3.1 Certification

The Certification function is intended to support application processing and certification of WIC participants[4]. To be certified as eligible to receive WIC benefits, applicants[5] must meet categorical, income, residence, and nutrition risk requirements. WIC certification involves capturing relevant demographic, income, health-related, and referral data on applicants to and participants in the WIC Program. In this area, eligible applicants are authorized to receive nutrition education, breastfeeding support, referral to health and social service programs, and food benefits. Upon certification WIC participants are prescribed a food package and are issued benefits (*see section 3.4: Food Benefit Issuance*). Certification functionality also includes the ability to process participant data changes and transfers.

Certification includes the following functions[6].

- Create and Locate Data Records
    - Create New Applicant Record
    - Search for Applicant/Vendor Record

- Manage Application Process
    - Maintain Basic Information on Applicant/Participant
    - Screen Applicant for Prior Enrollment
    - Determine Adjunct or Automatic Income Eligibility
    - Determine Documented Income Eligibility
    - Maintain Waiting List

- Determine Nutrition Risk of Applicant
    - Maintain Applicant Nutrition and Health Characteristics
    - Calculate Body Mass Index and Produce Automated Growth Chart
    - Capture and Document Blood Test Results

---

[4] The certification function may not include all business activities that take place during a certification appointment; this function describes the system functions that support the actual certification of an applicant.

[5] For the purposes of the FReD, an applicant is a person applying to be certified. That person may be new to WIC or may be applying for a subsequent certification.

[6] Due to the various processes performed in WIC local agencies, some functions may take place in a different order in the business process flow.

- ☐ Determine Nutrition Risk and Calculate Priority

- ■ Complete Certification

  - ☐ Assess Applicant for Temporary Certification/Presumptive Eligibility Requirements and Documentation Status

  - ☐ Certify Applicant

  - ☐ Maintain Proxy Information

  - ☐ Implementation Approaches

  - ☐ The system could maintain a history of proxies and dates of designation as proxy.

  - ☐ Issue Identification Card

- ■ Prescribe Food Package

  - ☐ Select and Nutrition Tailor Food Prescription

  - ☐ Change Food Prescription

- ■ Process Participant Changes and Transfers

  - ☐ Change Family/Household Grouping

  - ☐ Change Participation Status and/or Category

  - ☐ Process In-State Transfers

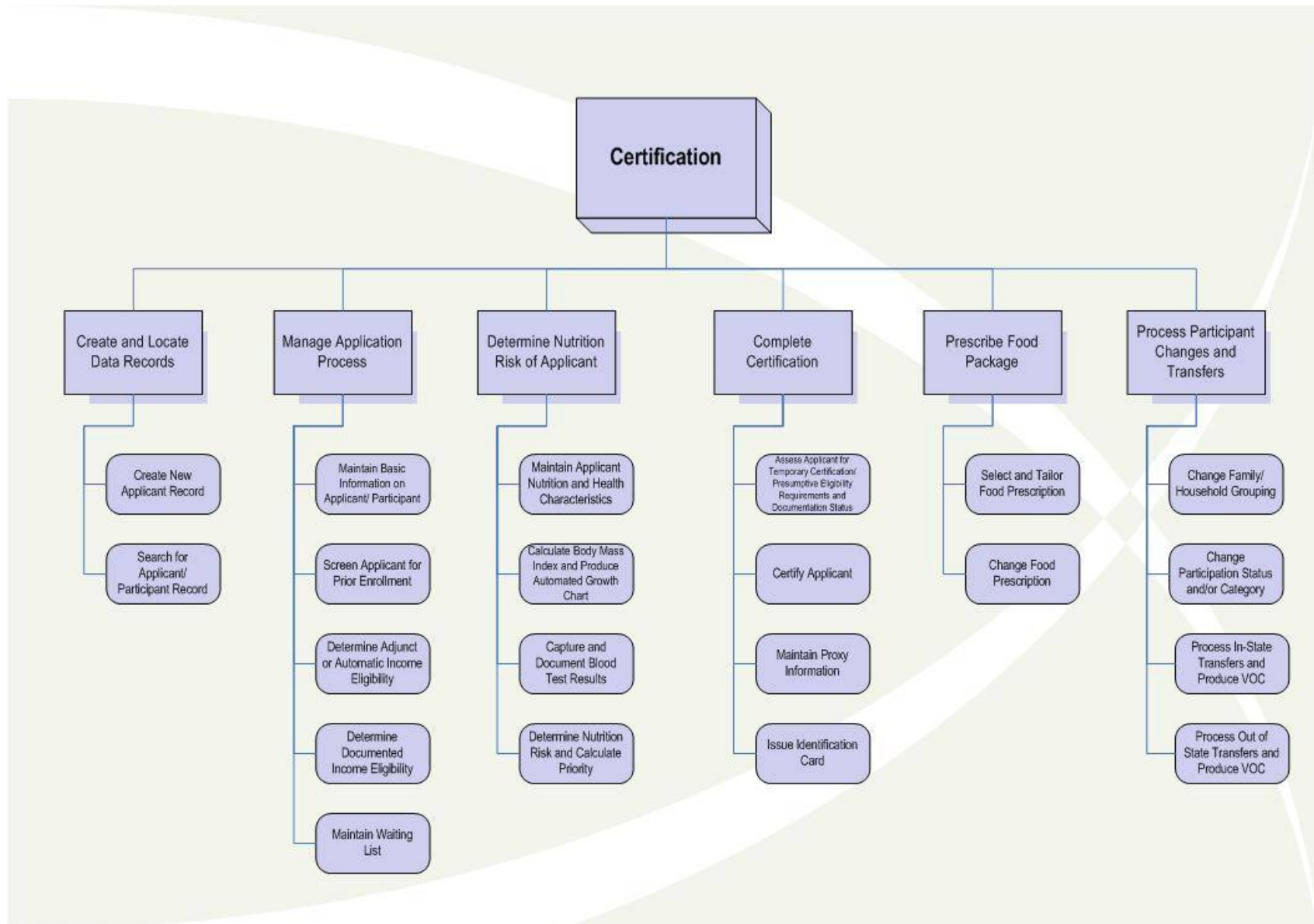 - ☐ Process Out of State Transfers and Produce VOC

Exhibit 3-1: Functional Decomposition Diagram – Certification

3.1.1 Create and Locate Data Records

For system management, data records need to be maintained and accessible. This functional area describes the process of creating a new data record with a unique identifier and subsequently locating the record through a search function.

3.1.1.1 Create New Applicant Record

When a person contacts WIC and is not already in the system, a user must create a new data record to capture and maintain information. For data management, each record should have a unique identification number. The WIC local agency could use this identification number to identify the participant when his or her records are needed.

The system should support the creation of new records into which data will be entered. When creating new records, the system should assign a unique identification number for each applicant/participant record and a unique family/household identification number if one or more members are applying to/participating in WIC. A family/household identification number should be assigned for the family/household and all individual participants in that family/household should be linked to the family/household identification number using their participant identification number.

