consent as needed, and fulfilling WIC requirements for certifications, recertifications, and other program services.
 - II. Telehealth WIC services must meet the same quality and professionalism standards as services performed in person. LAs must make reasonable accommodations for participants, family representatives, and caretakers with disabilities.
 - III. LAs are permitted to deliver the following WIC services via telehealth technology:
 - A. Individual and/or group Nutrition Education Contacts (NECs).
 - B. Health Nutrition Updates (HNU), including trimester checks.
 - C. High-risk nutrition appointments.
 - D. Breastfeeding support services. Refer to WPPM 220-20.
 - E. Mid-certifications.
 - F. Certifications and recertifications for any applicant who meets a presence exemption as specified in WPPM 210-07.
 - IV. LA staff must use CDPH/WIC-approved platforms for all telehealth appointments.
 - A. For videoconferencing appointments, use the CDPH/WIC-negotiated contract video platform.
 - B. For text messages, use the CDPH/WIC contract text messaging system.
 - C. For phone appointments, use a landline, a LA-approved cellular device, or an online-based telephone service that does not require participant, family representative, or caretaker personal identifying information (PII) in order to make the call.
 - V. Caretakers are permitted to participate in telehealth appointments on behalf of the family representative. Refer to WPPM 220-30.
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PROCEDURES:

- I. Pre-Approval for Conducting Telehealth Services
 - A. The LA must submit a written plan to their Nutrition Consultant (NC) prior to implementing telehealth services for the appointment types listed in Policy Section III. The plan does not need to be re-submitted again unless the LA makes a change in their telehealth process/procedures.
 - B. The proposal must contain the following information:
 1. Security precautions to protect participant information, including designation of private areas where staff can conduct telehealth appointments in a confidential manner. Refer to WPPM 220-30.
 2. Internal protocols for how the LA will conduct telehealth services, including procedures for:
 - a. Preparing participants for use of the telehealth platform and establishing expectations for the phone/video appointment.
 - b. Providing educational materials (e.g., via mail, email, or by directing participant to online materials), if applicable.
 - c. Collecting required documents remotely. Refer to WPPM 220-30 for acceptable methods.
- II. Obtaining and Documenting Consent for Telehealth Services
 - A. LA staff must:
 1. Obtain consent (verbal, written, or text message) from the family representative or caretaker prior to scheduling telehealth as a mode of service delivery.
 2. Document the consent by clicking the “Yes” radio button for “Consent for Video Appt” in the Contacts grid in the WIC Web Information System Exchange (WIC WISE). The Contacts grid is available on the Screening screen and the Family Information screen. It is not required to update the consent status in WIC WISE if consent has already been documented.
 3. Verify that consent has been documented in the WIC WISE family record prior to beginning each videoconference appointment. Obtain and document consent before proceeding if consent is missing.
 4. Inform the family representative/caretaker of all the individuals (e.g., interpreter, other pertinent staff members) who may be present to view the screen and/or hear the audio.

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III. Certification/Recertification via Telehealth

