

9.02 State Agency Review of Local Agency Program Operations

POLICY:

The State Agency will evaluate and review the Operations of each Local Agency to assure compliance with Federal, State and local regulations, policies and guidelines.

PROCEDURE:

A. Frequency of Local Agency Program Operations Review

The State Agency will perform the review of the Operations of each Local Agency a **minimum** of one (1) time every two (2) years, and more frequently if deemed needed by the State Agency, at the State Agency's discretion.

B. Functional Areas of the Local Agency Operations Review

Compliance with administrative and operations regulations will be monitored separately from compliance with clinical and nutrition related regulations, policy and procedure. In operations monitoring, reviews will consist of both a scheduled interview with the Local Agency Director, to include a review of past performance, current operations, and a review of documents at the Local Agency Headquarters. In addition, operations monitoring will consist of unannounced on-site visits to selected clinic sites (20% of sites under the Local Agency) to review documents and files, observe procedures and the physical site, and interview employees on the site-level application of procedures and policy.

The following Operational areas will be reviewed:

- Evaluation of Management
- Security
- Non-Clinical Eligibility and Certification
- Facility evaluation
- Caseload Management
- Outreach
- Civil Rights Compliance
- Food Delivery/Food Instrument Accountability Systems

C. Written Notification

1. The State Agency will send written notification to the Local Agency Director in the month prior to the start of the calendar quarter in which a review is planned, and a **minimum** of thirty (30) days in advance of a review to assure that appropriate Local Agency personnel and records are available. If at all possible, both Nutrition monitoring and Operations monitoring will occur in the same quarter.
2. Written notification will include a list of personnel to be available, proposed dates for Local Agency Director interviews, and a list of records or files that the Local Agency

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must have available for review. Written notification will not include an announcement of the clinic on-site review dates, or the individual participant files that will be reviewed.

D. On-site Operations Review of Local Agency Headquarters

The State Agency Operations Monitor will conduct a mandatory entrance interview with the Local Agency Director at the beginning of each Local Agency Review to discuss the upcoming review and any issues which the Local Agency may wish to share. The monitor will review documents stored at the Local Agency Headquarters, and discuss performance indicators and/or statistical reports at a Local Agency level with the Director.

1. The State Agency will use both 9.02, Attachment #1, Local Agency Program Review Operations Tool and 9.03, Attachment #2, Local Agency Internal Review Form Operations Monitoring Tool during an external monitoring review.

E. On-Site Operations Review of WIC Clinics

1. The State Agency will designate the WIC clinic(s) for the on-site review.
2. The number of WIC clinics to be reviewed will be twenty (20) percent of the total Local Agency WIC clinics.
3. The date of the on-site review of clinics will be unannounced.
4. The review will consist of observation of the physical site, personnel interviews, and observation of interviews or other direct observation of employees, review of documents, and review of individual participant files.
5. The number of individual participant files that will be examined is based on a stratified proportional sample at a Confidence Interval (CI) of 90% and a Confidence level of 90%, for the following participant categories:
 - a. The active clinic caseload, but not including the participants that are receiving special formula or that are designated High Risk, as these will be sampled by Nutrition monitoring, and
 - b. Terminations and Denials for the past 6 months.

These categories or samples may be changed as new risk categories arise, or as the State Agency deems warranted in specific instances.

F. Exit Interview

The Local Agency Director has the option to have an exit interview with the State Agency monitor to discuss preliminary review findings. The interview may be in person or by telephone.

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G. Local Agency Operations Review Report

The State Agency Monitor will submit a written report to the State Agency Director and the Local Agency Director within thirty (30) days of the completion of the review. The report will address the findings of the review.

H. Action Plan

1. The Local Agency Director will submit a plan of corrective action to the State Agency within thirty (30) days of the receipt of the review report. The plan must include proposed actions and target dates to correct the findings.
2. The State Agency will review the action plan and notify the Local Agency in writing of the approval or disapproval of the plan within fifteen (15) days of receipt.

I. Follow-up Review

The State Agency Operations Monitor will examine the Local Agency compliance with the action plan during a follow-up review of the Local Agency.

REFERENCES:

1. Federal Regulations 246.19, Management Evaluation and Reviews.

ATTACHMENTS:

1. Local Agency Program Review Operations Monitoring Tool