

Section 4.3: Competent Professional Authority (CPA) Qualifications and Responsibilities

9/2018

References

246.2 Definition of competent professional authority

246.6(b)(2) Perform certification procedures

246.7(e) Determine nutritional risk

246.7(i)(7) Sign certification form

246.10(a)(2)(iii) Prescribe supplemental food

246.11(e)(5) Provide individual care plan

USDA [WIC Nutrition Services Standards](#), *Nutrition Services Staffing*, Standard 3 (M, N,O)

Policy: Grantees are responsible for employing qualified CPAs in sufficient numbers to determine nutrition risk eligibility, provide nutrition education, and prescribe an appropriate food package for each participant.

Purpose: To ensure that qualified professionals are making decisions about eligibility and nutrition risk, and providing appropriate, competent nutrition services.

Definitions

- **Competent Professional Authority (CPA):** In the local agency (LA), a CPA is authorized to conduct nutrition and health assessments, determine nutrition risk, provide individualized nutrition education, and prescribe supplemental foods. The specific role of an individual CPA will depend on his/her education, experience, and professional credentials.
- **Registered Dietitian Nutritionist (RDN):** An individual with a minimum of a bachelor's degree in an accredited nutrition program and registered with the Commission of Dietetic Registration (CDR). RDNs have completed 1200 hours of supervised practice and passed a national exam.
- **Licensed Dietitian (LD):** An individual with a minimum of a bachelor's degree in an accredited nutrition program and licensed by the State of Minnesota Board of Dietetics and Nutrition Practice; Minnesota Statutes, Section 148.621 to 148.633. LDs have completed 900 hours of documented supervised practice in nutrition or have a doctoral degree from an accredited college with a major course of study in nutrition. LDs may also have valid current registration with the Commission of Dietetic Registration.

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- **Licensed Nutritionist (LN):** An individual with a master's or doctoral degree in an accredited nutrition program and licensed by the State of Minnesota Board of Dietetics and Nutrition Practice; Minnesota Statutes, Section 148.621 to 148.633. LNs have completed 1000 hours of documented supervised practice in nutrition or have received certification from the Certification Board for Nutrition Specialists.
- **Nutrition and Dietetics Technician, Registered (NDTR):** An individual educated and trained in nutrition and dietetics practice for the delivery of safe, culturally competent, quality food and nutrition services. NDTRs work under the supervision of an RDN. Successful completion of a Dietetic Technician accredited program includes 450 hours of supervised practice with at least a two year associate degree and successful completion of the Registration Examination for Dietetic Technicians.
- **Paraprofessional CPA:** An individual who has not attained a college degree to otherwise qualify for hiring as a CPA, but who is of a culture and/or speaks a language needed to serve participants from that community. To work as a paraprofessional CPA, such an individual must receive extensive training and mentoring to assure they acquire and maintain the minimum competencies needed in WIC. This individual can serve low risk participants under continuous supervision, and with ongoing training and mentoring from a local agency's nutrition professionals. See Section 4.3.1 below.
- **CPA Competencies:** Skills and tasks necessary to certify and serve WIC applicants and participants. The competencies will be attained through training and assured through initial and on-going monitoring of performance.
- **Cultural Competency:** For the purpose of this policy, cultural competency is defined as having extensive knowledge and experience of the cultural patterns and practices of a specific community, especially related to the beliefs and practices affecting maternal and child health and nutrition.

Procedures

WIC is a nutrition program in which individuals are assessed for nutrition risk, provided targeted nutrition education and referrals, and a food package. While many participants are considered "low risk", WIC serves many vulnerable individuals at high nutrition risk. The MN WIC Program is committed to assuring that Local Agencies have the staff to address these special nutrition needs.

