

Chapter 6 - Local Agency Monitoring

TABLE OF CONTENTS

MONITORING	1
Review of Local Agency Operations	1
Local Agency Monitoring Procedures	3
On-Site Visits.....	3
<u>Local Agency Monitoring Standards</u>	3
<u>Local Agency Self-Assessment</u>	4
<u>Disqualification of Local Agencies</u>	4
<u>Appeal of State Agency Decisions</u>	5
<u>Notification of Sanctions</u>	5
Requirements and Procedures.....	5
LOCAL AGENCY MONITORING REVIEW FORM	6
Organization of WIC Local Agency Monitoring Standards	6
Organization of WIC Local Agency Monitoring Standards	7
Chart Audit Guidelines	33
SUMMARY OF CHART AUDIT FINDINGS	36
Participant Interview Form	37

Local Agency Reviews

MONITORING

Review of Local Agency Operations

Federal WIC regulations require the Alaska WIC Program Office conduct a management evaluation of each local WIC agency at least once every two years.

The state agency on-going monitoring system includes:

- the monitoring of local agency operations;
- the review of local agency financial and participation reports;
- on-site visits; and
- the development of corrective action plans to resolve program deficiencies.

The Alaska WIC Program goals align with the focus of the Management Evaluation. Local Agency reviews assess how the WIC Local Agency is doing in reference to their nutrition education plan and related areas stipulated on their WIC Grant.

The Alaska WIC Program Strategic Plan Goals are:

- Goal 1** Meet or exceed federal caseload targets
- Goal 2** Assure program continuity in the face of flat federal funding levels
- Goal 3** Support and sustain quality nutrition programs
- Goal 4** Reduce the Prevalence of Overweight and Obesity among Alaskan Children (Healthy Alaska 2010 Nutrition Indicator #2)

Monitoring includes the review of WIC functional areas, supporting documents and on-site observations.

The WIC Functional areas are:

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing and Organization
- 6.0 Organizational Structure and Management Practices
- 7.0 Food Delivery/Food Instrument Accountability
- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10. Financial Management

The ME reviews 9 WIC Functional Areas to assess how the Nutrition Services Standards are met, using several supporting ME documents.

WIC Functional Areas	Nutrition Services Standards	ME Supporting Documents
1.0 Nutrition Services	Staffing Qualifications NS Plan & Evaluation Nutrition Education Contacts Nutrition Education Materials Participant Centered Education Breastfeeding Education/Support Clinic Environment Data Collection Nutrition Assessment Food Package Prescription	<ul style="list-style-type: none"> ◆ Local Agency Self Assessment ◆ Previous SFY and Current WIC Grant ◆ Current SFY Quarterly Reports ◆ Chart Reviews ◆ Previous and Current SFY WIC Nutrition Reports 340 and 346
2.0 Clinic Operations	Staffing Customer Service Clinic Environment Nutrition Education Contacts Nutrition Assessment Referrals Nutrition Education Contacts and Evaluation	<ul style="list-style-type: none"> ◆ WIC 505a Participation Report ◆ Previous SFY and Current WIC Grant ◆ Current SFY Quarterly Reports ◆ Chart Reviews
3.0 Caseload Management & Outreach	Program Outreach & Marketing Staffing Patterns Nutrition Education Contacts	<ul style="list-style-type: none"> ◆ Local Agency Self Assessment ◆ Current SFY Quarterly Reports ◆ Chart Reviews
4.0 Civil Rights	Nutrition Education Contacts	<ul style="list-style-type: none"> ◆ Local Agency Self Assessment
5.0 Staffing and Organization	Staffing Patterns, Recruitment & Retention Staff Training	
6.0 Organizational Structure and Management Practices	Staffing Patterns, Recruitment & Retention	
7.0 Food Delivery/Food Instrument Accountability	WIC Food Selection & Authorization Food Package Prescription	
8.0 Vendor Relations		<ul style="list-style-type: none"> ◆ Local Agency Self Assessment ◆ Vendor Management Report
9.0 Farmers' Market Nutrition Program		<ul style="list-style-type: none"> ◆ Local Agency Self Assessment
10.0 Financial Management		<ul style="list-style-type: none"> ◆ Current SFY Financial Information ◆ Last SFY Time Studies ◆ Last SFY Inventory

11.0 Information Management System		◆ Local Agency Self Assessment
------------------------------------	--	--------------------------------

Local Agency Monitoring Procedures

On-Site Visits

On-Site Visits

The state agency conducts monitoring reviews of each local agency at least once every two years. The reviews include on-site reviews of a minimum of 20 percent of the clinics in each local agency or one clinic, whichever is greater. The state agency may conduct such additional on-site reviews as the state agency determines to be necessary in the interest and effectiveness of the program.

The state agency will provide advance notice of an on-site monitoring visit. The on-site visit may be made by a single individual or by a team, depending on the size of the local agency. If a team is involved, one individual will be designated as the team leader. Team members will be responsible for specific components of the review, such as Nutrition Services or Financial Management. Team members may or may not make on-site visits as a group.

Review findings will be discussed with the local agency staff on-site at the end of the review. If the review is done by a team, the team leader will discuss results of the review. A written review report will be sent to the local agency within 30 days of the completion of the review.

