

# COB - BOSAIR FORM

11/05/2025 12:14 PM (MST)

Submitted by Angelica.Aros@pima.gov



## BOARD OF SUPERVISORS AGENDA ITEM REPORT (BOSAIR)

**\*All fields are required. Enter N/A if not applicable. For number fields, enter 0 if not applicable.\***

Record Number:

Amplifund Grant Record Number: 78964, 78965, 100648

Award Type: Grant

Is a Board Meeting Date Requested? Yes

Requested Board Meeting Date: 11/18/2025

Signature Only:

NO

Procurement Director Award / Delegated Award: • N/A

Supplier / Customer / Grantor / Subrecipient: The Arizona Department of Health Services (ADHS)

Project Title / Description: Women, Infants, and Children (WIC) and the Breastfeeding Peer Counseling (BFPC) Services

Purpose:

The Arizona Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides nutritional education and breastfeeding support services, supplemental nutritious foods, and referrals to health and social services. WIC serves pregnant, breastfeeding, and postpartum women, infants, and children under the age of five who are determined to be at nutritional risk. Pregnant and breastfeeding WIC participants may also participate in the Breastfeeding Peer Counseling program (BFPC) which offers additional peer-to-peer breastfeeding support aimed at increasing initiation and duration of breastfeeding.

This third amendment is to provide WIC and BFPC Services with administrative (staff and operational) funding for year three (2025-2026) in the amount of \$2,734,579. The total caseload will be 11,500. The two programs, WIC and BFPC, are set up under separate Grant Records in AmpliFund for grant management purposes. \$2,594,020 is being awarded for WIC Services under Record 78965. \$105,998 is awarded for BFPC under Record Number 78964. \$34,561 is awarded for BFPC Special Project Services under Record Number 100648.

This IGA does not provide Pima County with funding to pay for WIC food or formula benefits. The Arizona Department of Health Services is responsible for managing food vendor contracts directly and issues food and benefits through their vendors.

**Procurement Method:** Grant: Not applicable

**Procurement Method Additional Info:** NA

**Program Goals/Predicted Outcomes:** The goal of this program is to improve the health of pregnant, postpartum and breastfeeding mothers, as well as their infants and children up to age five by: 1) providing nutritious foods to supplement the diet of low-income participants; 2) providing breastfeeding education and support to increase the number of babies that are breastfed and to increase the duration of breastfeeding; 3) providing nutrition education; and 4) reducing malnutrition.

**Public Benefit and Impact:** These programs benefit nutritionally at-risk and qualifying low income pregnant, breastfeeding, and non-breastfeeding postpartum mothers and their infants and children up to age five in Pima County by improving their nutrition.

**Budget Pillar** • Improve the quality of life

**Support of Prosperity Initiative:** • 2. Improve Quality of Life and Opportunity in High Poverty Areas

**Provide information that explains how this activity supports the selected Prosperity Initiatives** These programs benefit nutritionally at-risk and qualifying low-income pregnant, breastfeeding, and non-breastfeeding postpartum mothers and their infants and children up to age five in Pima County by improving their nutrition.

**Metrics Available to Measure Performance:** ADHS conducts annual Financial Audits to review cost allowance, financial control improvement and improved Local Agency service. In addition, ADHS conducts biennial Management Evaluations to review management processes, client certification, food package determination, and nutrition education. ADHS also measures monthly and yearly caseload, indicated by the number of clients issued monthly supplemental food benefits.

**Retroactive:**

YES

**Retroactive Description:** Yes. The period funded by this amendment begins October 1, 2025, but the final IGA was not received until October 22, 2025. If not approved, the County would miss out on more than \$2 million to assist low-income mothers of young children.

**Grant / Amendment Information (for grants acceptance and awards)**

Record Number:

Amplifund Grant Record Number: 78964, 78965, 100648

**Type:** Amendment

**Department Code:** HD

**AmpliFund Grant Record Number:** 78964, 78965, 100648

**Amendment Number:** 03

**Commencement Date:** 10/01/2025

**Termination Date:** 09/30/2026

**Advantage Initial GTAW# (If Applicable):** NA

Total Revenue Amount:

\$2,734,579.00

Total Match Amount

\$0.00

**Advantage Grant ID # (If Applicable):** N/A

**All Funding Source(s) required:** Arizona Department of Health Services / U.S. Department of Agriculture (USDA)

**Does PCAO need to review the grant award (or grant amendment)?**

YES

**Does PCAO need to sign the grant award (or grant amendment)?**

YES

**Match funding from General Fund?**

NO

**Match funding from other sources?**

NO

**Are Federal Funds Involved?**

YES

**If Federal funds are received, is funding coming directly from the Federal government or passed through other organization(s)?**

U.S. Department of Agriculture (USDA) passed through the Arizona Department of Health Services (ADHS)

CFDA# 10.557

FAIN# 256AZ002W5003 (to record 78964 & 100648), 256AZ008W1003 (to record 78965)

Department: Health

Name: Angelica Aros

Telephone: (520) 724-7495

GMI Director:  Date: 11/10/25

Department Director Signature:  Date: Nov 7, 2025

Deputy County Administrator Signature:  Date: 11-10-2025

County Administrator Signature:  Date: 11/12/2025



**INTERGOVERNMENTAL AGREEMENT (IGA)  
Amendment**

ARIZONA DEPARTMENT OF  
HEALTH SERVICES  
OFFICE OF PROCUREMENT  
150 N. 18<sup>th</sup> Ave., Suite 530  
Phoenix, Arizona 85007

Contract No.: CTR067929

IGA Amendment No: 3

Procurement Officer:  
**Emily Ngo**

**WIC AND BFPC SERVICES**

It is mutually agreed that the Intergovernmental Agreement referenced is amended as follows:

1. Pursuant to Terms and Conditions, Provision Six (6) Contract Changes, subsection 6.1 Amendments, the Contract is hereby revised with the following:
  - 1.1. The Scope of Work is revised and replaced.
  - 1.2. The Price Sheet is revised and replaced.
  - 1.3. Exhibit/Attachments are added/is revised and replaced.

ALL CHANGES ARE REFLECTED IN RED

**All other provisions of this agreement remain unchanged.**

**Pima County Health Department**

Contractor Name:

Authorized Signature

3950 South Country Club Road, Suite 100

Address:

Print Name

Tucson

AZ

85714

City

State

Zip

Title and Date

Pursuant to A.R.S. § 11-952, the undersigned public agency attorney has determined that this Intergovernmental Agreement is in proper form and is within the powers and authority granted under the laws of Arizona

This Intergovernmental Agreement Amendment shall be effective the date indicated. The Public Agency is hereby cautioned not to commence any billable work or provide any material, service or construction under this IGA until the IGA has been executed by an authorized ADHS signatory.

*[Handwritten Signature]*      10/31/28

State of Arizona

Signature

Date

Signed this -

day of -

2025.

**Jonathan Pinkney**

Print Name

Procurement Officer

Contract No.: **CTR067929**, which is an Agreement between public agencies, has been reviewed pursuant to A.R.S. § 11-952 by the undersigned Assistant Attorney, who has determined that it is in proper form and is within the powers and authority granted under the laws of the State of Arizona.

REVIEWED BY: *[Handwritten Signature]*

Appointing Authority or Designee  
Pima County Health Department

Signature

Date

Assistant Attorney General

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	Contract No.: CTR067929	IGA Amendment No: 3	Procurement Officer: <b>Emily Ngo</b>

Print Name	
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## 1. BACKGROUND

The Arizona Department of Health Services (ADHS) Bureau of Nutrition and Physical Activity (BNPA) administers funds provided by the United States Department of Agriculture (USDA) for the operation of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and Breastfeeding Peer Counseling Program (BFPC) for the State of Arizona. The USDA nutrition programs are discretionary, and each provides a specific service to women, infants, and children who are low-income and at nutritional risk. The overall goal of all the USDA Nutrition Programs is to increase food security and reduce hunger by providing eligible participants access to nourishing food and supportive nutrition education. **ADHS is working with the counties to provide WIC services, and this opportunity is to provide additional community support as needed.**

