

WIC and Nutrition Manual
100 Policy Group
Financial

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WIC Financial Management



Kentucky Public Health
Prevent. Promote. Protect.

POLICY

Local WIC programs must submit monthly revenue and expenditure reports and an annual budget to the State Agency.

PURPOSE

To ensure payments to local programs reflect actual expenses. To comply with United States Department of Agriculture (USDA) reporting standards for the WIC program.

RELEVANT REGULATIONS AND GUIDANCE

[7 CFR 246.25 \(b\)](#) Records and reports-financial and participation reports-monthly.

[7 CFR 246.11](#) Nutrition education.

[7 CFR 246.14\(d\)\(2\)](#) Costs allowable with approval-capital outlay requests Federal Management circulars also apply to this area.

[OMB Circular A-87](#) Office of Management and Budget, Cost Principles for State, Local, and Indian Tribal Governments/ Standards for Determining Costs for Federal Awards Through Grants with State and Local Governments.

WIC Reporting Guide, December 2018 (internal)

[WIC Policy Memorandum #95-5](#) Allowability of Costs for Program Incentive Items.

PROCEDURES

The Department of Public Health is moved to the Workday Financial Management system effective July 2024. Below is a chart/crosswalk of Legacy Program Cost Centers and Workday Program Codes and descriptions.

Legacy Cost Center	Workday Program	Workday Program Name	Typically Described	Number of LHDs receiving this allocation in FY24
804	PGC2100	WIC Nutrition Services	WIC Program	All LHDs
833	PGC2101	WIC Breastfeeding Promotion Regional Coordinators	WIC Regional Breastfeeding Coordinators	6 LHDs
840	PGC2103	Breastfeeding Peer Counselor	WIC Breastfeeding Peer Counselor Program	25 LHDs
854	PGP2100	WIC Technical Assistance	WIC Passthrough Staff	2 LHDs
854	PGC2104	WIC Infrastructure	WIC USDA Infrastructure Grant	LHDs with an approved award from USDA annually

A. Funding and Budget

1. Funding for the WIC Program comes from the USDA to the Kentucky WIC Program, Nutrition Services Branch in the Department for Public Health. The Kentucky WIC Program (State Agency) pays all WIC Program food costs directly. The Program reimburses local agencies monthly for their program operation costs. Administrative expenditures shared by more than one program must be prorated on an equitable basis to all programs. The Kentucky WIC Program uses a per-participant funding formula to establish the annual funding allocations for local agencies. Based on their total allocation, local agencies must submit a projected annual budget. Budgets for local agencies are submitted annually in coordination with the Division of Administrative and Financial Management procedures. Refer to the annually-released Program Descriptions Budget file from the Division of Administrative and Financial Management for specifically allowed and disallowed budget costs.

B. WIC Federal Reporting Cost Categories for Time and Expenses

The following is a list of common WIC activities completed by staff in federal cost categories. Use this list to identify the cost category for WIC activities when completing time studies and for timekeeping. This list also includes examples of other costs (e.g., supplies, travel, etc.). There are four WIC Federal Reporting Cost Categories: Client Services, Nutrition Education, Breastfeeding Promotion and Support, and WIC Administration. See below for further details.

1. Client Services (Program Code PGC2100, Function Code FN1402)

All costs are directly related to food delivery and other client services and benefits. Client Services are the costs involved in screening, assessing, enrolling, and issuing benefits for WIC applicants and participants. Examples include WIC staff salaries/benefits and medical supplies and equipment necessary to conduct diet and health assessments required in the WIC certification process, salary/benefits and other costs necessary to refer clients to other health care and social services, to coordinate services with other programs, to participate in activities which promote a broader range of health and social services for participants, and to conduct and participate in surveys/studies which evaluate the impact of WIC on its participants. The majority of WIC staff time will be coded to Client Services, Function Code FN1402.

Below is a list of approved costs covered by client services:

- Any contact with applicants or WIC Participants (**does not** include nutrition education or breastfeeding promotion and support or outreach).
 - Phone coverage, appointment scheduling, reminder calls, and reminder postcards.
 - Income eligibility determination and documentation.
 - Notification of participants/applicants WIC Rights and Responsibilities.
 - Collection of demographic information for registration or appointment scheduling.
 - Health and dietary assessments and certifications.
 - Screening and notification of eligibility, ineligibility, and termination.
 - Performing blood or non-invasive hemoglobin tests and anthropometric measures for WIC assessment.
 - Food package assignment and substitutions and food package changes.
 - Printing/mailing WIC shopping lists to participants.
 - Reviewing the e-WIC 1 form and explaining the WIC Shopper App to WIC participants.
 - Issuing eWIC cards and eWIC benefits, explaining how to use eWIC cards, and replacing eWIC Cards.
 - Referral to other health and social services.
 - Coordination of services with other programs.