Corrective Action Plans

Local agencies are required to submit a corrective action plan to redress deficiencies identified during the review by the state agency, within 60 days of receipt of the written report.

The state agency will evaluate the adequacy of the corrective action plan and follow-up with the local agency to ensure corrective action measures are implemented. The state agency will send the local agency written notification of closure of the review.

Monitoring Standards

Local Agency Monitoring Standards

<http://www.nal.usda.gov/wicworks/Topics/WICnutStand.pdf>

The USDA, Food and Nutrition Services WIC Nutrition Services Standards published October 2001 are incorporated into the LA Self-Assessment document. It simplifies and streamlines the self-assessment process. The NSS becomes the Alaska WIC standard for LA ME review.

Some assessment of performance may be conducted prior to an on-site review, by examination of local agency financial reports, computer data sent to the state agency,

and similar records. A copy of the standard review form is included at the end of the section.

Local Agency Self-Assessment (See Pages 8-13)

Self-Assessment

Local agencies are required to complete the self-assessment, using the Local Agency Self-Assessment Standards document. LAs need to check “Yes” if the NSS is met. Check “No” if the NSS is not met, and check “NA” if the NSS does not apply. A space is provided for brief comments. The completed form is due in the state agency office a week prior to the scheduled ME.

Disqualification of Local Agencies

The state may disqualify a local agency when the state:

- Determines noncompliance with Program and state regulations;
- Determines Program funds are insufficient to support the continued operation of all existing local agencies at their current participation level; or
- Determines following a review of local agency credentials, that another local agency can operate the Program more effectively and efficiently.

Local Agency Disqualification

The state will consider:

- The availability of other community resources to participants and the cost efficiency and cost effectiveness of the local agency in terms of both food and administrative and program services costs;
- The percentages of participants in each priority level being served by the local agency and the percentage of need being met in each participant category; Do we actually do this? I don't believe I ever have. How do we help LA meet the percentage we want and what percentage is that? Thanks. Perhaps we need to put this on the chart review form also?
- The special populations served by the local agency;
- The capability of another local agency or agencies to accept the local agency's participants; and
- The local agency's past record of performance.

When disqualifying a local agency under the program, the state will:

- Make every effort to transfer affected participants to another local agency without disruption of benefits;
- Provide the affected local agency with written notice not less than 60 days in advance of the pending action which includes an explanation of the reasons for disqualification, the date of disqualification, and, except in cases of the expiration of a local agency's agreement, the local agency's right to appeal; and
- Ensure that the action is not in conflict with any existing written agreements between the state and local agency.

Disqualification will be made in accordance with Chapter 78 of the Alaska Administrative Code (7 AAC 78.290).

Appeals

Appeal of State Agency Decisions

Local agencies may appeal state decisions which adversely affect the local agency. A local agency may appeal a state agency decision if the state agency:

- denies the local agency's application to act as a WIC local agency;
- disqualifies, suspends or otherwise imposes sanctions on the local agency during the term of the state WIC office's agreement with the local agency; or
- makes a decision to require a WIC local agency to refund money that was granted to the WIC local agency under a WIC grant.

Sanction Notification

Notification of Sanctions

When the state agency intends to impose sanctions on a local agency or denies a local agency's application to participate, the state agency will send written notice to the local agency by certified mail at the last address provided by the local agency. If the state agency proposes to disqualify a local agency, the state agency will send notice to the local agency at least 60 days before the pending action will take place.

In the notice the state agency will set forth:

- the reason for denial of the local agency's application; or if applicable;
- the nature of the discrepancies or violations;
- the dollar value of the discrepancies or violations;
- the method of computing the dollar value;
- notice of further actions to be taken or sanctions to be imposed by the state WIC agency;
- the effective date of the action;
- notice of any actions required of the local agency;
- the local agency's right to a formal hearing; and
- the time and place at which each hearing on the action is scheduled to be held.

In the notice the state agency will state whether or not it intends to withhold payments on pending and subsequently received requests by the local agency for grant payments in an amount reasonably calculated.

Requirements and Procedures

The state agency will provide a hearing procedure in accordance with the provision as stated in CFR part 246.18.

LOCAL AGENCY MONITORING REVIEW FORM

Organization of WIC Local Agency Monitoring Standards

The WIC Functional areas are:

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing and Organization
- 6.0 Organizational Structure and Management Practices
- 7.0 Food Delivery/Food Instrument Accountability
- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10.0 Financial Management

The standards are organized to cover the major areas of federal and state regulations and policies. Each section includes several program characteristics. Each program characteristic has several standards. The standards are perhaps the most relevant indices for measuring program performance. The LA Monitoring Review Form compares the AK WIC ME Standards to the Nutrition Services Standard (NSS). Whenever they are inclusive of each other numbers and letters referencing the NSS appear under the (NSS) columns.

Each standard has program indicators. Indicators are intended to give the reviewers and the local agency staff suggestions of how the standard can be interpreted and evaluated. They are not fully inclusive or exclusive, and are most useful as guidelines.