Inputs[7]:

Participant Address- Apartment

Participant Address- City

Participant Address- Street

Participant Address- Zip Code

Participant Date of Birth

Participant Name- First

Participant Name- Last

Participant Name- MI

Participant Parent/Head of Household Indicator

---

[7] The required data elements to create a record will vary based on design. This function assumes that a database record can be created with only a name, address, and date of birth. Other data would be required for completing an applicant's initial application information.

Process:

- Accept user entry of minimum required data record data elements

- Assign individual participant identification number and family/household identification number (as applicable)

- Maintain record for search, view, and update

Outputs:

Participant Identification Number[8]

Participant Family/Household Identification Number

New database record

Implementation Approaches

► The system should assign one unique identification number to each record (person) in the system. The system does not need to maintain different sets of numbers for different WIC statuses, but for reporting and tracking purposes there must be a way to identify applicants versus enrollees or participants. Different statuses can be handled through a separate data element (for example, a status code indicator) associated with the record.

► The identification number should be either a sequential number (the next sequential number available) or a coded number (e.g., the WIC Program may have special codes for the local agency the participant is certified with, or a code for the participant's category. Note that in this case, the identification number would need to change if the participant's category changes).

► To minimize the creation of partial records, the system could require a specific set of data elements (e.g., an application) to be completed before a new record could be created. Additional data elements would be required in this approach.

► Prior to creating a record, the system could perform a check (for dual participation or to see if a record with the same data exists in the database) based on entered information. This would likely take place after entering basic information, such as name, address, or date of birth, but before the system assigns a unique identification number. See *section 3.1.2.2* for details on screening for prior enrollment.

► The system may create a family record simultaneously with the first applicant/participant in the family or as a separate process.

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[8] Although a person does not become a participant until after being certified, the term "Participant Identification Number" is used in this document to define the unique identifier used in an individual data record. The data record may be for a person that has not yet been certified (an applicant) is certified (participant or enrollee), or is not in an active certification (applicant for subsequent certification or terminated).

> ► Depending on design, a system may create a family/household record first and then add participants/applicants. The reverse may also take place. A unique household number is necessary for EBT readiness because benefits for each participant in the household are aggregated to a single account, which is typically associated to a family/household identification number because a card is generally issued per family rather than to each participant.

3.1.1.2 Search for Applicant/Vendor Record

After a record is created or to determine if a data record exists in the system, staff members have to have the ability to locate the record for viewing or data entry.

The system should have the capability to search for records using predefined criteria.

Inputs:

Data elements included in a search function will vary based on design and State agency preferences. See Implementation approaches for examples.

Process:

- Compare data search criteria with existing database records

- Display records that match search criteria

- Allow user to access the data record(s) matching search criteria

Outputs:

Screen display of matching records

Screen display of selected record

> Implementation Approaches
>
> ► The system should provide for searches by individual or family/household.
>
> ► Various data elements should be included in the search, such as identification number (participant and family/household), name, address, phone number, zip code, county, local agency, clinic, statewide, participation status (applicant, certified, terminated), or category. Combinations of search elements should be allowed.
>
> ► The system should have a method for searching for names that allows for variations in spellings, such as a search for similar sounding names (Smith, Smyth, Smythe) or the use of a wildcard character.
>
> ► The system should allow searches by current name and any previous or alias names.

3.1.2 Manage Application Process

The WIC Program collects and maintains information on individuals applying for participation in the WIC Program. Individuals provide this data to the WIC Program when they telephone or visit the agency. If an applicant does not meet the basic requirements for category, residence, and income, the applicant will not continue with nutrition risk eligibility interviews and will not become a participant in the WIC Program at that time.

The workflow in WIC clinics varies. Some agencies prefer to perform basic eligibility and income screening prior to setting up a certification appointment. Others perform the eligibility and income screening at the same time as the nutrition risk assessment for certification. Therefore, the specific processes performed within the initial application process or included within the certification screening will vary according to the procedures performed by a local agency.

Applicants who wish to participate in the WIC Program contact the WIC clinic to determine their eligibility to receive WIC benefits. When a local agency has reached maximum caseload capacity, a waiting list is established (see section *3.1.2.5*). Individuals already certified who are relocating from within or out of state receive priority over new applicants, and are generally enrolled immediately to minimize the interruption of services.

3.1.2.1   Maintain Basic Information on Applicant/Participant

Collecting basic data about each applicant/participant is important because the data are used throughout subsequent WIC Program activities. The data are used by other functions to notify applicants/participants of their appointments (such as for nutrition education and food instrument pickup), and, after certification, to help determine and track the type of food benefits the participant is assigned, and to determine the current caseload of a State or local agency.

The majority of basic data are collected when the applicant visits the agency. However, some of the data may be collected when the applicant telephones the agency. Some data may already be collected in the system for those participants who are reapplying for subsequent certification to WIC. Applicant data may be received through various means and at different times.

In addition, all applicants, including infants and children, must be physically present at their certification appointment. In some cases, income and physical presence requirements can be waived, but these exceptions must be documented.

The system should allow the input of applicant/participant data (demographic and eligibility) needed to process a certification. Applicant/participant data should be able to be added to, changed, or deleted to maintain up to date information[9]. The system should link the records of people associated with the same family/household; links should be able to be changed as family/household associations change.

Inputs[10]:

Clinic Identification Number

Local Agency Identification Number

Participant Address- Apartment

Participant Address- City

Participant Address- Street

Participant Address- Zip Code

Participant Alias Name(s)

Participant Application Date

Participant Category Code

Participant Certification End Date

Participant Data Sharing Consent

Participant Data Sharing Entity

Participant Date of Birth

Participant Date of First Certification

Participant Date of Initial Contact

Participant Education Level Code

Participant Employment Status Code

Participant Expected Date of Delivery

Participant Family/Household Identification Number

Participant Family/Household Size

Participant Guardian Name

Participant Health Source of Prenatal Care

Participant Identity Documentation Code

---

[9] Certain eligibility information should not be able to be changed within an active certification.

[10] If the State Agency opts to require proof of pregnancy, "Participant Proof of Pregnancy" should also be included as an input.