- Interpreter for registration, certification, MCHA weights and assessment, benefit issuance, and checkout (**does not** include nutrition education, breastfeeding, or outreach).
- Any activities that support WIC Clinic Services that are not directly with the applicant/participant.
 - Pulling and filing medical records.
 - Phone calls related to formula prescriptions to the State WIC Office, Physician's Office, or local pharmacy/retailer.
 - Participation or implementation of surveys/studies that evaluate the impact of WIC on its participants.
 - Creating agency WIC materials or forms such as a referral form (**does not** include nutrition education, breastfeeding, or outreach materials).
 - For WIC-only equipment, the cost of annual scale calibration and controls for hematological tests.
 - Inventory and destruction of returned WIC formula.
 - Support activities for online nutrition education, including reviewing online education emails/websites, printing online education labels, documentation in the medical record, and uploading eWIC benefits/mailling shopping list.
 - Translator services or materials translation for registration, certification, MCHA weights and assessment, and checkout (**does not** include nutrition education, breastfeeding, or outreach).
 - Clinic design and flow assessment.
 - Eligibility determination and review such as Conflict of Interest Log review (See FN1401)
 - Staff meetings with topics about providing client services, including WIC Policy.
- Supplies and Equipment to support Client Services.
 - Supplies to support WIC certifications, including hematological screening supplies, scales, and measuring equipment used solely by the WIC Program for WIC Services.

2. Nutrition Education (Program Code PGC2100, Function Code FN1403)

All costs are directly related to general WIC nutrition education. Examples include salaries/benefits, travel and training costs for WIC staff who plan or conduct nutrition education, costs to develop/procure, print, and distribute nutrition education materials, cost of equipment required to conduct nutrition education training, interpreter and translator services to facilitate training, and costs associated with evaluating and monitoring nutrition education. This federal cost category, Nutrition Education, should represent at least 20% of the total WIC Program budget. WIC Nutrition Education costs should be coded to Program Code PGC2100, Function Code FN1403.

Below is a list of approved costs covered by nutrition education:

- Any contact with applicants or WIC Participants related to nutrition education.
 - Providing nutrition education to participants at WIC certification, secondary, and MCHA visits.
 - Providing group nutrition education to participants.
 - Interpreter services used for nutrition education.
- Any activities that support WIC Nutrition Education that are not directly with the applicant/participant.
 - Planning nutrition education group sessions, including the purchase of any needed materials.
 - Documenting nutrition education in medical records (individual or group).
 - Staff meetings focused on nutrition education.
 - Nutrition Education Coordinator continuing education (a minimum of 4 hours annually).

- Nutrition Education Conferences require prior state approval (including registration fees, travel, and staff time).
 - Creating, printing, and distributing nutrition education materials. This includes the translation of nutrition education materials. (All local agency-created materials must be submitted to the State Agency for approval).
 - Translation services used for nutrition education.
 - Evaluation and monitoring of nutrition education services, for example, internal nutrition education quality assurance activity. WIC Internal Review will be coded to Administration.
 - Development of Nutrition Services Plan and Evaluation (formerly Narrative Plan) goals and plan, staff time spent carrying out the plan.
- Supplies and Equipment to support Nutrition Education.
 - Nutrition education materials and resources
 - Nutrition Education supplies for group education
 - Nutrition education supplies such as food models and MyPlate materials (prior state agency approval required).

3. Breastfeeding Promotion and Support (Program Code PGC2100, Function Code FN1404)

All costs directly related to the promotion and support of breastfeeding. Examples include the salary/benefits of WIC staff who plan or conduct educational and other services to promote or support breastfeeding, the salary/benefits of Designated Breastfeeding Experts (DBE) counseling participants referred from the Breastfeeding Peer Program, and other actions to encourage continuation of breastfeeding, costs to develop/procure, print and distribute educational materials related to breastfeeding promotion and support, clinic space devoted to breastfeeding educational and training activities including space set aside for nursing/pumping. WIC Breastfeeding Promotion and Support costs will be coded to Program Code PGC2100, Function Code FN1404.

Below is a list of approved costs covered by Breastfeeding Promotion and Support:

- Any contact with applicants or WIC Participants related to Breastfeeding Promotion and Support.
 - Providing breastfeeding education and support to pregnant and breastfeeding women.
 - Interpreter services used for breastfeeding activities.
 - Issuance of breast pumps to WIC participants.
 - Counseling and education on breast pump assembly, use, and cleaning or use of breastfeeding aids.
 - Follow-up calls to participants issued a breast pump.
 - Weight checks for breastfeeding infants.
- Any activities that support WIC breastfeeding promotion and support that are not directly with the applicant/participant.
 - Planning breastfeeding promotion, education, or support activities.
 - DBE training and breastfeeding activities, which may include continuing education, breastfeeding counseling, coordination with the Breastfeeding Peer Program, and lactation support referrals.
 - Staff time spent completing the USDA WIC Breastfeeding Curriculum.
 - Creating, printing, or distributing breastfeeding promotion and support materials. (All local agency-created materials must be submitted to the State Agency for approval).
 - Translation services used for breastfeeding activities.