A rating scale (Standard Met?: Yes, No, Partial, and Not Applicable [N/A]) is next to each program standard. The intent of the rating scale is to allow the reviewer some flexibility in determining whether or not the standard was met. In addition, the forms include areas for narrative comments that can highlight positive things the program is doing or provide constructive feedback in cases where the standard was not entirely met.

A monitoring review includes an audit of participant files. The forms used for this audit are in final section of the review form. The reviewer will determine whether the information in the files meets the standard.

A monitoring review includes a participant survey by the state agency. At the time of an on-site review, a random survey of WIC participants will be made. The survey format is in the final section of this review form.



Participant Centered Services (PCS) Local Agency (LA) Management Evaluation (ME)

Alaska WIC is striving to incorporate the Participant Centered Services (PCS) business model in all aspects of the WIC program. For the LA ME process, state staff are identifying linear information versus behavioral information with regard to the ME. For example: Linear information can be found in financial reports, time studies, equipment inventories, policies and procedures, and grant files. Linear information can be obtained in advance, and used for a preliminary desk audit in preparation for the on-site ME. Behavioral information is gathered by observation, with regard to implementing Value Enhanced Nutrition Assessment, Breastfeeding and Nutrition Education, Referrals, Issuance of Food Packages/WIC Benefits and Participant Centered Education, which differ with every single interaction between a Competent Professional Authority (CPA) and a WIC participant. AK WIC is using an ME approach which gathers linear information via a desk audit prior to the LA ME visit, allowing more time to be spent for observations, technical assistance and mentoring.

Tools to complete a LA ME Desk Audit:

- WIC Local Agency Monitoring and Self-Assessment Narrative (Pages 6-3 to 6-6)
- BFPC LA ME Mentoring and Self-Assessment Narrative (Pages 6-7 to 6-8)
- WIC Local Agency Monitoring and Self-Assessment Form (Pages 6-9 to 6-25)
- WIC Local Agency Management Evaluation Preparation Materials (Page 6-26)
- Abbreviations used in the document, (page 6-27)

Local Agency (LA) Management Evaluation (ME) and Self-Assessment Narrative (Page 6-3 to 6-9)

These two pages are open ended questions to gather information on the LA's Nutrition Education and Services Plan, the program's successes, challenges and ways the state can best assist the WIC LA program.

Local Agency Monitoring and Self-Assessment Form (Pages 6-10 to 6-25) covers the following WIC Functional areas:

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing
- 6.0 Organization
- 7.0 Food Delivery/Food Instrument Accountability

- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10.0 Financial Management
- 11.0 Information Management System

The USDA, Food and Nutrition Services WIC Nutrition Services Standards

<http://www.nal.usda.gov/wicworks/Topics/WICnutStand.pdf>

published in October 2001 are incorporated into the LA Self-Assessment document. It simplifies and streamlines the self-assessment process. The NSS becomes the Alaska WIC standard for LA ME review.

The standards are organized to cover the major areas of federal and state regulations and policies. Each section includes several program characteristics. Each program characteristic has several standards. The standards are perhaps the most relevant indices for measuring program performance. The LA Monitoring Review Form compares the AK WIC ME Standards to the Nutrition Services Standard (NSS). Whenever they are inclusive of each other numbers and letters referencing the NSS appear under the (NSS) columns.

Each standard has program indicators. Indicators are intended to give the reviewers and the local agency staff guidance to interpret and evaluate the standard. They are not fully inclusive or exclusive, and are most useful as guidelines.

A rating scale [Is the standard met?: Yes, No, Partial, and Not Applicable (N/A)] is next to each program standard. The intent of the rating scale is to allow the reviewer some flexibility in determining whether or not the standard was met. In addition, the forms include areas for narrative comments that can highlight positive things the program is doing or provide constructive feedback in cases where the standard was not entirely met. The last column includes numbers designated for items, documents, data, policies or procedures that may be needed to be sent to the State reviewer. The number corresponding to the requested items are listed on **page 6-26**.

Local Agency (LA) Management Evaluation (ME) Preparation Materials (Page 6-26)

This page is the reference for the last column on the WIC Local Agency Monitoring and Self-Assessment Form, which includes numbers designated for items, documents, data, policies or procedures that may need to be sent to the State reviewer.

Local Agency (LA) Monitoring and Self-Assessment Narrative

Local Agency: _____ Date: _____
Written by: _____

1. What are your organization’s biggest challenges and how do these challenges affect the WIC program?

Blank area for response to question 1.

2. How can the WIC Program Office help you achieve your program goals?

Blank area for response to question 2.

Local Agency (LA) Monitoring and Self-Assessment Narrative

Local Agency: _____ Date: _____
Evaluator(s) _____

3. What state or federal regulations or policies create barriers to providing high quality effective services to WIC participants?