1. **The goal of the MN WIC Program is for LAs to employ or contract with a credentialed nutrition professional (i.e., an RDN, Minnesota LD or LN) to plan and oversee the nutrition services for the agency.** The credentialed nutrition professional should be designated to serve high risk participants and/or oversee high risk services provided by the agency's other (non-nutrition credentialed) CPAs. See Guidance for other suggested roles and responsibilities for credentialed staff.

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- If the Grantee does not employ an RDN/LD/LN, when a staff opening occurs the grantee must attempt to recruit and hire one. See Guidance for suggestions. State WIC Consultants are available to assist.

2. In addition to CPAs with nutrition credentials, LAs may hire individuals with other credentials and/or related post-secondary education to function as a CPA. Agencies must ensure these individuals receive appropriate training before functioning as a CPA. The following are acceptable credentials/education:

- Bachelor's or Master's Degree in Nutrition such as Nutritional Sciences, Community Nutrition, Clinical Nutrition or Dietetics.
- Registered Nurse Licensed by the Minnesota Board of Nursing pursuant to Minnesota Statutes, Section 148.171 to 148.285. Preference should be given to nurses with a bachelor's degree or higher.
- Bachelor's or Master's Degree in Health or Home Economics field with applicable coursework in nutrition. *At a minimum*, coursework must include:
 - 10 semester (or 15 quarter) credits in Food and Nutrition, including coursework in general human nutrition, and in nutrition for infants, children, and women during prenatal, postpartum, and breastfeeding stages; **and**
 - 3 semester (or 4 quarter) credits in the principles of counseling and/or adult education; **and**
 - 3 semester (or 4 quarter) credits in Chemistry or Biological Sciences.

Use Exhibit 4-A: [Local Agency Application of Applicant Coursework](#) to evaluate health and home economic coursework, and consult with your State WIC Consultant as needed.

- Nutrition and Dietetics Technician, Registered by the CDR.
- Paraprofessional CPA requirements are addressed in Section 4.3.1 below. Also see Exhibit 4-L: [Written Plan for Local Agency to Complete Before Hiring a Paraprofessional CPA](#) and Exhibit 4-K: [Staffing Roles Grid for Nutrition Services](#)

3. Preparation and training requirements – All CPAs must:

- Complete nutrition modules and training in certification procedures, based on the individual's credentials and experience.
 - Successfully complete all phases of the Staff Training Policy ([Section 4.5: Staff Training](#)). Each phase incrementally builds skills to increase the CPA's capacity and role.
 - Successfully complete the Minnesota WIC [Nutrition Modules](#) before the end of the training period for all individuals without nutrition credentials. See [Section 4.5: Staff Training](#).
- Demonstrate proficiency in CPA competencies per Local Agency Staffing Policy, [Section 4.6: CPA Monitoring and Oversight](#).

- Participate in on-going staff development and training. See [Section 4.5: Staff Training](#).

4. All CPAs are responsible for certifying participants, including the following activities:

- Nutrition and health assessments
- Nutrition risk determination
- Final eligibility/ineligibility determination.
- Providing nutrition education addressing participants' nutrition risks.
- Conducting follow-up nutrition assessments as needed, with corresponding nutrition education.
- Prescribing appropriate supplemental foods based on participant category and individual needs and preferences.
- Referring all requests for *Medically Prescribed Formula* to a CPA designated to serve high-risk participants. See [Section 6.6: High Risk Individual Nutrition Care Plans](#).

Guidance

1. If the number of credentialed nutrition professional(s) (RDN, LD or LN) and/or their hours are limited, Local Agencies should prioritize how their skills and time can best be utilized in the program. Below are a number of WIC program roles or functions, for which individuals with nutrition credentials would be uniquely qualified.
 - WIC Coordinator
 - Nutrition Education Coordinator
 - Breastfeeding Coordinator
 - Staff person designated to serve “high risk” participants and/or to oversee high risk services provided by the agency’s other (non-nutrition credentialed) CPAs.
 - Assist in assessing staff nutrition competencies and identifying training needs.
 - Resource to other staff in increasing their nutrition knowledge and understanding, and as a consultant to others on nutrition issues.
 - Participate in on-going staff development and nutrition training. See [Section 4.5: Staff Training](#).
 - Develop (or participate in developing) and implementing the Nutrition Education Plan for the agency or grantee.
 - Be fully trained to function as a CPA, as needed by the LA.
2. If a Grantee contracts with an RDN/LD/LN, the contracted hours should be adequate for accomplishing the nutrition-related responsibilities and training requirements.
3. Recruiting credentialed nutrition professionals:

