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WIC Policy Memorandum: #95-22
WIC-Allowable Costs and Additional Issues Associated With a
Dietetic Supervised Practice Program or Other Out-of-Service
Training Program

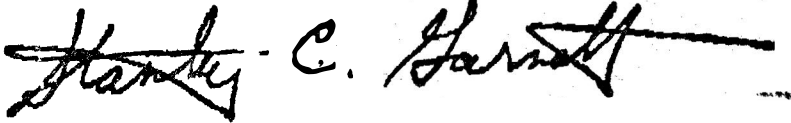
Regional Directors
Supplemental Food Programs
All Regions

The attached policy memorandum clarifies the requirements WIC agencies must meet to spend Federal WIC grant funds on a dietetic supervised practice program or other out-of-service training program for WIC staff and eligible in-kind staff. WIC agencies that incurred WIC-allowable training costs during the period October 1, 1994 through September 30, 1995 may charge these expenses to their fiscal year 1995 Federal WIC grant.

The Food and Consumer Service (FCS) also developed the accompanying technical guidance document to offer optional suggestions, which WIC agencies may adopt at their discretion, to help them implement the policy. Further, attached are two additional relevant resources to share with all WIC State agencies. One is the American Dietetic Association (ADA) publication, entitled *Developing a Dietetics Education Program*, and the other is a packet of information and fact sheets on dietetic supervised practice programs that was duplicated by FCS with permission from ADA.

The former ADA publication serves as a guide for interested WIC agencies on how to develop an ADA-approved/accredited dietetic supervised practice program and on the procedures for writing a related self-study. FCS originally intended to develop a prototype self-study to make it easier for WIC agencies to design their own dietetic supervised practice programs. However, ADA recently published the attached handbook which provides excellent guidance on this process. Therefore, in lieu of developing a similar guide, FCS purchased a copy of *Developing a Dietetics Education Program* for each WIC State agency's reference. The attached packet of ADA information includes an order form for WIC agencies to use if they wish to purchase more copies of this publication.

Please transmit copies of the subject policy memorandum, technical guidance document, ADA publication, and packet of ADA information to all your WIC State agencies as soon as possible. If you have any questions, please contact my staff member Rhonda Kane at (703) 305-2730.



STANLEY C. GARNETT
Director
Supplemental Food Programs Division

Attachments

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Note: All attachments for cc's may not include a copy of the ADA publication since limited copies were available.

**WIC Policy Memorandum #95-22 on WIC-Allowable Costs and Additional Issues
Associated With a Dietetic Supervised Practice Program
or Other Out-of-Service Training Program**

I. PURPOSE

The purpose of this policy is to clarify the appropriate use of Federal WIC nutrition services and administration (NSA) funds to support a WIC agency's development, operation and/or use of a dietetic supervised practice program or other out-of-service training program. Out-of-service training refers to the training of WIC staff and eligible in-kind staff, involving an extended period of time, e.g., a month or more, that is generally not at the site of the WIC agency but relates to and benefits the WIC Program. In comparison, in-service training refers to short-term, on-the-job training of WIC staff and eligible in-kind staff that relates to and benefits the WIC Program.

Although principles of this policy can be applied to any in-service or out-of-service training program that represents a significant or long-term commitment of WIC staff time or Federal WIC NSA funds, it particularly pertains to a WIC agency's involvement with a Preprofessional Practice Program (AP4) or a Dietetic Internship (DI) approved/accredited by the American Dietetic Association (ADA). Completion of a dietetic supervised practice program represents one avenue a nutritionist can follow to gain the ADA-required competencies to become a Registered Dietitian (R.D.). The Food and Consumer Service (FCS), Department of Agriculture, believes that making such training readily available to WIC nutritionists is consistent with the effort to promote the provision of quality nutrition services to WIC participants. It also may serve as strategy to help WIC agencies recruit and retain qualified staff.