### 1.1. WIC Nutrition Services

- 1.1.1. The WIC Program accomplishes this goal by providing participant-centered services (PCS), including nutrition and breastfeeding information and support, specific supplemental healthy foods through the issuance of food benefits that can be used at ADHS-approved grocery stores, and referrals to other health and human services as an adjunct to good health care during critical times of growth and development. Service population eligibility for the WIC Program is based upon federal regulations and **includes** participant category (pregnant and breastfeeding women, postpartum women, and infants or children under five (5) years of age), a household income at or below 185% of federal poverty guidelines, residence within the service area, and nutrition risks.
- 1.1.2. To be considered as a WIC Local Agency, the organization shall be a local public or private non-profit organization, County health department, or tribal entity under contract with ADHS to provide WIC services according to the WIC Program federal regulations and state policies and procedures. The State awards a WIC Contract based on the ability of the organization to provide WIC services, potentially eligible population, need, response to the Scope of Work, information technology capacity, and available funds. The State determines and awards the WIC Grant amount based on a funding formula using several factors such as a base level for a program to function, the amount of caseload negotiated with each Local Agency, and quality of performance.
- 1.1.3. Specific objectives for nutrition services (based on [Healthy People 2030 Goals](#) are:
  - 1.1.3.1. To increase the incidence of women initiating breastfeeding;
  - 1.1.3.2. To increase the duration of women breastfeeding for the first six (6) months of their baby's life;
  - 1.1.3.3. To increase the duration of women breastfeeding for the first one (1) year of their baby's life;
  - 1.1.3.4. To increase the rate, infants are exclusively breastfed at three (3) months and at six (6) months;
  - 1.1.3.5. To reduce the proportion of adults who are considered obese.
  - 1.1.3.6. To reduce the proportion of children ages two (2) to five (5) who are considered obese;



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1.1.3.7. To increase the consumption and variety of fruits and vegetables by those age two (2) and older;

1.1.3.8. To increase the consumption of whole grains by those aged two (2) and older; and

1.1.3.9. To reduce household food insecurity and hunger.

### 1.2. BFPC

1.2.1. Breastfeeding peer counselors add a critical dimension to WIC's efforts to help women initiate and continue breastfeeding. WIC breastfeeding peer counselors provide a valuable service to their communities, addressing barriers to breastfeeding by offering breastfeeding education, support, and role modeling. They are familiar with the resources available to WIC participants and the questions a new breastfeeding mother may ask, and they recognize when to refer mothers to other resources when issues outside their scope of practice arise. In 2020 the USDA Food and Nutrition Service (FNS) released their new national breastfeeding campaign titled WIC Breastfeeding Support: Learn Together. Grow Together. As a part of this, FNS has developed training and technical assistance to equip WIC Programs with a framework for designing and maintaining peer counseling programs. Developing this training included formative research to understand barriers and motivators to implementing and sustaining peer counseling programs and developing training curricula. This Peer Counseling Training for WIC Managers is a training and technical assistance project that shall be used as a model to aid WIC in designing, building, maintaining, and sustaining peer counseling programs that shall improve breastfeeding initiation and duration rates. Arizona will use this program to guide and develop the state peer counseling program.

1.2.2. The discretionary peer counseling services are considered an adjunct support to WIC breastfeeding services to help achieve the WIC Nutrition Services objectives regarding breastfeeding.

1.2.3. Peer counseling has been a significant factor in improving initiation and duration rates of breastfeeding among women in a variety of settings, including disadvantaged and WIC populations representing diverse cultural backgrounds and geographical locations. Peer counselors are especially effective in communities where role models for breastfeeding behaviors, knowledgeable healthcare providers, and cultural practices that include breastfeeding as the norm are scarce. Combining peer counseling with the ongoing WIC breastfeeding promotion and support efforts has the potential to significantly impact breastfeeding rates among WIC participants and, most significantly, increase the harder to achieve breastfeeding duration rates. WIC Local Agencies are strongly encouraged to provide peer counseling services in addition to ongoing breastfeeding support to their WIC participants. Subrecipients shall provide a breastfeeding-friendly environment and have policies to accommodate participants and staff who are breastfeeding.

## 2. OBJECTIVE

### The Subrecipient shall:

2.1 At a minimum, provide WIC services while allowing each Local Agency to provide, at their discretion, Breastfeeding Peer Counseling Services.

2.2 In the event the Arizona WIC Program funding is depleted (e.g., government shutdown), the **Subrecipient** shall request permission to continue operating their program utilizing local funds. The **Subrecipient** shall contact the Arizona WIC Director to discuss the feasibility of sustaining clinic operations and participant

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food redemption at authorized vendor locations. The **Subrecipient** shall transfer funds to ADHS to ensure continued operation.

- 2.3 Additional monies may be awarded under this grant for WIC Special Projects related to, but not limited to general infrastructure, breastfeeding promotion, nutrition services, information system enhancement efforts, and client retention efforts.

### 3. SCOPE OF SERVICE

#### 3.1 WIC Services:

The WIC Program **Subrecipient** shall perform all the work required to administer and provide WIC services to eligible participants according to the [Arizona WIC Program Policies and Procedures Manual \(WIC PPM\)](#). These include but are not limited to, the following activities:

- 3.1.1. Performing WIC certification procedures such as categorical and income screening and health and nutrition assessments,
- 3.1.2. Providing participant-centered nutrition and breastfeeding support services to WIC participants,
- 3.1.3. Providing the mandatory and appropriate additional referrals reflecting the needs of the individual WIC participants,
- 3.1.4. Issuing WIC food benefits tailored to meet the needs of the participants,
- 3.1.5. Ensuring the collection and recording of accurate information,
- 3.1.6. Providing professional training, mentoring, and monitoring of WIC staff competencies necessary for delivery of required services,
- 3.1.7. Providing administrative functions for the operation of the WIC Program, and
- 3.1.8. Preparing and submitting all required plans/reports in accordance with this Grant and the WIC PPM.

#### 3.2 BFPC Services

- 3.2.1 WIC BFPC **Subrecipients** shall perform all the work required to administer and provide additional breastfeeding support services to WIC mothers following the USDA WIC Breastfeeding Curriculum guidelines for peer counseling services and according to the Subrecipient's Application to increase the breastfeeding rate and duration of breastfeeding.
- 3.2.2 Provide supervision, mentoring, monitoring, and evaluation of peer counselors when appropriate.

#### 3.3 **BFPC Special Project Services**

##### 3.3.1 **Provide Breastfeeding Peer Counseling Services for the following Local Agencies:**

3.3.1.1 **Apache County Public Health Services District.**

3.3.1.2 **El Rio Santa Cruz Community Health Center, Inc.**



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- 3.3.1.3 Graham County Department of Health.
- 3.3.1.4 Greenlee County Health Department.
- 3.3.1.5 Navajo County Health Department
- 3.3.1.6 Epiphany Project,
- 3.3.1.7 Complete a Memorandum of Understanding (MoU) with each Local Agency in which Pima County will be providing services prior to services beginning.

**4. TASKS**

4.1 WIC Services, Outreach, Retention, and Referrals

**The Subrecipient shall:**

- 4.1.1. Conduct outreach activities targeting underserved populations by developing written and verbal presentations, or utilizing available materials, and/or promoting WIC on social media platforms to inform potentially WIC eligible individuals of the availability of the WIC Program and to explain the benefits of participation in accordance with the WIC PPM and this Contract.
- 4.1.2. Conduct retention activities to maintain and increase the participation of current WIC enrollees.
- 4.1.3. Establish community partnerships with, at a minimum, the mandatory referral agencies, local hospitals, OB/GYN, and pediatrician offices, and provide regular contacts in accordance with the WIC PPM and this Contract.
- 4.1.4. Establish community partnerships with community organizations such as food banks, human and social services, school districts, etc. in accordance with the WIC PPM and this Contract.
- 4.1.5. Establish a referral system with breastfeeding/lactation specialists, including, but not limited to, International Board-Certified Lactation Consultants (IBCLC), Certified Lactation Counselors (CLC), Certified Breastfeeding Counselors (CBC), and Certified Lactation Educators (CLE) in accordance with the WIC PPM and this Contract.

4.2 Additional BFPC Outreach Tasks

- 4.2.1 Develop and document an internal referral link between the WIC Program and the WIC Peer Counseling Program, when applicable. Interactions between the WIC Program and the WIC Peer Counseling Program shall occur at least monthly. They may be in the form of site visits from Peer Counselors, participation of Peer Counselors in WIC clinic meetings, and/or additional training for WIC clinic staff and Peer Counselors.

