



Chapter 10: Monitoring

Approval Date: Oct 2019

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Overview

The Idaho WIC Program operates according to WIC program specific federal regulations including monitoring guidelines to maintain program performance. The State agency will conduct on-site monitoring reviews of each local agency at least once every two years. The local agencies will be responsible for completing self-monitoring reviews. The local agency Coordinators will complete performance reviews on a quarterly basis. This chapter describes the expectations and procedures for monitoring and Quarterly Reports.

Purpose

The sections in this chapter provide procedures that outline processes and forms utilized by WIC program staff for monitoring and quarterly reports.

Scope

The policy applies to all State and local agency monitoring and quarterly reports within the WIC program.

In This Chapter

Section A Local Agency Monitoring

Section B Quarterly Reports

SECTION A: LOCAL AGENCY MONITORING

OVERVIEW

It is the purpose of this section to ensure that local agencies comprehend and comply with federal and state regulations, policies and procedures.

IN THIS SECTION

Quality Assurance (QA) Local Agency On-Site Monitoring
Quality Assurance (QA) Local Agency Self-Monitoring

Quality Assurance (QA) Local Agency On-Site Monitoring

POLICY

Each local agency's clinical operations, fiscal management and food delivery systems shall be monitored for compliance with state and federal regulations, rules, and policies and procedures at least once every two years (biannually). The State agency may conduct additional on-site reviews if it determined to be necessary in the interest of the efficiency and effectiveness of the program.

The reviews will include an on-site visit to a minimum of 20% of the clinics in each local agency or one clinic, whichever is greater.

Monitoring of local agencies must encompass evaluation of the following areas:

- Management
- Certification
- Nutrition education
- Breastfeeding promotion and support
- Participant services
- Civil rights compliance
- Accountability
- Financial management systems
- Food delivery

PURPOSE

The on-site review assesses:

- How the local agency is providing services to WIC participants
- Clarification needed on guidance provided by state and federal policies
- Training needs of local agencies
- Information flow
- Questions/discussion related to program service improvement

PROCEDURE

Upon notification by the State agency of an on-site quality assurance (QA) monitoring review, the local agency Coordinator will work with the State Office reviewer(s) to determine a mutually agreeable schedule for the on-site review. Once a date for the on-site review has been agreed upon, the State Office reviewer(s) will confirm via written correspondence on department letterhead the date of the on-site review, State staff who will be on site, and any additional information needed by the local agency prior to the review.

The local agency Coordinator shall make available requested documentation, including, but not limited to, participant records, staff training logs (including new staff, non-WIC staff and ongoing training for all staff), card inventory, calibration logs and files such as fair hearing and non-eligible applicants, equipment inventory, and local agency policies/procedures differing from State for review by State staff while on site.

Local agencies may be asked by the State agency staff to complete monitoring forms prior to the actual on-site review.

PRE-VISIT CONFERENCE CALL

The pre-visit conference call replaces the preliminary meeting typically scheduled for the first day of the local agency program review, allowing the review team to spend more time engaging with the clinic staff. The pre-visit call provides time to discuss the review process, including forms, requested documents, and the local agency review questionnaire.

The local agency Coordinator is expected to be in attendance and may invite the local agency Director or other staff they would like to attend, including the clinic supervisor or any lead staff coordinating Value Enhanced Nutrition Assessment (VENA) and/or Participant Centered Services (PCS). The local agency Coordinator will work with the State Office reviewer(s) to determine a mutually agreeable schedule for the pre-visit conference call. The call should be scheduled prior to the program review.

Once the pre-visit conference call has been scheduled, the State Office reviewer(s) will send an electronic confirmation to the local agency Coordinator. This confirmation will include the local agency review questionnaire.

REQUIRED DOCUMENTS

The required documents list will be sent to the local agency Coordinator at least 60 days prior to the onsite monitoring visit. The local agency Coordinator shall provide copies of the requested documentation, including, but not limited to, local agency policies/procedures differing from State, licensure for registered dietitians on staff, and list of all staff and their roles and conflict of interest forms. Please see the *Requested Documents for Reviewer Form* for a full list of items. Documents may be submitted however is most convenient (fax, email, etc.) at least 30 days prior to the scheduled monitoring visit.

BRIEF ENTRANCE MEETING

Upon arrival at the local agency, the State staff will meet with the local agency Coordinator for a clinic tour, meet clinic staff, obtain the clinic appointment schedule, and discuss any questions or concerns before beginning the review.