This policy describes how and when Federal WIC NSA funds can be used, identifies WIC-allowable costs, and stipulates related WIC agency requirements. WIC State agencies have the authority to determine: which of the allowable costs they elect to incur; any cost caps or maximums they wish to impose on WIC-allowable cost categories and items; and how the Federal requirements will be met. WIC State agencies are responsible for meeting the conditions specified herein, but may delegate appropriate activities to their WIC local agencies. Therefore, the term "WIC agency" used throughout this policy refers to either a WIC State or local agency, as applicable, and in accordance with the decisions of individual WIC State agencies to delegate any of their responsibilities to their respective local agencies.

Prior review of the Glossary found at the back of this document would help the reader interpret this policy and many terms used throughout. In addition, a companion document also prepared by FCS offers WIC agencies technical guidance in implementing the policy. The technical guidance provides additional background information and details on AP4s/DIs in its text and Appendices. Much of the guidance is based on the actual conditions and arrangements currently in use by AP4s/DIs.

II. TRAINING CRITERIA

WIC agencies can use Federal WIC NSA funds to pay the expenses of WIC staff and eligible in-kind staff to attend out-of-service training. [See subsections IV. A. 2 (a) and (b) for the definitions of WIC staff and eligible in-kind staff, respectively.] The out-of-service training may include courses that earn college credit. Such college credit courses also may be needed to pursue an educational degree. In this situation, Federal WIC NSA funds may be used to pay for WIC staff and eligible in-kind staff to attend these courses, which serve as prerequisites for an ultimate degree that has direct relevance to the staff member's WIC duties and responsibilities. These costs would be considered reasonable and necessary because they serve to train WIC staff to better function in their assigned WIC roles.

A.e Minimum Criteria: Minimum criteria shall be met before Federal WIC NSA funds can be obligated to support a WIC agency's development, operation and/or use of an AP4/DI or any other out-of-service training program. The following criteria are intended to ensure that expenses charged to the Federal WIC grant shall be reasonable and necessary:

- 1.e Maintains the Integrity of WIC Operations/Services: An important determinant in a WIC agency's decision to commit WIC staff time and Federal WIC NSA funds for any proposed training program is whether sufficient resources shall remain to comply fully with the Federal WIC NSA requirements and to efficiently and effectively operate the WIC Program.
- 2.e Is Consistent With WIC's Mission and Benefits WIC: The goals and objectives of the proposed training program shall be consistent with and supportive of the WIC Program's overall mission. In addition, the training program shall be cost-effective and benefit the WIC Program. Ways that the training program may benefit the WIC Program include, but are not limited to, the following:
 - (a) *Enhances WIC Services:* The training program enables a WIC agency to enhance its provision of WIC services. For example, bachelor-level WIC nutritionists who successfully complete an ADA-approved/accredited AP4/DI can take the ADA examination required for R.D. credentialing. Consistent with the recommendations of the WIC Nutrition Services Standards and the NAWD/FNS Joint Statement on Quality Nutrition Services in the WIC Program, R.D.s and R.D.-eligible nutritionists and those with Master's Degrees in a nutrition-related discipline are qualified to provide nutrition counseling to high-risk WIC participants. Therefore, a WIC agency that previously did not have an R.D. or R.D.-eligible nutritionist on staff would have to refer these participants for high-risk counseling elsewhere. However, after its staff completed an ADA-approved/accredited AP4/DI, the WIC agency could directly provide this important nutrition service.

- (b) *Improves WIC Staff Knowledge and Skills:* The training program improves the knowledge and skills of WIC staff and enables them to more proficiently administer the WIC Program at the State or local level and/or deliver quality WIC services to participants.
- (c) *Targets WIC Staff:* If costs to develop/operate the training program are charged to the Federal WIC grant, the training program primarily trains WIC staff to maximize the potential benefits to the WIC Program.
- (d) *Reduces WIC Staff Vacancies:* The training program serves to reduce the incidence and/or duration of WIC staff vacancies by preparing WIC staff to fill position vacancies and/or by serving as an incentive for WIC staff to continue their employment with WIC.
- (e) *Includes a Rotation in WIC:* If an AP4/DI is operated by a WIC agency, it shall include a rotation of dietetic supervised practice in WIC clinics for all trainees. This provision would enable the WIC agency's own staff trainees to complete part of the AP4/DI while working in WIC clinics and to expose any non-WIC staff trainees to the WIC Program as a potential future employer.