Participant Income Documentation Code

Participant Income per Period

Participant Income Period

Participant Language Spoken Code

Participant Marital Status Code

Participant Parent/Head of Household Address- Apartment

Participant Parent/Head of Household Address- City

Participant Parent/Head of Household Address- State

Participant Parent/Head of Household Address- Street

Participant Parent/Head of Household Address- Zip Code

Participant Parent/Head of Household Date of Birth

Participant Parent/Head of Household Indicator

Participant Parent/Head of Household Name- First

Participant Parent/Head of Household Name- Last

Participant Parent/Head of Household Name- MI

Participant Parent/Head of Household Telephone Number

Participant Physical Presence Exception Code

Participant Physical Presence Indicator (Y/N)

Participant Proxy Name

Participant Racial/Ethnic Ethnicity Code

Participant Racial/Ethnic Race Code(s)

Participant Residency Documentation Code

Participant Self-declared Income Eligibility Code

Participant Sex

Participant Source of Information About WIC Code

Participant Status Code

Participant Telephone Number

Transfer Date

Transfer From

Transfer To

Process:

- Add new applicant data to or update existing records for each family/household member

- Associate all other family/household members to the Participant Family/Household Identification Number

- Make changes to applicable applicant data to all records associated with the family/household identification number

- Generate screen display of linked participant family/household

Outputs:

Screen display of data

Implementation Approaches

► The family/household ID could be used to facilitate coordination of certification periods for family/household members, transferring families/households within the system, and food package tailoring when several family/household members are eligible to receive the full package.

► The system should allow users to add, change, and delete data on demand by accessing records through the unique identification number. While a participant's (or applicant, prior to certification) record may be updated with each visit to the clinic, the system must maintain the certification data that is the basis for eligibility.

► The system should allow for a number of alias names and a history of previous names to be maintained.

► In States that have implemented online or eApplications (that allow individuals to enter basic application information for one or more health and humans services programs using the Internet), the system should accept the application data or allow users to view the application information and automatically load the applicable data.

3.1.2.2   Screen Applicant for Prior Enrollment

Upon input of applicant data, the system should check to ensure that the person is not already enrolled in or disqualified from WIC or Commodity Supplemental Food Program (CSFP).

Inputs:

Participant Address- Apartment

Participant Address- City

Participant Address- Street

Participant Address- Zip Code

Participant Alias Name

Participant Category Code

Participant Date of Birth

Participant Family/Household Identification Number

Participant Identification Number

Participant Name- First

Participant Name- Last

Participant Name- MI

Participant Racial/Ethnic Ethnicity Code

Participant Racial/Ethnic Race Code

Participant Sex

Other inputs would include participation information from CSFP that would bar a person's participation in WIC.

Process:

■ Match newly entered applicant data with data in participant data store

■ Display potential matches in Dual Participation Potential Match data fields

■ Accept user input to potential matches

Outputs:

Screen display of prior enrollment

Notice of dual enrollment to applicant

Implementation Approaches

► The system should compare items such as participant name, address, date of birth, racial/ethnic code, and sex. If a match is found, the system should inform the user of the possibility of dual enrollment and allow the user to determine if, in fact, the record in the system is for the same person.

► When a system operates in an offline mode (for example, in a satellite clinic that does not have telecommunications access), dual participation checks should take place against a subset of statewide data that is available in the offline mode and/or when the offline system next goes online.

> ► Where two separate State agencies operate within a State (e.g., a geographic State agency and an Indian Tribal Organization or WIC and CSFP) the system should exchange data through an interface, electronic files, or a data tape. One or both of the State agencies involved should perform a participant data match. This information would be used to flag possible instances of dual participation for follow-up action.

3.1.2.3 Determine Adjunct or Automatic Income Eligibility

The system should enable the user to indicate whether an applicant, or one or more of the applicant's family/household members, is income eligible for WIC as a result of their eligibility for or enrollment in one or more other benefit programs. The system should allow for the documentation of proof documents, as appropriate.

Inputs:

Participant Adjunct or Automatic Income Eligibility Code(s)

Participant Family/Household Identification Number

Participant Identification Number

Participant Income Documentation Code

Participant Income Documentation Date

Participant Income per Period

Participant Income Period

Participant Income Range per Period

Participant Participation in Other Programs Code

Participant Self-declared Income Eligibility Code

Process:

■ Accept user input of participation in adjunctive or automatic eligibility program, self-declared income, and participant income information

■ Update participant data store for all members of the family/household, as applicable

Outputs:

Screen display of adjunct or automatic income eligibility status

> **Implementation Approaches**
>
> ► The system should capture the name of the program that is the basis for WIC income eligibility, whether through adjunct or automatic income eligibility. The applicant should provide documentation of adjunct income eligibility by showing, for example, a Food Stamp notice of eligibility and the system should accept documentation of proof. (See section 3.1.2.4 for documentation of income.)
>
> ► For Minimum Data Set (MDS) reporting (PC Report), the system should enable the user to enter all the adjunct programs in which the applicant is eligible. An income range and period, i.e., week, month, etc. is also needed (see PC Report Specifications).
>
> ► Where the system interfaces with another health and/or social services system, the WIC IS should permit the WIC staff to retrieve information to confirm the applicant's adjunct or automatic income eligibility for WIC. Where participant information is shared with other programs, federal regulations should be followed regarding confidentiality.

3.1.2.4   Determine Documented Income Eligibility

If the applicant is not adjunctively or automatically income eligible, he or she must be assessed for income eligibility through normal screening procedures. WIC income eligibility requirements are based on the number of individuals who share income and resources in the applicant's household (i.e., the economic unit) and the total gross income of that economic unit. Income Eligibility Guidelines, published annually, establish maximum weekly, bi-weekly, twice-monthly, monthly and annual income levels for each economic unit.

The system should be able to accept updates to the income eligibility guidelines.

The system should accept information related to an applicant's income and should automatically determine if the person is income eligible based on reported data and income guidelines. The system should perform all necessary calculations to determine the income amount to use for the income assessment and should compare the amount to income guidelines to determine income eligibility. The system should also capture information about the proof of income documentation used (e.g., pay stub, tax statement).

The system should permit the applicant's income and family/household size information to be saved and applied, as appropriate, to other members of the economic unit who are also applying for WIC. Multiple income assessments should be allowed within an active certification.

Inputs:

For Income Guidelines Updates:

Income Guideline Household Income Limit- Annual

Income Guideline Household Income Limit- Biweekly

Income Guideline Household Income Limit- Monthly

Income Guideline Household Income Limit- Twice Monthly

Income Guideline Household Income Limit- Weekly

Income Guideline Household Size

Income Guideline End Date

Income Guideline Start Date

For Participant/Family Income Assessment:

Participant Identification Number

Participant Family/Household Size

Participant Income Documentation Code

Participant Income Documentation Date

Participant Income per Period

Participant Income Period

Participant Income Range per Period

Participant Income Self-declared Indicator

Process:

- Accept annual updates to income guidelines for all household sizes

- Update Income Guideline data store

- Add, update, and delete income and family/household data

- Capture the specific documents used as proof of income (e.g., pay stub, tax return) or the reason for an exception. Generate a notice with the specific date that specific documents must be provided, if not provided

- Calculate annual or monthly family/household income

- Retrieve and compare income with income eligibility guidelines (Income Guidelines data store)

- Allow user input of income levels that exceed maximum allowed level if the participant has been determined adjunct or automatically eligible

- Display status of income eligibility determination and update Participant Ineligibility Date and Participant Ineligibility Reason Code

- Apply income eligibility determination to all applicable members of the family/household. Allow separate income determinations for some members of the family/household (as applicable)

- Generate a notice of ineligibility and the reason(s) for ineligibility, if applicable

- Automatically terminate applicants who have not provided income documents within applicable timeframes

Outputs:

Screen display of individual's income eligibility status

Ineligibility notice to ineligible applicants

Termination notice if documentation is not provided within applicable timeframes

---

Implementation Approaches

► The system should allow start and end dates for the income guidelines levels to ensure income comparisons occur based on the correct income guidelines. Historical or upcoming income guidelines records may be resident in the system, but only one set of guidelines should be used for income determination at any time.

