

## On-Site Agency Reviews

### Policy

#### USDA Federal Regulations:

(b) *State agency responsibilities.* (1) The State agency shall establish an on-going management evaluation system which includes at least the monitoring of local agency operations, the review of local agency 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. (2) Monitoring of local agencies must encompass evaluation of management, certification, nutrition education, breastfeeding promotion and support, participant services, civil rights compliance, accountability, financial management systems, and food delivery systems. If the State agency delegates the signing of vendor agreements, vendor training, or vendor monitoring to a local agency, it must evaluate the local agency's effectiveness in carrying out these responsibilities. (3) The State agency shall conduct monitoring reviews of each local agency at least once every two years. Such reviews shall 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 of the efficiency and effectiveness of the program. (4) The State agency must promptly notify a local agency of any finding in a monitoring review that the local agency did not comply with program requirements. The State agency must require the local agency to submit a corrective action plan, including implementation timeframes, within 60 days of receipt of a State agency report of a monitoring review containing a finding of program noncompliance. The State agency must monitor local agency implementation of corrective action plans. (5) As part of the regular monitoring reviews, FNS may require the State agency to conduct in-depth reviews of specified areas of local agency operations, to implement a standard form or protocol for such reviews, and to report the results to FNS. No more than two such areas will be stipulated by FNS for any fiscal year and the areas will not be added or changed more often than once every two fiscal years. These areas will be announced by FNS at least six months before the beginning of the fiscal year. (6) The State agency shall require local agencies to establish management evaluation systems to review their operations and those of associated clinics or contractors.

#### Iowa Administrative Code:

**441- 67.9(135) State monitoring of contract agencies.** At a minimum, one of the persons from the department responsible for reviewing a contract agency shall be a licensed dietitian.

### Authority

**USDA Federal Regulations:** 7 CFR Part 246.19(b)(1-6)

**Iowa Administrative Code:** **441- 67.9(135)**

Iowa Department of Health and Human Services/WIC

Procedures

Overview of Visits and Their Purpose

A variety of on-site review visits are completed by state staff to

- Meet regulatory review requirements,
- Identify innovative and successful strategies to share with agencies,
- Monitor compliance with federal regulations and state policies, and
- Provide technical assistance and support.

The agency review process includes several types of on-site visits. Each type of visit serves a different purpose. The table below lists the types of visits, a summary of the purpose and review process, and a manual reference/review tool title.

| Type of visit              | Purpose  | Review Process   | State Staff Responsible           | Reference/Review Tool Title |
|----------------------------|--|--|-----------------------------------|-----------------------------|
| <b>Agency Office Visit</b> | <p>An Agency Office Visit includes, but is not limited to the review of following:</p> <ul style="list-style-type: none"> <li>• Participation and enrollment</li> <li>• Expenditures</li> <li>• Program management/Subcontracts</li> <li>• Collaboration, partnerships, referrals</li> <li>• Work Plan</li> <li>• Local agency policies</li> <li>• Disaster Plan</li> <li>• Personnel/Training &amp; Requirements</li> <li>• Data management</li> <li>• Communication</li> <li>• Caseload management and outreach</li> <li>• Service delivery</li> <li>• Civil rights</li> <li>• Vendor information</li> <li>• Nutrition education</li> <li>• Food delivery</li> <li>• Chart management</li> <li>• Clinic Services Record Audit</li> </ul> | <p>The local agency will upload requested documentation into IowaGrants.gov prior to the review. Other documentation must be available during the review.</p> <p>During a review, the nutrition consultant will:</p> <ul style="list-style-type: none"> <li>• Collect and record the data specified on the review tool,</li> <li>• Interview local personnel about program operations,</li> <li>• Review program documentation,</li> <li>• Discuss program strengths, recommendations, and requirements</li> </ul> | State Office nutrition consultant | Agency Office Visit         |

| Type of visit                        | Purpose   | Review Process  | State Staff Responsible  | Reference/Review Tool Title  |
|--------------------------------------|---|---|--|------------------------------|
| <b>Clinic Services Record Audit*</b> | The Clinic Services Record Audit is a form used for the Clinic and Agency Office Visits. It is used to assess WIC Program compliance, data integrity and documentation. | The audit reviews terminated, ineligible, and active participant records. | State Office nutrition consultant (Completes for the Clinic Visit, however it may also be completed for the Agency Office Visit or as needed.) | Clinic Services Record Audit |

\* Local agencies are required to complete the Clinic Service Record Audit prior to the Agency Office Visit and as required per the Procedure "WIC Nutrition Assistants". Local WIC agencies are also encouraged to use this tool for self-assessment activities throughout the year.