B. Optional Criteria: In addition, FCS highly recommends that WIC agencies adopt the following additional two criteria:

1. **Represents a Competency-Based Training Program (CBTP):** In general, the proposed training program should be competency-based, having a structured and consistently implemented curriculum including the following components:
 - (a) *Performance Requirements:* Has specified knowledge and performance requirements for the trainees, which include those pertinent to WIC staff duties and/or WIC services.
 - (b) *Learning Opportunities:* Provides practical, hands-on learning opportunities for the trainees to master these requirements.
 - (c) *Performance Evaluation:* Assesses trainees' performance to determine if they have successfully met the established requirements.
2. **Includes a Program Evaluation Component:** The proposed training program should include an evaluation component. If a WIC agency conducts the training, it should: monitor all trainees' progress, soliciting their feedback; and assess the overall quality and effectiveness of the training program, including the trainers/instructors. If a WIC agency uses a training program conducted by another agency or business, at a minimum it should evaluate the progress of its own staff trainees, soliciting their feedback. Documentation of the outcome of

the WIC agency's assessment of the training program/trainees should be kept on file and made accessible to its respective FCS regional office upon request.

FCS is aware that all ADA-approved/accredited AP4s/DIs are CBTPs and have a structured and comprehensive evaluation component to ensure the quality and effectiveness of the dietetic supervised practice program. ADA requires the Directors of AP4s/DIs to keep certain records and submit periodic reports of their AP4/DI operations and assessments. If a WIC agency develops/operates an ADA-approved/accredited AP4/DI, fulfilling the ADA self-study and evaluation requirements would meet the two optional criteria stated above.

III. REQUIRED SUBMISSION TO FCS

A. Initial Training Program Proposal: For any new or existing out-of-service program, such as an AP4/DI, that represents a significant investment of Federal WIC NSA funds (i.e., a total annual expenditure of \$25,000 or more per trainee or a total aggregate annual expenditure of \$100,000 or more per training program) or a long-term commitment of WIC staff time (i.e., six or more months) to develop/operate/use, the WIC agency shall first submit a narrative description justifying the proposed training program and the cost to its respective FCS regional office for approval. At a minimum, this description shall address the following:

1. Explain the need for the training program and how each of the FCS minimum criteria outlined under subsection II. A. will be met, and provide a copy of the training curriculum, when available.
2. Identify who will be trained in the program, including the numbers of WIC staff, eligible in-kind staff and non-WIC staff to be trained annually. [See subsections IV. A. 2. (a) and (b) and the Glossary for staff definitions.]
3. Specify the time schedule for developing, implementing and evaluating the training program, including the length of time allowed to train each person and the amount of time each WIC staff trainee may not be able to fulfill his/his work duties and responsibilities during the training.
4. List the names, titles and designated responsibilities of all the WIC agency staff involved with developing, operating, monitoring, evaluating and otherwise providing support services to the training program.
5. State whether the WIC agency has received or is seeking approval/accreditation of this training program from ADA or any other professional association or organization.

6. State the total annual estimated/actual training cost per trainee and the total aggregate annual estimated/actual cost of the training program, identifying all cost items to be charged to the Federal WIC grant (e.g., WIC staff salaries, fringe benefits, stipends, travel expenses, training materials and supplies, etc.). [See Section IV. for details on the types of WIC-allowable training costs.]
7. Identify any cooperators and provide a brief description of their roles in developing/operating/using the training program. Also identify the percent or portion of the total aggregate annual estimated/actual cost of the training program to be paid by the cooperators and whether this amount is commensurate with the benefits they are likely to receive.