- Outreach, if combined with breastfeeding promotion (for example, community baby showers).
 - Evaluation and monitoring of breastfeeding promotion, education, and support services.
 - Inventory of breast pumps and breastfeeding aids.
 - Staff meetings focused on breastfeeding support and promotion.
 - Breastfeeding Coordinator and DBE continuing education (a minimum of 4 hours annually).
 - Breastfeeding Conferences require prior state approval (including registration fees, travel, and staff time).
 - Ordering of manual breast pumps or breastfeeding aids (must have prior approval and submit the invoice to the state agency).
 - Providing breastfeeding support services such as community coordination and follow-up phone calls regarding breastfeeding.
- Supplies and Equipment to support Breastfeeding Promotion and Support.
 - Breastfeeding materials and resources such as breastfeeding dolls, tummy size models, etc. (state approval required).
 - Breastfeeding materials for group classes.

4. WIC Administration/Program Management (Program Code PGC2100, Function Code FN1401)

General management costs (direct or indirect) include those costs associated with program monitoring, prevention of fraud, general oversight, and food instrument (eWIC card) accountability. Examples include WIC administrative salaries/benefits and other costs necessary to conduct outreach, food instrument reconciliation, monitoring and payment, processing vendor complaints, administrative records, and fiscal and program management reports. This includes direct costs associated with Program and staff management and should be less than 10% of the overall WIC budget. WIC Administration/Program Management costs will be coded to Program Code PGC2100, Function Code 1401.

Below is a list of approved costs covered by WIC administration/WIC Program Management:

- Cost associated with Quality Assurance and Program Monitoring.
 - Conducting biannual WIC internal review.
 - Working WIC e-reports.
 - WIC eWIC card accountability, including inventory and audits.
 - Conflict of Interest Log Reviews (also see FN1402)
 - Completing time studies.
 - Inventory of office equipment.
 - Researching/preventing fraud by vendors or participants.
 - Letters to participants regarding reports of abuse or fraud.
 - Financial management, budget development, and tracking.
 - Staff training or staff meetings on topics such as supervisory skills or other management topics (**does not** include staff training on WIC policy, nutrition education, and breastfeeding promotion and support). Includes staff time for vicinity travel and training time.
- Costs associated with WIC Outreach.
 - WIC Outreach (**does not** include nutrition education or breastfeeding).
 - Outreach materials, including translation of materials (**does not** include nutrition education or breastfeeding promotion materials).
- Supplies and Equipment to support Outreach.

- Supplies for WIC Outreach (State Agency approval required).
- Summary of WIC Program Code PGC2100 Function Codes**

WIC Administration/ Program Management	WIC Client Services	WIC Nutrition Education	WIC Breastfeeding Promotion and Support
FN1401	FN1402	FN1403	FN1404

C. Time Reporting and Time Study

1. Staff time spent on WIC Program Activities should be directly coded to the WIC Federal Reporting Cost Categories.
2. Periodic Time Studies should be completed to ensure the accuracy of direct time coding. See the Sample Time Study Template below.

WIC Time Study Monthly Log

Name										
Position/Title										

Time Worked in the WIC Program									
Date	Client Services	Nutrition Education	Breastfeeding Promotion	Administration	Total Minutes	Total Hours	Time (Hours) Worked in Other Programs	All Hours Worked	Leave Without Pay (Hours)
					-	-		-	
					-	-		-	
					-	-		-	
					-	-		-	
					-	-		-	
					-	-		-	
Total	-	-	-	-	-	-	0.00	-	0.00

D. WIC Program Incentive Items

1. WIC Program incentive items refer to a class of goods, usually of nominal value (less than \$8 each), that are given to applicants, participants, and potential participants, or persons closely associated with the WIC Program, such as staff, for purposes of outreach, nutrition education, or breastfeeding promotion.
2. Program incentive items can be allowable if they are considered reasonable and necessary costs that promote specific program purposes of outreach, nutrition education, or breastfeeding promotion.
3. Reasonable and Necessary Costs
USDA requires the State WIC Agency to determine if purchase requests are reasonable, considering the context of the specific program areas of outreach, nutrition education, and breastfeeding. In addition, the state agency is responsible for considering whether an item is necessary and reasonable from the standpoint of the overall program operations and the relative financial situation of the Program. Local agencies should consider the public perception of program funds spent on items, even when the connection to outreach, nutrition education, or breastfeeding promotion is clear.