► At the State agency's option, the applicant's Self-declared income amount may be entered into the system as opposed to an income range. If the applicant is adjunctively income eligible, the system should permit the user to enter an income amount or an income range that exceeds the maximum allowed for WIC (based on the established Income Eligibility Guidelines) if the maximum income limit in the adjunct Program is greater than the maximum income limit for WIC.

► The system should accept and process income in any of the following increments: weekly, bi-weekly, twice-monthly, monthly, and annual. The system should compare the income reported by the applicant to the maximum income allowed for the household size, and identify income that exceeds the maximum. If the income fluctuates or is episodic, WIC staff may need to enter several amounts into the system to obtain a monthly or annual income amount that can be used for comparison to the appropriate maximum income limit.

► The system should allow separate income assessments for all or specific individuals within a family/household. For example, a foster child may be part of a family on WIC, but his/her income would be assessed separately.

► The system should permit the user to enter an income level that exceeds the maximum allowed for WIC only if the applicant is participating in TANF, FSP, or Medicaid (see section 3.1.2.3) or, if applicable, other programs that convey automatic income eligibility. It should also alert the user that the applicant has already been determined adjunctively income eligible, if appropriate.

► The system should allow multiple income assessment records during an active certification (e.g., to accommodate mid-certification income checks). The original income level used for certification should not be overwritten; multiple income records should be accessible during an active certification. The system should capture the income amount and date of income determination each time an applicant's income is assessed or a participant's income is reassessed.

► The system should store the income level in the individual's record for those individuals determined income eligible. For applicants determined ineligible, the system should maintain income information, along with the reason for ineligibility.

► The system should compare income data for all economic unit members on WIC to prevent inconsistencies in income information. Individuals in the same family/household with differing incomes should be assessed as separate economic units.

3.1.2.5 Maintain Waiting List

For each local agency, the system should maintain a waiting list of the applicants by priority who wish to enroll in the WIC Program when caseload is full. As caseload slots become available, the system should identify applicants on the waiting list by expected or determined priority level so the higher risk applicants are certified before the lower risk applicants[11].

Inputs:

Clinic Identification Number

Local Agency Identification Number

Participant Category Code

Participant Health Nutrition Risk Code (if pre-screening is done)

Participant Identification Number

Participant Priority Level Code

Participant Status Code

---

[11] Individuals already certified who are relocating from within or out of state are served first so that services are not interrupted.

Process:

- Update applicant status with participant status code for waiting list

- Calculate waiting list priority

- Retrieve participant records with waiting list active status

- Sort records by waiting list priority

- Display waiting list in priority order

- Update participant status

Outputs:

Printed report or screen display of waiting list

Notification of waiting list status

Implementation Approaches

► The system should indicate that the applicant is on the waiting list by a specific code in the participant wait list status field. It should also produce a list of the applicants and basic data on each applicant waiting for their certification appointment. The WIC staff may then either change the applicant's wait list status field to indicate the applicant is no longer on the waiting list, inactivate the record from the system if the applicant is no longer interested or available, or do nothing to the record to leave the applicant on the waiting list.

► If nutrition assessments are not performed on waiting list applicants, then potential priorities could be documented to help staff members manage the waiting list.

3.1.3 Determine Nutrition Risk of Applicant

Generally, the local agency assesses the nutrition risk of applicants at the time of certification. As part of the nutrition risk assessment, information is collected about the applicant's nutrition and health characteristics. Based on those characteristics, the WIC staff member is able to determine the appropriate nutrition risk conditions, nutrition education messages, food package prescription, and health care/social services referrals. Based on the applicant's nutrition and health characteristics, the WIC staff member is able to determine the appropriate nutrition risk conditions, nutrition education messages, and health care referrals. Furthermore, this information is used to evaluate the individual's health and nutrition progress while participating in WIC.

Since participant health and nutrition data are received through various means and at different times, the system should allow users to review, add, change, and delete health and nutrition data at any time. However, those

data that are the basis for eligibility determinations must be maintained for audit tracking purposes.

3.1.3.1 Maintain Applicant Nutrition and Health Characteristics

> *The nutrition risk assessment is made based on information obtained by the CPA from the applicant, or primary caregiver in the case of an infant or child, regarding his or her nutrition and health characteristics. Some of the information is obtained by interviewing the applicant, while other information is obtained through height and weight measurements and a blood test, or from referral information. The anthropometric measurements and blood test may be performed during the certification assessment or by the applicant's health care provider. These data are necessary to support both initial and subsequent certification, and to identify high risk participants to receive more frequent monitoring and intensive nutrition education. Much of the data collected during the nutrition risk assessment will be used in reporting to FNS and CDC.*

The system should allow the entry of applicant nutrition and health characteristics data. In addition, the system should enable the data to be modified as necessary throughout the individual's application and certification period, but not after the certification period.

Inputs[12]:

Participant Age

Participant Date of Last Checkup/Immunization- Infants and Children

Participant Health Anthropometric Date

Participant Health Bloodwork

Participant Health Bloodwork Date

Participant Health Bloodwork Type Code

Participant Health Height/Length

Participant Health Infant Birth Length

Participant Health Infant Birth Weight

Participant Health Nutrition Assessment[13]

Participant Health Pregnancy Outcome Code

Participant Health Trimester of First WIC Visit

---

[12] The list of inputs may not be inclusive of all data elements required to capture all risks. Refer to Appendix F for additional information on risk codes.

[13] Because of Value Enhanced Nutrition Assessment (VENA), this data element will vary based on the approach taken by each State. VENA questions and responses will be documented as applicable in the system and for the State agency.