4.3 Participant Records

- 4.3.1 Document in Health and Nutrition Delivery System (HANDS) and maintain documentation of participant centered certification and administrative procedures as described in the WIC PPM, including, but not limited to, the following:
  - 4.3.1.1. Eligibility and ineligibility determinations,
  - 4.3.1.2. Nutrition assessments,



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- 4.3.1.3. Nutrition and breastfeeding education and support,
- 4.3.1.4. Nutrition and breastfeeding counseling,
- 4.3.1.5. Facilitate behavioral goal setting,
- 4.3.1.6. Appropriate referrals, and
- 4.3.1.7. Food Benefit issuances.
- 4.3.2. Maintain inventory and accountability records, as outlined in the WIC PPM for Electronic Benefits Transfer (EBT) WIC (eWIC) cards.
- 4.3.3. Maintain records in accordance with the PPM.
- 4.3.4. Assure participant confidentiality by obtaining written permission from affected program participant(s) prior to the release of participant information to any agency. The Subrecipient shall have a written agreement, completed in accordance with [7 CFR 246.26\(d\)](#), and the Arizona WIC Policy and Procedure Manual, with any agency or program that will share participant information. The above federal regulation details the implementation of a written agreement and state plan to regulate the use and disclosure of confidential applicant and participant information.
- 4.3.5. Staff shall only access the WIC Computer Data System and client files for business-related reasons.
- 4.3.6. Ensure paper files containing confidential participant information are stored in a secure location in the clinic, archived when appropriate, and destroyed according to the retention schedule. All files shall be destroyed in an appropriate manner.
- 4.3.7. The **Subrecipient** shall notify the ADHS WIC Program immediately by telephone call and email upon the discovery of a breach of a participant's confidentiality.
- 4.3.8. **Subrecipient** shall immediately investigate such security incidents, breaches, or unauthorized use or disclosure of participant information. These investigations shall include:
  - 4.3.8.1. What data elements were involved and the extent of the data involved in the breach;
  - 4.3.8.2. A description of the unauthorized person(s) known or reasonably believed to have improperly used or disclosed the protected information;
  - 4.3.8.3. A description of where the protected information is believed to have been improperly transmitted, sent, or utilized;
  - 4.3.8.4. A description of the probable causes of the improper use or disclosure; and
  - 4.3.8.5. Whether Arizona Revised Statutes [\(A.R.S\) § 18-552](#) or any other federal or state laws requiring individual notifications of breaches are triggered.



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4.3.9 The **Subrecipient** shall provide a written report of the investigation to the Chief of BNPA/WIC Director and Chief of the **Office of Program Integrity** within ten (10) working days of the discovery of the breach or unauthorized use or disclosure. The report shall include the information specified above, as well as a full, detailed corrective action plan, including information on measures that were taken to halt and/or contain the improper use or disclosure. 10.3.10. The **Subrecipient** shall notify individuals of the breach or unauthorized use or disclosure when notification is required under state or federal law and shall pay any costs of such notifications, as well as any costs associated with the breach using non-WIC funds. The BNPA Chief/WIC Director, **Chief of the Office of Program Integrity**, and Assistant Attorney General shall approve the time, manner, and content of any such notifications. The Local Agency will arrange and pay for any mitigation (e.g., LifeLock) for participants at risk for identity theft because of a breach of security of information.

#### 4.4 Service Delivery and Program Rules:

4.4.1 Determine eligibility of persons requesting WIC services by screening individuals in accordance with procedures outlined in the WIC PPM.

4.4.2 Eligible program participants shall include the following categories whose household income does not exceed 185% of the current designated federal poverty guidelines, who have a nutritional risk as defined in the WIC PPM, and reside in Arizona as defined by the WIC PPM:

4.4.2.1 Pregnant women, breastfeeding women up to twelve (12) months post-partum, and non-breastfeeding women up to six (6) months following the end of a pregnancy;

4.4.2.2 Infants from birth to age one (1); and

4.4.2.3 Children from age one (1) year up to five (5) years.

4.4.3 Provide complete nutrition assessment and document results and follow-up as outlined in the Arizona WIC Policy and Procedure Manual.

4.4.4 Provide participant-centered nutrition education to participants and appropriately utilize materials provided by the State.

4.4.5 Facilitate goal setting for behavioral change and follow-up on goals set.

4.4.6 Promote breastfeeding to WIC participants and provide breastfeeding education and support, and refer to and promote the Breastfeeding Peer Counseling Program, when appropriate.

4.4.7 Prescribe and tailor a food package appropriate to the participant's nutritional risk(s), the amount of formula consumed, and cultural preferences and issue food benefits as set forth in the WIC PPM.

4.4.8 Provide program participants with information about available health and social services to which the participant could be referred. The WIC participants shall be provided with written information regarding community services and referrals in accordance with the WIC PPM and Local Agency referral procedures.

4.4.9 Coordinate WIC Services with other health and social services available within the service area, including but not limited to immunizations, voter registration, and breastfeeding support.

4.4.10 Provide information, check for understanding, and document instruction to participants on



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program rules, regulations, WIC approved foods, use of eWIC cards, and food benefit use and redemption. The program instruction shall be documented in the participant's record **as outlined** in the WIC PPM.

4.4.11 Consider the impact of scheduling practices, hours of operation, and clinic closures on caseload and WIC applicants' access to services.

### 4.5 Additional BFPC Service Delivery:

4.5.1 Accept referrals generated from calls to the ADHS Pregnancy and Breastfeeding Hotline into the Peer Counseling Program.

4.5.2 Provide peer counseling services when appropriate. Services shall be made available outside of usual clinic hours and outside of the WIC clinic, but may also be available during usual clinic hours and in the WIC clinic.

### 4.6 Participant Centered Nutrition Education:

4.6.1 Provide and document participant-centered nutrition education to all WIC adult participants and to parents or caretakers of participants according to the guidelines of the State Nutrition Services Plans. Nutrition education contacts shall be made available quarterly to all adult participants and the Authorized Representatives of infant and child participants certified. Nutrition education contacts shall be scheduled on a periodic basis by the local agency, but such contacts do not necessarily need to take place in each quarter of the certification period.

4.6.2 Provide and document professional supervision, mentoring, and monitoring of staff at the clinic level on a regular basis, in accordance with Local Agency Self-Assessment requirements and as often as necessary, to ensure competence.

4.6.3 Offer, as often as necessary, high- and medium-risk nutrition education/counseling by a Registered Dietitian Nutritionist (RDN) to all participants deemed high-risk upon assessment. As defined in the WIC PPM Local Agencies may designate a Bachelor's degree nutritionist or Nutrition and Dietetic Technicians registered to serve as a WIC Nutritionist to provide medium-risk counseling to participants under the supervision of the RDN.

4.6.4 Expend a minimum of seven percent (7%) of the total amount the Subrecipient receives for the provision of WIC services each contract year on salary, employee related expenses, travel expenses, continuing education, and training for one or more Registered Dietitian Nutritionists (RDN) providing high risk services. The Subrecipient may pay another Arizona WIC Local Agency or RDN contractor for RDN services as approved by the State WIC Director or the State WIC Director's designee. If seven percent (7%) of the total amount the Subrecipient receives for the provision of WIC services is not expended for employee related expenses, travel expenses, continuing education, and training expenses for RDNs, ADHS may request the Subrecipient to return an amount equal to the difference between the seven percent (7%) of the total amount the Subrecipient receives for provision of WIC services and the actual amount expended.

4.6.5 Expend for nutrition education activities an aggregate amount that is not less than the sum of one-sixth (1/6) of the amount the Subrecipient receives for the provision of WIC services each contract year. If the one-sixth (1/6) amount is not expended for nutrition education activities, ADHS shall request the **Subrecipient** to return an amount equal to the difference between the one-sixth (1/6) requirement and the actual amount expended if ADHS must pay a penalty to the Federal Government.



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Costs that can be applied to meet one-sixth (1/6) requirement for nutrition education include:

- 4.6.5.1 Salary and other costs for time spent on nutrition education, whether with an individual or group;
- 4.6.5.2 The cost of procuring and producing nutrition education materials;
- 4.6.5.3 The cost of training nutrition educators, including costs related to conducting training sessions and purchasing and producing training materials;
- 4.6.5.4 The cost of conducting participant evaluations of nutrition education, nutrition assessments, and observations;
- 4.6.5.5 Breastfeeding Promotion Costs in excess of the targeted amount, currently four percent (4%) of NSA expenditures, may be added to other Nutrition Education costs to meet the one-sixth (1/6) of NSA expenditures target for other Nutrition Education.
- 4.6.5.6 Other ADHS-approved costs, **including but not limited to items allowable per WIC federal regulations, the State of Arizona Accounting Manual, and the Arizona Policy and Procedure manual.**
- 4.6.6 Coordinate nutrition education activities and messages. Whenever possible, the **Subrecipient** shall utilize USDA and/or AZ Health Zone materials and messages to ensure common nutrition messages, and
- 4.6.7 Provide documentation that a minimum of four percent (4%) of the annual WIC expenditures have been used to support breastfeeding promotion and education. If the four percent (4%) is not expended for breastfeeding promotion and education activities, ADHS will request the **Subrecipient** to return an equal to the difference between the four percent (4%) and the actual amount expended if ADHS must pay a penalty to the Federal Government.

