

IV. ORGANIZATION AND MANAGEMENT

(Please indicate) **State Agency: South Dakota** for FY: 2024

Organization and management involve the procedures for the documentation of staff time at the State level devoted to the various WIC functions, the evaluation and selection of local agencies, the documentation of local agency staffing standards and data, as well as disaster planning.

During a disaster, public health emergency, or supply chain disruption, the State agency may request to implement existing WIC regulatory and programmatic flexibilities or waivers to support the continuation of Program benefits and services. State agencies should consider the overarching authority, i.e., Stafford Act or provision(s), Access to Baby Formula Act, or authorized by Congress, and duration before developing a policy and procedure. The State agency must provide a detailed description of how it plans to operationalize the flexibility or waiver through their procedure manual where applicable. Please note the State Plan Guidance is not intended to capture a description of waivers authorized by Congress with separate reporting requirements.

Executive Order (EO) 13988, "*Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*", issued to all Federal Agencies, set out policies that all persons are entitled to dignity respect and equal treatment under the law, no matter their gender identity or sexual orientation. The EO does not usurp section 17 of 42 U.S.C., as amended or applicable regulations, rather it complements the nondiscrimination statement. Following the contents of the EO, State agencies must update their policies and procedures to align with the contents of the EO and the nondiscrimination statement.

A. [State Staffing](#) – [246.3\(e\)](#), [246.4\(a\)\(4\)](#) and [\(24\)](#): describe the information relating to State level staff requirements and utilization as it relates to WIC Program functions and how the State agency will provide a drug-free workplace.

B. [Evaluation and Selection of Local Agencies](#) - [246.4\(a\)\(5\)\(i\)](#) and [\(7\)](#) and [246.5](#): describe the procedures and criteria utilized in the selection and authorization of local agencies.

C. [Local Agency Staffing](#) - [246.4\(a\)\(4\)](#): describe the State staffing standards which apply to the selection of local agency staff and the means used by the State agency to track and analyze local level staffing data.

D. [Plan of Alternate Operating Procedures \(Disaster Plan\)](#) - describe the plan of alternate operating procedures in preparation for a disaster and/or public health emergency.

A. State Staffing

1. State Level Staff

- a. Record below the current total full-time equivalent staff (FTEs) available for each position listed or attach equivalent information in the section's Appendix noted here: [Click or tap here to enter text.](#)

<u>Position</u>	<u>FTE WIC</u>	<u>FTE In-Kind</u>	<u>Total FTE</u>
Director, (Rhonda)	1		1
Assistant Directors (2) (Alyson, Megan)	2		2
Vendor Specialist (Wendy)	1		1
Program Specialist (Hanna)	1		1
Nutrition Coordinator (Carolyn)	1		1
Breastfeeding Coordinator (Stacy)	1		1
MIS/EBT Specialist (Avery)	1		1
Intern (Abbigail Ferris, Claire Koenecke)	0.18		0.18
Other (specify): RD Managers (5)	5		5
Other (specify): Quality Assurance Specialist (Beth)	1		1
Other (specify): OCFS Administration (Katelyn, Makayla)	0.34		0.34
Other (specify): MCH Epidemiologist (Fa)	0.1		0.1

- b. The State agency has a WIC organizational chart showing all positions, titles, and staff names.

☒ Yes ☐ No

If yes, please attach and/or reference the location of the State agency's WIC organization chart:
See Section 3, Functional Area IV - Appendix B-OCFS Org Chart, Appendix C- Local Agency Org Chart

- c. Please attach and/or reference the location of the overall organizational chart that identifies the WIC Program's relationship within the State Health Department or Indian Tribal Organization:

See Section 3, Functional Area IV, Appendix A- DOH Org Chart

- d. The State agency has updated position descriptions for each of the above positions.

☒ Yes ☐ No

If yes, please attach and/or reference the location of the position descriptions:
See Section 3, Functional Area IV – Appendix J-Staffing and Organization Policy and Procedure

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

[Click or tap here to enter text.](#)

2. Estimate below the average percent of State staff time devoted to fulfilling the following functions:

<u>Function</u>	<u>Percent of Total Staff Time</u>
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Certification, including nutrition risk determination	Click or tap here to enter text.
Breastfeeding training/promotion and support	10
Nutrition education	10
Monitoring of local agencies	9
Fiscal reporting	10
Food delivery system management	15
Vendor management, including vendor training	15
Staff training and continuing education	15
(MIS/EBT) system development and maintenance	15
Civil Rights	0.5
Coordination with and referrals to other assistance programs and social service agencies	0.5
Other (specify):	Click or tap here to enter text.
Total	100

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

3. Drug-Free Workplace

a. The State agency has a plan that will enable them to achieve a drug-free workplace.