| <b>Clinic Visit*</b> | A Clinic Visit includes, but is not limited to the review of the following:  | During a review, the consultant will:  | State Office nutrition consultant | Clinic Visit |
|----------------------|--|--|-----------------------------------|--------------|
|                      | <ul style="list-style-type: none"> <li>• Quality of services</li> <li>• Clinic service information</li> <li>• Clinic staffing</li> <li>• Facility</li> <li>• Clinic environment</li> <li>• Signage</li> <li>• Customer service</li> <li>• Management Information System</li> <li>• Scheduling</li> <li>• Intake</li> <li>• Clinic flow</li> <li>• Anthropometrics</li> <li>• Blood Tests</li> <li>• Nutrition, breastfeeding, and health assessment</li> <li>• Nutrition education</li> <li>• Rights and Responsibilities</li> <li>• Food package</li> <li>• Breast pump</li> <li>• Referrals</li> <li>• Food Instrument issuance</li> <li>• Civil rights</li> <li>• Breastfeeding Peer Counseling Program</li> <li>• Materials and information</li> </ul> | <ul style="list-style-type: none"> <li>• Follow participants through the clinic, and</li> <li>• Observe clinic activities for a specific task or position (e.g., intake, health assessment, nutrition assessment and education, outtake).</li> </ul> |                                   |              |

**\*WIC Services Toolkit**

The “Iowa WIC Services Clinic Assessment Tools” document must be completed **by the local agency** for the clinic that is scheduled for a Clinic Visit. The completed form should be posted to IowaGrants.gov one week before the scheduled Clinic Visit. Any staff member may complete the assessment (WIC Coordinator, Support Staff, CPA). This toolkit can be found on the WIC Web Portal. **Note:** This toolkit is modified versions of the Mid-Atlantic WIC Services Toolkit and the Western Region WIC PCE Assessment Tools for Participant-Centered Nutrition Education and Services created by Altarum Institute.

|                                      |  |   |                     |                               |
|--------------------------------------|--|---|---------------------|-------------------------------|
| <b>Administrative On-site Review</b> | <p>An Administrative On-Site Review Visit includes, but is not limited to the review of the following areas:</p> <ul style="list-style-type: none"> <li>• Section I – Staffing</li> <li>• Section II – Subcontractors</li> <li>• Section III – Licensure</li> <li>• Section IV – OSHA Bloodborne Pathogens Standards and Tuberculin Testing</li> <li>• Section V – Personnel Policies</li> <li>• Section VI – Job Descriptions</li> <li>• Section VII – Salary Descriptions</li> <li>• Section VIII – Civil Rights</li> <li>• Section IX – Purchasing/Equipment Inventory Control</li> <li>• Section X – Fiscal Policies and Control</li> <li>• Section XI – Time Records</li> <li>• Section XII – Expenditures and Documentation</li> <li>• Section XIII – Monthly Expenses</li> <li>• Section XIV – MCAH, Bureau of Family Health Questions</li> </ul> | <p>The local agency will upload requested documentation into IowaGrants.gov prior to the review.</p> <p>During a review, the WIC Program Planner will:</p> <ul style="list-style-type: none"> <li>• Collect and record the data specified on the review tool,</li> <li>• Interview local personnel about program operations,</li> <li>• Review program documentation, and</li> <li>• Discuss program strengths, recommendations, and requirements,</li> </ul> | WIC Program Planner | Administrative On-Site Review |
|--------------------------------------|--|---|---------------------|-------------------------------|

### **Scheduling Visits**

In general, visits are completed during the first three quarters of the federal fiscal year. This allows adequate time for technical assistance or follow-up. Most on-site reviews are scheduled with input from the WIC Coordinator; however, ~~clinic~~ visits may be unannounced. For scheduled reviews, the agency director and WIC Coordinator will receive reminder letters several weeks before the visit.

### **Typical review schedule**

The Agency **Office** Review takes place every other **fiscal** year, alternating with the Administrative On-Site Review. A typical review schedule is:

- Year 1: Administrative On-site Review + Clinic Visit(s)
- Year 2: Agency Office Visit + Clinic Visit(s)

### **Report of review findings**

Standard review tools have been developed for each type of visit and are used to:

- Record observations, and
- Note strengths, areas needing improvement, and requirements

After each visit, a written summary report and copies of the review tools are sent to the agency director and WIC program coordinator. A plan of action or progress report will be requested when a weakness is identified. Technical assistance may be arranged at the request of the agency.

Note: On-site reviews completed for other program-related purposes will be documented in a letter summarizing the visit and any planned follow-up. This letter will be sent to the agency director and the WIC program coordinator.

## **Best Practices**

### **Additional Visits**

Additional visits may be scheduled for:

- New agencies
- New clinic sites
- Other program-related purposes (e.g., technical assistance, data system function, outreach plans), or
- Upon request

### **Local Agency Self-Assessment Activities**

WIC Coordinators are encouraged to use the review tools for self-assessment activities throughout the year.