**4.7 Staffing**

- 4.7.1 Designate a WIC Program Director/Manager who is an RDN, with previous WIC and/or community health experience to manage and administer the WIC Program and shall provide high-risk nutrition counseling and/or formula authorization to WIC participants. If an RDN is on staff to provide the WIC RDN services and with prior approval from ADHS, the Subrecipient shall designate a Director with a minimum of an undergraduate degree from an accredited institution in nutrition (community nutrition, public health nutrition, nutrition education, human nutrition or nutrition science) or a related field such as home economics or biochemistry with an emphasis in nutritional science or public health administration. With prior approval from ADHS, the number of years working in a WIC program may substitute for some years of education.
- 4.7.2 Identify an RDN to serve as the Local Agency Nutrition Coordinator as defined in the WIC PPM. The Nutrition Coordinator shall oversee all WIC nutrition services for the Local Agency. If a Local Agency has barriers to this staffing standard, they shall be submitted in writing to ADHS with their plan for coordination of nutrition services within the Local Agency to be approved by ADHS.
- 4.7.3 Provide an appropriate number of RDNs, based on assigned caseload, to perform high-risk and medium risk counseling, formula authorization, and as necessary, certification of



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participants. The **Subrecipient** shall provide the RDN services in a number proportional to the agency's high-risk caseload in accordance with the WIC PPM. The **Subrecipient shall** hire graduates with a minimum of a Master's or Bachelor's degree from an accredited institution in Nutritional Sciences, Community Nutrition, Clinical Nutrition, Dietetics, Public Health Nutrition, or Home Economics with an emphasis in Nutrition or Nutrition and Dietetic Technicians, registered to do medium-risk counseling, formula authorization, and as necessary, participant certification under the direction of an RDN. If a Local Agency has a barrier to having an RDN on staff, the agency must submit in writing to ADHS with their plan for providing high risk nutrition services to participants.

- 4.7.4 Provide an appropriate number of adequately trained certification specialists, based on caseload, to provide categorical and financial eligibility screening, pre-certification, and record required documentation, in accordance with the WIC PPM, as well as administrative support services when necessary. Such individuals shall have a minimum of a high school degree or equivalent and shall complete the state training requirements and be certified by the Subrecipient as competent according to the competencies for the position. Previous nutrition or health related job experience is desirable. These individuals shall meet ADHS competencies as set forth in the WIC PPM prior to providing each service, such as verifying applicant eligibility, collecting anthropometric and biochemical data for participants, and instructing on Food Benefits in the Arizona WIC Program. Staff shall be observed and certified by the supervising authority to be competent in an activity before being allowed to perform on their own without supervision.
- 4.7.5 Provide an appropriate number of adequately trained nutrition education specialists, based on caseload, to provide certification and nutrition education services to participants in accordance with the WIC PPM. Such individuals shall have a minimum of a high school diploma with nutrition experience, education, and training that have been certified by local or state agencies to be competent for the position. An Associate or Bachelor's degree is highly preferred. These individuals shall meet the ADHS competencies for Nutrition Education Specialists as set forth in the WIC PPM prior to certifying applicants for participation and/or providing nutrition services in the Arizona WIC Program. Staff shall be observed and certified by the supervising authority to be competent in an activity before being allowed to perform on their own without supervision.
- 4.7.6 **Identify an** IBCLC to serve as the local agency Breastfeeding Coordinator as defined in the WIC PPM. The Breastfeeding Coordinator shall oversee all WIC breastfeeding services for the local agency to ensure all participants have access to breastfeeding promotion and support services. If a local agency has barriers to this staffing standard, they shall be submitted in writing to ADHS with their plan for coordination of breastfeeding services within the local agency to be approved by ADHS.
- 4.7.7 Identify a Training Coordinator as defined in the WIC PPM. The Training Coordinator shall oversee and facilitate both new employee and ongoing WIC training for the Local Agency including certifying that staff has met competencies prior to providing services without supervision. If a Local Agency has barriers to this staffing standard, they shall submit in writing to ADHS their plan for coordination of training services within the Local Agency to be approved by ADHS.
- 4.7.8 Identify an Outreach Coordinator who shall oversee and facilitate activities and efforts to retain current WIC enrollees and outreach to potentially eligible populations not currently enrolled in WIC, and participate in outreach-related workgroups. If a Local Agency has barriers to this staffing standard, they shall submit in writing to ADHS their plan for coordination of outreach activities within the Local Agency to be approved by ADHS.



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4.7.9 Provide staff to conduct outreach activities targeting high risk and underserved populations, including but not limited to homeless and migrants, by developing written and verbal presentations or utilizing available materials to inform the potentially eligible individuals of the availability of the WIC Program and explain the benefits of participation.

4.7.10 Provide WIC Clerks to perform administrative support within WIC clinics, when applicable. Such individuals shall have a minimum of a high school degree or equivalent and must meet WIC Program competencies. Previous clerical or work experience is desirable.

#### 4.8 Additional BFPC Service Staffing

4.8.1 Employ a BFPC Program Manager to plan, direct and coordinate the general operation of the Peer Counseling Program. The ideal candidate shall be an IBCLC, have WIC experience, and be familiar with community resources,

4.8.2 Develop a support referral system for peer counselors with community Lactation Consultants, including IBCLCs, if the BFPC Program Manager is not an IBCLC or is unable to fulfill consultation duties for any reason, and

4.8.3 Employ Breastfeeding Peer Counselors to provide services. Qualifications for peer counselors shall be previous personal experience with breastfeeding, enthusiasm for helping others to succeed at breastfeeding, and similarities with the WIC population the program serves (including similar age, ethnic background, and language spoken). Exemptions to the peer counselor qualifications must be approved by ADHS before hiring. When possible, peer counselors should be current or previous WIC participants.

#### 4.9 Staff Training

4.9.1 Train new staff as outlined in the ADHS developed **new employee training plan**,

4.9.2 In addition to state requirements for competency training, Local Agencies shall implement and adopt the state training standards as reflected in the **ADHS WIC PPM**. In addition, **Subrecipients** must participate in any mandatory training provided by ADHS due to changes in policy, procedures, and/or federal regulations,

4.9.3 Provide training for all new staff members regarding Civil Rights, Americans with Disabilities Act (ADA), Conflict of Interest and Confidentiality, and Voter Registration during their orientation and, annually, provide all staff with training on Civil Rights, ADA, Conflict of Interest and Confidentiality, and Voter Registration by completing the ADHS LMS courses on Civil Rights, Conflict of Interest and Confidentiality, and Voter Registration or other courses or trainings that will be required by ADHS,

4.9.4 Provide, at a minimum, **the Breastfeeding Coordinator, Nutrition Coordinator, Training Coordinator and WIC Director or their representative for a 3-day all staff WIC conference**. In this meeting, there will be opportunities for the Subrecipient to discuss issues regarding the WIC policies and procedures, federal rules and regulations, and nutrition standards,

4.9.5 Provide one (1) representative for a maximum of **four (4)** WIC Director teleconference meetings to receive information updates on WIC operations, policies and procedures, and other relevant materials being held in lieu of face-to-face meetings. This may include urgent meetings to discuss current events (e.g., government shutdown) and plan on managing the continuity of operations plan (COOP),

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4.9.6 Maintain a record of the training provided, monitoring and observation results of staff competencies in each staff file and/or the State LMS, and

4.9.7 Document and maintain a record of any additional staff training that applies to the annual Continuing Education Requirements for WIC staff in accordance with the PPM.

4.10 Additional BFPC Staff Training

4.10.1 Send the WIC Director or designee and the Breastfeeding Peer Counselor Program Manager to a one (1) day virtual training during each Peer Counseling Program **Grant** term,

4.10.2 Provide training of Breastfeeding Peer Counselors using the [ADHS provided Breastfeeding Peer Counselor Mini Series](#) within one (1) month of employment,

4.10.3 Provide continual education and adequate resources to peer counselors. Continual education shall include basic and continuing breastfeeding training and may include opportunities to shadow lactation consultants, opportunities to meet with other peer counselors, and related training such as counseling skills, adult learning styles, and others.

4.10.4 Provide all WIC clinic staff with the recorded presentation of the USDA WIC Breastfeeding Curriculum at least once during each Peer Counseling Program **Grant** term.

4.11 Data Collection

4.11.1 Utilize the hardware, software, and training provided by the Arizona WIC Program to operate the **Subrecipient's** portion of the WIC Computer Data System – HANDS.

4.11.2 Complete all data elements required on the WIC Computer Data System as outlined in the WIC PPM.

4.11.3 WIC Computer Data System users are required to maintain integrity by keeping their usernames and passwords secure. Users shall not share their login information with others.