☒ Yes ☐ No

b. Please attach and/or reference the location of a description of the State agency's plans to provide and maintain a drug-free workplace in Appendix of this section.

Policy 1.14 Smoke and Drug Free Workplace

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

B. Evaluation and Selection of Local Agencies

☐ Does not apply because the State agency has only one location or no local agency(ies). (PROCEED TO NEXT SECTION)

1. Local Agencies Authorized

76 Number of local agencies authorized to provide WIC services last fiscal year

74 Number of local agencies planned to provide WIC services this fiscal year

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

2. The State agency accepts applications from potential local agencies:

☐ Annually

☐ Biennially

☒ On an on-going basis ☐ Other (specify) Click or tap here to enter text.

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

3. Existing local agencies must reapply and compete with new applicant agencies for authorization:

- ☐ Annually ☐ Biennially
☒ Not applicable ☐ Other (specify) [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

[Click or tap here to enter text.](#)

4. Selection Criteria

a. The State agency uses the following criteria in selecting local agencies in new service areas and/or in reviewing applications from existing service areas:

New Service Areas	Existing Service Areas	
☒	☒	Coordination with other health care providers
☒	☒	Projected cost of operations/ability to operate with available funds
☒	☒	Location/participant accessibility
☒	☒	Financial integrity/solvency
☒	☒	Relative need in the area
☒	☒	Range and quality of services
☒	☒	History of performance in other programs
☒	☒	Ability to serve projected caseload
☒	☒	Non-smoking facility
☒	☒	Americans with Disabilities Act (ADA) compliance

Other (specify by typing into the cells below):

☐☐☐☐

b. The State agency conducts studies (provide date of most recent study: [Click here to enter a date.](#)) of the cost-effectiveness of local agency operations that examine:

- ☒ Location and distribution of local agencies in proportion to new applicants/participants
☒ Clinic procedures to optimize participant access/service (Patient Flow Analysis, etc.)
☒ Staff-to-participant ratios and related staffing analyses
☒ Comparative analyses of local agency/clinic costs
☐ Other

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

The State Agency along with the Office of Child and Family Services reviews on a continuous basis the cost-effectiveness of local agency operations. This is done through various committees, Leadership Team, each time a person resigns a position and quarterly time study reviews are analyzed. In addition, at each ME time is analyzed against participation to assure staffing is adequate to serve the population. Analysis of staffing and effectiveness of the program is reviewed at each ME and monthly through the 798 reporting process and our 100% time study allocation process. Effective October 1, 2020, The Office of Child and Family Services contracted for a Project Manager to assist in a complete assessment of the Office of Child and Family Services operations. In May 2021, the assessment was completed and implementation began. The project has evolved significantly through trial and error. A major evolution was

the decision to separate Community Health Service programs from WIC services. Internal referrals will be a key piece in continuing to offer both beneficial programs to South Dakota families. WIC is now working to reduce the number of nursing staff providing services and focusing on nutrition professionals and paraprofessional support through public health assistants (PHA). Through attrition we will replace nursing staff with Dietitians, PHA's and Nutrition Educators. Ultimately reducing the cost for the delivery of WIC services in South Dakota. Anticipation for completion of the process is 3-5 years. Starting September 1, 2023 we will have 5 Service Areas each with a Registered Dietitian (RD) Manager and RD Team Lead managing WIC staff in each area.

Each year we evaluate the need for services based on analysis of income and needs for each county, See Section 3, Functional Area IV – Appendix E-Eligible Applicants & Coverage. All clinics are currently serving priorities I through VI. Priorities may be limited throughout the year based on funding. Further outreach efforts will be directed to reach those individuals in all counties most at risk, specifically pregnant women and infants. A marketing plan has been developed for marketing the Program and increasing clients' awareness of the Program (e.g., local newspapers free to the public radio announcements and/or public service announcements). This is described under Program Availability. A needs assessment may be done to identify more than one agency in counties specifically where distances to travel to the clinic is a hindrance to several clients. Since WIC has been implemented statewide, operations will be expanded in the neediest one-third to one half of the state according to the following: Local Agencies with a minimum caseload of 100 in the top one-third to one-half of the Affirmative Action Plan will be assessed for expansion of outlying clinic sites, according to the potential eligible not being served and distance to travel/proximity of participants to the clinic site. Documentation will be kept as to the reason an area of lower priority was chosen. Selection of Local Agencies - The State Agency shall consider the following priority system which is based on the relative availability of health and administrative services, in the selection of local agencies:a. First consideration shall be given to a public or a private nonprofit health agency that will provide ongoing, routine pediatric and obstetric care and administrative services.b.