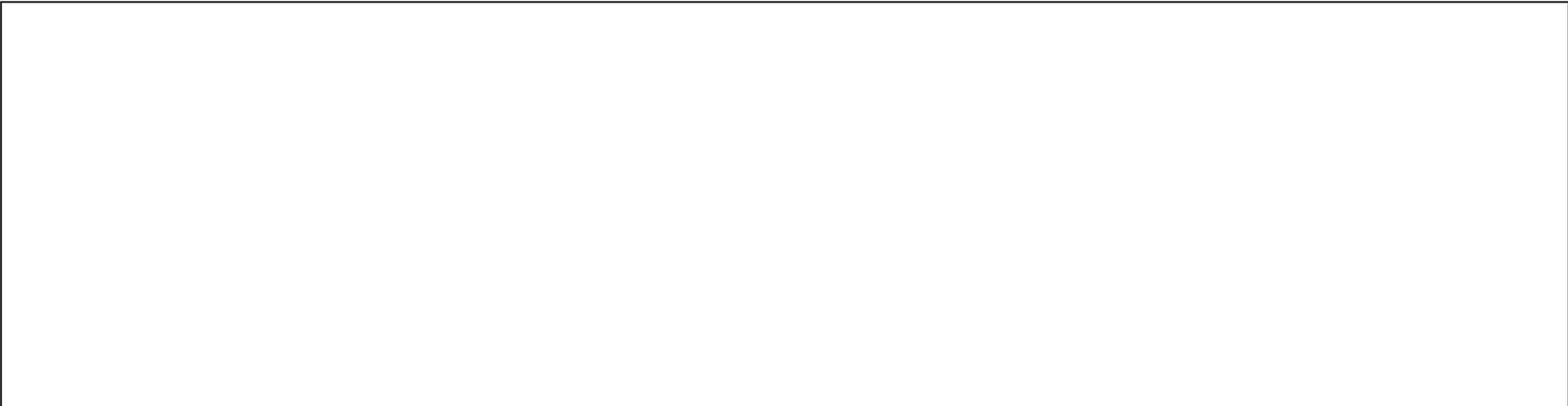
--

Other Comments

--

4. What are your processes from when a client arrives to when they leave? Describe the complete process and attach copies of forms. If you have off-site clients that receive mailed applications, please describe that complete process as well.

Other Comments



6. Tell us your best practices.

Other Comments

BFPC Local Agency (LA) Management Evaluation (ME)

Local Agency (LA) Monitoring and Self-Assessment Narrative

Local Agency: _____ Date: _____
Written by: _____

1. What have been the successes and highlights of your BFPC program?

--

2. What have been the barriers to running your BFPC program? What have you done/are doing to overcome the barriers?

--

3. What are your recommendations for the Alaska WIC Breastfeeding Peer Counseling Program?

Other Comments



Local Agency (LA) Monitoring and Self-Assessment WIC Regulations (FR) and Nutrition Services Standards (NSS)

Local Agency: _____ Date: _____
Evaluator(s) _____

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD)	Y	N	N/A	Partial	Comments	Send forms for ME review to the WIC Program Office through Direct Secure Messaging only
1. Nutrition Services FR 246.6b5 & 246.11								Item Number #
LA Nutrition Education Plan 1.1.0	1.1.1 Follows currently approved Nutrition Education Plan	NSS 4D; 5AB; 4A2 FD						
Individual Care Plans	1.1.2 All WIC participants must have completed S.O.A.P note	NSS 1C2d; 1C2f; 8A3; 10A3 FD						
Contacts	1.1.3 Each participant must receive quarterly nutrition education contacts.	NSS 8A1; CFR 246.11 (e)(3) FD						
	1.1.4 Nutrition education is based on personal needs, household situation, educational level, and cultural preference	NSS 8A2a FD						
	1.1.5 Delivery of nutrition education must be interactive: face-to-	FD						

	face, telephone, or electronically						
1.1.6	LAs with rural clients conduct 20% of their client certifications by video certification methods, providing nutrition education	LA memo 12-03 rev 1 FD					
1.1.7	Supportive reinforcement activities and resources are available: bulletin boards, newsletters, pamphlets.						
1.1.8	Nutrition ed. Follow-up must be interactive, examine client's progress towards goal/behavior changes, and occur before or at next certification	LA Memo 12-05 FD					
1.1.9	LA must make 2 attempts to contact clients to provide education before mailing FIs. Attempts must be documented in client's electronic record	LA Memo 12-05					
1.1.10	LA coordinates with other agencies and programs to provide nutrition education	NSS 8C					
1.1.11	Literacy and language skills of staff are appropriate to address needs of diverse participants	NSS 8A2b; 9B2;9B1; 10A1e; 10A1d FD					

Materials 1.2.0	1.2.1	Materials available are accurate, relevant, and at an appropriate cultural and literacy level	NSS 8A2a; 8A2b FD						
	1.2.2	Materials offered address client's nutrition risk	NSS 8B1; 10A4 FD						
Participant Centered Education (PCE) 1.3.0	1.3.1	PCE model used when delivering education services							
Critical Thinking	1.3.2	Staff uses critical thinking skills							
Breastfeeding 1.4.0	1.4.1	PGW are encouraged to BF	NSS 8A5; 1D2a; 13A FD						
	1.4.2	BFW are counseled and supported	NSS 13B; 3C; 13D; 1D2b FD						
	1.4.3	Designated LA BF Coordinator	NSS 1D1 FD						#7
	1.4.4	LA BF Coordinator has at least 1 yr in counseling BFW and /or extended lactation training, CLC or IBCLC (BP)	NSS 1D1a; 11B						#7
	1.4.5	Workplace policies are breastfeeding-friendly (BP)	NSS 19B5						
	1.4.6	LA monitors BF initiation and duration rates	NSS 14A FD						

