

# ARPA Waivers at a Glance

01/2026

## Introduction

The American Rescue Plan Act (ARPA) waivers, in effect until September 30, 2026, permit the exemption of physical presence and allow remote issuance of benefits for WIC certification and re-certification appointments, provided necessary measurements are obtained within specified time frames. Refer to [Implementation of WIC ARPA Waivers](#) for full ARPA waiver guidance.

## Obtaining anthropometric and hematological data

Local agencies must establish procedures to obtain required measurements prior to or at the time of the WIC appointment via WIC clinic measurements or referred measurements (measurements obtained from another health professional). See Minnesota Operations Manual (MOM) sections [5.3.1](#) and [5.3.2](#) for referral data criteria.

## WIC clinic measurements

When to use	Documentation	Benefits Issuance and Measurement Follow-Up
<p>Participant has <b>all required measurements taken by the WIC clinic by the time of the certification</b> (or mid-certification) and measurements meet the following criteria:</p> <ul style="list-style-type: none"> <li>Height/length and weight were obtained no more than 60 days prior to WIC certification (30 days for infants).</li> <li>Hemoglobin was obtained no more than 90 days prior to WIC certification.</li> <li>Date of measurements reflects the current WIC category for which the participant is being certified (e.g., infant, child, pregnant, post-partum).</li> </ul>	<p><b>During Certification</b> Demographics:</p> <ul style="list-style-type: none"> <li>Physically Present: Yes</li> <li>Reason Not Present: N/A</li> </ul> <p>HT/WT/Blood:</p> <ul style="list-style-type: none"> <li>Enter actual date measurements were taken.</li> <li>Measurement Source (HT/WT): <i>WIC Clinic</i></li> </ul>	<p><b>Benefits issuance:</b> 1-3 months, limited by required signatures and CPA determined need based on individual assessment.</p> <p>See <i>Required signatures</i> section.</p> <p><b>Measurement follow-up:</b> No additional tracking or follow-up required if measurements are available and entered at the time of certification.</p>

## Referred measurements

Referral data available at the time of the WIC certification:

When to use	Documentation	Benefits Issuance and Measurement Follow-Up
<p>Participant has <b>all required measurements from a health professional (including from FHV or C&amp;TC) available at the time of the certification</b> (or mid-certification) and measurements meet the following criteria:</p> <ul style="list-style-type: none"> <li>Height/length and weight were obtained no more than 60 days prior to WIC certification (30 days for infants).</li> <li>Hemoglobin was obtained no more than 90 days prior to WIC certification.</li> <li>Date of measurements reflects the current WIC category for which the participant is being certified (e.g., infant, child, pregnant, post-partum).</li> </ul>	<p><b>During Certification</b> Demographics:</p> <ul style="list-style-type: none"> <li>Physically Present: <i>No</i></li> <li>Reason Not Present: <i>Referral Data Used</i></li> </ul> <p>HT/WT/Blood:</p> <ul style="list-style-type: none"> <li>Enter date measurements were taken.</li> <li>Measurement Source (HT/WT): <i>Medical Clinic, Child &amp; Teen Check-Up, or Home Visit, as appropriate.</i></li> </ul>	<p><b>Benefits issuance:</b> 1-3 months, limited by required signatures and CPA determined need based on individual assessment.</p> <p>See <i>Required signatures</i> section.</p> <p><b>Measurement follow-up:</b> No additional tracking or follow-up required if measurements are available and entered at the time of certification.</p>

Deferred measurements received from referral source after the WIC certification:

When to use	Documentation	Benefits Issuance and Measurement Follow-Up
<p>Participant hasn't yet had the required measurements taken, but <b>has an upcoming appointment scheduled, in which a health professional will obtain all required measurements.</b> Measurements must meet the following criteria:</p> <ul style="list-style-type: none"> <li>• Height, Weight, and hemoglobin will be taken within 60 days of WIC certification appointment.</li> <li>• Date of measurements will reflect the status of the participant as certified (e.g., infant, child, pregnant, post-partum).</li> <li>• Must be reviewed by WIC Competent Professional Authority (CPA) upon receipt.</li> </ul> <p>Use of deferred measurements should be limited and only used after a concerted effort was made to get referral measurements prior to or at the time of the WIC certification.</p> <p><b>* Deferred measurements are not allowed for mid-certification appointments.</b> It may be necessary to provide 1 month of benefits and schedule the mid-certification for following month if measurements are not available at the time of a mid-certification.</p> <p>See <a href="#">Implementation of WIC ARPA Waivers</a> for deferring measurements outside of Standard Operating Procedures.</p>	<p><b>During Certification</b></p> <p>Demographics:</p> <ul style="list-style-type: none"> <li>• Physically Present: <i>No</i></li> <li>• Reason Not Present: <i>Measurements Deferred</i></li> </ul> <p>HT/WT/Blood:</p> <ul style="list-style-type: none"> <li>• Height &amp; Weight: <i>Unknown</i></li> <li>• Hemoglobin: <i>Measurements Deferred</i></li> <li>• Document deferral period in an alert.</li> </ul> <p><b>After Certification (measurements received)</b></p> <p>HT/WT/Blood:</p> <ul style="list-style-type: none"> <li>• Enter actual date of measurements.</li> <li>• Measurement Source (HT/WT): <i>Medical Clinic</i> (or actual measurement source)</li> <li>• See below regarding participant identified as high risk upon receipt of measurements.</li> <li>• Document <i>deferred measurements reviewed</i> in a "ht/wt/hgb" note.</li> <li>• <b>High risk identified after deferral data received:</b> CPA must contact participant to provide appropriate nutrition education and develop/document a high-risk care plan according to MOM <a href="#">Section 6.6</a>.</li> <li>• If "Other-see-notes" for the Physical Presence Exception field of the Information System (Reason Not Present) is selected, document the specific circumstance in a Physical Presence Exception note.</li> </ul>	<p><b>Benefits issuance:</b> 1-2 months at the time of certification, limited by required signatures and CPA determined need based on individual assessment.</p> <p>1 month at a time once deferral period has expired (60 days after certification).</p> <p>See <i>Required signatures</i> section.</p> <p><b>Measurement follow-up:</b> Local agencies must establish procedures to track and obtain deferred measurements within the required time frame.</p> <p>If deferred measurements are not received before the deferral period expires (60 days after certification), the WIC agency should make efforts to schedule an in-person WIC appointment to obtain required measurements.</p> <p>Continue efforts at least monthly until measurements are obtained via referral data or in WIC clinic.</p>

## Required signatures

- *Primary Card Holder* and *Certification* signatures (Rights & Responsibilities) are required within 30 days of the WIC certification.
- The local agency must develop and implement procedures to track and obtain required signatures.
  - **Only One (1) month of benefits may be issued at a time until the required signatures are obtained.**
  - All signatures must be scanned into the participant record when not captured on the signature pad.
  - To proceed past the *Rights & Responsibilities* signature in the Information System, CPA should write "phone cert" and initial the signature pad.
- Private data may not be released until/unless the signed Release of Information (ROI) form is received.
- **WIC benefit issuance must not be limited due to lack of ROI signature.**
- Signatures may be obtained electronically via DocuSign or the [Participant Signature Form](#).

It is best practice to send the electronic signature request to participants at the end of their appointment, while still on the phone/video call, to facilitate timely signatures with guided assistance from WIC staff.

## References

Implementation of WIC ARPA Waivers

(<https://www.health.state.mn.us/docs/people/wic/localagency/arpaguide.pdf>)

Section 5.3.1: Anthropometric Data

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_3\\_1.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_3_1.pdf))

Section 5.3.2: Hematological Assessment

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_3\\_2.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_3_2.pdf))

Section 6.6: High Risk Individual Nutrition Care Plans

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch6/sctn6\\_6.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch6/sctn6_6.pdf))

Participant Signature Form (<https://redcap.health.state.mn.us/redcap/surveys/?s=TD4P4PEJPT>)