Maine Center for Disease Control and Prevention
WIC Nutrition Program

Effective: October 1, 2011 Policy No. FM-8
Revised: October 1, 2018

Documentation of Allowable Costs via Time Study

Authority

7 CFR 246.4(a)(14)(x); §246.10(e)(1)(iii); and §246.16a.
7 CFR §3016;
2 CFR §200

Policy

1. Allowable costs are defined as reasonable, necessary, and documented.
2. Documentation of allowable costs must be maintained for a minimum period of three (3) years.
3. A cost is considered reasonable if under the circumstances a prudent person would incur the cost. Consideration should be given to the following:
    - 3.1. Whether the cost provides the program a benefit commensurate with the cost incurred.
    - 3.2. Whether the cost is of a type generally recognized as ordinary and necessary.
    - 3.3. Whether incurring the cost follows sound business practice.
    - 3.4. Whether the cost meets Market prices for comparable goods and services.
    - 3.5. Whether the cost was incurred in accordance with the terms and conditions of the contract with the State Agency.
4. Necessary costs are costs incurred to carry out essential program functions that cannot be avoided without adversely impacting program operations.
    - 4.1. See Appendix FM-8-A for a summary chart listing allowable and unallowable costs.
    - 4.2. Policies FM-9 through FM-13, specify in further detail allowable and unallowable costs.
5. The State Agency shall establish procedures for consistent and accurate reporting of Nutrition Services and Administration (NSA) expenses so that the cost effectiveness of the WIC program can accurately be measured.
6. Time studies shall be prepared using information from the first full week of each reportable month for each State and Local Agency WIC employee that is paid in full or in part with NSA funds (not breastfeeding peer counseling funds). If the employee is on vacation during

the first full week of the month, the employee will use information from the following week to prepare the time study. In the event the employee is sick or on vacation longer than one week, the employee will not conduct the time study until the following month.

7. The Time study shall allocate NSA expenditures into four defined cost categories – Program Management, Client Services, Nutrition Education and Breastfeeding Promotion.

Procedure

1. To document allowable nutrition education costs under the WIC program, the State Agency shall determine the percentage of staff time devoted to WIC tasks for both the State Agency and its Local Agencies through an established protocol.
2. Time study information shall be completed by state and local agency staff using their MIS log-in on the following website: https://wicspirit.maine.gov/production/timestudy/Account/Login.aspx
3. State and local agency staff shall complete online time studies the first full week of every month.
4. Time study categories and descriptions are as follows:

    4.1. Client Services (paid for out of the NSA grant)

    4.1.1. Certification - Performing height and weight measurements, blood test assessments, income, residency and identification verifications, health and diet assessments; completing certification forms, explaining the benefits of the Program, determining risk, documenting in the client file, obtaining and sending medical information; issuing food instruments; referring to other services.

    4.1.2. Nutrition Education - Providing individual counseling (including face-to-face, telephone or written correspondence) or group education and evaluating results; arranging for interpreter/translator services.

    4.1.3. Breastfeeding - Providing individual counseling (including face-to-face, telephone or written correspondence) and/or group education related to breastfeeding promotion and support; electric breast pump authorizations and follow-up.

    4.1.4. Food Delivery - Printing and mailing food instruments.

    4.2. Client Support (paid for out of the NSA grant)

    4.2.1. General - Maintaining files, medical, breastfeeding and other office supplies; food instrument registers, scheduling appointments.

    4.2.2. Travel - Travel to and from clinics

    4.3. Program Management (paid for out of the NSA grant)

    4.3.1. Administrative - Program planning and evaluation; managing day-to-day operations; supervising and training staff; caseload management including outreach and community collaborations; attending meetings and training; travel.

4.3.2. Nutrition Education - developing, implementing and evaluating education initiatives; attending meetings and training; travel.

4.3.3. Breastfeeding - developing, implementing and evaluating breastfeeding initiatives; staff training; attending meetings and training; travel.

4.3.4. Special Formula - tracking special formula authorization, follow-up and orders.

4.4. FMNP - Farmers' Market planning and program management; paid for out of the FMNP grant

4.5. EBT – planning, development and implementation of eWIC initiatives; paid for with WIC EBT funding

4.6. Other

4.6.1. Lunch

4.6.2. Break

4.6.3. Leave

4.7. BFPC

4.7.1. BFPC - Work related to and paid for out of Breastfeeding Peer Counseling Program funds/Loving Support grant

4.8. Non-WIC

4.8.1. Non-WIC - Work not paid for out of the WIC administrative (NSA) grant

5. Time studies are calculated automatically by the reporting tool as follows:

5.1. Determine total WIC hours

5.2. Determine total direct service hours

5.2.1. Percentage of hours spent on direct service is calculated by dividing total direct services hours by total WIC hours and multiplying by 100

5.3. Determine direct support hours

5.3.1. Percentage of hours spent on direct support is calculated by dividing total direct support hours by total WIC hours and multiplying by 100

5.4. Determine total administrative hours

5.4.1. Percentage of hours spent on administration is calculated by dividing total administrative hours by total WIC hours and multiplying by 100

5.5. The sum of the percentage of direct service, direct support and administration hours shall total 100%

6. The results of the time study shall be reported to the state agency financial manager within two weeks of its completion.

7. The study results provide a projection for nutrition education and breastfeeding costs and shall be used for reporting nutrition education and breastfeeding support activities expenses.

8. The state agency Financial Manager monitors time study submissions for accuracy.
9. The Financial Manager shall report time study results to Local Agencies on a semiannual basis.
10. Other allowable costs must be documented by retaining all accounts payable invoices, and any other documentation necessary to document that the expense is allowable.