



Memorandum

#19-087

TO: WIC Local Agency Directors

FROM: Amanda Hovis, Director
Nutrition Education / Clinic Services Unit
Texas WIC Program

DATE: October 28, 2019

SUBJECT: Managing Returned Formula

Attached are the Questions and Answers from the live trainings about the revision to FD:19.0 that was presented in September.

We reviewed all questions submitted and organized them into different sections from the training. Some of the questions submitted were repeated or covered the same topic, so may have been combined.

As a friendly reminder, effective October 1, 2019, clinics should no longer be reissuing returned formula to participants for any reason.

The training has now been recorded and will be available for viewing by November 1st, 2019. We reviewed all inquiries during and after the live trainings were completed and added additional information in the presentation to address many of the attached questions.

The recorded training can be found in the WIC training catalog.

If you have questions, or require additional information, contact:

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**Questions and Answers from FD 19.0 Managing Returned Formula
Live Trainings: 09/06, 09/10, 09/16, & 09/23**

Returned Formula Log Documentation

- 1) How often do we fill in the yellow section of the log? How often do we balance physical cans with the log? Is it only when the sheet is filled in?**

The yellow section is designed to allow you to add multiple lines of the same formula together to make balancing the log against physical count clearer. Your clinic can decide how often to reconcile physical inventory. At minimum, it should be done whenever the log sheet is full.

- 2) In the Alimentum example on the spread sheet, the total returned is 7 cans, but the quantity exchanged is 5 cans. How is inventory balance 0?**

In the example, the notes in the Agency Comment Section explain this. Since 2 of the cans were from previous month issuance and the other 5 were from current month, only 2 of the cans will not be exchanged in TXIN. The quantity is zeroed out once all the cans are donated and leave the clinic.

- 3) Are both staff signing in same little screen? Because there is no 2nd signature option.**

Only one signature is needed in TXIN from the staff member who is accepting the returned formula. However, both the staff accepting the formula and a witness should sign for disposal on the paper log.

- 4) Did you say we could use our own forms?**

Yes, your LA can create a form if it contains the same elements as those listed on the SA form.

- 5) Clarification, participant identifier, are you referring to PAN?**

Yes, any identifier listed in the policy can be used. Examples include: the PAN number, FID number, or participant's phone number. We recommend LA's determine one uniform identifier to be used across their agency for improved standardization.

- 6) Will there be a report in TXIN that can provide this information rather than a paper log to document inventory?**

We will be looking into using TXIN to document, but unfortunately, do not see that happening soon. We will need to use written documentation in the meantime.

- 7) In the Returned formula log example for 8/21/19 where 5 cans of Advance were returned - under what scenario, would quantity exchanged be "0"? - or is this in the case where formula from a previous month was turned in?**

Yes, if no formula is exchanged but formula is returned, it would be from a previous month.

- 8) Is the form intended to be filled out digitally? Are we able to make this electronic/digital?**

No, it wasn't designed to be electronic (fillable). However, we are looking into this. In the meantime, your LA can make it electronic (fillable) now if you would prefer.

- 9) Please explain more about the staff and witness signatures on the returned log? When does the witness need to sign?**

The staff signature is for who is handling the returned formula. A witness will only sign when formula is discarded in the clinic.

- 10) Are the formula disposal instructions currently in KB?**

Yes, the KB article has been posted as KA-02047.

- 11) There was a suggestion to have the donation form printed on carbon copy paper to allow us to give out a copy. Is that an option from state?**

We will investigate this beginning with a survey to gauge the amount of interest in this option.

- 12) Is the expiration date on the donation form the same as the earliest expiration date on the returned formula log?**

Yes.

- 13) On the returned formula log do you always enter NA as date removed for formula from previous month? Does it not appear in TXIN?**

If formula is returned from a previous month and is never added to TXIN inventory, then NA would be appropriate to enter under the "date to remove from TXIN" column. This would show it didn't need to be removed from TXIN inventory. It is no longer necessary to process formula from a previous month using the "in stock only" option in TXIN.

- 14) Do we still need to print screenshots or documentation for formula crossing hands?**

No, this is not needed in TXIN.

15) Do we need to have a signature space on the sheet since the signatures will be in the system when we remove formula from stock? Also, can we have people initial in the system so will have both names in there?

Yes, a signature space is needed. Because TXIN will only capture return of formula from current month issuance, it is necessary to have the signature of staff handling all formula (current or previous). On the Returned Formula Log, the second signature is only needed when formula is discarded. Because TXIN will not capture all information related to the inventory process, a paper log of some kind is needed to help you track the formula from return to disposal or donation. This will help create clear documentation for monitoring.

Formula Exchange Process

1) Is there a reason that we can't receive the formula as "damaged"? It would keep it in inventory to be "destroyed" but wouldn't reissue it out to another participant. It would be in inactive formula inventory until destroyed right?

You can select the "damaged" option as the reason for the formula exchange during the exchange process. We also recommend entering the current date as the expiration date for added security against system reissuance.

2) Will staff do the same formula exchange process that we have normally done in TXIN?

Yes, for any formula that is returned from current month issuance, follow the same processes that you have been using. When you dispose or remove the formula from your inventory, it will be a separate process from the exchange.

3) Do we have to "Inactivate" formula for now, so the system does not issue it?

Yes, formula in "inactive inventory" is not re-issued.

4) Inventory control needs to be completed weekly, monthly, etc.?

It should be done in a timely fashion, but at least monthly is recommended. How often will depend on what you plan to do with the physical containers and what is practical for your agency and clinics. Local agencies should determine expected frequency for all clinics.

5) Do we only put in TXIN what is eligible for donation?

