

## Agency Administrative On-Site Review

### Procedures

#### Documents for Review

**Upload these documents to the Requested Documentation section of the Site Visit component found in IowaGrants.gov at least 30 days prior to the review.**

- Current table of organization including all administrative and program staff by name and position paid with contract funds (see section I)
- Exposure control plan (see section IV)
- Current salary schedule for all staff paid with program funding (see section VII)
- Clinic site accessibility evaluation documentation (see section VIII.A.1)
- Provide evidence that the Agency will provide “reasonable accommodation” to a disabled applicant or employee who requests it (see section VIII.A.5)
- Equal Opportunity Affirmative Action plan (see section VIII.B.2)
- Equipment inventory list for individual items \$5,000 and above (see section IX)
- List of vehicles in use purchased with WIC contract funding (see section IX)
- Fiscal policies and procedures manual (see section X)
- Cost allocation plan for shared costs (see section X)
- One month’s current fiscal year’s cost support detail (see section XIII)

**These documents should be available during the on-site review.**

- Verification of current licensure status of professional staff
- Current job description for each budget position
- Employee performance evaluation form – if applies
- Employment application form
- Time sheets
- Time studies – if applies
- Verification of compliance with:
  - OSHA bloodborne pathogens standards
  - Americans with Disabilities Act of 1990
- Fiscal records, chart of accounts, and support documentation
- Verification of cash advance amounts and tracking of interest earned
- MCAH/FP sliding fee, billing, collection and bad debt policies – if applies

## AGENCY ADMINISTRATIVE ON-SITE REVIEW

Agency:

Programs reviewed: WIC, WIC BFPC, MCAH, and FP

Date of on-site review:

Agency staff consulted:

- WIC Coordinator
- Fiscal Manager
- Personnel Representative
- Other

Department reviewer:

Date of last administrative review:

**I. Staffing:** Compliance Yes  No

- A. A copy of the agency table of organization (TO) that includes all administrative and program staff paid with contract funds has been uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review. The TO is consistent with the Cover Sheet-General Information, WIC Contact Personnel, and WIC Salary and Fringe Details components found in IowaGrants.gov. All information is current.
- B. Any changes in key personnel have been reported in the Correspondence component of IowaGrants.gov.

Comments:

Reference: WIC Policy Hiring Agency Personnel  
This policy includes information about hiring WIC staff.

The Iowa Department of Public Health General Conditions  
23. Changes of Key Personnel

... The Contractor shall notify the Department in writing within ten (10) working days of any change of key personnel (as listed in Article IV – Key Personnel of the contract). A copy of the resume for a director hired during the course of the contract shall also be sent to the Department within ten (10) working days from the date of hire.

Note: If there are staffing changes, report these through the correspondence section of IowaGrants.gov to your consultant and program planner within 10 days. State Staff will advise you of the next steps to ensure compliance.

**II. Subcontractors:** Compliance Yes  No  N/A  (no subcontractors)

- A Subcontracts have been submitted timely and approved by the Department as verified by the Subcontract Document report found in the Progress Reports component of IowaGrants.gov.
- B Subcontracts written subsequent to the original application have been approved by the Department as verified by the Subcontract Document report found in the Progress Reports component of IowaGrants.gov.
- C If during the course of the subcontract period the Contractor or subcontractor wish to amend or revise the subcontract, prior written approval from the Department is required.

Comments:

Reference: The IDPH General Conditions, 5. Procurement Standards and Subcontracting

Note: WIC Policy and contract conditions require that each subcontract contain the following information:

- A A list of the work and services to be performed by the subcontractor.
- B The contract policies and requirements.
- C Provision for the Department, the Contractor, and any of their duly authorized representatives to have access, for the purpose of audit and examination to any documents, papers, and records of the subcontractor pertinent to the subcontract.
- D The amount of the subcontract.
- E A line item budget of specific costs to be reimbursed under the subcontract or agreement or other cost basis for determining the amount of the subcontract as appropriate.
- F A statement that all provisions of this contract are included in the subcontract including audit requirements.
- G Period of performance.
- H Any additional subcontract conditions.
- I Confidentiality clause.
- J Assurance of Civil Rights Compliance.