4.11.4 The **Subrecipient's** IT that supports WIC shall coordinate with ADHS WIC IT to ensure immediate restoration of technical equipment (i.e. ADHS owned equipment) including providing a temporary administrative account.

4.12 Administrative Services

4.12.1 Obtain written approval from ADHS prior to implementing any policy or procedure that deviates from those set forth in the Arizona WIC PPM.

4.12.2 Update the Local Agency **clinic** information **within ten (10) business days in HANDS**. This information includes clinic names, addresses, phone numbers, days and hours of operations, closure days, and other pertinent information for public disclosure.

4.12.3 **Provide the state agency with updated staff information, at a minimum, the names of CEO/Health Officer, WIC Director, Clinic Supervisors, Nutrition Services Coordinator, Breastfeeding Coordinator, Training Coordinator, and IT lead(s).**

4.12.4 Provide, at a minimum, ten (10) weeks' written notice when planning on opening, moving, or suspending WIC services at any location.



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- 4.12.5 Read all ADHS provided documents and provide responses within the requested timeframe, if applicable.
- 4.12.6 The Local Agency Director shall ensure the ADHS WIC Program has the most recent contact information in an effort to maintain current and accurate information in the **Master Contact List**.
- 4.12.7 Maintain records of WIC services in WIC Computer Data System and electronic files of other WIC related operations and trainings, if applicable, according to the WIC PPM. These records include, but are not limited to:
  - 4.12.7.1 Signed consent for hemoglobin screening and anthropometrics,
  - 4.12.7.2 Signed Rights and Obligations for enrolled participant files (active and inactive),
  - 4.12.7.3 Eligible participant files (active and inactive),
  - 4.12.7.4 Ineligible applicant signature,
  - 4.12.7.5 Monthly Participation Reports by Category and Ethnicity,
  - 4.12.7.6 Outreach files,
  - 4.12.7.7 Medical documentation,
  - 4.12.7.8 Staff files, including trainings attended, skill observations, and Local Agency Self Assessments,
  - 4.12.7.9 Documentation of dual participation actions,
  - 4.12.7.10 Waiting lists (when applicable),
  - 4.12.7.11 Reconciliations of eWIC cards,
  - 4.12.7.12 Civil rights files, including documentation and resolution of all civil rights complaints,
  - 4.12.7.13 Documentation of annual civil rights and voter registration training of all employees,
  - 4.12.7.14 Documentation of annual Conflict of Interest and Confidentiality training of all employees and the WIC Confidentiality and Conflict of Interest forms,
- 4.12.8 Correct and resolve inappropriate or missing participant information, improbable assessment values, duplicate participation, and other quality assurance WIC Computer Data System issues identified in the report provided to the **Subrecipient** by ADHS within the timeframes specified in the WIC PPM.
- 4.12.9 Correct any regulatory deficiency or discrepancy noted during any of the program Management Evaluations, Audits, Local Agency Compliance Investigations or Program Financial Management Reviews within sixty (60) calendar days of the date of the audit report unless an extension date is granted by the auditing/reviewing agency and documented. Any reimbursement dollars back to ADHS (WIC) shall be done within thirty (30) days of receiving the Financial Management Review completion notification.



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- 4.12.10 Adhere to the State of Arizona Accounting Manual (SAAM) travel rates. Travel rates reimbursed by the Local Agency cannot exceed the current Arizona State Reimbursement Rates located at <https://gao.az.gov/travel/welcome-gao-travel>.
- 4.12.11 Complete electronic copies of the Contractor's Expenditure Reports (CER (Exhibit 2) for each contracted program and submit the electronic and a signed copy to ADHS according to the instructions and requirements of the WIC PPM.
- 4.12.12 Retain all evidentiary documentation (i.e., meal receipts) and submit to ADHS upon request for all expenses charged towards the WIC grant.
- 4.12.13 Prepare Final Closeout CER invoice for each contracted program reflecting the cumulative expenditures for a Grant year.
- 4.12.14 Prepare WIC Local Agency Quarterly Cost Summary Reports that match the amount of each quarter's expenditures respectively in accordance with the requirements in the WIC PPM.
- 4.12.15 Prepare an annual evaluation of the annual Contractor's Outreach Plan and a progress report on activities accomplished during the year.
- 4.12.16 Prepare an annual Amendment Application in accordance with the individual program requirements that will include a budget breakdown of line items and budget justifications for any budget changes.
- 4.12.17 Adhere to the allowable and unallowable cost principles for WIC and BFPC as outlined in the WIC PPM.
- 4.12.18 Conduct Local Agency self-assessments annually in the year that the Local Agency has a Management Evaluation, and semi-annually in the year that they do not have a Management Evaluation.
- 4.12.19 Prepare all required plans, reports, and documents in accordance with the requirements in the WIC PPM.
- 4.12.20 In addition to complying with the Guidance for Federal Grant Award Management (Blue Book), SAAM for Contractors of ADHS Funded programs, and the WIC PPM, the **subrecipient** shall:
  - 4.12.20.1 **Control and monitor all State Agency-provided WIC automation resources.**
  - 4.12.20.2 **Report when WIC automation resources move physical locations by using the F4 Property Control Form. The form shall be completed in Microsoft Word including all required fields (Tag number, Serial number, Item and Make/Model), be signed, and then submitted to the WIC Service Desk via email at [WICServiceDesk@azdhs.gov](mailto:WICServiceDesk@azdhs.gov).**
  - 4.12.20.3 **In the event any WIC automation resources are lost, stolen, or damaged, the subrecipient shall report the information required to the State Agency following the details listed in the PPM.**
  - 4.12.20.4 **Complete an annual physical inventory of all tagged WIC equipment, including WIC automation resources, at both the state and local levels at all locations.**



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- 4.12.20.5 All equipment expenditures \$10,000 or higher or computer equipment listed in Chapter 17 shall be purchased by ADHS. The State Agency will tag WIC automation resources according to Arizona Department of Health Services (ADHS) policy with an ADHS property sticker with a unique identification number. The State Agency will tag all WIC automation resources that cost \$250 and above.
- 4.12.20.6 Annually, the state office will send each subrecipient an inventory sheet of tagged equipment issued to them. The subrecipient shall verify the items listed on the inventory sheet, identifying what is present, if applicable what is missing, and any additional items that are present with a tag but not listed. The state and local agency will work together to determine what happened to items marked as missing. Equipment lost or damaged due to negligence and/or a lack of internal control shall be the responsibility of the entity which last possessed the equipment.
- 4.12.20.7 The physical inventory must be completed annually in May and within one month. During the annual physical inventory, equipment moves at the Local Agency should be limited and only made if necessary.
- 4.12.20.8 The subrecipient is required to have all individuals that are conducting the physical inventory attend an ADHS-provided Annual Inventory Training.
- 4.12.20.9 During the physical inventory, the subrecipient shall
  - 4.12.20.9.1 Physically verify the location of all equipment in the State Agency-provided inventory.
  - 4.12.20.9.2 Account for WIC automation resources that Local Agency staff use at home for teleworking by bringing the WIC automation resource into a Local Agency office or clinic.
  - 4.12.20.9.3 Add WIC automation resources to the State Agency-provided inventory that were found during physical inventory that was not included in the State Agency-provided inventory.
  - 4.12.20.9.4 Indicate the WIC automation resources that were on the State Agency-provided inventory, but could not be found during the physical inventory.
  - 4.12.20.9.5 Update WIC automation resource physical location changes (e.g., laptop on State Inventory was documented at clinic A, but was found at clinic B).
  - 4.12.20.9.6 Verify that a WIC automation resource is in a single location and not duplicated across multiple physical locations.
  - 4.12.20.9.7 When inventory is completed at a specific physical location, the Local Agency is required to have the individual who completed the inventory sign to verify the accuracy and be available to answer any State Agency questions.