You will enter in TXIN all returned containers needed for a current

month exchange. These containers can be donated or disposed as determined by the agency. Containers purchased from a previous month but not needed for an exchange do not need to be tracked in TXIN and instead should be tracked by the paper log.

Donation Form Documentation Process

1) If we already documented on the 1st form (formula log) that it was donated, why are we filling out a 2nd (donation form) that says the same thing?

The Formula Log is your record of what happened to the returned formula while it was in your clinic. The Donation form is to show proof it was accepted by the nonprofit organization and requires a representative's signature. It shows proof of the change of hands.

2) Do we need to give a copy of the donation form to the nonprofit accepting the formula?

It is not required by our procedures, but you can provide a copy if they would like one for their records.

3) Can we donate formula that was issued from previous months?

Yes.

Donation Process

1) If we are planning on collecting the formula from the clinics and having the nonprofit pick up all collected formula from one location:

a. Do you want the clinic sites to use the date the formula leaves the actual clinic or the day the formula is picked up by the nonprofit? Document the date the formula leaves?

Each location will need to track the formula separately. Example: Returned formula containers will be picked up from the clinic by LA staff and taken to the Admin office. The clinic will log the formula cans leaving their clinic. The Admin office will document the containers they receive and then when and where they go next. The donation form captures when the non-profit picks them up if that is the arrangement.

b. Will the clinics be transferring the cans via the MIS?

No. Because only formula returned from the current month is processed through the MIS, it is better to document transfer of cans through the paper logs.

2) Is ECI an eligible agency to donate to?

If your local ECI office agrees to accept the formula, yes they would be.

3) Could we possibly work with Life Houston and have them pick up all returned formulas for all sites?

It is up to your agency to coordinate with a local nonprofit organization. Logistics of receiving donations will be up to the nonprofit and your local agency.

4) What about metabolic formula returns? Is there any protection that these formulas will not be used incorrectly by donation sites?

It will be up to the nonprofit to determine what formulas they will accept. If the local agency does not feel confident that specialty formula will be used appropriately, the local agency may choose to discard the formula.

5) Would we need legal disclosure stating no responsibility, in case of an incident due to incorrect use?

The state does not require this.

6) Someone needs to pick up formula to be donated, correct?

Local agencies will need to work with nonprofit to decide whether the formula can be dropped off or picked up by the nonprofit agency staff. Either is acceptable.

7) Are we allowed to refer clients to those specific food banks/agencies that come for our formula?

Food bank referrals may be made as they were prior to the change in policy. Staff must not show preference to the WIC formula donation sites when making a referral.

8) If we are not able to give it to our clients, why is it acceptable to donate?

The USDA advised us to consult our legal counsel for direction regarding our ability to donate. HHSC's legal counsel pointed to the laws referenced in the revised draft of FD 19.0 Policy. They indicate that entities who donate apparently wholesome food products to nonprofit agencies for distribution to the needy would not be held civilly or criminally liable. A nonprofit organization's decision to accept those donations is up to the organization and their governing body. Please keep in mind this policy is still in draft and is pending final USDA approval.

Monitoring

1) When will monitoring begin?

We do not have a date to start monitoring on the revised policy.

Security of Formula Containers

1) Does returned formula have to be stored in a locked area before it is disposed or donated?

Yes, returned formula should still be stored in a locked area, out of view of the public, before disposal or donation.

Staff Roles

1) Who has access to remove the formula from stock, as far as user roles in TXIN?

We are not aware of any limitations on staff roles for removing returned formula from inventory. Please let us know if you run into any restrictions.

2) The individual signing the Returned Formula log is also the individual that is removing the formula from inventory and signing the E-signature page, correct?

Yes, the signature will be of the staff member who is handling the return.

Disposal Steps

1) In TXIN is there a donate option or only discard and how do we document if we are donating instead of discarding?

There is no option in TXIN for donating. The only options are "Damage" or "Expire." The Returned Formula Log should be used to document if the formula is donated or discarded.

2) Each time we remove formula from inventory, we follow these steps you just covered in TXIN, including E-signature?

Yes. Any updates will be included in the recorded training. If you have any questions relating to these steps please contact the service desk.

3) Can the formula be taken in as "In Stock Only"?

This is not recommended, because this will prompt the formula to be

issued out. Doing this will add formula to your inventory and will prompt staff to issue it out.

4) Can staff damage the formula before completing the exchange to avoid issuance issues?

While this is an option, we have heard that in the live environment this has not proven reliable in preventing reissuance of formula. We are recommending to enter today's date as the expiration date as well as marking it as damaged. This method seems to be ensuring that TXIN will not prompt reissuance.

Implementation Date

1) Will this will take effect on Oct 1st?

Yes.

2) What should we do with formula that is currently in inventory as of October 1st?

All formula still in inventory must either be donated or discarded.

Policy Related Questions

1) Do we need to have a physical count of formula returned and donated? Or, is the top section on the Returned Formula Log showing that we have disposed of it or donated it sufficient?

Standard inventory procedures need to be followed for returned formula. If formula is held in the clinic prior to donation, there will need to be a physical count that is routinely reconciled against a documented count.

2) We have clients that have hard times, can we give them formula from our returned formula if we have some on hand & that is what food banks do when they give formula to babies?

Unfortunately, no. Returned formula cannot be given to participants for any reason. Additionally, we may not issue additional formula to participants that exceeds what is allowed in exchange.

3) Are the forms part of the policy on the website?

The forms will be attached to memo #19-078 posted [here](#).

4) Is it ok to just dispose all formula or do you prefer to donate?

We encourage local agencies to donate formula. If local agencies are unable to, they may discard formula that is returned to the clinic.

5) Will this training be recorded?

Yes, the training will be recorded. Some adjustments to the content will be made to better address questions received since the live trainings.