	1.4.7 LAs provide basic training to all staff about BF and their role in supporting PG and BF mothers	NSS 12A FD						
Value Enhanced Nutrition Assessment 1.5.0 (VENA)	1.5.1 Uses VENA principles to complete nutrition assessment	NSS 7 FD						
WIC Nutrition Risk	1.5.2 Uses national WIC Nutrition Risk Criteria to identify and document all nutrition risk	NSS 7A FD						
Dietary Assessment	1.5.3 Uses standardized dietary assessment procedures consistent with the AK P & P	NSS 7B2 FD						#3
	1.5.4 Dietary risk is assessed through the application process at the time of certification	NSS 7B1 FD						
Anthropometric Assessment	1.5.5 Anthropometrics are current, reflect participant status and are assessed according to AK P & P	NSS 7C						#3
	1.5.6 Appropriate technique used and results interpreted correctly	FD						
Hematological Assessment	1.5.7 Hematological assessments current, reflect participant status and assessed according to the standards in the AK P & P	NSS 7D						#3
	1.5.8 Appropriate technique used, and	FD						

	results interpreted correctly						
Medical/Health/ Economic/Social	1.5.9 Information is collected and assessed interactively with client at certification	NSS 7E					#3
Food Prescription 1.6.0	1.6.1 Food packages prescribed by qualified staff	NSS 1C2b 18A1 FD					#3
	1.6.2 Tailored appropriately	NSS 18A4; 18B1; 18B2 FD					#3
	1.6.3 Breastfeeding assessment is made by a CPA or RD before changing a food package for a breastfeeding dyad						
WIC CPA Roles/Responsibilities 1.7.0	1.7.1 CPA determines nutritional risk of participants	NSS 1C2a FD					#3
	1.7.2 Identifies and refers high-risk participants to a qualified nutritionist	NSS 1C2g					#3
	1.7.3 Completes a CPA competency based training program	NSS 1C1b					Confirm with UAA
	1.7.4 CPA qualifications meet FR definition	NSS 1C1a FD					
	1.7.5 CPA prescribes food packages	NSS 1C2b FD					
Contract Formula Prescriptions	1.8.1 Contract formulas are prescribed unless a non-contract formula ENPR is completed	NSS 18A2; 18A3					#3

1.8.0	and in the chart	FD							
High Risk 1.9.0	1.8.2 Non-contract formula usage rate is <5%								
	1.9.1 Appropriate HR codes are identified and correctly assigned in the computer file	FD							
	1.9.2 HR SOAP notes are developed and identify appropriate nutrition education and support materials needed	FD							
	1.9.3 HR nut. Ed. contact with RD must take place during certification period	FD							
	1.9.4 CPA follow-up with client on plan written by RD	FD							
	1.9.5 Households with multiple WIC clients must receive quarterly education contacts targeted to nutritional risk in addition to HR consultation, and the education must be documented in the electronic chart								
	1.9.6 All education contacts as listed above in 1.9.5 must be documented in the participants record								
	1.9.7 Tracking system exists to determine whether HR clients received a follow up appointment								

	AK WIC ME Standard	NSS	Y	N	N/A	Partial	Comments	
2. Clinic Operations (FR 246.6b8)								
Certifications 2.1.0	2.1.1 Follows SPIRIT certification Policies & Procedures for all applicants	NSS 1C2; 1E2; 20D1 FD						#2
	2.1.2 Establish rapport to begin a conversation. Practices active listening skills. Collects information without interrupting or correcting the participant. Paraphrases or reflects what was heard. Uses open ended sentences appropriately.	PCE						
	2.1.3 If LA has rural clients that can't be seen face to face, video teleconferencing is used to see 20% of rural caseload	LA Memo 12-03 rev 1						
	2.1.4 If using video teleconferencing, a signed confidentiality release is in client's chart	LA Memo 12-05						
	2.1.4.1 CPA determines and documents applicants nutritional risk via medical and nutritional assessment and/or referral	NSS 7A						#3
Medical Assessments 2.2.0	2.2.1 Anthropometrics & Hematological measurements performed & recorded	NSS 7C; 7D						#3

	accurately							
	2.2.2 Medical Histories assessed	NSS 7E						#3
	2.2.3 Benefits based on certifications timeframes	NSS 1C2b						#3
Referrals Assessed/Documented 2.3.0	2.3.1 Immunizations	NSS 1C2e						#3
	2.3.2 Food Stamps, ATAP, EPSDT, Immunizations, CSE, and written material on Medicaid, drug and other harmful substance abuse counseling and treatment for participants	NSS 1C2e; 10B8 16A1; 16A2; 16A3; 16A4; 16A5 FD						#8
	2.3.3 Provides & documents follow-up to referrals (BP)	NSS 1C2g; 1C2h; 1C2i; 8A9;8A11; 10A2; 10A7						#3
	2.3.4 Follow up on High-Risk participants' referrals	NSS 10B8						#2 #3
	2.3.5 Information on drug and other harmful substance abuse given at each new pregnancy/BF certification	NSS 8A6 FD						
Program Benefits 2.4.0	2.4.1 Participants relocating out of state receive VOC							#3
	2.4.2 New participants are oriented and recertified clients review information	NSS 20D1						#9
	2.4.3 AK P & P and							#10