EXIT MEETING

At the completion of the on-site QA monitoring review, the State staff will meet with the local agency Coordinator and any others the Coordinator wishes to have present at the exit meeting. State staff will discuss the results of the on-site review and any areas requiring corrective action on the part of the local agency.

REPORT(S)

The State Office reviewer(s) will compile the results of the on-site QA monitoring review into a formal written report within 60 days on return to the State agency, to be shared with the local agency Coordinator and/or contracting agency contacts.

The local agency must submit a corrective action plan, including implementation timeframes, within 60 days of receipt of the State agency report of the QA monitoring review containing a findings of program non-compliance. This submission response should be completed using the *Monitoring Action Plan* form.

SAMPLE ON-SITE MONITORING FORMS

- State Monitoring Clinic Site Review
- State Financial Review
- State Observation
- State Chart Review
- State Class Observation or Large Group NE Observation (if applicable)
- State Ineligible/Terminated Files

Quality Assurance (QA): Local Agency Self-Monitoring

POLICY

Each local agency will conduct a QA self-monitoring of each clinic at least every two years (bi-annually). Self-monitoring does not need to be conducted in clinic sites where the State agency performs on-site monitoring. The clinic sites designated for self-monitoring by the local agency Coordinator will be reviewed using the standard Local Agency Self-Monitoring form.

Monitoring of clinic sites must encompass the following areas:

- Management
- Certification
- Nutrition education
- Breastfeeding promotion and support
- Participant services
- Civil rights compliance
- Accountability
- Financial management systems
- Food delivery

PURPOSE

The clinic review assesses:

- How the clinic is providing services to WIC participants
- Clarification needed on guidance provided by state and federal policies
- Training needs for clinic staff
- Information flow
- Questions/discussion related to program service improvement

PROCEDURE

Each local agency Coordinator or designated registered dietitian (RD) will schedule and conduct an on-site review of each clinic as described above. The WIC Coordinator must use the standard Local Agency

Self-Monitoring form. The following table depicts the number of charts to review using the chart review form based on clinic participant number.

| Clinic Size | Number of Chart Reviews |
|---------------|-------------------------|
| Less than 500 | 5 |
| 501-3000 | 10 |
| 3001+ | 15 |

The following table depicts the number of observations to be completed using the Observation Review form based on the number of clinic participants.

| Clinic Size | Number of Staff Observations |
|---------------|------------------------------|
| Less than 500 | 2-4 |
| 501-3000 | 5-7 |
| 3001+ | 8-10 |

REPORTS

The local agency Coordinator must send a copy of the completed Local Agency Self-Monitoring form along with the chart review forms for each clinic monitored to the State Office reviewer(s) at the State agency. This may be done as the clinic reviews are completed or may be provided to the State agency by September 30 of each year.

SELF-MONITORING FORMS

- Local Agency Self-Monitoring Clinic Site Review
- Local Agency Observation
- Local Agency Chart Review
- Local Agency Ineligible/Terminated Files

REFERENCE

7 CFR 246.19(b) State Agency Responsibilities
 State of Idaho, Dept. of Health and Welfare Contract with Local Agency-Scope of Wor

SECTION B: QUARTERLY REPORTS

OVERVIEW

It is the purpose of this section to ensure that local agencies understand and review their clinics' performance to ensure compliance with federal and state regulations, policies, and procedures.

IN THIS SECTION

Performance Review Local Agency Quarterly Reports

Quarterly Reports

POLICY

On a quarterly basis, local agency Coordinators must complete and submit the Quarterly Report form accompanied by applicable supporting documents to the State WIC Office.

PURPOSE

The purpose of the Quarterly Report is to measure local agency performance and progress towards meeting their Nutrition Education Plan goals and objectives, creating corrective action plans in response to monitoring findings and changes related to monitoring recommendations. The Peer Counseling report helps the State understand program progress and how to best provide technical assistance. The Fiscal Operating Detail Report will help ensure fiscal accountability.

PROCEDURE

- Reports are due by the end of the month of the first quarter month. The local agency Coordinator must electronically submit copies (preferred method) to the State WIC Office.
- Applicable support documents are to be submitted with the Quarter Report form.
- The State agency will review the report and provide feedback and/or request additional information within 30 days of receiving the report from local agencies.
- Local agency Coordinators will provide information requested by the State agency within 30 days of receiving the report from the State WIC Office.

FORMS

- Quarterly Report
- Comment
- Current Staff List
- Semi-annual Certification (if applicable)
- Time Study (if applicable)
- Peer Counseling Quarterly Report

REFERENCE

7 CFR 246.19(b) State Agency Responsibilities
State of Idaho, Dept. of Health and Welfare Subgrants with Local Agency