With some exceptions, the content of the training proposal requested by FCS is similar to what ADA requires in an AP4/DI self-study. Therefore, to avoid duplication of effort, a WIC agency that has developed an AP4/DI self-study can submit it to FCS, identifying the page numbers that specifically address particular proposal items listed above. However, the WIC agency must submit any additional information necessary to provide a complete training proposal to its respective FCS regional office for review and approval.

When a training proposal is approved, the WIC agency shall submit to its FCS regional office a copy of the final training curriculum, including the AP4/DI self-study, if applicable. The WIC agency also shall submit three complete sets of the final training curriculum and self-study to the Food and Nutrition Information Center (FNIC), National Agricultural Library, Room 304, 10301 Baltimore Boulevard, Beltsville, Maryland 20705-2351 to be entered into the WIC database for lending them to other interested WIC agencies. The phone number for FNIC is (301) 504-5719. If the training curriculum or AP4/DI self-study is revised or updated, the WIC agency shall provide its FCS regional office and FNIC the required number of copies as stated above.

B. Other Required Documentation: For any out-of-service training program that represents a significant investment of Federal WIC NSA funds (i.e., a total annual expenditure of \$25,000 or more per trainee or a total aggregate annual expenditure of \$100,000 or more per training program) or a long-term commitment of WIC staff time (i.e., six or more months) to develop/operate/use, the WIC agency shall keep the following documentation on file and make it accessible to its respective FCS regional office upon request:

1. All standard accounting and financial statements and forms required by FCS to document Federal WIC NSA fund expenditures. Identification of the amount of Federal WIC NSA funds spent on the training program to be applied toward the WIC nutrition education and breastfeeding promotion and support expenditure requirements.

- 2.e Findings of any annual or semi-annual evaluation of the training program,e including any ADA-required AP4/DI self-assessment and self-monitoringe documents.e
- 3.e Findings of any ADA reviews, evaluations and site visits for ADA-accreditede AP4s/DIs.e

IV. WIC-ALLOWABLE COSTS

As applies to any other WIC-allowable cost, Federal WIC NSA funds spent to develop/operate/use a dietetic supervised practice program or other training program are subject to audit and review. At their option, WIC agencies may elect to establish cost caps or maximums for any WIC-allowable training cost category or item.

A WIC agency should determine the most economical way to accomplish the desired staff training. The decision to either develop/operate an AP4/DI or enroll its staff in an AP4/DI developed/operated by another entity (e.g., a university, college, hospital or food service company) should be based on a comparison of the expected costs and benefits to WIC.

A. Cost Categories:

- 1.e Start-up and Operating Costs: Start-up costs are those incurred by a WICe agency to develop a dietetic supervised practice program or other traininge program for the purpose of training WIC staff and eligible in-kind staff.e Operating costs are those incurred by a WIC agency to administer, maintain,e monitor and evaluate such a training program. When a WIC agency calculatese its operating costs, it shall take into consideration any fees it charges its trainees (e.g., application, acceptance, enrollment, processing, registration and tuition fees) which serve to reimburse the Federal WIC grant.e

FCS strongly encourages WIC agencies that wish to develop/operate a dietetic supervised practice program to collaborate with other WIC agencies, State/locale government agencies, or not-for-profit, non-WIC agencies that would mutually benefit to help share the financial and administrative responsibility for this endeavor. Some agencies that may be interested in collaborating with WICe agencies on designing/utilizing an AP4/DI to train their nutrition staff include,e but are not limited to: the Maternal and Child Health (MCH) Program, the Medicaid Program, the National School Lunch and Breakfast Programs, the Child and Adult Care Food Program, and the Head Start Program, to name a few. [If such collaboration occurs, see subsection IV. B. concerning the sharing of costs.] e

In many instances, it would not be cost effective for a WIC agency to use Federal WIC NSA funds to subsidize an AP4/DI developed/operated by a university, college, hospital, food service company, or for-profit organization.