	regulations are followed for mid-cert terminations and clients not recertified							
Clinic Organization 2.5.0	2.5.1. Clinic schedules serve caseload and accommodates missed contacts	NSS 10B5						
	2.5.2 Clinic setting is suitable and supports breastfeeding	NSS 19A; 19B FD						
	2.5.3 Clinic promotes nutrition and health education for families i.e., videos, interactive bulletin boards, posters, puzzles, etc (BP)	NSS 19A6						
	2.5.4 Participants surveys improve services							#11
	2.5.5 Private space is provided for staff and clients to BF or pump (BP)	NSS 19B4						
	AK WIC ME Standard	NSS	Y	N	N/A	Partial	Comments	
3. Caseload Management & Outreach								
Caseload 3.1.0	3.1.1. Maximum served with current funding appropriate for staffing and participation levels							
	3.1.2. Effective food fund management							
	3.1.3 Plan addressing minimizing no-shows,	NSS 8A7; 10B6;						#12

	especially among high risk participants							
	3.1.4 Coordination of appointments for the participant or family members with other services delivered at the same site (BP)	NSS 1F2d; 1F2e						
Effective Outreach 3.2.0	3.2.1. Public Notification informing all potential participants, minorities & women in early months of pregnancy	NSS 21A; 21B FD						#13
	3.2.2 On-going contact with physician's offices, medical, public health, tribal clinics and major referral sources	NSS 21C						# 14
Collaborations to Improve access 3.3.0	3.3.1 Written agreements are in place between LA and other community service agencies	NSS 15A FD						#14
Marketing 3.4.0	3.4.0 Uses marketing strategies to promote participation in WIC	NSS 21E						#14
	AK WIC ME Standard	NSS	Y	N	N/A	Partial	Comments	
4. Civil Rights (FR 246.6b9)								
Rights & Responsibilities 4.1.0	4.1.1. Client has read and signed the rights and responsibilities form							
	4.1.2. "Justice For All" poster in anthropometric room, waiting area, classroom, or any area where services are	FD—if not posted at all						

	offered						
Nondiscrimination Laws & Regulations 4.2.0	4.2.1 Documentation showing that staff have received annual civil rights enforcement. Include list of staff who attended training, agenda, and date	FD					#16
	4.2.2 No qualified person is subject to employment discrimination	FD					
	4.2.3. Clients who have been determined ineligible must be advised of their right to a fair hearing	FD					
	4.2.4. Racial/ethnic participation data are collected	FD					
	4.2.5. Individuals that have civil rights complaint must be assisted in completing that complaint. The written complaint must be forwarded to state office within 30 days of complaint.	FD					#15
Nondiscriminat -ory Services 4.3.0	4.3.1 Information available in appropriate languages	NSS 8A2b FD					
	4.3.2 Services are not discriminatory to any applicant based on race, color, national origin, age, sex, or handicap	FD					
	4.3.3 Procedures, locations, appointment schedules and hours	FD					

	of operation do not discriminate						
5. Staffing (FR 246.6b2)							
Staff 5.1.0	5.1.1	Appropriate staffing structure	NSS 2A; 2B;				
	5.1.2	Staffing education and experience are appropriate for assigned responsibilities	NSS 2C2; 2C5; 2C7; FD-state				#18
	5.1.3	Paraprofessional CPAs are "State or medically trained" or complete a State approved CPA Training Program	NSS 3A1 FD				
	5.1.4	Professional and paraprofessional staff have documentation supporting their CEU requirements	NSS 3B1a-j FD				UAA
	5.1.5	Grantee must ensure staff who oversee nutrition services receive management training appropriate to their roles and responsibilities	NSS 3C				#16
6. Organization							
Organizational Structure & Mgmt. Practices 6.1.0	6.1.1	Staff responsibilities and assignments support the organizational structure	NSS 2C8				# 20
6.2.0	6.2.1	New staff orientation documented					# 21
	6.2.2	Grantee must ensure that their staff are regularly trained on					# 16

	USDA and State policies.						
7. Food Delivery/Food Instrument Accountability (FR 246.10 & FR 246.12)							
Adequate Warrant Stock Controls 7.1.0	7.1.1	Receipt of blank warrants are thoroughly tracked	FD				# 22
	7.1.2	Warrants storage is secure	FD				#22
	7.1.3	WIC Warrant and Check Tracking forms are maintained daily					#23
Warrants Issuance 7.2.0	7.2.1	Warrants are printed according to MIS standards					#22
	7.2.2	Warrants are issued only to eligible clients	FD				#23
	7.2.3	Certification and warrant issuance procedures are separated	FD				#22
Warrant Controls 7.3.0	7.3.1	Voided warrants are handled according to AK P & P	FD				#22
	7.3.2	Lost or stolen warrants are handled according to AK P & P	FD				#22.
Mailed Warrants Controls 7.4.0	7.4.1	Warrants are mailed to participants according to AK P & P					#23
8. Vendor Relations (FR 246.12)							
Vendor Relations 8.1.0	8.1.1	Conflict of interest between WIC staff and vendors does not impair WIC services	FD				
Vendor Training 8.2.0	8.2.1	LA provides adequate and training and technical assistance to vendors according to AK P & P	FD				