- a. Reasonable Costs
 - i. Provide the WIC Program a benefit generally commensurate with the costs incurred.
 - ii. Consistent with the costs of similar items from other vendors.
 - iii. In proportion to other Program costs for the function that the costs serve.
 - iv. These are priority expenditures relative to other demands on available administrative resources.
 - v. Have a proven or intuitive positive outreach or nutrition/breastfeeding education impact.
- b. Necessary Costs
 - i. Costs incurred to carry out essential program functions.
 - ii. Cannot be avoided without adversely impacting WIC Program operations.
- c. Outreach refers to promotional efforts to encourage and increase participation in the WIC Program. Outreach efforts must be consistent with the goals of the WIC Program.
 - i. Program incentive items for outreach should:
 - 1. Contain a WIC-specific message that targets the potentially eligible population.
 - 2. Normally seen in public (Note: Clinic staff logo shirts are not normally seen in public and are therefore not considered an approved outreach item).
 - 3. Contain the current USDA Nondiscrimination Statement (on all print items or as space allows on nonprint items). See Policy 306, Civil Rights.
 - 4. Have value as an outreach device that equals or outweighs other uses.
 - 5. Include WIC contact information such as the name, address, and/or phone number of the state or local agency.
 - 6. Constitute or show promise of an innovative or proven way of encouraging WIC participation.
 - 7. Be a reasonable and necessary cost.
 - ii. Examples of allowable costs include buttons, bibs, toothbrushes, pens, small cups, measuring spoons, or other nominally priced items with WIC promotional messages.
- d. Nutrition Education means individual, or group education sessions and the provision of information and educational materials designed to improve the health status, achieve positive change in dietary habits, and emphasize the relationship between nutrition and health, keeping with the individual's personal, cultural, and socioeconomic preferences. Teaching aids for nutrition education may be an allowable cost.
 - i. Program incentive items for Nutrition Education should:
 - 1. Be targeted to WIC participants.
 - 2. Contain the current USDA Nondiscrimination Statement (on all print items or as space allows on nonprint items). See Policy 306, Civil Rights.
 - 3. Have a clear and useful connection to the particular WIC nutrition message.
 - 4. Convey enough information to be considered educational or be utilized by WIC participants to reinforce nutrition education contacts.
 - 5. Have value as a nutrition education aid that equals or outweighs other uses.
 - 6. Be distributed to the target audience for which the items were designed (e.g., sippy cups distributed to the caregivers of infants who are learning or will be learning to drink from a cup during a relevant nutrition education contact).
 - 7. Messaging should be consistent with the Kentucky Department for Public Health, Kentucky WIC program, and USDA Nutrition Messaging.
 - 8. Be reasonable and necessary costs.
 - ii. Examples of allowable costs include calendars or refrigerator magnets with nutrition messages, sippy cups, infant feeding spoons, measuring spoons, MyPlate items, or other nominally priced items that support WIC Nutrition Education messages.
- e. Breastfeeding Promotion means strategies, initiatives, and services to encourage and increase the initiation and support of the duration of breastfeeding among WIC participants. Teaching aids for breastfeeding promotion may be an allowable cost.
 - i. Program incentive items for Breastfeeding Promotion should:
 - 1. Be targeted to WIC participants.

2. Contain the current USDA Nondiscrimination Statement (on all print items or as space allows on nonprint items). See Policy 306, Civil Rights.
 3. Have a clear and useful connection to promoting and supporting breastfeeding in general, inform participants about the benefits of breastfeeding, or offer support and encouragement to women to initiate and continue breastfeeding.
 4. Convey enough information to be considered educational or be utilized by WIC participants to reinforce nutrition education contacts.
 5. Have value as a breastfeeding promotion and support item that equals or outweighs other uses.
 6. Be distributed to the target audience for which the items were designed.
 7. Messaging should be consistent with the Kentucky Department for Public Health, Kentucky WIC program, and USDA Breastfeeding Messaging.
 8. Be reasonable and necessary costs.
- ii. Examples of allowable costs include Infant T-shirts or buttons with breastfeeding messages, such as “Breastfed is Best Fed” or other nominally priced items that support WIC Breastfeeding Promotion messages.
 - iii. Note: Breastfeeding Aids are a distinct and separate class of allowable costs and should not be considered incentive items. Refer to Policy 503, Breastfeeding Accessories, for additional information.

E. Unallowable Expenses for the WIC Program

The following list provides examples of **non-approved** WIC Program expenses. This list is not all-inclusive. Please contact the State WIC Office for guidance when considering purchases.