An AP4/DI developed/operated by these entities typically generates income for the entities and generally serves the broader purpose of training the larger population of nutrition professionals, not primarily WIC staff and eligible in-kind staff. However, if such an entity does develop/operate an AP4/DI that primarily trains WIC staff and eligible in-kind staff, then a WIC agency may elect to support its development/operation using Federal WIC NSA funds commensurate with the portion of WIC staff and eligible in-kind staff it actually trains.

WIC agencies are encouraged to collaborate with entities that operate AP4s/DIs to offer their WIC clinics as AP4/DI rotation sites. In addition, WIC staff may wish to serve as AP4/DI preceptors. In exchange for this service, WIC agencies are encouraged to negotiate a discounted or free tuition fee for their staff to enroll in these same AP4s/DIs.

2. **Trainee Costs:** Trainee costs include fees (e.g., tuition or registration fees) and expenses (e.g., training materials, supplies and travel) incurred by the trainees to participate in the AP4/DI or other training program.

The WIC agency has the flexibility to establish its own criteria for selecting trainees it wishes to financially support through the AP4/DI or other training program it operates/uses. These criteria may be different for its own WIC staff trainees compared to any eligible in-kind staff. The WIC agency also may establish the same or different cost caps for the trainee cost items it pays for its WIC staff as opposed to its eligible in-kind staff.

Several entities that operate AP4s/DIs have successfully implemented work service contracts with staff they have sponsored through this training. The accompanying technical guidance document provides additional details on how a WIC agency may design and enforce a WIC work service contract, based on actual strategies in place.

Any WIC agency that accepts non-WIC staff, who are not eligible in-kind staff as defined under subsection IV. A. 2. (b), as trainees shall charge these non-WIC staff fees (e.g., application, acceptance, enrollment, processing, registration and tuition fees) commensurate with the training costs the WIC agency incurs on their behalf. Costs to train non-WIC staff, who are not providing a service to WIC, are not WIC-allowable expenses and cannot be charged to the Federal WIC grant. The WIC agency has the authority to determine which of the WIC-allowable trainee costs it elects to pay for trainees who are WIC staff compared to eligible in-kind staff.

FCS has identified the following two functional categories of WIC-allowable trainee costs that apply to this policy:

- (a) **WIC Staff Trainee Costs:** WIC staff are defined as full-time or part-time employees of the WIC agency whose salaries and/or fringe benefits are paid in part or full by State or Federal WIC grant funds and who are responsible for administering the WIC Program at the State or local level and/or for providing WIC services to Program participants.
- (b) **Eligible In-Kind Trainee Costs:** In-kind staff are volunteers or employees of another agency/program who provide a service or benefit to the WIC Program usually at no cost to the WIC agency. If a WIC agency elects to use Federal WIC NSA funds to pay any WIC-allowable trainee costs for in-kind staff, these staff should meet the following four minimum eligibility criteria: he/she is not a paid employee of a cooperator of the training program; he/she is likely to successfully complete the training program; he/she is providing an in-kind service to the WIC Program that approximates the value of the total WIC-allowable trainee costs to be paid by the WIC agency with Federal WIC NSA funds; and he/she is likely to continue providing an in-kind service to WIC after completing the training.

B. Sharing of Costs:

- 1.e **Single Agency Operation:** When a WIC agency serves as the sole operator of the training program, 100 percent of the associated start-up and operating costs are WIC allowable.
- 2.e **Multiple Agency Operation:** If a WIC agency collaborates with one or more entities in the development/operation of a training program, the start-up/operating costs should be equitably shared.