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- 4.12.20.10 Provide maintenance and upkeep for all equipment purchased with WIC funds. Maintenance shall be provided through the **subrecipient's** own organization or the Subrecipient may participate in State maintenance contracts where available **as specified in the WIC PPM.**
- 4.12.20.11 Obtain written permission from ADHS prior to expending WIC funds to purchase equipment with a value of \$**10,000** or more.
- 4.12.20.12 Submit a request for all asset-related items to ADHS utilizing the process specified in the WIC PPM. **ADHS WIC provides these items to local agencies.** Asset-related items include but are not limited to **hardware including:**
- 4.12.20.12.1 **Computers.**
  - 4.12.20.12.2 **Tablets.**
  - 4.12.20.12.3 **Scanners.**
  - 4.12.20.12.4 **Printers.**
  - 4.12.20.12.5 **Card readers.**
  - 4.12.20.12.6 **Pin pads.**
  - 4.12.20.12.7 **Webcams.**
  - 4.12.20.12.8 **Headsets.**
  - 4.12.20.12.9 **Signature pads.**
  - 4.12.20.12.10 **Certain telecommunications equipment necessary to access the web-based WIC Computer Data System (e.g. MiFi's).**
- 4.12.20.13 **New technology will be evaluated for inclusion based on program needs.**
- 4.12.20.14 **For software purchases with WIC funds, the Local Agency may purchase software that is reasonable and necessary. The subrecipient is responsible for ensuring that new software will not impact the use of WIC applications on the WIC automation resource. The subrecipient may submit a request for testing new software that the subrecipient may want to purchase to ensure that the WIC applications are not impacted. Subrecipients may submit software testing requests to the WIC Service Desk at [WICServiceDesk@azdhs.gov](mailto:WICServiceDesk@azdhs.gov).**
- 4.12.20.15 Provide notification to ADHS for any asset-related resource items in need of transfer or disposition. The Subrecipient shall not directly dispose of any asset.
- 4.12.20.16 Adhere to WIC PPM procedures for transfer and disposals.
- 4.12.20.17 **Notify the Office Chief for the Office of Program Integrity (OPI) of the loss or theft of State-owned WIC automation resources within 24 hours of the occurrence. The Local Agency must provide final documentation within 10 business days. Final documentation includes the F4 Property Control Sheet and police report. The Local Agency is only required to provide a police report**

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for stolen WIC automation resources.

4.12.20.18 In the event the Arizona WIC Program funding is depleted (e.g., government shutdown), the Subrecipient may request permission to continue operating their program utilizing local funds. The Subrecipient will contact the Arizona WIC Director to discuss the feasibility of sustaining clinic operations and participant food redemption at authorized vendor locations. The Subrecipient may transfer funds to ADHS to ensure continued operation.

4.12.21 Additional monies may be awarded under this Grant for WIC Special Projects related to, but not limited to, general infrastructure, breastfeeding promotion, nutrition services, information system enhancement efforts, and client retention efforts.

4.13 Additional Peer Counseling Administrative Services

4.13.1 Prepare and submit a Quarterly Report for the Peer Counseling services in the format provided by ADHS.

4.13.2 Provide training and resources to assist the local agency in establishing and maintaining competency for new and existing staff.

4.14 Additional WIC & BFPC Tasks

4.14.1 The Subrecipient shall submit to ADHS each Contracted Program's amendment application by the specified deadline for the following year containing the following information:

4.14.1.1 Request for Caseload to be served.

4.14.1.2 Request for budget and budget justification.

4.14.1.3 Updated Outreach Plan for the upcoming FFY and an evaluation of the previous year's activities.

4.14.1.4 Any additional services and other documents specified.

4.15 Additional Breastfeeding Peer Counseling Special Projects

ADHS is providing additional funding for the special project for FFY26 for WIC BFPC Special Projects for the following:

4.15.1 Salary, ERE, and equipment needed for a Breastfeeding Peer Counselor to establish and maintain Breastfeeding Peer Counseling services for the following agencies: Apache County Public Health Services District, El Rio Santa Cruz Community Health Center, Graham County Department of Health, Greenlee County Health Department, Navajo County Health Department, Epiphany Project and Wesley Community & Health Centers.

4.15.2 The Peer Counselor will be an employee of the Pima County and will report to the Breastfeeding Manager and Director. Pima County will be responsible for adhering to all BFPC policies as outlined in Chapter 19.

4.15.3 Pima County and each agency will have a completed memorandum of understanding (MoU) in place before services begin with their agency.

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## 5 REFERENCE DOCUMENTS

- 5.1 CFR (Code of Federal Regulations) 246.26(d) [https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246#p-246.26\(d\)](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246#p-246.26(d))
- 5.2 Arizona WIC Program Policies and Procedures Manual [https://azdhs.gov/azwic/local\\_agencies\\_policyManual.htm](https://azdhs.gov/azwic/local_agencies_policyManual.htm).
- 5.3 Healthy People 2030 <https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating>.
- 5.4 WIC Specific Code of Federal Regulations <https://www.ecfr.gov/current/title-7/part-246>.
- 5.5 General Accounting Office (Travel) <https://gao.az.gov/travel/welcome-gao-travel>.
- 5.6 Guidance for Federal Grand Award Management (Blue Book) <https://www.azdhs.gov/documents/operations/financial-services/bluebook-2018.pdf>.
- 5.7 Peer Counseling Training for WIC Managers <https://wicworks.fns.usda.gov/resources/peer-counseling-training-wic-managers>.
- 5.8 State of Arizona Accounting Manual (SAAM) <https://gao.az.gov/publications/SAAM>.

## 6 STATE PROVIDED ITEMS

ADHS will provide:

- 6.1 Electronic copies of the Arizona WIC Program Policies and Procedures Manual,
- 6.2 Hardware and software necessary for operation of the WIC Computer Database System,
- 6.3 Training and resources to assist local agencies in establishing staff competency for new and existing staff,
- 6.4 AZHZ Collaborators Username and Password access to order,
- 6.5 eWIC cards,
- 6.6 Nutrition Education Materials for participants,
- 6.7 Breast pumps and kits,
- 6.8 Breastfeeding-materials/resources for staff,
- 6.9 Required posters,
- 6.10 Clinic operation materials,
- 6.11 Outreach materials,
- 6.12 Financial documents:

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- 6.12.1 **Federal Funding Accountability and Transparency Act (FFATA)** Form,
- 6.12.2 Direct Expenses Template,
- 6.12.3 **Labor Activity Report (LAR)** Template,
- 6.12.4 Contractor Expenditure Report (**CER**) Template,
- 6.12.5 Quarterly Cost Summary Report Template,
- 6.12.6 **Technical assistance and support, as needed,**
- 6.13 **Required Breastfeeding resources for staff,**
  - 6.13.1 **Assistance with IBCLC career track or advanced lactation consultant education, when appropriate.**
  - 6.13.2 **Periodic redemption reports for issued benefits, as requested by the Local Agency.**
- 6.14 **Additional BFPC Provided Items**
  - 6.14.1 **Quarterly Report template (electronic) for Peer Counseling Program.**
  - 6.14.2 **USDA WIC Breastfeeding Curriculum: Peer Counselors, which includes the PowerPoint presentation "Peer Counseling: Making a Difference for WIC Families", when appropriate.**
  - 6.14.3 **Interpreter Services. Local agencies have the option to use the State provided service or utilize their own paid for by their Local Agency.**
  - 6.14.4 **Hemoglobin Screening Supplies. Local agencies have the option to use the State provided service or utilize their own paid for by their Local Agency.**

**7 DELIVERABLES AND DELIVERY SCHEDULE**

- 7.1 If applicable, any work plan or other documentation submitted to and accepted by ADHS regarding participation in WIC or BFPC shall be incorporated into this **Grant**. Furthermore, any policy or procedure that deviates from those outlined in the Arizona WIC Program Policies and Procedures Manuals requires approval from ADHS prior to implementation. The **Subrecipient** shall submit to ADHS:
  - 7.1.1 Updated copies of Local Agency Policies and Procedures as required by the WIC PPM,
  - 7.1.2 Individual electronic and signed CER invoices for each program no later than thirty (30) days following the end of each reporting month,
  - 7.1.3 WIC Local Agency Quarterly Cost Summary matching the WIC Contractor's CER expenses no later than thirty (30) days following the end of each quarter:
    - 7.1.3.1 **Quarter One (1): October – December.**
    - 7.1.3.2 **Quarter Two (2): January – March.**
    - 7.1.3.3 **Quarter Three (3): April – June.**



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7.1.3.4 **Quarter Four (4): July – September.**

- 7.2 Final electronic and signed CER invoice for each program no later than forty-five (45) days following the end of each **Federal Fiscal Year (FFY), which is from October first (1<sup>st</sup>) through September thirtieth (30<sup>th</sup>).**
- 7.3 Completed FFATA Grant Reporting Certification Form at the beginning of each contract for each Grant within thirty (30) days of receipt of the purchase order (PO).
- 7.4 WIC Local Agency fourth (4th) Quarterly Final Cost Summary matching the WIC Contractor's CER expenses, not later than forty-five (45) days following the end of each year.
- 7.5 A Local Agency Corrective Action Plan within sixty (60) days in response to Management Evaluation. Any reimbursement dollars back to ADHS (WIC) shall be done within thirty (30) days of receiving the Financial Management Review completion notification.
- 7.6 **Additional Peer Counseling Deliverables**
  - 7.6.1 Quarterly reports for the Peer Counseling Program to be submitted fifteen (15) days after each quarter of the **Grant** year.

