**North Carolina – FFY 2023**

**Report of Local Agency WIC Program Review**

**Local Agency:**

**Date(s) of Review:**

**Site(s) Reviewed:**

**Reviewers:** Administrative Services –

Nutrition Services –

**Local Agency Program Strengths**

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**Report of Findings**

 **1. Application Process & Transfer of Certification**

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| * 1. **Does the local agency follow required procedures for processing applications for the WIC Program?**

Minimum Standard: When an applicant contacts the local WIC office by phone or comes in and asks for WIC services, the applicant must be given an appointment within processing standards. If the appointment is outside ofprocessing standards for the applicant’s category, staff must document the reason the appointment is outside theprocessing standard. Applicants who miss their appointment to complete the eligibility determination, must receivenotification of the missed appointment. Pregnant women must receive this notification within 10 days. All other WICcategories must receive this notification of the missed appointment within fifteen days. (WPM Chapters 6A and 6D)Local agencies must have a written policy for handling applications within processing standards, when specificappointments are not given such as in open access scheduling systems or when walk-ins are allowed. (WPM Chapter 6A)Method of Review:* + - Review the records of five individuals from the Detail Initial Certification Appointments Made Outside of Processing Standards report using Table 1.1 to document findings. Include at least three women in the sample, if possible.
		- Ask staff for next available appointment for a pregnant woman, infant, child, and postpartum woman.
		- Interview staff about their procedures for processing applications.
		- Review local agency’s written policy for handling applications within processing standards when specific appointments are not given such as in open access scheduling systems or when walk-ins are allowed.

**Finding:**     **Required Actions:**      **Suggestion:**       |

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| * 1. **Is physical presence of applicants/participants noted and documented at each certification (initial and**

 **subsequent)?**Minimum Standard: At each initial certification and each subsequent certification applicants/participants must be physically present. Physical presence or an allowable exception must be documented in Crossroads system. (WPM Chapter 6A) Method of Review:* + - Observe physical presence for 3-5 clients using Appendix 1, item 3 to document findings.
		- Link findings of observations with those from the record review.

 **Finding:**      **Required Actions:**      **Suggestion:**       |

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| **1.3 Is proof of identification and proof of residence reviewed and documented according to guidelines?**Minimum Standard: Proof of Identification and proof of residence must be reviewed and documented at every certification and for participants transferring into the program. (WPM Chapter 6A)Method of Review:* Observe screening of proof of identification and proof of residence for 3-5 applicants using Appendix 1, items 5-6

to document findings.**Finding:**      **Required Actions:**       |

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| **1.4 Is income eligibility screened and documented according to guidelines?**Minimum Standard: Income must be screened and documented at each certification in accordance with program policy. (WPM Chapter 6B) Method of Review: * Observe income screening and review documentation for 3-5 applicants using Appendix 1, item 8 to document findings. If possible, include at least one full income screening (i.e., individual is not adjunctively income eligible).
* Interview staff about agency’s procedure for determining income eligibility in various situations including adjunctive, full income screening and lack of proof.

**Finding:**      **Required Actions:**       |

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| **1.5 Do applicants/participants read the rights and responsibilities for program participation (or have staff read and explain to them) and then sign?**Minimum Standard: At each initial and every subsequent certification, staff must make the applicant/participant aware of the rights and responsibilities of program participation and in such a way that accommodates the language and literacy needs of the client. The applicant/participant must sign and date the rights and responsibilities indicating their understanding of them. (WPM Chapter 6D)Method of Review: * Observe 3-5 certifications using Appendix 1, item 9 to document findings.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **1.6 Does staff offer the participant/parent/guardian/caretaker the opportunity at each certification to appoint a proxy for pick-up?**Minimum Standard: Staff must offer the participant/parent/guardian/caretaker the opportunity at each certification to appoint a proxy for issuance of food benefits. (WPM Chapter 8)Method of Review: * Observe 3-5 certifications using Appendix 1, item 10 to document findings.