1. Celebratory items or items designed primarily as Staff Morale Boosters.
2. Breastfeeding supplies such as topical creams, ointments, hydrogel dressings, vitamin E and other medicinal items, foot stools, infant pillows, and nursing clothing. Refer to Policy 503, Breastfeeding Accessories, for more information.
3. Incentive items of a nominal value that have no outreach, breastfeeding, or nutrition education message or are intended for persons who have no connection to the WIC Program.
4. Incentive items not of a nominal value, such as diaper bags, infant slings, and ponchos, regardless of nutrition, outreach, or breastfeeding messages. These would not be considered reasonable and necessary.
5. Gift cards.
6. Staff WIC logo shirts, pullovers, cardigans, etc.
7. Fitness Center dues, membership, or fitness equipment, fitness instructors, fitness classes.
8. Pregnancy testing supplies.
9. Vitamins or Supplements.
10. Medical supplies not directly related to WIC services (e.g., syringes, needles, urinalysis testing supplies, glucose testing supplies, blood pressure supplies, immunization supplies, otoscopes, speculums).
11. Food, beverages, flowers, and entertainment for any kind of training event or meeting. Food or beverages for WIC staff or WIC participants. Food may be allowable with state approval if purchased for nutrition education, such as for a 1% or less milk taste test or WIC food preparation group class.

F. Equipment, Printing, and Purchase Requests

Local Agencies must obtain written approval from the State Agency prior to purchasing or expending WIC funds on:

1. Any purchase over \$500.
2. Any medical equipment (i.e., scales, measurement devices, breast pumps, hematological equipment/supplies) regardless of cost.
3. Any computer equipment (including software) regardless of cost. Computer accessories, such as keyboards and monitors, **do not** require approval.
4. Incentive items for nutrition education and breastfeeding education or outreach.

5. Any nutrition or breastfeeding education materials that are **not** state-approved. (Nutrition and Breastfeeding materials listed in the WIC and Nutrition Manual or the annual Nutrition Services Plan **do not** require approval unless the cost is \$500)
6. Locally-developed nutrition education, breastfeeding education, or outreach items intended for use in the WIC Program or for WIC outreach.
7. Any item that contains the KY WIC Logo or Shape the Future Breastfeeding Logo.

Obtaining State Agency Approval

1. Complete the WIC Purchase Request Form.
 - a. Include WIC agency name, staff member contact information, Program information (WIC or Breastfeeding Peer, WIC Infrastructure), Federal Cost Category (Client Services, Nutrition Education, Breastfeeding Promotion and Support, and Administration), item description, intended use, manufacturer information, unit price, quantity, shipping cost, total cost, indicated if the item will be used 100% for WIC Program or shared with other Programs.
 - b. The WIC Purchase Request Form is available in a PDF Fillable from the State Agency and may be requested via email at KY.WIC@KY.GOV.
 - c. Submit to KY.WIC@ky.gov with the **subject line: Purchase Request**.
 - d. It takes up to seven working days to obtain approval from the State Agency WIC Program.
 - i. Purchases over \$5,000 must receive USDA prior approval. This requires justification, may require multiple bids, and will add an additional 60 days to the review period.

WIC PROGRAM PURCHASE REQUEST FORM

WIC Purchase Request Form	
Local WIC Agency Name:	
Requestor Email:	
Date Submitted for Review:	
Program (WIC Program, WIC BFPC Program, WIC BF Regional Coordinator, etc.)	
WIC Function Area:	
Item Description:	
Intended Use/Need:	
Company Name/ Manufacturer & Item No.:	
Unit Price (\$):	
Quantity to Order:	
Unit Price (\$) x Quantity to Order:	
Shipping Cost (\$):	
What Programs will use this item?:	
Other Information:	
Total Amount (\$):	
*Please verify, with your local financial officer, that funds are available prior to submitting this request.	

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G. Non-Personnel and Shared Program Costs

Administrative expenditures shared by more than one program must be prorated on an equitable basis to all programs. WIC's percentage of the total must be used to allocate a shared cost to WIC. Purchases such as any equipment and supplies used by multiple programs must be allocated based on "fair share."

NOTE: Shared costs charged to the WIC Program still must be considered "necessary" and "reasonable" costs as defined above.

H. Fixed Asset Inventory

Local Agencies are responsible for maintaining a fixed asset inventory, including but not limited to a description, cost, serial number, fixed asset tag number (optional), and date of purchase for each item purchased with WIC funds with a value of \$500 or more. This does not include items such as hematological cuvettes/sensors utilized within one year. The local agency shall make the inventory available to the state agency upon request.

I. Surplus

Local agencies wishing to surplus equipment that is listed on their fixed asset inventory must indicate the method and date of disposal on the inventory form, which requires a staff signature verifying that the items have been taken or destroyed. Each local agency should follow its local surplus procedure to dispose of fixed asset inventory.