- Consider contacting colleges with dietetics programs and advertising on the Minnesota Academy of Nutrition and Dietetics ([MAND](#)) website. Your State WIC Consultant can assist you with contact information.
- Contact your State WIC Consultant if unable to find suitable applicants with the desired credentials.

4.3.1 Paraprofessional CPAs

Policy: To meet the cultural and/or language needs of participants served by a LA, the agency may be approved to hire a para-professional CPA who speaks the language and/or is of the culture. Since these individuals lack the specified post-secondary education and nutrition credentials, they require extensive training and on-going monitoring.

Purpose: To meet the language and/or cultural needs of participants in order to best serve them, and to increase the diversity of the WIC workforce to better reflect the communities WIC serves.

Procedure

A written plan must be developed and approved **before** a paraprofessional CPA is hired. Local agencies must work with their State WIC Consultant from the beginning of the process. Paraprofessional CPAs may be hired if the plan is approved, and the LA assures that the following requirements will be met throughout the paraprofessional CPA's employment. See Exhibit 4-L: [Written Plan for Local Agency to Complete Before hiring a Paraprofessional CPA](#).

1. Local agencies must demonstrate their need to hire a paraprofessional CPA:

- The local agency must first attempt to hire a CPA with professional credentials who could meet the cultural and/or language needs of participants.
- The local agency serves participants of a non-majority culture and/or participants who speak another language than English.

2. Local agencies must demonstrate their ability to meet the requirements involved in employing a paraprofessional CPA:

- The local agency must have demonstrated compliance with WIC policies and procedures and had minimal required actions at recent management evaluations before taking on the responsibility of training, supervising, and mentoring a paraprofessional CPA.
- Paraprofessional CPAs require extensive preparatory and on-going training and mentoring throughout their employment.
 - The local agency must have nutrition professionals (RDN, LD, or LN) on staff and available to provide the required training, mentoring and continuous supervision at all clinic sites.

- Larger local agencies with multiple RDNs on staff would be better able to meet this requirement.

Paraprofessional qualifications:

1. Candidates for serving a local agency's non-English speaking participants, must be proficient in the community's language and knowledgeable of their culture.

- A high school diploma, or GED equivalent, and a year of employment that includes customer service is required. Consult your State WIC Consultant if it is not possible to find a candidate with these requirements to meet a language need.
- Candidates with some post-secondary education are preferred.
- Candidates must be willing and able to successfully complete the required training. See training requirements below.

2. Candidates for serving a particular cultural group must be a member of that cultural community, with extensive knowledge of their culture and socioeconomic conditions.

- Candidates must have completed an associate or bachelor's degree, in any of the following disciplines:
 - Public health; Community health education; Health education; Health science; Exercise science or other health-related degrees.
 - Biology; Family consumer science; Psychology; Adult and/or early childhood education; Human services; Social work; Sociology; Family social science; Global development/global studies.
 - Strong consideration should be given to candidates with coursework in nutrition, biology, and chemistry.
 - Candidates must be willing and able to successfully complete the required training. See training requirements below.