C.e WIC-Allowable Cost Items: The individual cost items listed below are WIC-allowable if they are "reasonable" and "necessary." [See the Glossary for the definitions of these terms.] All WIC-allowable training costs also shall comply with all current applicable laws, Federal regulations, OMB Circulars, FCS Instructions, and WIC policy memoranda issued by FCS that address WIC financial management issues and define allowable cost categories and items. [The Appendices of the accompanying technical guidance document list some pertinent references.] However, the more likely WIC-allowable cost items that a WIC agency may incur to develop/operate/use an AP4/DI or other out-of-service training program include:

- 1.e **Communications:** e.g., telephone calls, faxes and postage.
- 2.e **Compensation for Personnel Services:** e.g., wages, salaries, and fringe benefits of WIC staff involved with the training program or stipends consistent with State statute pertaining to such compensation.

3. Insurance and Indemnification: e.g., cost of any required professional liability or malpractice insurance for WIC staff and eligible in-kind staff to participate in a training program.
4. Legal Expenses: e.g., legal expenses for developing, enforcing and litigating any WIC work service contracts the WIC agency may wish to implement with staff whose training expenses are paid in full or in part by State or Federal WIC grant funds.
5. Materials and Supplies: e.g., purchase of textbooks or other references, training curriculum materials and office supplies.
6. Printing and Reproduction: e.g., printing or duplication of training manuals/materials and fliers to publicize the availability of the training program.
7. Professional Services: e.g., professional and consultant services rendered to assist a WIC agency develop/operate a training program, including the cost of developing the AP4/DI self-study or a cost-benefit analysis.
8. Training and Education: e.g., a WIC agency's expenses to develop, administer (including the hiring of instructors), maintain, monitor and evaluate a training program for WIC staff and eligible in-kind staff and/or the costs for such staff to participate in a training program or educational course sponsored by an outside entity.
 - (a) *No Prior FCS Approval*: No prior FCS approval is required for any WIC in-service training program, regardless of its cost or duration. In addition, no prior FCS approval is required for a WIC out-of-service training program that meets **both** of the following criteria: 1) has total annual cost of less than \$25,000 per trainee and a total aggregate annual cost of less than \$100,000 per training program; and 2) is less than six months in duration.
 - (b) *Prior FCS Approval*: Prior FCS approval is required for a WIC out-of-service training program (e.g., an AP4/DI) that meets **either** of the following criteria: 1) has a total annual cost of \$25,000 or more per trainee or a total aggregate annual cost of \$100,000 or more per training program; or 2) is six or more months in duration. Costs for such an out-of-service training program are WIC allowable **only** when authorized by FCS.
 - (c) *Tuition and Related Fees*: These fees include those charged to WIC staff and eligible in-kind staff by the entity operating the training program (e.g., application, acceptance, enrollment, processing, registration and tuition fees).

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

- (d) *Accreditation Fees:* These fees include those charged by a professional association, such as ADA, to review and approve/accredit a training program developed/operated by a WIC agency.e
- (e) *AP4/DI Computer Matching Fee:* This fee is charged by ADA fore computer-matching of AP4/DI applicants with participating dietetice supervised practice programs of their choice.e
- (f) *AP4/DI Preceptor Fees:* Expenses, such as honoraria and travel costs, charged by selected AP4/DI preceptors are WIC allowable **only** on an exception basis for a WIC agency that operates an AP4/DI (i.e., only for those AP4/DI preceptors who provide a unique and valuable learning experience for trainees that cannot be obtained in-kind from another AP4/DI preceptor).
- (g) *Selected Health Examination, Immunization and Medical Test Costs:* Expenses of any health examination, immunization, or other medical test,e not covered by the trainee's individual health insurance plan, are WICe allowable when required for WIC staff or eligible in-kind staff toe participate in a training program (e.g., a general physical, a tuberculosis skin test, and a vaccine against hepatitis that may be required for AP4/DIe trainees to participate in a hospital or food service training rotation).e

10.e Travel: e.g., costs of transportation, lodging and meals incurred by WIC staff,e eligible in-kind staff and hired instructors involved with a training program.e

V. FEDERAL WIC NSA FUNDS MANAGEMENT

If an AP4/DI is used to train WIC nutritionists, the WIC agency must prorate these costs between the nutrition education (NE) and breastfeeding promotion and support (BFPS) functional cost categories and report them on the *Addendum to WIC Program Annual Closeout Report - NSA Expenditures (Form FNS-227A)* as such, consistent with standard procedures. Costs reported for NE and BFPS on the FNS-227A count toward the statutory minimum spending levels for NE and BFPS.