- A. LAs are permitted to offer telehealth certifications/recertifications to any applicant who meets one of the presence exemptions in WPPM 210-07.
- B. LA staff must follow the same requirements for telehealth appointments as they would for in-person appointments. Refer to WPPM 210-01 to 210-16 and WPPM 270-20. These requirements include:
 - 1. Maintaining Separation of Duties (SOD), unless the LA has submitted a WPPM 1000-80 *Alternate Procedure for Separation of Duties* form for the current contract period. Refer to WPPM 210-16.
 - 2. Determining WIC program eligibility by properly verifying required proofs of eligibility and assessing nutritional risk.
 - a. LA staff must obtain required documentation (i.e., proofs of income, residency, identification, and/or proof of pregnancy) and any needed health information (e.g., anthropometric measurements and bloodwork) in a secure and confidential manner. Refer to WPPM 220-30.
 - b. If the applicant requires a Self-Declaration Statement (SDS) or a Notice of Action (NOA), LA staff must:
 - i. Provide verbal notification of the form.
 - ii. Generate the appropriate form in WIC WISE.
 - iii. Write "telehealth" in the WIC WISE e-signature box.
 - iv. Provide a copy of the form to the family representative or caretaker. Refer to WPPM 220-30 for acceptable ways to transfer a document remotely.
 - 3. Ensuring that the family representative/caretaker has been informed of their rights and responsibilities. Refer to WPPM 260-40. LA staff must:
 - a. Provide an electronic copy of the Rights and Responsibilities (R&R) to the family representative/caretaker and ask them to read it, direct them to watch the R&R video, or read the form aloud to them.
 - b. Obtain verbal confirmation that the family representative/caretaker understands and agrees to the R&R.
 - c. Document this confirmation in WIC WISE by writing "telehealth" in the WIC WISE e-signature box for R&R.

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IV. Mid-Certifications via Telehealth

- A. LA staff must follow the same requirements for a telehealth mid-certification as an in-person mid-certification. Refer to WPPM 240-30.
- B. Staff must obtain any required health information (e.g., anthropometric measurements) in a secure and confidential manner. Refer to WPPM 220-30.

V. Text Messages

- A. WIC appointments must not be conducted by text. Text messages must only be used to:
 - 1. Schedule appointments or provide appointment reminders.
 - 2. Share information about nutrition, breastfeeding, and/or infant development as part of a NEC. Refer to WPPM 400-04.
 - 3. Provide peer contacts as part of the Breastfeeding Peer Counselor (BFPC) Program. Refer to WPPM 630-13.
 - 4. Provide other WIC program-related information (e.g., to update participants that their food benefits have been issued remotely for a qualifying reason).
- B. LAs must:
 - 1. Use only the CDPH/WIC contracted text messaging system when communicating with participants via text.
 - 2. Use text messages for simple and short communications. LAs must address issues that require more complex or nuanced discussion in person or over the phone.
 - 3. Never communicate participant personal identifying information (PII) in the content of any text message.

VI. Documentation of Telehealth Services in WIC WISE

- A. LA staff must maintain appropriate documentation in WIC WISE. Staff must complete data entry and documentation of Care Plans/follow-up notes and ensure that they meet the same quality standards as for a comparable in-person service.
- B. LA staff must document on the Nutrition Education screen that the appointment was performed using the method type of video conference or phone.
- C. Refer to WPPM 220-20 for requirements regarding documentation of telehealth breastfeeding support services.

CERTIFICATION

WPPM #220-10

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AUTHORITY:

[CA Business and Professions Code Section 2290.5](#)

[7 CFR §246.7](#)

[7 CFR §246.26](#)

CROSS REFERENCE:

WPPM 210-01 General Income Eligibility Guidelines and Procedures

WPPM 210-02 Adjunctive Eligibility

WPPM 210-03 Determination of Income Eligibility

WPPM 210-04 Income Exclusions

WPPM 210-06 Proof of California Residency

WPPM 210-07 Presence Requirement

WPPM 210-08 Proof of Pregnancy

WPPM 210-09 Overview – Nutrition Assessment Requirement for All Categories

WPPM 210-10 Determining Nutritional Risk – Anthropometric

WPPM 210-11 Determining Nutritional Risk – Biochemical

WPPM 210-12 Determining Nutritional Risk – Clinical/Health/Medical

WPPM 210-13 Determining Nutritional Risk – Dietary

WPPM 210-16 Separation of Duties

WPPM 220-20 Virtual Breastfeeding Support and Telelactation

WPPM 220-30 Telehealth Privacy and Confidentiality

WPPM 270-20 Proof of Identity

WPPM 290-00 Family Representative

WPPM 290-10 Designation of Caretaker

WPPM 240-30 Mid-Certification Nutrition Assessment