J. WIC Clinic Services Reporting
PATIENT ENCOUNTER FORM & SYSTEM CODING FOR WIC SERVICES

CPT Code	PEF Description	CMS Description	Long Description	Routine Providers
W0200	W0200 CERT & ENROLLED	W0200, CERTIFIED & ENROLLED	CERTIFIED & ENROLLED This is coded at certification and recertification visits. This is for the certification visit's assessment, measurements, and risk code assignment portion.	RD, RDN, CN, RN, LPN
W0203	W0203 SCR NOT ELIGIBLE - INCOME	W0203, SCREENED NOT ELIGIBLE- INCOME	SCREENED NOT ELIGIBLE DUE TO INCOME This is coded when completing an income assessment for a WIC certification or recertification, and the applicant/participant is income ineligible (Over income eligibility limits)	Support Staff
W0204	W0204 SCR NOT ELIGIBLE - RISK	W0204, SCREENED NOT ELIGIBLE-RISK	SCREENED NOT ELIGIBLE DUE TO NUTRITION RISK This is coded when a certification or recertification is completed, and the applicant/participant has no valid qualifying nutrition risk. Be sure to thoroughly assess and utilize regression codes and presumed dietary risk, if appropriate, before determining not eligible.	RD, RDN, CN, RN, LPN
W0205	W0205 MID-CERT HEALTH ASSESSMENT - MCHA	W0205, WIC MID-CERT HEALTH ASSESSMENT-IN PERSON	MID-CERT HEALTH ASSESSMENT (MCHA) This is coded for the nutrition assessment completed at the MCHA appointment. The health professional should be sure to indicate by checking the MCHA box in CMS that an MCHA visit is being completed.	RD, RDN, CN, RN, LPN
W0208	W0208 VOC ENROLLMENT	W0208, VOC ENROLLMENT	VERIFICATION OF CERTIFICATION (VOC) ENROLLMENT This is coded to transfer a participant from another site (outside the agency) with a valid certification period. Once assigned, the Health Professional may assign the food package.	Support Staff
W0209	W0209 BENEFIT ISSUANCE	W0209, FOOD INSTRUMENT ISSUANCE	WIC FOOD BENEFIT ISSUANCE This is coded to indicate the issuance of WIC food benefits.	Support Staff or RD, RDN, CN, RN, LPN

CPT Code	PEF Description	CMS Description	Long Description	Routine Providers
W0210	W0210 ISSUING A BREAST PUMP	W0210, ISSUING A BREAST PUMP	BREAST PUMP ISSUANCE This is coded when the health professional issues a WIC breast pump, provides required breast pump education and completes required forms.	RD, RDN, CN, RN, LPN, IBCLC, DBE
W0211	W0211 FOOD PACKAGE CHANGE/COUNSELING	W0211, FOOD PACKAGE CHANGE/ COUNSELING	FOOD PACKAGE CHANGE/COUNSELING This is coded when a health professional must change a food package and provides counseling regarding how to transition to the new foods; it is primarily coded when the health professional spends time explaining the infant formula challenge protocol and how to transition to a new formula. This may involve time calling a store or doctor's office to assist the participant with a product while they are in the office. Documentation in the medical record should indicate counseling provided.	RD, RDN, CN, RN, LPN
W0220	W0220 CAPILLARY BLOOD SPECIMEN	W0220, CAPILLARY BLOOD SPECIMEN	CAPILLARY BLOOD SPECIMEN FOR WIC HGB OR HCT SCREENING This is coded when a finger stick is completed for a WIC hematological screening.	RD, RDN, CN, RN, LPN, Lab Tech, Lab Assistant
W0230	W0230 HEMOGLOBIN	W0230, HEMOGLOBIN	HEMOGLOBIN SCREENING This is coded to indicate WIC Hgb screening in conjunction with W0220.	RD, RDN, CN, RN, LPN, Lab Tech, Lab Assistant
W0231	W0231 NON-INVASIVE HEMOGLOBIN	W0231, NON-INVASIVE HEMOGLOBIN	NON-INVASIVE HEMOGLOBIN SCREENING This is coded when the Pronto Non-Invasive Hgb Screening is conducted for WIC.	RD, RDN, CN, RN, LPN, Lab Tech, Lab Assistant
W0240	W0240 HEMATOCRIT	W0240, HEMATOCRIT	HEMATOCRIT SCREENING This is coded to indicate WIC HCT screening in conjunction with W0220.	RD, RDN, CN, RN, LPN, Lab Tech, Lab Assistant