VI. RECOVERY OF COSTS TO SERVE AS REIMBURSEMENT OR PROGRAM INCOME

Generally, there are several fees that an operator of an AP4/DI charges the individual trainees to help recover its AP4/DI operating costs. These fees typically include one or more of the following: application, acceptance, enrollment, processing, registration and tuition fees. Such fees collected by a WIC agency that operates an AP4/DI or other training program shall be applied as reimbursements to the Federal WIC grant. Only those fees collected in excess of the training program's operating costs, if any, shall be applied as program income.

GLOSSARY

ADA	The American Dietetic Association A private organization in the U.S. that promotes optimal nutrition, health and well-being and represents food and nutrition professionals.
AP4	Preprofessional Practice Program (formerly called the Approved Preprofessional Practice Program) A program approved by ADA for enabling individuals to meet the supervised practice requirements to become a Registered Dietitian. By the year 2004, all AP4s must be accredited by ADA. Individuals enrolling in an AP4 must have first earned at least a Bachelor's Degree and meet ADA's academic requirements.
AP4/DI preceptor	Person who serves as an instructor and/or supervisor of participants of an AP4/DI during their training and learning experiences.
AP4/DI rotation	A block of time spent in different facilities (e.g., hospital, public health clinic or food service operation) offering learning experiences in different clinical/practice areas (e.g., pediatrics, surgical unit, maternal nutrition and elderly nutrition) to gain the required knowledge and competencies related to the AP4/DI curriculum.
AP4/DI self-study	A process of self-assessing the status and effectiveness of an AP4/DI in relation to the ADA Standards of Education. As part of the application process for requesting ADA approval/accreditation of an AP4/DI, the sponsor must submit to ADA a written report of the outcome of this self-analysis.
CBTP	Competency-Based Training Program Training program that enables trainees to achieve the minimum knowledge, skills, affective behavior and/or attitudes needed to carry out a set of specific tasks. The CBTP is designed to prepare individuals to function proficiently in a particular task, job or role. A CBTP has specified knowledge and performance requirements that the trainees must meet, provides learning opportunities so trainees can master these requirements, and includes an evaluation component to assess whether trainees have met all requirements.

GLOSSARY (continued)

developmentally accredited

Term used by ADA to identify those dietetic supervised practice programs that are officially in the process of applying for accreditation as a DI.

DI

Dietetic Internship

An internship in dietetics accredited by ADA for enabling individuals to meet the supervised practice requirements to become a Registered Dietitian. Individuals enrolling in a DI must have first earned at least a Bachelor's Degree and meet ADA's academic requirements.

FCS

Food and Consumer Service (formerly called the Food and Nutrition Service--FNS)

The Federal agency under the Department of Agriculture responsible for administering the WIC Program at the Federal level.

in-kind

The WIC Program is neither assessed a charge nor incurs a cost for a service or benefit it receives, usually from staff of another agency/program or volunteers. In-kind services may include, but are not limited to, the provision of the following at no cost to WIC: staff time; clinic space, utilities, and furniture; office supplies; laboratory equipment; and nutrition education materials.

in-kind staff

Volunteers or employees of another agency/program whose salaries and fringe benefits are not paid in part or in full by State or Federal WIC grant funds and who provide a service or benefit to the WIC Program at no cost to the WIC agency.

in-service training

Short-term, on-the-job training of WIC staff and eligible in-kind staff that relates to and benefits the WIC Program.

NAWD

National Association of WIC Directors

A non-profit, voluntary organization composed of representatives of WIC State and local agencies dedicated to maximizing WIC Program resources through effective management practices.