**Finding:**      **Required Actions:**       |

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| **1.7 Does the local agency assist clients with transfer into and out of the agency?**Minimum Standard: Local agencies must ask clients at certification about plans to move during the certification period and issue a Verification of Certification (VOC) to participants/caretakers/ guardians who plan to move out-of-state. A VOC, the Crossroads system, or telephone verification may be used when accepting transfers. If transfers are not enrolled on a walk-in basis, they should be enrolled within a time to avoid a break in the provision of benefits to which a transfer is entitled.  Is the “Are You Moving” poster (dated 7/2017, English & Spanish versions) prominently displayed where it can  be read by those who receive WIC services? (WPM Chapter 6E)Method of Review: * Observe 3-5 certifications using Appendix 1, item 11 to document findings.
* Interview staff about procedures for transferring participants into and out of the agency and, if possible, observe a client requesting transfer into or out of the agency.
* View locations(s) of posters.
* Interview staff regarding use of posters in satellite clinics.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **1.8 Does the local agency make program services more accessible for individuals who are employed, attend school, live in a rural area, and/or have transportation problems?**Minimum Standard: The WIC Program is required to make program services more accessible for applicants/participants who are employed, attend school, live in a rural area, and/or have transportation problems. There are a variety of approaches to increase accessibility including scheduling appointments at the individual’s convenience and extending clinic hours. (WPM Chapter 10)Method of Review: * Interview staff about how the agency makes WIC services accessible to client.
* Review Local Agency Texting/Digital Platform Policy. (WPM Chapter 6A)
* Review clinic appointment schedules.

**Finding:**      **Required Actions:**       **Suggestion:**       |

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| **1.9 Is the National Voter Registration Act (NVRA) being implemented in accordance with program policy?** Minimum Standard: The WIC Program is required to ask applicants/participants/parents/guardians/caretakers the NVRA question at the time of application for program benefits, subsequent certification, or a change in residential address or name. Applicants, participants, parents, guardians and caretakers must be offered the Voter Registration Application Form and complete and sign a Voter Registration Preference Form. Completed Voter Registration Applications must be sent along with the NVRA Agency Transmittal Form to the county Board of Elections office. Copies of the submitted NVRA Agency Transmittal Form and the original NVRA Preference Form must be maintained on file in a confidential manner by the local agency. (WPM, Chapter 6A, Section7) Local agencies must have a written policy that identifies the NVRA Point Person position and alternate NVRA Point Person position responsible for the management and retention of the NVRA Agency Transmittal Forms, Voter Registration Preference Forms, and Voter Registration Applications. The NVRA poster (dated 5/2021, English & Spanish versions) must be prominently displayed where it may be read by those who receive WIC services. (WPM Chapter 6A)Method of Review:* + - Observe 3-5 certifications using Appendix 1, item 7 to document findings.
		- Interview staff about the procedure for completing the requirements of the NVRA.
		- Observe staff offering the opportunity to register to vote by asking the following question using the EXACT wording stated: “If you are not registered to vote where you live now, would you like to apply to register to vote here today?”, by offering the voter registration application and by providing the preference form.
		- View location(s) of posters.
		- Interview staff regarding use of posters in satellite clinics.
		- Review local agency’s written NVRA policy.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**2. Electronic Benefit Transfer**

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| **2.1 Does the local agency comply with policy at food benefits issuance?*** **Proof of identity of the participant/parent/guardian/caretaker/proxy**
* **Signature of recipient**
* **Issuance when a cardholder is not physically present**

Minimum Standard: The individual staff issuing food benefits must view proof of identity of the recipient at each issuance. Signature of the person receiving issuance is required. Local agencies may issue food benefits when clients are not physically present only for reasons specified in program policy. (WPM Chapter 8)Method of Review: * Observe issuance to 3-5 participants using Appendix 1, item 15 to document findings.
* Interview staff about procedures used for issuing benefits when a cardholder is not physically present.
* Review documentation of a sample of issuance occurrences using the Food Benefits List screen of selected participants.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| * 1. **Are clients educated on how to use the NC eWIC card at the initial certification or when first issued the eWIC card?**

Minimum Standard: Staff must educate clients on the use of the NC eWIC card, food and cash value benefits, store coupons, authorized vendors and how to access their benefit balance, purchase history and account information. (WPM Chapter 8) Method of Review: * Observe issuance to 3-5 participants using Appendix 1, item 15 to document findings.
* Interview staff about how they educate new and existing clients on use of the NC eWIC card, food and cash value benefits, store coupons and authorized vendors. Do staff use the eWIC brochure to educate clients on selecting a PIN and the shopping guide for educating about selecting WIC approved foods?