**III. Licensure:** Compliance Yes  No

- A Documentation of current Iowa licensure status of professional staff (LPN, LD, and RN), including contracted staff is on file or available for review.
- B Who monitors and/or verifies that licenses are current?

Comments:

Reference: WIC Policies Hiring Personnel, Licensed Dietitian, Registered Nurse, Licensed Practical Nurse, Personnel and IAC 645-80.4, IAC 655-3.1(17A, 147, 152, 272C) Iowa Administrative code and WIC policy state that all LPNs, LDs and RNs must possess a current Iowa professional license in their field of work. Local Agency Contract – Article XI- Additional conditions, The Contractor shall provide written notification of assurance of current licensure for new hire or change of licensed professional staff within 10 days of hire.

Note: Copies of all current licenses must be available for review upon request.

**IV. OSHA Bloodborne Pathogens Standards and Tuberculin Testing:**

Compliance Yes  No

- A Agency exposure control plan was uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review and meets all of the OSHA Bloodborne Pathogens Standards.
- B Employees directly exposed to bloodborne pathogens signed a Hepatitis B Immunization Consent/Refusal Form. An example is found in WIC Policy Infectious Disease Control.
- C Agency provides documentation of training and education (within the first month of hire and annually thereafter) concerning bloodborne pathogen exposure.
- D Agency provides documentation that the Facility Tuberculosis Risk Assessment Tool for Health Care Settings using the form found at <http://idph.iowa.gov/imm/tb/rules> was completed.
- E Individual TB test results are on file for all staff.

Comments:

Reference: WIC Policy Infectious Disease Control and Infection Control Guidelines, Federal Register 1910.1030  
Local Agency Contract – Article XI -Additional Conditions,  
Any Contractor having employees at risk of exposure to bloodborne pathogens shall comply with the bloodborne pathogen standards published December 6, 1991, in the Federal Register by the United States Occupational Safety and Health Administration (OSHA) and any publications thereafter.

Note: It is the Agency’s responsibility to identify staff by position who could be directly exposed to bloodborne pathogens.

**V. Personnel Policies:** Compliance Yes  No

- A Conditions of employment include recruitment, selection, termination, promotion, and compensation.
- B Leave and absence.
- C Grievance procedure.
- D Employee performance evaluation.
- E Nondiscrimination policy, to be consistent with Title VI of the Civil Right Act, Section 504 of the Rehabilitation Act of 1973, and 28 CFR Part 35, Title II, Subtitle A of the Americans with Disabilities Act.
- F Employee orientation program.
- G Provision for career development or continuing education.
- H Fringe benefits.
- I Policies reviewed annually.

Comments:

Reference: Local Agency Personnel Training. This section discusses orientation, training and continuing education and Civil Rights Training.

Note: All policies should be dated and reflect current practices.

**VI. Job Description:** Compliance Yes  No

- A Every agency position in the budget has a current written job description available.
- B Job descriptions are updated to reflect current qualifications, responsibilities and delineate essential functions of the position.
- C Qualifications and responsibilities are stipulated in the contract, or with contracted providers, as required by the Americans with Disabilities Act of 1990 (ADA).

Comments:

Reference: IV. Organization and Management Policies. These policies will assist you with job descriptions for all WIC staff. The Americans with Disabilities Act (28 CFR Part 35, Title II, Subtitle A), prohibits discrimination on the basis of disability in all services, programs, and activities provided to the public by State and local governments.

Note: Job descriptions should be reviewed and updated if necessary prior to being posted for new hire.

**VII. Salary Schedule:** Compliance Yes  No

- A The agency’s salary schedule is current and was uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
- B Salaries for all staff paid with contract funds agree with this schedule.

Comments:

Reference: CFR 200.404 Reasonable costs, A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Note: Compensation for employees engaged in work on Federal awards will be considered reasonable to the extent that it is consistent with that paid for similar work in other activities of the non-Federal entity. In cases where the kinds of employees required for Federal awards are not found in the other activities of the non-Federal entity, compensation will be considered reasonable to the extent that it is comparable to that paid for similar work in the labor market in which the non-Federal entity competes for the kind of employees involved.