Participant Health Weight

Participant Health Weight at Labor

Participant Health Weight Change Code

Participant Health Weight Prepregnancy

Participant Identification Number

As Applicable to Risk Conditions:

Breastfeeding Data Collected Date

Breastfeeding Discontinued Date

Breastfeeding Discontinued Reason Code

Breastfeeding Duration

Breastfeeding Infant Currently Breastfeeding

Breastfeeding Infant Ever Breastfeeding

Breastfeeding Status Code

Breastfeeding Supplemental Formula Received

Participant Expected Date of Delivery

Participant Health Bloodwork Change Code

Participant Health Cigarette Smoking

Participant Health Cigarettes per Day

Participant Health Dietary Supplement During Pregnancy

Participant Health Dietary Supplement Prepregnancy

Participant Health Drink

Participant Health Drink per Week- 3 Months Prepregnancy

Participant Health Drink per Week- Last Trimester

Participant Health Drug

Participant Health Drug Frequency

Participant Health Environmental Tobacco Smoke Exposure

Participant Health Folic Acid Consumption

Participant Health Gestational Diabetes

Participant Health Height/Length Change Code

Participant Health High Blood Pressure During Pregnancy

Participant Health Infant Gestational Age

Participant Health Introduction to Supplementary Feeding

Participant Health LMP Date

Participant Health Multiple Fetuses

Participant Health Multiple Fetuses Number of Live Births

Participant Health Multivitamin Consumption

Participant Health Pregnancy Weight Gain

Participant Health Previous Pregnancy End Date

Participant Health Source of Prenatal Care

Participant Health Source of Prenatal Care Begin Date

Participant Health Total Previous Pregnancies

Participant Health Trimester

Participant Health TV/Video Viewing

Participant Number of Infants Resulting from Current Pregnancy

Participant Number of Live Births

Participant Physical Presence Exception Code

Participant Physical Presence Indicator (Y/N)

Process:

- Accept user entered Participant, Participant Health, and Breastfeeding data for nutrition assessment

- Update the Participant, Participant Health, and Breastfeeding data stores

Outputs:

Screen display of participant nutrition assessment data

Data for PC Report, PedNSS, and PNSS[14]

Implementation Approaches

► As participant health and nutrition related information changes, the system could retain selected historical data (e.g., height and weight) in addition to capturing more current data. This data may then be used to track an individual participant's progress and to do an historical analysis of participants of a particular type or in a particular geographic location. Historical encounter data should be maintained chronologically in the applicant's record.

---

[14] Readers should refer to CDC documentation for ideal features and data elements as preferred by the CDC for PNSS and PedNSS reporting. Links to the CDC website and reference information can be found in Appendix F.

3.1.3.2 Calculate Body Mass Index and Produce Automated Growth Chart

> *The applicant's height (or length and head circumference for infants) and weight measurements must be taken and/or documented in the applicant's file at the time of certification. In addition, Body Mass Index (BMI) is used as a screening tool to assess nutrition risk for women and children 2 years of age and older. Applicants whose measurements are outside the normal range may be determined to be at risk based on WIC nutrition risk criteria.*

The system should calculate the BMI based on entered data and CDC standards. The calculated BMI should be used as the basis for assessing nutrition risk (e.g., assigning automated risks) of WIC applicants.

The system should plot anthropometric measures automatically on a graphical chart. The system should be able to accept updated growth data and recalculate the growth chart to show all values (current measure and previous measures).

Inputs:

Participant Identification Number

Participant Health Anthropometric Date

Participant Health BMI

Participant Health Parent BMI (Father)

Participant Health Parent BMI (Mother)

Participant Health Parent Height (Father)

Participant Health Parent Height (Mother)

Participant Health Parent Weight (Father)

Participant Health Parent Weight (Mother)

Participant Health Head Circumference

Participant Health Height/Length

Participant Health Weight

Process:

- Accept user input of anthropometric data or retrieve data from Participant Health data store

- Compare actual measurements to CDC standards

- Assign BMI score and weight status classification (if applicable)

- Generate graphic growth chart or percentile chart with participant's data

Outputs:

Screen display or printout of participant growth chart

Implementation Approaches

► The system should graphically plot an individual's growth and/or provide the nutritionist with the calculated percentiles, based on inputs to the system such as height, weight, and head circumference (for infants). The types of automated growth charts produced will vary depending on the age, sex, and category of the participant.

► The system should calculate a woman's BMI based on height and weight inputs to the system and determine her weight status classification (e.g., underweight, normal, overweight, obese). The weight status classification will vary depending on category of the participant.

► WIC staff should enter the date measurements were taken and the system could alert the staff if the measurement was taken outside of the acceptable timeframe.

► The system should maintain prenatal weight gain charts for pregnant women.

► The system should calculate the parental Body Mass Index for a potential risk. This should be based on self-reported information collected from parents that are present at the WIC appointment.

► The system should calculate gestational age when plotting growth charts.

► The system could display height, weight, and head circumference measurements, BMI values, BMI percentiles for children older than 2 years old and women, and height, weight, and weight/height percentiles for infants and children under age 2.

3.1.3.3 Capture and Document Blood Test Results

All WIC applicants, except for infants younger than 9 months old, must be tested for anemia. A hematological test for anemia (such as a hemoglobin, hematocrit, or erythrocyte protoporphyrin test) must be performed by the WIC agency or test results obtained from a referral source. Blood test results must be documented in the applicant's record. Bloodwork must be done at appropriate times in accordance with program regulations.

The system should allow the user to enter the date the blood test was performed and the test results. The system should identify participants that require bloodwork according to regulations.

Inputs:

Participant Actual Date of Delivery

Participant Identification Number

Participant Certification Date

Participant Date of Birth

Participant Expected Date of Delivery

Participant Health Bloodwork

Participant Health Bloodwork Date

Participant Health Bloodwork Type Code

Process:

■   Accept user input of bloodwork or retrieve data from Participant
    and Participant Health data stores

■   Run an algorithm to determine if bloodwork is needed in a
    specified time period based on participant category, participant
    age, date of certification, and date of last bloodwork

■   Determine participants requiring bloodwork

Outputs:

Screen display or printed list of participants needing bloodwork

---

Implementation Approaches

►   The system should not accept the entry of a blood test date that is outside the
    appropriate range based on the applicant's category.

►   At the State agency's option, if an individual is eligible based on income and has at
    least one qualifying nutrition risk present at certification, the individual may be certified
    without a blood test for a period based on regulations. Participants who do not have
    blood test results within the applicable timeframe should not be terminated by the
    system.

►   The system should track the number of participants, by category, with missing blood
    test data after the applicable period and summarize this information for the State
    agency and by local agency within the State agency.

3.1.3.4 Determine Nutrition Risk and Calculate Priority

*Program regulations establish a priority system to ensure individuals
most in need are served first when caseload slots are no longer available
(e.g., pregnant women and infants receive priority over children). In
addition, FNS provides State agencies with a uniform set of allowed*

> *nutrition risk conditions, with corresponding code numbers, which relate to the various priorities. Risk factors are determined based on the information provided by the applicant and using the priority and allowed risk conditions as a checklist. Ten data fields are needed to allow for the PC reporting of up to 10 risk factors. Risk factor data and the related priority data are used by the State Agency for caseload management purposes.*

The system should automatically assign risk codes for each applicant based on the raw data (i.e., blood test results, height/weight measures, etc.) captured in the system. Based on nutrition assessment and professional discretion, the WIC staff member should have the ability to add to or override risk factors assigned by the system. The system should ensure that possibility of regression to the same risk condition is not used for consecutive certification periods.