GLOSSARY (continued)

**NAWD/FNS Joint
Statement on
Quality Nutrition
Services in the
WIC Program**

Statement jointly developed and endorsed by NAWD and the Food and Consumer Service (formerly called the Food and Nutrition Service--FNS), Department of Agriculture, as an expression of commitment of both parties to improve the management and operation of the WIC Program. The statement was issued to WIC State and local agencies in February 1988 and addresses voluntary standards, strategies and recommendations for accomplishing this goal.

non-WIC agency

Any separate office, group or unit (e.g., a Division, Branch or Section) within a larger governmental, organizational or business entity (e.g., Federal, State or local government department or agency; private for-profit or non-profit organization or company; or educational institution) or the larger entity itself that does not receive Federal WIC grant funds to directly administer the operations of the WIC Program at the State or local level.

non-WIC staff

Individuals whose salaries and fringe benefits are not paid in part or in full by State or Federal WIC grant funds and who do not provide any in-kind WIC services to the WIC agency.

NSA funds

Federal WIC nutrition services and administration funds

These funds represent the part of the Federal WIC grant awarded to WIC agencies that can be used to support the direct and indirect costs, excluding food costs, to operate the WIC Program at the State and local levels. Federal WIC NSA costs include, but are not limited to, the costs for WIC Program administration, monitoring, food delivery systems, nutrition education, breastfeeding promotion and support, certifications and outreach.

OMB

Office of Management and Budget

The Federal government office responsible for developing guidance for Federal, State and local agencies on allowable uses of Federal funds.

GLOSSARY (continued)

out-of-service training

Training of WIC staff and eligible in-kind staff, involving an extended period of time, such as a month or more, that is generally not at the site of the WIC agency but relates to and benefits the WIC Program.

R.D.

Registered Dietitian

An individual who has at least a Bachelor's Degree in a foods- or nutrition-related discipline and has met the educational, supervised practice, examination and continuing professional education requirements for an R.D. established by the Commission on Dietetic Registration, the credentialing agency for ADA.

reasonable and necessary costs

Reasonable costs:

- provide the WIC Program a benefit generally commensurate with the costs incurred,
- are consistent with the costs of similar items or services available from other sources,
- are in proportion to other WIC Program costs,
- are a priority expenditure relative to other demands on available WIC administrative resources, and
- have a positive impact on the WIC Program, such as on its operations, staff development/recruitment/retention or participant services.

Necessary costs:

- are incurred to carry out essential WIC Program functions, and
- would create a negative impact on the WIC Program if not incurred.

trainee

An individual who is receiving work-related instruction, education and/or experience through participation in a training program, such as an AP4/DI. Trainees may be referred to as interns or by another title that is most suitable to the type of training they are receiving.

GLOSSARY (continued)

WIC	The Special Supplemental Nutrition Program for Women, Infants, and Children (formerly called the Special Supplemental Food Program for Women, Infants and Children) A Federally-funded nutrition program that provides supplemental foods, nutrition education and health care referrals to low-income pregnant, breastfeeding and nonbreastfeeding postpartum women, infants and children under the age of 5 who are at nutritional risk.
WIC agency	The separate office or unit (e.g., a Division, Branch or Section) within a larger governmental, organizational or entity (e.g., State or local health department or Indian Tribal Organization) that is directly responsible for administering the WIC Program at the State or local level using Federal WIC grant funds.
WIC Nutrition Services Standards	Formerly called the Focus on Management (FOM) Nutrition Services Standards that were jointly developed and endorsed by NAWD and FCS in January 1988 and distributed to WIC State and local agencies. These twelve standards address a variety of WIC nutrition services components and are intended to assist WIC agencies to evaluate and improve the quality of these services in their programs.
WIC staff	Employees of a WIC agency whose salaries are paid in part or in full by State or Federal WIC grant funds for the purpose of administering the WIC Program at the State or local level and/or providing WIC services to Program participants.