**8 PERFORMANCE STANDARDS AND AWARD PROGRAM**

- 8.1 Upon **Grant** finalization, ADHS shall notify the **Subrecipient** by email of the assigned caseload and, throughout the term of the **Grant**, any changes to the assigned caseload. The **Subrecipient** shall maintain an average monthly participation level in accordance with the following table.

<u>Caseload Assignment</u>	<u>% Maintained</u>
<10,000 participants/month	97%
10,000 to <49,999 participants/month	98%
>50,000 participants/month	99%

- 8.2 If, after each quarter of the Federal Fiscal Year (October through September), the **Subrecipient** has not attained the required participation level, ADHS will have the option of reducing the assigned caseload and resources to the Subrecipient's current service level. ADHS may then move the unused caseload and corresponding resources to other WIC Local Agencies in order to fully utilize the resources.
- 8.3 Subrecipients shall be eligible for one (1) or more of the following awards:
  - 8.3.1 Any local agency which meets 100% or more of its caseload assignment for three (3) consecutive months during the previous FFY may receive an award of \$10,000 added to that agency's following fiscal year WIC funding formula award if the Contract is extended and additional expenditures can be identified.
  - 8.3.2 Utilizing the "Nutrition Discussion Contact" report ran in the first quarter of the FFY preceding time of application (October 1<sup>st</sup> through December 31<sup>st</sup>), any Local Agency meeting ninety-five percent (95%) of its nutrition education documentation requirement for each participation time period may receive an award of \$10,000 added to that agency's following fiscal year WIC funding formula award if the Grant is extended and additional expenditures can be identified.
  - 8.3.3 The agency with the highest increase of eWIC redemptions in the first (1<sup>st</sup>) quarter (October 1<sup>st</sup> through December 31<sup>st</sup>) of the FFY preceding time of application compared to their own Local Agency's eWIC redemptions from the first quarter (October 1<sup>st</sup> through December 31<sup>st</sup>) of the previous FFY within their Assigned Caseload Cohort may be eligible to receive an

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award added to the following fiscal year WIC funding formula award if the **Grant** is extended and additional expenditures can be identified.

Assigned Caseload Cohort	Award Amount
Less than 2000	\$5,000
2000 - 8000	\$10,000
More than 8000	\$15,000

8.3.4 The agency with the highest percentage of Infants Exclusively Nursing (IENs) in the first (1<sup>st</sup>) quarter (October 1<sup>st</sup> through December 31<sup>st</sup>) of each fiscal year within their Assigned Caseload Cohort may be eligible to receive an award added to the following fiscal year's WIC funding formula award if the **Grant** is extended and additional expenditures can be identified.

Assigned Caseload Cohort	Award Amount
Less than 2000	\$5,000
2000 - 8000	\$10,000
More than 8000	\$15,000

8.4 Pursuant to 7 CFR 246.14, which allows the WIC program to fund nutrition services and administrative expenses, the Performance Awards may be part of the annual funding formula and awarded to the **Subrecipient** in the next contract year.

8.5 USDA has the option to award breastfeeding performance awards to State Agencies who exceed the national average. If funds are awarded to Arizona, each Local Agency program will receive a proration of the amount based on the number of exclusively nursing women in their Local Agency. It will be a set amount and may only be used for purposes outlined in the current federal guidelines.

## 9 FUNDING RESTRICTIONS

9.1 Funding is limited to the program service area and USDA funding allocation;

9.2 Funds shall only be used for allowable program purposes,

9.3 Funds shall not be used for:

9.3.1 **Bad Debts.**

9.3.2 **Central Accounting and General Operations.**

9.3.3 **Certification Costs.**



# INTERGOVERNMENTAL AGREEMENT (IGA)

## Amendment

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- 9.3.4 Contingency Fund Contributions.
- 9.3.5 Contributions and Donations.
- 9.3.6 Depreciation and Use Allowances.
- 9.3.7 Entertainment.
- 9.3.8 Fees for Health Services.
- 9.3.9 Food and Beverages.
- 9.3.10 Fines and Penalties.
- 9.3.11 Incentives or Payments to Participant.
- 9.3.12 Interest and Other Financial Costs.
- 9.3.13 Legal Expenses.
- 9.3.14 Legislative Expenses.
- 9.3.15 Lobbying Expenses.
- 9.3.16 Petty Cash.
- 9.3.17 Performing non-WIC services.
- 9.3.18 Physical Fitness.
- 9.3.19 Publicity or propaganda for the preparation, distribution, or use of any material designed to support or defeat the enactment of legislation before any legislative body.
- 9.3.20 Purchase of Real Estate.
- 9.3.21 Research.
- 9.3.22 Self-Insured Losses.
- 9.3.23 The salary or expenses of any grant or contract recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before any legislative body.
- 9.3.24 Travel exceeding the SAAM.
- 9.3.25 Future Financial Commitments outside of the current federal fiscal year.

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**10 PROGRAM IMPLEMENTATION**

- 10.1 The WIC Program provides nutrition and breastfeeding support and information, supplemental nutritious foods, and referrals to other health and social services as an adjunct to good health care during critical times of growth and development, in order to prevent the occurrence of health problems and to improve the health status of eligible women, infants and children.
- 10.2 Nutrition education including breastfeeding promotion and support as part of the WIC program, shall be designed to achieve the following two broad goals:
  - 10.2.1 Emphasize the relationship between nutrition, physical activity, and health with special emphasis on the nutritional needs of pregnant, postpartum, and breastfeeding women, infants, and children under five years of age, and raise awareness about the dangers of using drugs and other harmful substances during pregnancy and while breastfeeding.
  - 10.2.2 Assist the individual who is at nutritional risk in improving health status and achieving a positive change in dietary and physical activity habits, and in the prevention of nutrition-related problems through optimal use of supplemental foods and other nutritious foods. This is to be taught in the context of the ethnic, cultural, and geographic preferences of the participants and with consideration for educational and environmental limitations experienced by the participants.

**11 AREAS OF SERVICE**

Underserved communities that have eligible populations at or below 185% of the Federal Poverty Guidelines within the State of Arizona.

**12 TARGET POPULATION**

WIC services nutritionally at-risk and low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, infants, and children up to age five (5).

- 12.1 Eligible populations may also include:
  - 12.1.1 Migrant and agricultural workers.
  - 12.1.2 Pregnant women, especially women in the early months of pregnancy.
  - 12.1.3 Homeless individuals and facilities.
  - 12.1.4 Infants and children under the care of foster parents and/or the Department of Child Safety (DCS).
  - 12.1.5 Persons employed or residing in rural areas.
  - 12.1.6 Working families.
  - 12.1.7 Recipients of Temporary Assistance for Needy Families (TANF).
  - 12.1.8 Recipients of Supplemental Nutrition Assistance Program (SNAP).
  - 12.1.9 Participants in the Child and Adult Care Food Program (CACFP).

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- 12.1.10 Women enrolled in substance abuse programs.
- 12.1.11 Persons enrolled in the Arizona Health Care Cost Containment System (AHCCCS).
- 12.1.12 Minority and immigrant populations.

**13 NOTICES, CORRESPONDENCE, AND REPORTS**

13.1 Notices, correspondence, reports, and **invoices/CERs** from the Contractor to ADHS shall be sent **electronically or** by mail to:

Arizona Department of Health Services  
**Attn: Tasha Williams, Chief**  
**Office of WIC Nutrition, Breastfeeding and Training Services**  
**150 N 18th Avenue, Suite 300**  
**Phoenix, AZ 85007**  
**Telephone: (480) 653-2896**  
**Email: [tasha.williams@azdhs.gov](mailto:tasha.williams@azdhs.gov)**

- 13.2 CERs shall be sent to the WIC Contracts Consultant and BFPC Program Manager, for WIC and BFPC respectively.
- 13.3 **AUTOMATED CLEARING HOUSE.** ADHS may pay invoices or CERs for some or all Orders through an Automated Clearing House (ACH). In order to receive payments in this manner, the Grantee must complete an ACH Vendor Authorization Form (form GAO-618) within thirty (30) days after the effective date of the Contract. The form is available online at: <https://gao.az.gov/sites/default/files/2023-05/GAO-618.pdf>
- 13.4 ACH Vendor Authorization Form shall be emailed to [Vendor.Payautomation@azdoa.gov](mailto:Vendor.Payautomation@azdoa.gov).