**VIII. Civil Rights:** Compliance Yes  No

- A The following criteria will determine if the agency is in compliance with Title VI of the Civil Rights Act, the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the 1973 Rehabilitation Act.
  1. All service sites have been evaluated for handicapped accessibility and are consistent with the WIC Service Delivery Table component found in IowaGrants.gov. Documentation was uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
  2. Agency Section 504/Americans with Disabilities Coordinator has been appointed. The Section 504/Americans with Disabilities Coordinator is listed in the WIC Contact Personnel component of IowaGrants.gov.
  3. Section 504/Americans with Disabilities Coordinator has taken the required Iowa WIC Civil Rights training.
  4. Documentation that all WIC employees, including subcontractors, have taken the required Iowa WIC Civil Rights training annually.
  5. Provide evidence that the Agency will provide “reasonable accommodation” to a disabled applicant or employee who requests it. Documentation of compliance was

- uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
6. Staff involved in the hiring process (ex. WIC Coordinators and Human Resource personnel) must complete ADA training. Documentation of training must be kept in the employee file.
- B The following criteria will determine if the agency is in compliance with Affirmative Action requirements.
1. The agency has an Equal Opportunity Affirmative Action Officer. The Equal Opportunity Affirmative Action Officer is listed in the WIC Contact Personnel component of IowaGrants.gov.
  2. The current agency Equal Opportunity Affirmative Action Plan was uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
  3. The Affirmative Action Plan analyzes and compares the agency’s workforce to the labor market.
  4. Areas of under-utilization are identified. Goals, objectives, action steps, and timetables have been developed to correct these under-utilizations.
  5. The Affirmative Action Plan is evaluated and updated at a minimum of every 3 years to reflect progress.
- C The following criteria will determine if the agency Employment Application form is in compliance with Title VI of the Civil Rights Act, the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the 1973 Rehabilitation Act.
1. Forms are in compliance with civil rights regulations.
  2. Form includes a detachable demographic data sheet that is used in completing the Affirmative Action Plan.
- D The following criteria will determine if agency job descriptions are in compliance with Title VI of the Civil Rights Act, the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the 1973 Rehabilitation Act.
1. Every agency position in the budget has a current written job description available.
  2. Job descriptions are updated to reflect current qualifications, responsibilities and delineate essential functions of the position.
  3. Qualifications and responsibilities are stipulated in the contract, or with contracted providers, as required by the Americans with Disabilities Act of 1990 (ADA).

Comments:

Reference: Food and Nutrition Services (FNS) Instruction 113

WIC Policy Civil Rights Training -This policy includes a link to the required Iowa WIC Civil Rights Training, WIC Policy WIC Clinic Access Survey

Note: FNS 119 XIII Compliance Reviews (B) The State Office staff performing compliance reviews must advise the agency, in writing, of the review findings and recommendations. Significant findings are to be reported to the FNS Regional Office.

**IX. Purchasing/Equipment Inventory Control:** Compliance Yes  No  N/A  (no inventory)

- A Purchasing and procurement processes are documented.
- B Purchase orders are pre-numbered and accounted for.
- C Invoices are matched with purchase orders and stock received prior to payment.
- D Equipment inventory records are maintained. A copy of the equipment inventory listing and record of any vehicles purchased with program funds has been uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
- E Annual physical equipment inventory checks are conducted.
- F The Department’s Capital Asset Inventory Record reconciles with items on site.

Comments:

Reference: Equipment Purchasing Guidelines Defines equipment (Equipment is defined as any item with a cost or value of \$5,000 or more, and an anticipated useful life of one year or more. Computer software is excluded from this definition.)

