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 staffs have identified 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 interprete 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?
2. How can the WIC Program Office help you achieve your program goals?

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 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 Information on drug and other harmful substance abuse given at each new pregnancy/BF certification	NSS 8A6 FD						

1.1.6	Delivery of nutrition education must be interactive: face-to-face, telephone, or electronically	FD						
1.1.7	LAs with rural clients conduct 20% of their client certifications by video certification methods, providing nutrition education	LA memo 12-03 rev 1 FD						
1.1.8	Supportive reinforcement activities and resources are available: bulletin boards, newsletters, pamphlets.							
1.1.9	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						
1.1.10	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						
1.1.11	LA coordinates with other agencies and programs to provide nutrition education	NSS 8C						

	1.1.10 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 1.5.6 Appropriate technique used and results interpreted correctly	NSS 7C FD						#3
Hematological Assessment	1.5.7 Hematological assessments current, reflect participant status and assessed according to the standards in the AK P & P 1.5.8 Appropriate technique used, and results interpreted correctly	NSS 7D FD						#3

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 1.8.0	1.8.1 Contract formulas are prescribed unless a non-contract formula ENPR is completed and in the chart	NSS 18A2; 18A3 FD						#3
	1.8.2 Non-contract formula usage rate is <5%							

High Risk 1.9.0	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 nutr 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 1.9.7 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 AKWIC certifications 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 accurately	NSS 7C; 7D						#3
	2.2.2 Medical Histories assessed	NSS 7E						#3
	2.2.3 Benefits based on certifications	NSS 1C2b						#3

	timeframes							
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
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 regulations are followed for mid-cert terminations and clients not recertified							#10
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	NSS 19A6						

	nutrition and health education for families i.e., videos, interactive bulletin boards, posters, puzzles, etc (BP)							
	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 Minimize no-shows, especially among high risk participants	NSS 8A7; 10B6;						#12
	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,	NSS 21C						# 14

	tribal clinics and major referral sources							
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 offered	FD—if not posted at all						
Nondiscrimin-ation 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	FD						

	collected							
	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 of operation do not discriminate	FD						
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	NSS 3B1a-j FD						UAA

	requirements							
	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 USDA and State policies.							# 16
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	10.1.1 Required single audits are completed	FD						# 26

10.1.0	and WIC findings are addressed promptly							
	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 Timestudies are completed by each WIC employee the first week of every month	FD						
	10.1.5 CFRs are done in accordance with grant award requirements	FD						
	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	10.3.1 Equipment and supplies are	FD						

Management System 10.3.0	managed according to federal regulations and AK P & P							
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					

WIC Local Agency (LA) Management Evaluation (ME) Preparation Materials

Local Agency Reviewed _____ Review Dates_____Reviewers_____

Item	Documents or Materials	Date Received	Date Reviewed	Comments
1.	LA Nutrition Education Plan changes, if applicable			
2.	Individual Care Plan Policies, if applicable			
3.	Client Chart Data, if not available on AKWIC			
4.	Nutrition education contact policies			
5.	Client nutrition education handouts			
6.	Unless included in current grant agreement, Memorandum of Agreements			
7.	If different from approved grant agreement, Submit LA Breastfeeding Coordinator changes			
8.	Current referral flyer/letter			
9.	New participant letter/flyer			
10	Copies of 2-3 termination letters			
11	Copy of current client survey summary results			
12	Copy of No Show appointments communications letter/fax/email…			
13	Copy of current Public Notification ad/flyer			
14	If different than current grant agreement, Marketing plan or list of activities			
15	Copies of letters or log of current year civil rights complaints			
16	Copies of current staff training agenda and handouts (including annual civil rights training)			
17	Copies of or log of current year clients' vendors complaints			
18	If different than grant agreement, staff background and staffing chart			
19	Copies of management training (agendas only)			
20	If different than current grant agreement, staff responsibility changes			
21	Staff orientation process/policies/checklist			
22	Food Delivery/Food Instrument Accountability policies, if different than AK P & P			
23	LA warrant log			
24	Copies of client confirmation receipts samples for current year			
25	MOV nutrition education materials examples			
26	Pages from most recent single audit report regarding WIC, If applicable			
27	All current LA WIC services subcontracts			
28	If different than current grant agreement, copy of current indirect cost rate plan			
29	Support documentation for one month of supply purchases in the current fiscal year. Support documentation must align with eGrants.			
30	Personnel reports to justify a time study report for this SFY.			

Abbreviations Used in the LA Self Assessment Form	
AK P & P	State of Alaska WIC Policy and Procedure
AKWIC	Alaska WIC computer system
ATAP	Alaska Temporary Assistance Program
BP	Best Practices
BF	Breastfeed
BFPC	Breastfeeding Peer Counselor
BFW	Breastfeeding Woman
CPA	Competent Professional Authority
CSE	Child Support Enforcement
EPSDT	Early Periodic Screening, Diagnosis and Treatment, usually performed by Public Health Nursing
FD	Finding
FMNP	Farmer's Market Nutrition Program
FR	Federal regulations
LA	Local Agency
ME	Management Evaluation
MIS	Management Information System
MOV	Mail Order Vendor
NSS	Nutrition Service Standards
Nutr ed	Nutrition education
PCE	Participant Centered education
PCS	Participant centered services
PGW	Pregnant Women
SFY	State Fiscal Year
RD	Registered Dietitian
VENA	Value Enhanced Nutrition Assessment