The system should automatically assign priority based on applicant data.

Inputs[15]:

Participant Identification Number

Participant Certification Date

Participant Certification End Date

Participant Health Anthropometric Date

Participant Health Bloodwork

Participant Health Bloodwork Date

Participant Health Bloodwork Type Code

Participant Health Head Circumference

Participant Health Height/Length

Participant Health Infant First Supplemental Feeding

Participant Health Nutrition Risk Code(s)[16]

Participant Health Weight

Participant Ineligibility Reason Code

Participant Priority Level Code

---

[15] The data elements included in this section are not all-inclusive of all data that need to be considered to determine all possible risks. Please refer to Appendix F for additional information about risk codes.

[16] Nutrition Risk Codes are derived from data entered into the system during nutrition assessment and height/weight/bloodwork documentation. Risk codes could be assigned by the system or by an authorized WIC staff member.

Process:

- Retrieve data from Participant, Participant Health, and Nutrition Assessment data stores

- Enable entry of Participant Nutrition Risk Codes or automatically calculate the Participant Nutrition Risk Codes based on entered data and store in the Participant Health data store

- Automatically assign Participant Priority based on Participant Nutrition Risk Code and Participant Category, with the opportunity to allow staff to override the value, and store in the Participant Health data store

- Accept user input of new Participant Priority Level Code and store in the Participant data store

Outputs:

Screen display of nutrition risk assessment

Screen display of priority level

Implementation Approaches

► The system should capture the identity of the certifying official for audit tracking purposes. To support separation of duties, the system could prevent the WIC staff member that performs the eligibility assessment from issuing benefits to those same individuals. If the participant is not eligible, the system should capture the reason for ineligibility.

► For reporting purposes, the system should have the ability to capture at least ten risks per participant; participants may have only one risk to be certified, but all applicable risks (even if more than 10) should be captured.

► The system should support issuance of notification of certification information, notifying the applicant of certification and termination decisions and rights and responsibilities, and notifying the WIC staff of the next certification date.

3.1.4 Complete Certification

After all of the required data are collected, the information is reviewed to ensure that all requirements have been met and that the applicant meets the criteria for participation in the WIC Program. If the applicant is eligible and has completed all of the requirements, he/she is certified to participate in WIC and will be eligible to receive benefits.

3.1.4.1 Assess Applicant for Temporary Certification/Presumptive Eligibility Requirements and Documentation Status

> *To receive WIC benefits, applicants must not only be eligible based on category and income, they must also meet residency requirements and have at least one nutrition risk condition. All applicants must provide documents to show proof of identity, income, and residence within 30 days of their certification visit or they must be terminated from the system and issued a notice of ineligibility. However, at the State agency's option, a pregnant woman who is income eligible and meets residential requirements may be certified without a nutrition risk assessment for a period of up to 60 days.*
>
> *At the State agency's discretion, an applicant that meets all other eligibility criteria (including nutrition risk), but fails to bring proof of income to the certification appointment, may "self declare" their income, and may be given one month of food benefits, with the requirement that they provide appropriate income documentation within 30 days.*

If State agency policy permits the applicant to be certified temporarily or the pregnant woman to be presumptively eligible, the system should allow the certification to be completed for the appropriate time period. The system should support the management of these certifications to ensure participants provide required information in the appropriate timeframes based on regulations. The system should limit food instrument issuance until a proof documentation has been provided for applicants who are temporarily certified and for pregnant women who are deemed presumptively eligible.

Inputs:

Participant Category Code

Participant Certification Date

Participant Certification End Date

Participant Certification Status Code

Participant Identification Number

Participant Identity Documentation Code

Participant Income Documentation Code

Participant Income Documentation Date

Participant Ineligibility Reason Code

Participant Physical Presence Exception Code

Participant Physical Presence Indicator (Y/N)

Participant Residence Documentation Code

Participant Self-declared Income Eligibility Code

Process:

- Capture the specific documents used as proof of identity, and proof of residency (e.g., a current utility bill, rent or mortgage receipts), or the reason for an exception

- Capture that applicants were physically present at the certification visit or the reason for an exception

- Determine type of documentation missing from required certification data

- Calculate date missing documents are due

- Flag record to ensure that benefits cannot be issued for a timeframe greater than the approved timeframe unless missing documentation is provided

- Generate a notice for the applicant with the date that specific documents must be provided

- Automatically terminate the participant after the applicable timeframe and prevent issuance of food instruments if documents are not provided

Outputs:

Screen display of documentation recorded

Notice of documents needed and date due

Screen display of participants that need to provide documentation

Screen display or printed report of participants automatically terminated by the system because of missing certification data

Notice of ineligibility/termination for temporarily certified applicants that fail to bring in documentation on time

Notice of ineligibility/termination for pregnant women presumptively certified that do not meet any risk conditions within the appropriate timeframe

---

Implementation Approaches

► The system should flag records for temporary certification/presumptive eligibility to assist staff in obtaining the necessary documentation to avoid any disruption or termination of benefits.

> ►   The system could provide a notification that benefits will terminate if income
> documentation is not completed by a specific date as determined by regulations.

3.1.4.2 Certify Applicant

Based on the data entered, the system should determine whether an
applicant is eligible to be certified to the WIC Program. The system
should automatically calculate the date the participant's certification is due
to expire. If there is missing information required for a certification, the
system should notify the user of what is missing.

Inputs:

Participant Certification Date

Participant Certification End Date

Participant Certification Status Code

Participant Identification Number

Process:

- Retrieve data from Participant data store

- Run an algorithm to determine if all certification conditions have
  been met. If so, update Participant Certification Status Code to
  Certified. If not, update ineligibility/termination information or
  allow user to enter missing data and attempt the certification again

- System automatically calculates the next certification date and
  store in the Participant data store [calculated field Participant
  Certification End Date][17].

Outputs:

Notification of next certification date

Notification of ineligibility, if applicable

Implementation Approaches

►   The system could produce certification forms, such as the Rights and Responsibilities
form. The system could also capture a signature for the forms electronically.

---

[17] Under certain circumstances, the certification period may be shortened or extended by
a period not to exceed 30 days.

3.1.4.3 Maintain Proxy Information

Once the WIC staff determines an applicant is certified for the WIC Program, the user should enter any data on proxy, alternate, or authorized representatives who can pick up or redeem food benefits on the participant's behalf. This information should be updateable at any time during an active certification.

Inputs:

Participant Family/Household Identification Number

Participant Identification Number

Participant Proxy Authorization Date

Participant Proxy Name

Process:

■   Accept user entered Proxy data

■   Store Proxy data in Participant data store

Outputs:

Screen display of proxy information

Implementation Approaches

►   The system could maintain a history of proxies and dates of designation as proxy.

