

Policy 450.25

Local Agency Routine Vendor Monitoring

Introduction

Vendor program integrity is an essential component of the WIC Program. Integrity evolves from strong relationships not only at the State office, but also at the local agency level. A local agency vendor liaison will develop and maintain a good rapport with local stores, attend vendor trainings and agreement signings when requested, and complete local routine vendor monitoring visits. Routine vendor monitoring is an opportunity for local WIC staff members to review the daily operations of an Iowa Authorized WIC Vendor and:

- Measure training effectiveness,
- Review store inventory levels,
- Identify problem vendors, and
- Improve and/or develop a working relationship with the vendor community.

This policy outlines the steps to take when completing a routine vendor monitoring visit.

Personnel conducting the visit

The individual within the local agency named as the vendor liaison should be completing the routine vendor monitoring visits. State office staff will also conduct routine vendor monitoring visits.

Note: If local agency staff are interested in completing compliance buys, they will need to contact State staff.

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Local Agency Routine Vendor Monitoring, Continued

Store Selection & number of visits

The following procedure will be used to determine which and how many stores will be selected for monitoring visits.

- The State Vendor Coordinator and State Vendor Representative will determine the number of stores and which stores a local agency will visit.

Criteria used in determining which stores are selected for routine vendor monitoring include:

1. Vendors who have not received a monitoring visit in the past five or more years
2. Vendors that were added to the approved vendor list in the past fiscal year.

A local agency must visit a minimum of one retail store or 5% of retail stores, whichever is larger. When determining 5% of stores, any fraction above a whole number will be rounded up (i.e. 1.3 = 2).

- The vendor liaison will notify the State Vendor Coordinator and State Vendor Representative the dates of the planned visits. Visits must be completed by September 1st.

Preparing for an onsite visit

The following guidelines should be followed when preparing to complete a routine vendor monitoring visit:

- Gather the Routine Vendor Monitoring Report which can be found in policy 450.20a. The price survey on page 2 of the report should **not** be completed.
- Dress appropriately. Wear casual clothing, but nothing that indicates extreme poverty or that may be considered intimidating.

Approaching the building

As the monitor approaches the business, the monitor should observe the exterior of the business and determine:

- The condition of the facility,
- The cleanliness of the parking lot and entrance,
- If the appropriate Iowa Authorized WIC decal is attached to the front window or entrance and is visible,
- If the approved/required store hours are posted and visible, and
- There is no unauthorized use of the WIC signage/logo present.

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Local Agency Routine Vendor Monitoring, Continued

Entering the building

Upon entering the building the monitor should:

- Introduce and identify themselves to the store associate in the customer service area,
 - Request to speak with the manager or the person in charge at that time,
 - When introduced to the manager the monitor should:
 - Introduce themselves,
 - Explain the purpose of the visit, detailing the steps the monitoring visit will include,
 - Inform the manager that an exit interview with will be done once the visit is completed, and
 - Inform the manager that they may accompany the monitor if they wish.
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Evaluate the sales floor area

The following should be completed when evaluating the sales floor area:

- Note the number and type of registers at the store. Determine if the store has scanners and if they do whether the scanners are programmed to identify Iowa WIC Authorized products.
 - Determine if more than 50% of the store's grocery inventory is devoted to the sale of non-WIC items. This can be estimated by scanning the layout of the store.
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Evaluate the sales floor area, continued

- Determine if it is a full service grocery store with inventory of the following items:
 - Canned edible items,
 - Frozen vegetables, fruits, and juice,
 - Dairy products
 - Cereal
 - Bread
 - Fresh/frozen un-breaded and non-processed meat items,
 - Fresh fruits and vegetables,
 - Chemical products such as soap and cleansers, and
 - Paper products
 - Review the store shelf conditions:
 - Determine if the WIC Approved Foods minimum inventory guidelines are being met. The inventory guidelines can be found in Policy 450.10a. If there is insufficient product on the shelf, review storage inventory and pending deliveries to the store.
 - Review signage for the following:
 - Verify that the foods are properly marked with authorized "WIC Approved" shelf tags. Vendors are not required to use WIC Identification signage, however if they do, all approved items within a food category must be tagged. No brand name tags may be used.
 - Confirm if WIC foods are either legibly marked with price points or shelf labels with retails that are used to identify food items with price points.
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Local Agency Routine Vendor Monitoring, Continued

Evaluate the sales floor area, continued

- Observe if there are any signs of insect or rodent infestations. If evidence of insect or rodent infestation is found, contact the Iowa Department of Inspections and Appeals at 515-281-7102.
 - Review expiration dates on a few samples of at least two of the categories listed below (one must be infant formula):
 - Milk, cheese, soy beverage
 - Cereals
 - Peanut butter
 - Baby food
 - Infant formula
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Completing the report

The following steps should be completed when completing the Complete Routine Vendor Monitoring Report.

Step	Action
1	Review the report with the person in charge. Inform the person of all findings. Review any findings that are discovered during the monitoring visit. Note: The state office staff will determine and issue and violations.
2	Have the person in charge sign and print the report under the Store Signature line.
3	Sign the report under the WIC Representative signature line.
4	Thank the person in charge for their cooperation.
5	Mail the completed report to the State WIC Office to the following address: Iowa Department of Public Health Attn: WIC Program, Vendor Management 321 East 12 th Street Des Moines, Iowa 50319-0075

Note: Copies of the documentation must be furnished if requested by store management.

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Local Agency Routine Vendor Monitoring, Continued

State office responsibilities

Once the completed Routine Vendor Monitoring Report is received by the State WIC office, the State WIC office will:

- Enter the information into IWIN, and
 - Inform the vendor by letter detailing any violation points assigned. If any violations are documented, the State office will require the store to develop a corrective action plan.
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Other considerations

During the visit, avoid entrapment of grocery personnel. Do not influence or coerce grocery store staff to commit an illegal act that they would not otherwise have committed. Do not say anything that might influence grocery staff to violate WIC regulations. For example, do not say “Go ahead, nothing will happen to you.”

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