CPT Code	PEF Description	CMS Description	Long Description	Routine Providers
W9401	W9401 WIC NUTRITION ED/COUNSELING (7.5)	W9401, WIC NUTRITION EDUCATION 7.5 MN	WIC NUTRITION EDUCATION 7.5 MINUTES This is the most frequent code for WIC. Nutrition Education at certification, mid-certification, secondary and re-certification visits. This code is for providing 7.5 minutes of WIC Nutrition Education. Use the ICD code 2699- to indicate WIC Nutrition Education/ Counseling. The 7.5 minutes is for the nutrition education portion of the WIC visit only; this code does not cover the <i>time</i> involved in the assessment, enrollment, hematological measures, or food benefit issuance. Use the appropriate codes for those portions of the WIC visit.	RD, RDN, CN, RN, LPN
W9401BF	W9401 WIC NUTRITION ED/COUNSELING (7.5) BF	W9401BF, WIC NUTRITION EDUCATION 7.5 MN	WIC BREASTFEEDING NUTRITION EDUCATION 7.5 MINUTES (V241-) This is coded for Breastfeeding Education, Counseling, and Support above and beyond protocol at certification, mid-certification, secondary and recertification visits, and when issuing a breast pump. Use the ICD code V241- to indicate WIC Breastfeeding Counseling.	RD, RDN, CN, RN, LPN
W9402	W9402 WIC NUTRITION ED/COUNSELING (15)	W9402, WIC NUTRITION EDUCATION 15 MIN	WIC NUTRITION EDUCATION 15 MIN This is coded when the health professional spends 15 minutes rather than 7.5 minutes on Nutrition Education – See W9401 for more information. This is not frequently coded.	RD, RDN, CN, RN, LPN
W9402BF	W9402 WIC NUTRITION ED/COUNSELING (15) BF	W9402 BF, WIC BREASTFEEDING NUTRITION EDUCATION 15 MIN	WIC BREASTFEEDING NUTRITION EDUCATION 15 MINUTES (V241-) This is coded for Breastfeeding Education, Counseling, and Support above and beyond protocol at certification, mid-certification, secondary and recertification visits, and when issuing a breast pump. Use the ICD code V241- to indicate WIC Breastfeeding Counseling. This is not frequently coded.	RD, RDN, CN, RN, LPN

CPT Code	PEF Description	CMS Description	Long Description	Routine Providers
W9403	W9403 WIC NUTRITION ED/COUNSELING (22.5)	W9403, WIC NUTRITION EDUCATION 30 MIN	WIC NUTRITION EDUCATION 22.5 MIN This is coded when the health professional spends 22.5 minutes rather than 7.5 minutes on Nutrition Education-See W9401 for more information. Documentation in the medical record should support the additional time spent on nutrition education. This is not routinely coded.	RD, RDN, CN, RN, LPN
W9403BF	W9403 WIC NUTRITION ED/COUNSELING (22.5) BF	W9043 BF, WIC BREASTFEEDING NUTRITION EDUCATION 22.5 MIN	WIC BREASTFEEDING NUTRITION EDUCATION 22.5 MINUTES (V241-) This is coded for Breastfeeding Education, Counseling, and Support above and beyond protocol at certification, mid-certification, secondary and recertification visits and when issuing a breast pump. Use the ICD code V241- to indicate WIC Breastfeeding Counseling. This is not frequently coded. <i>Only for DBE, or WIC IBCLC/CLC/CLS or Refer to RD for MNT.</i>	DBE, or RD/RN with IBCLC/CLC or CLS Credential
W9404	W9404 WIC NUTRITION ED/COUNSELING (30)	W9404, WIC NUTRITION EDUCATION 45 MIN	WIC NUTRITION EDUCATION 30 MIN This is coded when the health professional spends 30 minutes rather than 7.5 minutes on Nutrition Education-See W9401 for more information. Documentation in the medical record should support the additional time spent on nutrition education. This is not routinely coded. This would be rarely coded; an MNT visit/referral is more appropriate.	RD, RDN, CN, RN, LPN
W9404BF	W9404 WIC NUTRITION ED/COUNSELING (30) BF	W9404 BF, WIC BREASTFEEDING NUTRITION EDUCATION 30 MIN	WIC BREASTFEEDING NUTRITION EDUCATION 30 MINUTES (V241-) This is coded for Breastfeeding Education, Counseling, and Support above and beyond protocol at certification, mid-certification, secondary, and recertification visits and when issuing a breast pump. Use ICD code V241- to indicate WIC Breastfeeding Counseling. This is rarely used. <i>Only for DBE or WIC IBCLC/CLC/CLS or Refer to RD for MNT.</i>	DBE or RD/RN with a IBCLC/CLC or CLS credential.

CPT Code	PEF Description	CMS Description	Long Description	Routine Providers
W9431	W9431 WIC GROUP NUTRITION CLASS	W9431, WIC GROUP NUTRITION CLASS	WIC GROUP NUTRITION CLASS This is coded when a health professional provides nutrition education in a group setting using the approved Facilitated Group Session Modules or other state-approved curricula.	RD, RDN, CN, RN, LPN
W9432	W9432 WIC GROUP BREASTFEEDING CLASS	W9432, WIC GROUP BREASTFEEDING CLASS	WIC GROUP BREASTFEEDING CLASS This is coded when a health professional provides Breastfeeding education/support in a group setting using the approved Facilitated Group Session Modules or other state-approved curricula.	RD, RDN, CN, RN, LPN, IBCLC, DBE

WIC Breastfeeding Peer Counselor Program (BFPC) Time Recording Program Code PGC2103

WIC Breastfeeding Peer Counselor Program Staff should code their time spent on the activities below based as outlined below. Refer to Policy 504 Breastfeeding Peer Counselor Program for allowable expenses.