3.1.4.4 Issue Identification Card

As an option for those State agencies that issue ID cards, the system may issue identification cards once applicants are certified in the WIC Program. The system should support the replacement of ID cards according to State policy.

Inputs:

Local Agency Identification Number

Participant Card Replacement Date

Participant Card Replacement Reason Code

Participant Certification Date

Participant Family/Household Identification Number

Participant Identification Card Number

Participant Identification Number

Participant Name- First

Participant Name- Last

Participant Name- MI

Process:

- Using data contained in the Participant data store (including parent/guardian name for infants and children), produce an identification card

- Track card replacements

- Flag records of participants with multiple card replacements for local agency follow-up

Outputs:

Participant identification card

Report of participants with multiple card replacements

Implementation Approaches

► The system could produce an identification card for use when receiving and using food benefits and for proof of previous certification if the participant moves to another local or State agency. The identification card could include the participant's name, participant identification number, certification expiration date, and the participant's local agency identification.

► The system could issue a replacement identification card if the participant's card is lost or stolen. A control procedure, based on the participant identification card code, should be implemented to ensure that fraudulent cards are not produced.

► In addition to the identification card, the system could produce a rights and responsibilities form and capture a signature.

3.1.5 Prescribe Food Package

Once the WIC CPA has certified the applicant, he/she assigns a particular food package based on the category and nutrition risk of the participant. Functionality for determining standard food packages is included in the Food Management section (*Section 3.3*).

The system should capture data about the participant's assigned food package and schedule for picking up the food benefits. Because the nutritional health or dietary needs of participants may change, the WIC

CPA should be able to nutrition tailor or change[18] an individual participant's food package prescription at any time within a certification period if medically or nutritionally warranted. The system should remind users when there is a change in a participant's status that necessitates a change in the prescribed food package.

3.1.5.1 Select and Nutrition Tailor Food Prescription

> *The full maximum monthly allowances of all supplemental foods in all food packages must be made available to participants if medically or nutritionally warranted. Reductions in these amounts cannot be made for cost-savings, administrative convenience, caseload management, or to control vendor abuse. Reductions in these amounts cannot be made for categories, groups or sub-groups of WIC participants. Once a food package has been assigned to an individual participant, it is referred to as the participant's food benefit prescription. The food benefit prescription may change from month to month.*

The system should capture and store the prescribed food package for each participant consistent with the participant's categorical status and age. The system should allow for individual tailoring of the food package as allowed by State policy. The system should verify that the prescribed food package and participant category match (i.e., a child cannot receive an infant package). The system should capture whether medical documentation for qualifying conditions is on file.

Inputs:

Food Package Identification Number

Participant Identification Number

Participant Non-Contract WIC formula Medical Documentation on File

Participant Non-Contract WIC formula Received

Participant Non-Contract WIC formula Received Reason Code

Participant Soy Beverage/Tofu/Additional Cheese Medical Documentation on File

Participant Soy Beverage/Tofu/Additional Cheese Received

Participant Soy Beverage/Tofu/Additional Cheese Received Reason Code

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[18] For the purposes of this document, the term "tailor food package" means to adjust or modify the contents or quantities of food items in a food package. The term "change food benefit prescription" means to replace a food package assigned to a specific person with a different food package.

Participant Supplemental Foods in Food Package III Medical Documentation on File

Participant Supplemental Foods in Food Package III Received

Participant Supplemental Foods in Food Package III Received Reason Code

For each individual food item changed:

Category/Subcategory Category Code (*Required for EBT)*

Category/Subcategory Subcategory Code (*Required for EBT)*

Food Instrument Type Identification Number

Food Item Prescribed Date

Food Item Prescribed Identification Number

Food Item Prescribed Unit Quantity

Food Item Prescribed Unit Size

Process:

■ Retrieve Participant's Category from Participant data store

■ Display appropriate standard packages or list of supplemental foods,

■ Select Food Package based on Participant Category Code[19] and display Food Package with assigned food items to user

■ Alert user to inappropriate food package selection and flag for overissuance, if applicable

■ Accept user food package confirmation or Food Package updates

■ Update the Food Benefit Prescription data store to assign a Food Package to the participant

■ If WIC formula or supplemental foods that require medical documentation are issued, add or update the WIC formula or supplemental foods received and reason in the Participant data store.

Outputs:

Screen display of participant food package data

Printed report of food benefits prescribed

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[19] Participant Category Code refers to the participant's WIC classification (e.g., pregnant woman, infant, child). This is different from a Food Category, which refers to the classification of WIC food types (e.g., milk, cheese)

Implementation Approaches

► The system should recommend a standard/default food package based on the participant's category/age, which can be accepted or overridden by the certifying official. The system should produce a message to the CPA if an incorrect food package is prescribed (e.g., infant's package for a woman). The system should allow the CPA to prescribe a different food package (including prorated packages) at any visit, and should flag over-issuance of benefits. The system should display appropriate food packages and supplemental foods from which the certifying official can select a different package, if necessary.

► The system must allow authorized users to individually tailor food benefits as necessary to meet participant needs. The system should allow users to adjust quantities of specific food items (within regulatory limits) if medically or nutritionally warranted.

► The system should allow deletion of food items or reduction of amounts of food items based on State-authorized prorated pick-up schedules.

► For systems using EBT issuance, benefit adjustments can be specific to quantities of each food category and subcategory and may entail a void of some or all for existing and future benefits followed by replacement of a revised food package.

► The system should allow food package change for infants transitioning from infants to children without a complete recertification at 13 months as some infants are certified in infancy for a period that extends into 1 year of age.

► The system should include functionality to calculate for food equivalency. For example, replacing x ounces of liquid formula with y ounces of powered formula or x number of gallons of milk with y number of ounces of cheese.

► The system could capture a scanned image of formula prescriptions.

3.1.5.2 Change Food Prescription

A participant's nutritional needs may change within a certification period. For example, a fully breastfed infant may need to change to a partially breastfeeding food package i and would need to be prescribed a new food benefit prescription within the active certification.

The system should allow authorized users to change the food benefit prescription assigned to a participant as necessary.

Inputs:

Food Benefit Prescription Identification Number

Food Package Identification Number

Participant Family/Household Identification Number

Participant Identification Number

Process:

- Accept user input of participant identification and food package identification

- Retrieve and display existing Food Package Prescription

- Accept new Food Package selection and update Food Benefit Prescription

Outputs:

Screen display of participant updated food prescription data

Printed report of food package prescribed

Implementation Approaches

► At the State agency's discretion, the system could automatically change the prescription in some cases or flag the date the change should occur. For example, the system should automatically add allowable infant foods to an infant's package when the infant changes from 5 to 6 months of age. The system could automatically change infant formula quantities at a specific age.

► The system could maintain a history of food benefit prescriptions assigned to track changes.

► The system could include an approval function to track approval by a certified staff member (CPA or State staff as defined by policy) to make changes to the food prescription.