Second consideration shall be given to a public or a private nonprofit health or human service agency that will enter into a written agreement with other agency for either ongoing or routine pediatric and obstetric care or administrative services.c. Third consideration shall be given to a public or private nonprofit health agency that will enter into a written agreement with private physicians, licensed by the State, in order to provide ongoing, routine pediatric and obstetric care to a specific category of participants (women, infants, or children).d. Fourth consideration shall be given to a public or private nonprofit human service agency that will enter into a written agreement with private physicians, licensed by the State, to provide ongoing, routine pediatric and obstetric care.e. Fifth consideration shall be given to a public or private nonprofit health or human service agency that will provide ongoing, routine pediatric and obstetric care through referral to a health provider.Refer to State Plan Policy/Procedure – Chapter 1 – 1.06, 1.06A and 1.06B

5. The State agency enters into a formal written agreement or contract with each local agency.

☒ Yes (state contract duration):Click or tap here to enter text. ☐ No

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Refer to WIC Policy Chapter I Administration; 1.04 Office of Child and Family Services – these formal written agreements are for our County Clerical positions mostly. We do have agreements with Public Health Alliance Sites for public health services which includes WIC.

6. The State agency has established statewide fair hearing procedures for local agency appeals.

☒ Yes, attach local agency fair hearing procedures or specify the location in the Procedure Manual and reference below:
☐ No

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

7. The State agency maintains a listing of clinic sites that includes the following information. If available, please attach and/or reference the location of the listing:

See Section 3, Functional Area IV, Appendix D – Local Agency Directory

- ☒ Location
- ☒ Type of site (e.g., hospital, health department, community action program)
- ☐ Service area
- ☒ Hours of operation
- ☒ Days of operation
- ☐ Health services provided on-site
- ☐ Social services provided on-site
- ☐ Participation
- ☐ Other (specify): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Please refer to www.sdwic.org

C. Local Agency Staffing

☐ **Does not apply because the State agency has only one location or no local agency(ies). (PROCEED TO NEXT SECTION)**

1. Staffing Standards

a. The State agency prescribes local agency staffing standards that include:

- ☒ Credentials
- ☒ Staff levels
 - ☒ Staff-to-participant ratio standards
 - ☒ Time spent on WIC functions
 - ☐ Other (specify): [Click or tap here to enter text.](#)
- ☒ Functions of CPAs
- ☒ Paraprofessional requirements
- ☐ Separation of duties to ensure no conflicts of interest
- ☒ Other (specify):
- ☐ Not applicable

b. The State agency has a plan for ensuring that local agency credentials are in line with the Nutrition Services Standards.

☒ Yes ☐ No

c. The State agency maintains copies of local agency CPA position descriptions, classified in terms of Nutrition Services Standards, i.e., federal requirements, recommended criteria, best practices.

☒ Yes ☐ No

d. Local agencies follow staffing standards established by unions or local governmental authorities.

☐ Yes ☒ No

If yes, how many of the total local agencies are currently authorized by unions or local governmental authorities? [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

Click or tap here to enter text.

2. Local Level Staffing Data

a. The State agency gathers and analyzes data to determine staff-to-participant ratios (check all that apply):

- | | |
|--|---|
| ☒ For each clinic/local agency | ☒ By function |
| ☒ At regular intervals | ☒ Program management |
| ☒ Monthly | ☐ Food delivery |
| ☒ Quarterly | ☒ Certification |
| ☒ Annually | ☒ Nutrition education |
| ☒ Breastfeeding promotion and support | |
| ☐ Other (specify): Click or tap here to enter text. | |

b. Results of analyses are reported back to local agencies.

- ☐ No
- ☒ Yes, in a single report comparing all local agencies
- ☒ Yes, in a local agency-specific report (no comparative data)

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

We are now utilizing Tableau to provide data back to the Local Agencies in a dashboard format. We are working to develop data related to redemption and certification process in the next year. Current dashboard data is available at: <https://sdwic.org/kb/data-center/> Password: WICsd1978!

3. Local Agency Breastfeeding Staffing Requirement

a. Number of local agencies with a designated staff person to coordinate breastfeeding promotion and support activities.