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**PRICE SHEET**

October 1, 2025 to September 30, 2026

Agency Name: Pima County

Cost Reimbursement Line-Item Budget

**WIC Services**

Federal Award Date: **October 1, 2025**

CFDA number and name: **10.557 Special Supplemental Nutrition Program for Women, Infants, and Children**

WIC Services Account Classification	Amount
Personnel Services (PS)*	<b>\$1,662,231.00</b>
Employee Related Expenses (ERE)*	<b>\$615,120.00</b>
Professional & Outside Services*	<b>\$25,600.00</b>
Travel*	<b>\$14,326.00</b>
Occupancy	<b>\$0.00</b>
Other Operating*	<b>\$40,923.00</b>
Capital Equipment	<b>\$0.00</b>
Indirect Costs* (10%)	<b>\$235,820.00</b>
<b>Total Expenses</b>	<b>\$2,594,020.00</b>

**Breastfeeding Peer Counseling Services**

Federal Award Date: **October 1, 2025**

CFDA number and name: **10.557 Special Supplemental Nutrition Program for Women, Infants, and Children**

Breastfeeding Peer Counseling Services Account Classification	Amount
Personnel Services (PS)*	<b>\$78,677.00</b>
Employee Related Expenses (ERE)*	<b>\$9,269.00</b>
Professional & Outside Services	<b>\$450.00</b>
Travel*	<b>\$1,941.00</b>
Occupancy	<b>\$0.00</b>
Other Operating*	<b>\$6,065.00</b>
Capital Equipment	<b>\$0.00</b>
Indirect Costs* (10%)	<b>\$9,596.00</b>
<b>Total Expenses</b>	<b>\$105,998.00</b>

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**Breastfeeding Peer Counseling Services Special Projects**

**Federal Award Date: October 1, 2025**

**CFDA number and name: 10.557 Special Supplemental Nutrition Program for Women, Infants, and Children**

**Special Project Per Task 3.3 - Funding available through 9/30/2029. Amounts may change annually.**

<b>Breastfeeding Peer Counseling Services Special Projects Account Classification</b>	<b>Amount</b>
Personnel Services (PS)*	<b>\$25,370.00</b>
Employee Related Expenses (ERE)*	<b>\$5,348.00</b>
Professional & Outside Services	<b>\$0.00</b>
Travel	<b>\$0.00</b>
Occupancy	<b>\$0.00</b>
Other Operating*	<b>\$701.00</b>
Capital Equipment	<b>\$0.00</b>
Indirect Costs* (10%)	<b>\$3,142.00</b>
<b>Total Expenses</b>	<b>\$34,561.00</b>

**Additional Terms and Conditions:**

With prior written approval from the Program Manager, the Contractor is authorized to transfer up to a maximum of ten percent (10%) of the total budget amount between funded line items. Transfers of funds are only allowed between funded line items. Transfers exceeding ten percent (10%) or to a non-funded line item shall require an amendment.

ADHS reserves the right to adjust awards given to local agencies depending on federal dollars received. Adjustments will be at the discretion of ADHS.

\*Indicated indirect rate calculation

**Additional WIC Program:**

Should additional administrative monies become available through state or federal grants, ADHS may increase the purchase order to increase the number of participants served and increase the total of this contract.

The assigned caseload for FFY 2026 is: **11,500**

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**Exhibit A- 2 CFR 200.332**

§ 200.332

Requirements for pass-through entities.

All pass-through entities must

(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward.

Prime Awardee:	Arizona Department of Health Services
UEI #	QMWUG1AMYF65
Federal Award Identification (Grant Number):	256AZ008W1003
Subrecipient name (which must match the name associated with its unique entity identifier):	Pima County Health Department
Subrecipient's unique entity identifier (UEI #):	U8XUY58VDQS3
Federal Award Identification Number (FAIN, sometimes it's the same as the Grant Number):	256AZ008W1003
Federal Award Date (see the definition of Federal award date in § 200.1 of this part) of award to the recipient by the Federal agency:	10/01/2025
Subaward Period of Performance Start and End Date:	10/01/2025 - 9/30/2026
Subaward Budget Period Start and End Date:	10/01/2025 - 9/30/2026
Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient (this is normally the contract amount):	\$2,594,020.00
Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current financial obligation (how much is available for contracts):	\$2,594,020.00
Total Amount of the Federal Award committed to the subrecipient by the pass-through entity:	\$2,594,020.00
Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA):	Arizona local implementation of the WIC Special Supplemental Nutrition Program for Women, Infants, and Children
Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity:	United States Department of Agriculture, FNS Southwest Regional Office, Food and Nutrition Service, 1100



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Phoenix, Arizona 85007

Contract No.: CTR067929

IGA Amendment No: 3

Procurement Officer:  
**Emily Ngo**

Commerce Street Room 522, Dallas, TX 75242-9980,  
Telephone: (214)290-9810

	<b>INTERGOVERNMENTAL AGREEMENT (IGA)</b>  <b>Amendment</b>		<b>ARIZONA DEPARTMENT OF HEALTH SERVICES</b> <b>OFFICE OF PROCUREMENT</b>  150 N. 18 <sup>th</sup> Ave., Suite 530 Phoenix, Arizona 85007
	Contract No.: CTR067929	IGA Amendment No: 3	Procurement Officer: <b>Emily Ngo</b>

**Exhibit B- 2 CFR 200.332**

**§ 200.332**

**Requirements for pass-through entities.**

**All pass-through entities must:**

**(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward.**

<b>Prime Awardee:</b>	<b>Arizona Department of Health Services</b>
<b>UEI #</b>	<b>QMWUG1AMYF65</b>
Federal Award Identification (Grant Number):	256AZ002W5003
Subrecipient name (which must match the name associated with its unique entity identifier):	<b>Pima County Health Department</b>
Subrecipient's unique entity identifier (UEI #):	<b>U8XUY58VDQS3</b>
Federal Award Identification Number (FAIN, sometimes it's the same as the Grant Number):	256AZ002W5003
Federal Award Date (see the definition of Federal award date in § 200.1 of this part) of award to the recipient by the Federal agency:	<b>05/30/2025</b>
Subaward Period of Performance Start and End Date:	<b>10/01/2025-9/30/2026</b>
Subaward Budget Period Start and End Date:	<b>10/01/2025-9/30/2026</b>
Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient (this is normally the contract amount):	<b>\$34,561.00</b>
Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current financial obligation (how much is available for contracts):	<b>\$34,561.00</b>
Total Amount of the Federal Award committed to the subrecipient by the pass-through entity:	<b>\$34,561.00</b>
Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA):	Arizona local implementation of the Breastfeeding and Peer Counseling Program



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Phoenix, Arizona 85007

Contract No.: CTR067929

IGA Amendment No: 3

Procurement Officer:  
**Emily Ngo**

Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity:	United States Department of Agriculture, FNS Southwest Regional Office, Food and Nutrition Service, 1100 Commerce Street Room 522, Dallas, TX 75242-9980, Telephone: (214)290-9810
Assistance Listings number and Title; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement:	10.557 WIC Special Supplemental Nutrition Program for Women, Infants, and Children
Identification of whether the award is R&D:	Not R&D award
Indirect cost rate for the Federal award (including the de minimis rate is charged) per § 200.414:	<b>10.00%</b>

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**Exhibit C - 2 CFR 200.332**

**§ 200.332**

**Requirements for pass-through entities.**

**All pass-through entities must:**

**(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward.**

Prime Awardee:	Arizona Department of Health Services
UEI #	QMWUG1AMYF65
Federal Award Identification (Grant Number):	256AZ002W5003
Subrecipient name (which must match the name associated with its unique entity identifier):	Pima County Health Department
Subrecipient's unique entity identifier (UEI #):	U8XUY58VDQS3
Federal Award Identification Number (FAIN, sometimes it's the same as the Grant Number):	256AZ002W5003
Federal Award Date (see the definition of Federal award date in § 200.1 of this part) of award to the recipient by the Federal agency:	05/30/2025
Subaward Period of Performance Start and End Date:	10/01/2025-9/30/2026
Subaward Budget Period Start and End Date:	10/01/2025-9/30/2026
Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient (this is normally the contract amount):	\$105,998.00
Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current financial obligation (how much is available for contracts):	\$105,998.00
Total Amount of the Federal Award committed to the subrecipient by the pass-through entity:	\$105,998.00
Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA):	Arizona local implementation of the Breastfeeding and Peer Counseling Program
Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity:	United States Department of Agriculture, FNS Southwest Regional Office, Food and Nutrition Service, 1100 Commerce Street Room 522, Dallas, TX 75242-9980, Telephone: (214)290-9810



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**Emily Ngo**

Assistance Listings number and Title; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement:

10.557 WIC Special Supplemental Nutrition Program for Women, Infants, and Children

Identification of whether the award is R&D:

Not R&D award

Indirect cost rate for the Federal award (including the de minimis rate is charged) per § 200.414:

10.00%