Vendor Monitoring 8.3.0	8.3.1 LA monitors at least 5% of authorized vendors per year	FD						
Mailed Food Boxes 8.4.0	8.4.1 LA follow AK P & P regarding assigning MOV packages	FD						
9. Farmers' Market Nutrition Program (FMNP)								
FMNP 9.1.0	9.1.1 FMNP is promoted to improve fruits & vegetables intake among WIC clients							
	9.1.2 FMNP warrants are secure							
	9.1.3 FMNP promotion and outreach are done							
	9.1.4 Monitoring and evaluation are done yearly							
10. Financial Management (FR 246.6b7, FR 246.13 & FR 246.14)								
State Agency Records 10.1.0	10.1.1 Required single audits are completed and WIC findings are addressed promptly	FD						# 26
	10.1.2 All grantee subcontracts are reviewed and approved by state and records are available for review	FD						#27
	10.1.3 Indirect costs are claimed according to federal and state policies	FD						#28
	10.1.4 Time studies are completed by each WIC employee the first week of every month	FD						
	10.1.5 CFR are done in accordance with grant award	FD						

	requirements							
	10.1.6 Each fiscal year approximately 17% of grantee expenditures must be for nutrition education activities and BF promotion	FD AK P & P Chapter 7						
	10.1.7 Inventory records are tracked according to state policies and submitted Feb 15 each year	FD						
	10.1.8 Each fiscal year, 25% of grant award is obligated by September 30	FD LA Memo 13-06						
Administrative Expenditures Documentation	10.2.1 Personnel expenses are allocated correctly	FD						#30
Effective Property Management System 10.3.0	10.3.1 Equipment and supplies are managed according to federal regulations and AK P & P	FD						
11.0 Information Management System								
11.1.0 Systems security	11.1.1 There is adequate physical security for system hardware, and software	FD						
	11.1.2 Confidentiality is maintained.	FD						
	11.1.3 Grantee has adequate security software to operate the WIC system	FD						
11.2.0 Hardware	11.2.1 There is adequate IT support for the WIC grantee							

	Total						
--	--------------	--	--	--	--	--	--

	AK WIC ME Standard		Y	N	N/A	Partial	Comments
12.0 Breastfeeding Peer Counseling							
12.1.0 STAFFING	12.1. 01 Qualified BFPC coordinator on staff	FD					
	12.1. 02 Qualified BFPC on staff	FD					
	12.1.03 Peer counselors who provide BFPC services have completed all required training	FD					
	12.1.04 An up-to-date BFPC training log documents that peer counselor(s) meet with the BFPC coordinator						
	12.1.05 BFPC peer counselors are used according to BFPC peer standards and BFPC plans						
12.2.0 SERVICES	12.2.01 The required minimum BFPC contacts are made and are within the appropriate time frames during the						

	prenatal and postpartum period						
	12.2.02 BFPC are available during non-clinic hours	FD					
	12.2.03 Peer counselors stay within their scope of practice and make appropriate referrals	FD					
	12.2.04 LA has a referral protocol for peer counselors and a list of referral resources for their agency/community	FD					
12.3.0 DOCUMENTATION	12.3.01 BFPC contacts are documented appropriately	FD					
12.4.0 FISCAL	12.4.01 BFPC staff time is excluded from the "BF Promotion " WI activity on the monthly time study	FD					
	12.4.02 BFPC and WIC funds and expenditures are segregated, and reported separately	FD					

Chart Audit Guidelines

A Chart audit is a management tool to measure nutrition services provided. A representative chart audit of one/or two percent for clinics with a caseload of less than 2,000 and one percent for clinics with a caseload of greater than 2,000 is suggested. The following will guide the management evaluation person/team in performing chart audits.

	Criteria	Definition
1.	Category Correct	Verify if the assigned category is correct. The various categories are: W1 Woman 1 st trimester W2 Woman 2 nd trimester W3 Woman 3 rd trimester WP Woman Postpartum WB Woman Breastfeeding IB Infant Breastfeeding IF Infant Full Formula IP Infant Partial Formula C Child
2.	Date of Birth Matches	Compare date of birth recorded on the application form versus the date of birth in the computer system.
3.	Ethnic Code Matches	Compare ethnic code recorded on the application form versus the ethnic code in the computer system.
4.	Ht/Wt, Hgb, Ht/Lt Data Matches	Compare Ht/Wt/Hgb/Ht/Lt Data taken versus the medical information in the computer system.
5.	Ht/Wt, Hbg, Ht/Lt Data Within 60 days	Verify if the medical information is within 60 days of certification. (Hgb, if within normal limits at last certification for the same category, does not need to be current.)
6.	Income Eligibility Matches/Documented	Verify if income calculation is correct and matches the income in the computer system.
7.	Identity/Residency Documented	Verify if proof of identity and residency is documented in the participant's chart.
8.	Cert. Within 10/20 days of initial visit.	Verify if certification is within - 10 days for Priority I participants Priority I participants are:

		Pregnant women, Infants under six months, migrant workers, and homeless applicants 20 days for all other participants
9.	Pregnancy Documented	Verify that a medical professional provided proof of pregnancy.
10.	Baby Due Date	Verify if the baby's due date is documented on the proof of pregnancy/chart.