Paraprofessional CPAs must complete their training prior to certifying low risk participants:

- At minimum, complete two college-level nutrition courses within one year of hire:
 - **3 semester credits in a general nutrition course.** This course should cover the following areas: Fundamental concepts of nutrition, nutrient functions, human nutritional requirements, food sources, role of nutrition in chronic disease.
 - **3 semester credits in a lifecycle nutrition course.** This course should cover the following areas: Nutrition for infants, children, and women during prenatal, postpartum, and breastfeeding stages.
 - The State WIC Consultant will review documentation and provide guidance.
- Complete and document required [WIC New Staff Training](#):

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- New staff training must be completed within six months of hire.
- [Nutrition modules](#) must be completed within two months after completing the college nutrition courses.
- Successfully complete training in basic skills needed to function in the position and specific competency areas.
- Demonstrate attainment of required working skills.
- Paraprofessionals must receive extensive training to identify participants at higher nutritional risk to refer to a nutrition professional.

Ongoing and frequent training for paraprofessional CPAs is required:

- The RDN/LDN/LN must assess the paraprofessional CPA's training needs and assure that training is provided as needed; quarterly at a minimum.
 - Paraprofessionals must continue to meet minimum standards as assessed by periodic evaluation and identified training needs.
- Documentation of ongoing training must be kept for review at the Management Evaluation.
- Also, see [Section 4.5: Staff Training](#).

Supervision of paraprofessional CPAs:

- Paraprofessional CPAs and the local agency must meet the continuous supervision and training requirements specified in Local Agency Staffing Policy, [Section 4.6: CPA Monitoring and Oversight](#).
- This requirement is ongoing throughout the employment of the paraprofessional CPA, including during any time periods where staff turnover makes this supervision difficult.

Paraprofessional CPAs have a limited scope of practice:

- Paraprofessional CPAs are best suited to serve low risk participants.
- If the paraprofessional identifies that a participant has a high risk condition, the local agency must have a plan in place to assure that the participant receives appropriate care from a high risk CPA at follow-up appointments.
- See Exhibit 4-L: [Written Plan for Local Agency to Complete Before Hiring a Paraprofessional CPA](#).

Approval of paraprofessional CPAs:

- Approval of a paraprofessional CPA is provisional and may be revoked for the following reasons:
 - The local agency is not adequately training and/or supervising the individual.

- The individual has not adequately attained skills and competencies necessary to function as a CPA.
- The individual is working outside the approved scope of practice.
- If state-approval for employing the paraprofessional CPA is revoked, that individual may no longer function as a CPA.

Guidance:

- Local agency staff must work with their State WIC Consultant from the beginning of the process. A representative from the local agency should meet with their State WIC Consultant.
- Documentation of all training, chart reviews and observations should be kept for review at the Management Evaluation.
- Best practice is to test candidates on their language proficiency. Contact your State WIC Consultant for a list of test sites.

Reference – Complete Listing of Hyperlinks

WIC Nutrition Services Standards

(https://wicworks.fns.usda.gov/sites/default/files/media/document/wic-nutrition-services-standards_0.pdf)

Exhibit 4-A: Local Agency Application of Applicant Coursework

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4a.pdf>)

Exhibit 4-L: Written Plan for Local Agency to Complete Before hiring a Paraprofessional CPA

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4l.pdf>)

Exhibit 4-K: Staffing Roles Grid for Nutrition Services

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4k.pdf>)

Section 4.5: Staff Training

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch4/sctn4_5.pdf)

Nutrition Modules

(<https://www.health.state.mn.us/people/wic/localagency/training/nutmodules.html>)

Section 4.6: CPA Monitoring and Oversight

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch4/sctn4_6.pdf)

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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)

MAND (<https://www.eatrightmn.org/>)

WIC New Staff Training

(<https://www.health.state.mn.us/people/wic/localagency/training/nst.html#NaN>)

Minnesota Department of Health - WIC Program 625 Robert St N, PO BOX 64975, ST PAUL MN 55164-0975; 1-800-657-3942, health.wic@state.mn.us, www.health.state.mn.us. To obtain this information in a different format, call: 1-800-657-3942

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