74

b. The State agency maintains approved copies of local agency Breastfeeding Coordinator and Peer Counselor position descriptions as outlined in the WIC Breastfeeding Support.

- ☒ Yes ☐ No

c. Number of local agencies with breastfeeding peer counselors. 74

D. Plan of Alternate Operating Procedures (Disaster Plan)

Developing a plan of alternate operating procedures, more commonly referred to as a Disaster Plan, is not required but encouraged. A Disaster Plan should include policies and procedures for operations when regular operations are disrupted, which may include disasters, public health emergencies, and supply chain disruptions. In this section are questions to guide State agencies in developing their plan of alternate operations prior to a disaster and/or public health emergency.

1. State agency has developed a WIC disaster or emergency operations plan.

- ☒ Yes ☐ No

2. The WIC disaster and public health emergency plan is part of a broader Health Department or other State agency disaster plan.

- ☐ x Yes, what agency(ies): Department of Health Disaster Plan, Refer to WIC Policy Chapter I

Administration 1.18

☐ No

3. **The State agency shares the disaster and public health emergency plan with its local agencies and clinics?**

☒ Yes ☐ No

4. **The disaster plan addresses:**

a. **Disaster and Public Health Emergency Planning**

☒ Designate a WIC State agency emergency contact to work with relief organizations for continued WIC benefits.

☒ Internal/external communications plan

☒ Establish point of contact with State/ITO-level relief agencies

☒ Design a comprehensive plan that aligns with the Department of Health's Disaster Plan for continued WIC services

☒ Plans are submitted with State Plans for approval

☒ Train staff and test readiness periodically on approved plans

☒ Other (describe) The South Dakota Department of Health through their Office of Emergency Preparedness has developed a Continuity of Operations Plan (COOP). Currently a State Office WIC staff persons serves on this Committee that meets quarterly. SD WIC Program has it's own 1.18 Disaster Situations policy.

b. **Alternate Certification**

☒ Remote certification

☒ Physical presence

☒ Anthropometric data

☒ Eligibility documentation

☒ Certification period (temporary or fully certified)

☒ Signature requirements

☒ Verification of Certification (VOC) issuance

☐ Other (describe) [Click or tap here to enter text.](#)

c. **Alternate Benefit Issuance and Redemption**

☒ Electronic benefit (EBT) issuance sites

☐ Out of State benefit redemption

☒ Replace EBT cards

☒ Replace destroyed supplemental foods

☒ Mailing food instruments (FI) and cash value voucher/benefits (CVV/B)

☐ Direct Distribution

☐ Home Food Delivery

☐ Other (describe) [Click or tap here to enter text.](#)

d. **Vendor Management Requirements**

☒ Minimum stocking requirements (MSR)

☐ Vendor Monitoring Schedules

☐ Emergency authorization of vendors

☐ Other (describe) [Click or tap here to enter text.](#)

e. **Nutrition Services**

☒ Infant formula

☐ Medically fragile participants

☒ Medical documentation

☒ State agency options for evacuated participants

- ☒ Food package adjustments
- ☒ Breastfeeding Support
- ☐ Other (describe) [Click or tap here to enter text.](#)

f. Allowable Cost

- ☐ Necessary equipment (health and safety) approval process
- ☐ Use of WIC staff
- ☐ Cost of personal protective equipment (PPE)
- ☐ Other (describe) [Click or tap here to enter text.](#)

g. Participants

- ☒ Access to program records
- ☒ Certification and food issuance sites and procedures
- ☒ Publication notification of variances in program operations
- ☒ Use of mobile devices
- ☐ Other (describe) [Click or tap here to enter text.](#)

h. Alternate Procedures

- ☐ Local agency monitoring
- ☒ Procedures to assess the extent of a disaster and report findings
- ☐ Use of mobile clinics
- ☒ Management Information System (MIS) Recovery
- ☒ Back up filing systems
- ☒ Back up computer systems
- ☒ MIS alternate procedures
- ☐ Reciprocal agreement with bordering States
- ☒ Plan to ensure continuity of services for priority populations
- ☒ Collect and report on alternate operating procedures implemented
- ☒ Other (describe): Deploy staff to affected area as needed

5. The State agency requires local agencies/clinics to have individual disaster plans.

☐ Yes ☒ No

If yes, such plans are reviewed for compliance and consistency with the State agency disaster plan.

☐ Yes ☐ No

6. The State agency has a designated staff person to coordinate disaster planning.

☒ Yes ☐ No

ADDITIONAL DETAIL: Organization & Management Appendix and/or Procedure Manual (citation):

[Click or tap here to enter text.](#)