3.1.6 Process Participant Changes and Transfers

The system should capture and process changes, as necessary, to individual participant data. These changes could be to demographic data, family/household grouping, or participant status. The system should also accommodate transfers between local agencies within the State agency and from WIC Programs in other State agencies. This function also includes producing verification of certification (VOC) documents for transfers.

3.1.6.1 Change Family/Household Grouping

During an active certification period, participants may have changes that need to be documented. For example, a family may move to a new address or a child may switch families/households. To change households, the participant has to be unlinked from the existing family/household grouping and be linked either to a different, existing

> *family/household grouping or to an entirely new family/household grouping.*

The system should allow authorized users to change the family/household grouping of individual participants and to make other changes to participant data, as necessary.

Inputs:

Participant Family/Household Identification Number

Participant Identification Number

Other data elements vary based on change being made.

Process:

■ Accept user input of data changes and apply changes to all applicable members of the family/household

■ Accept user input of participant identification number and family/household identification number and retrieve participant's existing family/household grouping

■ Display list of existing family/household grouping

■ Accept user selection of an existing family/household grouping or generate new family/household

■ Link participant to selected/newly created family/household grouping

■ Update Participant data store with new Participant Family/Household Identification Number

Outputs:

Screen display of participant's updated family/household grouping

Screen display of changes to participant records

Implementation Approaches

► The system should maintain a history of family/household assignments and changes. The history should be viewable by individual (noting all families/households to which the individual has belonged) and by family/household (displaying all individuals that are currently or have previously been assigned to the family/household).

> ► For states using an EBT issuance method, for situations where a participant may frequently change households such as foster children, the state may choose to issue a card to a foster child's caregiver as the head of household or to the foster child as the head of household. The child may be the head of household or part of a group with a single EBT card.

3.1.6.2 Change Participation Status and/or Category

A participant's status[20] may change during the certification period for a variety of reasons including, but not limited to, income adjustments, expiration of eligibility period (e.g., reaching end of non-breastfeeding or postpartum period or upper age limit for child), moving out-of-state, or misuse of WIC benefits. The participant's category may also change.

The system should allow authorized users to change the participation status of participants as necessary. The system should automatically change the participant's category when applicable (e.g., when an infant becomes 1 year old, when a pregnant woman delivers her baby).

Inputs:

Participant Category Code

Participant Identification Number

Participant Status Code

Participant Termination Date

Participant Termination Reason Code

Process:

- Accept user input of participant identification number and retrieve and display existing participant participation status or category

- Update Participant data store with updated status or category or automatically update status or category (if applicable)

- Add a record to or update an existing record in the Participant data store to show an applicant as ineligible or a participant's termination reason

- Notify user of food package changes due to status change

- Generate notice of participant change

---

[20] Participant status refers to the person's affiliation with the WIC Program, such as Certified, Terminated, or Ineligible.

Outputs:

Screen display with participant status change

Notice of participant change

Implementation Approaches

►   When status changes occur, the system could remind the user of other specific changes needed due to the status change, such as food package changes or termination notifications.

►   When status changes occur, the system could automatically generate an appropriate notice of status change. For example, when an infant turns 1 year old and categorically changes from an infant to a child, a notice outlining the potential adjustments to the food package should be sent to keep the infant's caretaker fully informed.

3.1.6.3 Process In-State Transfers and Produce VOC

WIC participants transferring between local agencies within a State agency should already be included in the State's system[21]. Thus, when a transfer participant visits the new local agency, all data on the participant should already be available through the system. The data should be immediately accessible so services and benefits are not disrupted[22]. The staff at the participant's new location should be able to access the participant's file to find out what foods were issued at the former local agency and when they were last issued, as well as other information useful in providing continued health and nutrition-related services. The local agency will need to update demographic data on the participant (such as Participant Address and Participant Transfer To or Transfer From).

The specific process for performing in-state transfers will vary depending on the architecture of the system.

The system should allow for the transfer of individual participants and families/households across local agencies in the same State.

Inputs:

Participant Family/Household Identification Number

Participant Identification Number

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[21] If a State transitions from paper to EBT, the transfer procedures need to be established to accommodate movement between paper and EBT clinics.

[22] If a system is operating in offline mode, immediate access to statewide participant data may not be immediately available. In these cases, the local agency staff members should contact the agency from which the participant is transferring to obtain the information required to continue services. The participant's electronic record should be assigned to the receiving local agency as soon as possible.

Transfer Date

Transfer From

Transfer To

Process[23]:

■   Retrieve existing Participant or Family/Household data

■   Terminate Participant record access at originating agency

■   Update authorization to access record at receiving agency

■   Update Participant or Family/Household data store with participant information

Outputs:

Participant transfer

Screen display of transfer information

Implementation Approaches

► Systems using an online centralized database that restrict access by site could simply change the authorization to access the participant records to the receiving clinic. The staff at the participant's new location would be able to access the participant's file to find out what foods were issued at the former local agency and when they were last issued, as well as other information useful in providing continued health and nutrition-related services.

► If the State uses a "pull" approach, the receiving agency initiates the transfer and retrieves the record from the originating agency. The system should notify the receiving agency and the originating agency of the successful transfer.

► If the State uses a "push" approach, the receiving agency initiates the transfer by contacting the originating agency. The originating agency conducts a process to transfer the record access to the receiving agency.

► The system could maintain a history of transfers within the State for each participant and family/household.

► In a State agency that issues benefits via EBT, the EBT card can serve as a VOC if the participant data format is standardized and the participant is going to another in-state local agency that has implemented EBT. If the receiving local agency has not converted to EBT, the sending local agency should issue a paper VOC.

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[23] The processes related to how access to records is controlled will vary based on system design.

3.1.6.4 Process Out of State Transfers and Produce VOC

> *When the participant relocates during a certification period, the receiving agency accepts the Verification of Certification (VOC) as proof of eligibility and accepts the participant into the program immediately to avoid any disruption of service. Participants with a valid VOC are placed on WIC immediately ahead of all waiting list applicants, regardless of the priority status assigned to them at their previous agency. VOC information can be issued to a participant on a paper card or standard size paper. The VOC should list vital information about the participant currently participating with one State WIC agency but transferring to another in order to ensure the continuation of benefits.*

The system should support the transfer of participants to other States. The system should generate a VOC as needed.

Inputs:

Local Agency Identification Number

Local Agency Name

Participant Certification Date

Participant Certification End Date

Participant Health Nutrition Risk Code(s)

Participant Identification Number

Participant Income Documentation Date

Participant Name- First

Participant Name- Last

Participant Name- MI

Transfer Date

User Name[24]

Other Data may be included on the VOC

Food Instrument Issuance Date

Participant Date of Birth

Participant Health Anthropometric Date

Participant Health Bloodwork

Participant Health Bloodwork Date

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[24] This is the user that conducted certification. This person must also sign the paper VOC.