Note: Vehicle purchases are not counted as equipment inventory; vehicles purchased with program funds are owned directly by the agency. WIC Policy Vehicle Costs

**X. Fiscal Policies and Control:** Compliance Yes  No

- A A current Financial Operations Policy Manual including; lines of responsibility, accounting standards, segregation of duties, payment schedules, and the policy manual reflects approval authorities, and record-keeping requirements is in place. A copy has been uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
- B A general ledger is in place.
- C The agency maintains a cash disbursement and receipts journal.
- D The agency prepares periodic financial statements.
- E The agency tracks interest earned on cash advances and remits interest if necessary.
- F Bank statements are reconciled monthly.
- G Valid methodology for allocating administrative and/or indirect costs charged to programs.

H Agency has a current cost allocation plan. A copy has been uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.

Comments:

Reference: Financial Requirements

Note: If the agency has more than one program, develop a plan for cost allocation to indicate how costs are distributed equitably to each program. The allocation plan should cover all joint costs of the agency.

**XI. Time Records:** Compliance Yes  No

- A Time records allow reporting for more than one program.
- B Time records accurately reflect the total distribution of work time/cost category.
- C All agency personnel are keeping time records.
- D Time studies are current and meet requirements for all staff and contracted personnel.

Comments:

Reference: WIC Time Study Report - All personnel paid by WIC funds are required to report their time by functional cost categories (nutrition education, breastfeeding promotion and support, client services and administration). This policy describes the acceptable options for time reporting.

Note: Time reporting is necessary to ensure nutrition education and breastfeeding promotion and support requirements are met. All WIC personnel will report WIC time using one of the following four methods:

- Actual Daily Time Records
- Signed Statement located on the WIC Time Study Report
- Quarterly Time Study utilizing the WIC Time Study Report
- Inclusion of salary in the agency Federally Approved Indirect Cost Rate Agreement

**XII. Expenditures and Documentation:** Compliance Yes  No

- A Chart of accounts is current.
- B The agency fiscal year covers the following time period. FFY
- C Agency-wide audit is conducted annually.
- D Agency audit checked by the Department auditor.

- E Expense reports and vouchers are prepared and signed properly.
- F Expenses are within contractual and budget parameters.
- G Monthly expense reports and agency ledgers match.
- H Supporting documentation is adequate for WIC NE and BF Documentation.

Comments:

Reference: Financial Requirements

**XIII. Monthly Expenses:** Compliance Yes  No

- A A minimum of one month’s current fiscal year’s expenses was reviewed. A copy of one month’s of expenses support detail has been uploaded to the Requested Documentation section of the Site Visits component found in IowaGrants.gov in advance of the review.
- B All expenses reviewed appear to be allowable, reasonable, and appropriately billed.

Comments:

Reference: CFR §200.403 Factors affecting allowability of costs. Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal requirements.

Note: Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- (e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.

- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also §200.306 Cost sharing or matching paragraph (b).
- (g) Be adequately documented. See also §§200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

**XIV. MCAH Bureau of Family Health Questions**

**I. Early Periodic Screening Diagnosis and Treatment:** Compliance Yes  No  N/A

- A Protocols in the EPSDT Handbook
  - 1. Informing services
  - 2. Care coordination services
- B Date of last protocol review: \_\_\_\_\_
- C Protocols shared on a regular basis with staff and subcontractors.
- D Time studies are continuous for EPSDT services.

Comments:

**II. Employee/Personnel Files:** Compliance Yes  No  N/A

- A Employee performance in employee personnel files is in compliance with Employee performance evaluation policy. (Randomly selected a representative sample and all Family Planning personnel files.)
- B Confidentiality of personnel records is insured in what way(s)? \_\_\_\_\_

Comments:

**III. Fiscal Policies and Control:** Compliance Yes  No  N/A

- A MCH and FP programs have a sliding fee scale.
- B The sliding fee scale is applied after payment from other sources received.
- C The methodology for deferring fees meets program requirements.

- D Patient bills show total cost of services and fees based on the sliding fee scale, as applicable.

Comments:

**IV. Agency lines of Communication and/or Management**

How often are staff meetings held? \_\_\_\_\_

- A Staff minutes are dispersed to staff to read.
- B Minutes reflect a regular schedule of meetings with subcontractors.
- C Documentation provides evidence of policies and procedures communicated to staff and contractors.

Comments:

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**List recommendations and requirements from the review**

Note: 7 CFR Ch. II, 246.19

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.

1)