11.	Nutrition Risk Matches	Compare the nutrition risk in the chart versus the nutrition risk in the computer system.
12.	Nutrition Risk Documented	Verify if the nutrition risk assigned is correct.
13.	Any Nutrition Risk Omitted	Check for any nutrition risk omitted.
14.	Referrals Documented	Verify if referrals were provided and documented.
15.	Food Rx Correct	Verify if the assigned food package is appropriate for the participant's needs.
16.	Food Issued at Cert.	Verify if warrants were issued at the time of certification.
17.	Medical Hx Complete	Verify if the medical history is documented on the application form.
18.	Rt./Oblig.Signed/Dated	Verify if the rights and obligation is signed and dated by the participant/parent/guardian.
19.	Two Nutr. Ed Contacts in 6 mos	Verify if nutrition education was provided to the participant/guardian/alternate twice within 6 months.
20.	Approval for Non-Contract Formula	Verify if any non-contract formula provided to the participant was approved by the State.
21.	Care Plan for High Risk	Verify if a care plan is documented for high-risk participants.
22.	Enhanced BF Package is Correct	Verify if the enhanced BF package was appropriated assigned only to women whose infants are not receiving any formula from WIC.

C = Correct

E = Error

M = Missing

I = Incomplete

NC = Not Current

NA = Not Applicable

	WIC ID	Name	Category	Ht/Wt, Hgb, Ht/Lt Data Within 60 days	Income Eligibility Documented	Identity/Residency Documented	Cert. within 10/20 days of Initial Visit	Baby Due Date	Nutrition Risk Complete/Documented	Referrals Documented	Food Rx Correct	Food Issued at Certification	Medical and Prepregnancy Hx Complete	Rts/Oblig. Signed/Dated	Nutr. Ed Contacts Quarterly	Approval for Non-Contract Formula	RD Care Plan for High Risk	Enhanced BF Package Correct	Ineligibility letter	VOC	Comments
1																					
2																					
3																					
4																					
5																					
6																					
7																					
8																					
9																					
10																					
11																					
12																					
13																					
14																					
15																					

SUMMARY OF CHART AUDIT FINDINGS

Number of Charts with Information that was:

	Missing	Incomplete	Error	Not Current	Total	%
Category Correct						
Date of Birth Matches						
Ethnic Code Matches						
Ht/Wt, Hgb, Ht/Lt Data Matches						
Ht/Wt, Hgb, Ht/Lt Data within 60 days						
Income Eligibility Matches/Documented						
Identity/Residency Documented						
Cert. within 10/20 days of Initial Visit						
Pregnancy Documented						
Baby Due Date						
Nutrition Risk Matches						
Nutrition Risk Documented						
Any Nutrition Risk Omitted						
Referrals Documented						
Food Rx Correct						
Food Issued at Certification						
Medical Hx Complete						
Rts/Oblig. Signed/Dated						
Two Nutr. Ed Contacts in 6 mos						
Approval for Non-Contract Formula						
Care Plan for High Risk						
Enhanced BF Package Correct						
TOTAL CLIENT FILES REVIEWED						

COMMENTS:

8. Do (did) you have any problems filling out the WIC forms?

9. Do (did) you have enough time to ask questions during your WIC appointment?

10. How does (did) the WIC staff treat you?

11. What is your opinion of the nutrition education you get (got) at the WIC clinic?

12. What is your opinion of the foods you get (got) from WIC?

13. Have you ever asked for any WIC services that you did not get? (If yes, ask what kind of services.)

14. Have you had any problems cashing your WIC checks? If yes, what kind of problems?

15. Are (were) you treated with respect when you cash your WIC checks at the grocery store? (If no, ask for details.)

16. What do you think is the best thing about the WIC Program?

17. What do you think is the worst thing about the WIC Program?

18. Is there anything else you would like to tell me about the WIC Program?

Thank you very much for taking the time to answer my questions. Your answers will be kept completely confidential. This will be very helpful to us in finding ways to improve the WIC Program.

Alaska WIC Local Agency (LA) Management Evaluation (ME)
Preparation Materials (Current SFY)

Local Agency Reviewed _____ Review Dates _____
Reviewers _____

Materials	Location	Date Reviewed	Comments
1. Last LA ME Report	WIC Adm. folder		
2. Last LA ME Report Response	WIC Adm. folder		
3. Current SFY Grant Application	Grant file		
4. Current SFY Nutrition Education Plan	Grant file		
5. Current SFY Quarterly Reports	WIC Adm. folder		
6. Current LA Self-Assessment	Mailed by LA before ME		
7. Current SFY Nutrition Reports	AK WIC MIS Nutrition Reports		
8. Last SFY Inventory	WIC Accountant		
9. Last SFY Time Studies	WIC Accountant		
10. Current SFY Financial Information	WIC Accountant		
11. ENPR Report Usage Rate	ENPR database		
12. Current SFY Vendor Monitoring Reports	Vendor Coordinator		
13. Chart Reviews	AKWIC MIS		