

Section III: State Agency Procedure Manual

X. State Monitoring and Audits

A. Monitoring

Purpose

Ensure program compliance, quality and integrity through desk and on-site monitoring processes.

Policy

The State WIC Office monitors at least 20 percent of all independently operating WIC clinics within each local WIC agency at least biennially to review compliance with federal regulations, state policies and procedures, and contracts.

1. State WIC Office Responsibilities

- A monitoring schedule for the 12-month period of the Federal Fiscal Year will be drafted by July 31st of the previous fiscal year. The needs and schedules of each local agency are accommodated when possible.
- The State WIC Office will notify local agencies of travel dates, clinics to be visited, tentative arrival and departure times, items requested to be submitted 30 days prior to visit, and state staff assigned to the monitoring in a letter at least 60 days before the scheduled visit.
 - If a local agency operates a Breastfeeding Peer Counselor Program and/or a Farmer's Market Nutrition Program (FMNP), these will be reviewed during the regular program monitoring using additional materials specific to those programs.
- Provide updated monitoring forms for use during the review and during self-monitoring in the state plan which is posted on the state's website.
- State WIC Office staff will review participant records prior to the local program onsite review.
- State Office staff will perform onsite monitoring using standard forms to observe the overall clinic environment, local agency processes, and participant appointments. Follow-up on items found in pre-monitoring activities will also be completed onsite.
 - If appointments or activities are not available for actual observation, the monitor will interview local agency staff on their processes for validation of compliance and understanding.
- The state staff will facilitate completion of a monitoring report, scoring matrix, and formal cover letter to be sent no more than 30 days after the onsite monitoring visit.
- The local agency shall submit a Corrective Action Plan (CAP) addressing all the findings in the report within 30 days of receipt of the monitoring report. The CAP will be sufficiently detailed to ensure that the finding area will be resolved by local agency training, resource development, or process changes.
- State staff will review and either approve or deny the submitted CAP within 30 days of receipt.
- The local agency shall submit proof that CAP activities were completed via CAP Verification within 60 days of CAP approval letter.
- State Office staff will review and either approve or deny the submitted CAP Verification within 30 days of receipt.

- Appropriate follow-up to finding areas will be completed on schedule (based on Tier) throughout the following 2-year cycle until the next scheduled monitoring evaluation.
- The State WIC Office will provide technical assistance and training to local agencies when necessary to resolve areas of non-compliance.
- The State WIC Office will inform USDA of unresolved problems, delays or adverse conditions found during the monitoring process.

2. Monitoring Forms/Reference Material

- Forms and processes used for biennial local agency monitoring will remain set for each two-year monitoring cycle, including:
 - *Monitoring- Breastfeeding Peer Counselor Program (BFPCP)*
 - *Monitoring- Financial Questionnaire*
 - *Monitoring- Chart Review Areas Explained*
 - *Monitoring- Chart Review Form*
 - *Monitoring- Farmers Market Nutrition Program (FMNP)*
 - *Monitoring- On-site Observation for Clinic*
 - *Monitoring- On-site Observation for Appointments*
 - *Monitoring- Pre-Visit Worksheet*
 - *Monitoring Process*
- Additional resources may be located on eLearn or sent directly to the local agency while monitoring, including:
 - Scoring Matrix (small, medium, or large version)
 - Corrective Action Plan (CAP) Verification Template
 - Monitoring Process Flowchart