Activities	WIC Program Breastfeeding Support	Breastfeeding Peer Counselor Program
Attend quarterly Peer Counselor meetings (time and travel).		Peer Counselor Peer Supervisor Designated Breastfeeding Expert
Complete USDA Training Curriculum.	Designated Breastfeeding Expert	Peer Counselor Peer Supervisor
Peer conducting breastfeeding class for BFPC participants.		Peer Counselor
Peer counseling BFPC participants per Protocol.		Peer Counselor
Peer documenting BFPC contacts with participants.		Peer Counselor
Peer follow-up with BFPC participants on referrals made.		Peer Counselor
Peer referring a BFPC participant to a Designated Breastfeeding Expert (DBE).		Peer Counselor
Peer terminating BFPC participants per protocol.		Peer Counselor
Peer Supervisor administrative duties including: recruitment, interview, onboarding, arranging shadowing opportunities for newly hired Peers, and observing Peer counseling contacts, working BFPC reports, completing Quality Assurance reviews and evaluations per protocol.		Peer Supervisor
BFPC Staff Meeting/local agency training		Peer Counselor Peer Supervisor Designated Breastfeeding Expert
Filing in Medical Record		Peer Supervisor/Support Staff
DBE face-to-face or remote follow-up with participants based on a BFPC Peer referral.	Designated Breastfeeding Expert	Designated Breastfeeding Expert

Allowable Costs and Time Coding for Regional Breastfeeding Coordinators

Program Code PGC2101

Only expenditures for designated Regional Breastfeeding Coordinators approved by the State WIC office in specified agencies can be charged to the Regional Breastfeeding Coordinator Function Area. The expenditures will be for breastfeeding promotion activities to increase breastfeeding initiation and duration rates. This includes working with other local health departments and public and private community partners. Expenditures for direct one-on-one breastfeeding services cannot be coded to this function area. The State WIC Office must approve all expenses over \$500 (five hundred) dollars.

The table below helps to identify allowable Regional Breastfeeding Coordinator costs.

Item or Service	Allowable Costs	Comments/ Function Area
Durable Goods		
Computer and Laptops	No	Coded to indirect costs. These items are used for multiple programs.
Office equipment	No	Coded to indirect costs. These items are used for multiple programs.
Incentives and Educational Materials to Promote Breastfeeding		
Breastfeeding educational materials such as pamphlets and DVDs	Yes**	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
Breast pumps and breastfeeding aids for mothers and demonstration purposes	Yes	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
Incentive items distributed to encourage breastfeeding	Yes	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
Personnel and Compensation		
Salaries and compensation for Regional Breastfeeding Coordinators	Yes	WIC Regional Breastfeeding Coordinator
Salaries and compensation for lactation referrals	No	WIC Breastfeeding Promotion
Staff Training and Resources		
Travel for Regional Breastfeeding Coordinators	Yes	WIC Regional Breastfeeding Coordinator
Breastfeeding resources for WIC staff	Yes	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
International Board-Certified Lactation Consultant (IBCLC), Certified Lactation Specialist (CLS), or Certified Lactation Counselor (CLC) exam fees	No	

Item or Service	Allowable Costs	Comments/ Function Area
International Board-Certified Lactation Consultant (IBCLC), Certified Lactation Specialist (CLS), and Certified Lactation Counselor (CLC) association membership fee	No	
Program Advertising and Promotion		
Pamphlets and similar materials to promote breastfeeding	Yes**	WIC Regional Breastfeeding Coordinator with State Approval
Media campaigns, e.g., bus placards, to advertise breastfeeding	Yes**	WIC Regional Breastfeeding Coordinator with State Approval
Ads that promote breastfeeding in general.	Yes**	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
Incentive items for Breastfeeding Promotion	Yes	WIC Breastfeeding Promotion or WIC Regional Breastfeeding Coordinator with State Approval
Miscellaneous		
Food	No	
Secondary nutrition education contacts	No	
Childcare	No	
Cribs or other materials and equipment for infants of staff or peer counselors who bring their babies to work	No	

* All brochures, materials, and advertisements must include the required non-discrimination statement. This statement is included in the Policy 306, Civil Rights.

** All brochures, materials, and advertisements that have the KY WIC logo or the Shape the Future: Breastfeed logo must be reviewed and approved by the State WIC Office.