

## X. Monitoring and Audits

### 10.1.030 State and Local Agency Monitoring Process

Authority 7 CFR 246.11(c)(5) & CFR 246.19(b)(1-4, & 6)

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**POLICY:** The WIC state agency shall establish an on-going management evaluation system which includes at least the monitoring of local agency (LA) operations, the review of LA financial and participation reports, the development of corrective action plans to resolve program deficiencies, the monitoring of the implementation of corrective action plans, and on-site visits. The results of such actions shall be documented.

The LA shall establish a management evaluation system to review their operations and those of associated clinics or contractors.

The LA will make available, for an on-going management evaluation system, the requested WIC records for review by the WIC monitoring team.

When the monitoring findings and recommendations are received, the LA:

- A. Must, if requested, participate in either an on-site visit or phone consultation with the designated WIC staff.
- B. Must prepare a Corrective Action Plan (CAP), including implementation timeframes, within 60 days of receipt of the State WIC program monitoring review report.

#### PROCEDURES:

- A. A member of the WIC monitoring team will communicate with the LA Coordinator to schedule a monitoring visit. This visit will include observations of clinics and review of records, reports, documentation, etc.
- B. The LA will make available the requested WIC records for review by the WIC monitoring team. The records will include but are not limited to:
  - 1. Record destruction documentation.
  - 2. Audit exceptions.
  - 3. Financial records.
  - 4. Correspondence.
  - 5. Office policies.
  - 6. Local agency plan (LAP).
  - 7. Staff training records.
  - 8. Planning documents.
  - 9. Inventory records.
  - 10. News release and public notification files.

11. Outreach plan, as well as the activities conducted as part of the plan.
  12. Nutritionist transcript copies.
  13. Documentation of agreements with health care providers for referrals.
  14. Memoranda of Agreement/Understanding with local organizations.
- C. The LA will provide adequate workspace for the monitors to review the records, and provide access to MOWINS and the Internet, if requested.
- D. The LA coordinator will assure that all appropriate staff attends the exit interview conducted by the monitoring team, normally on the last day the agency is monitored.
- E. When the monitoring findings and recommendations are received, the LA:
1. Must, if requested, participate in either an on-site visit or phone consultation with the designated WIC staff to review the findings, recommendations, and to discuss the appropriate methods to correct the findings.
  2. Must prepare the Corrective Action Plan (CAP). The CAP shall be submitted to the designated WIC staff in the format specified and by the date stated on the Findings and Corrective Action Plan (CAP) Form.
- F. The LA response should be prepared on the Findings and CAP form provided by the WIC State program. The submitted plan must contain:
1. An explanation of how each finding will be corrected, implemented, and evaluated.
  2. The expected implementation dates for each response.
  3. The identification of the staff that will be responsible for implementation of the action.
  4. A method of determining and documenting the findings have been resolved.
  5. In those instances where a finding correction cannot be implemented, the justification as to why the finding is not appropriate or why correction is not possible should be specifically explained.
- G. Once the monitoring response is approved, the designated WIC staff will return copies of the approved CAPs and will request a written acceptance of the WIC CAP as approved by the WIC Coordinator or local agency administrator.
- H. The WIC Central Office will send a request for completion of the CAP Progress Report to the LA for follow-up within six months of approval of the plan, unless WIC state staff determine additional time is needed for LAs with intensive technical assistance needs. The LA will send the completed CAP Progress Report to the designated WIC staff for review within the timeframes requested.
- I. The WIC Central Office will send a request for completion of the self-monitor forms to the LA for follow-up within nine to twelve months from the monitor date, unless WIC state staff determine additional time is needed for LAs with intensive technical assistance needs. The LA will send the completed Self Monitor Report to the designated email address for review within the timeframes requested.

- J. The LA will keep on file for audit purposes and for follow-up the monitor findings, the LA response and implementation plan, documentation of all actions taken related to the monitoring findings, a copy of the CAP Progress Report, and a copy of the Self Monitor Report.