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| * 1. **Are proxies asked to read or have read to them the rights and responsibilities at time of food benefit**

**issuance?**Minimum Standard: A proxy must read or have read to them the rights and responsibilities as stated per program policy at time of food benefit issuance. The signature obtained of food benefits issuance indicates the proxy understands the rights and responsibilities as related to the WIC Program. (WPM Chapter 8)Method of Review:* Interview staff on the procedures for issuing food benefits to a proxy.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**3. Security and Accountability**

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| **3.1 Does the local agency ensure separation of duties? When separation of duties cannot be achieved, does the local agency follow their written policy?**Minimum Standard: There must be a separation of duties among local agency staff so that the same person does not complete both income eligibility determination and medical or nutritional risk for the same participant. Local agencies must have a written policy that addresses the strategy used when separation of duties is not possible. (WPM Chapter 1) Method of Review * Interview staff about procedures they use when staff is limited.
* Review the Separation of Duties Log for the past 12 months.
* Review the local agency’s Separation of Duties policy.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **3.2 Do staff protect access to the Crossroads system?**Minimum Standard: Local agency staff should log out of the Crossroads system when away from their work station and must never share NCID and/or passwords. (WPM Chapter 16) Method of Review: * Observe staff practices.
* Interview staff about practices they use to secure access to the Crossroads system.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **3.3 Does the local agency utilize a secure method for storing NC eWIC cards?**Minimum Standard: The local agency is responsible for keeping NC eWIC cards in a locked storage area when not in use. (WPM Chapter 8)Method of Review: * View secure storage areas and interview staff about security measures practiced for NC eWIC cards.

 **Finding:** **Required Actions:** **Suggestion:** |

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| **3.4. Are formulas and WIC-eligible nutritionals received from the Community Nutrition Services Section (CNSS),** **other local agencies, authorized vendors or wholesalers maintained in a secure location following food safety** **practices and issued and inventoried according to program requirements? Is all returned formula from**  **participants being properly disposed of according to NC WIC Program policy?** Minimum Standard: All products received from the CNSS, other local agencies, authorized vendors or wholesalers must be maintained in a secure storage area following food safety practices until issued. Staff must maintain an ongoing inventory of all formulas/medical foods received from CNSS and document issuance/disposition of inventoried products. All returned formula products from participants, out-of-date products, and damaged products should be disposed of in a timely and appropriate manner. (WPM Chapter 7) Method of Review: * Observe storage area of formulas/nutritionals.
* Check expiration date of products in stock.
* Review physical inventory of formulas/WIC-eligible nutritionals received from the CNSS and the formula disposal log.
* Compare product in inventory with amount documented in Crossroads
* If included in the monitoring packet of products shipped to the agency from the CNSS, compare the inventory to the report(s).
* Interview staff on the procedure for receiving and issuing of products ordered from CNSS (products received are added into inventory, products are issued using the Formula Wizard).
* Interview staff about the formula disposal process.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**4. Vendor Management**

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| **4.1 Is documentation of the last annual vendor training on file?**Minimum Standard: Documentation of the last annual vendor training including correspondence announcing the training with two dates offered, the training agenda, and a copy of the module used for the training must be kept on file. (WPM Chapter 11) Method of Review: * Review vendor training file.

**Finding:**      **Required Actions:**       |

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| **4.2 Is required documentation of vendor management activities on file?**Minimum standard: The WIC Vendor Agreement is a three-way contract between a Vendor, the State WIC agencyand the Local WIC agency. Each vendor’s file must include copies of the following forms:* + 1. Vendor Application
		2. Vendor Agreement
		3. Price Lists (new vendors only as of 10/1/18)
		4. Information Update form (non-reauthorization years)
		5. Verification of Attendance forms
		6. Above 50% Vendor Self-Declaration Form or Cost Containment Exemption Form as indicated in Table 4.2.

The specific forms required to be in each vendor’s file are contingent upon corporate or non-corporate vendor status. Additionally, non-corporate free-standing pharmacy vendors must have a Cost Containment Exemption Form in their file while non-corporate retail vendors must have an Above 50% Vendor Self Declaration Form in their file. Refer to the most recent Vendor Agreement for the dates of authorization. Local agencies must have a written policy addressing when they accept vendor applications. (WPM Chapter 11)Method of Review:* Review a sample of 5 vendor files using Table 4.2 to document findings. Include both corporate and non

 corporate vendors in sample.* Review the local agency’s policy addressing the acceptance of vendor applications.

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| * 1. **Are vendors monitored in accordance with program policy?**

Minimum Standard:  Local agencies must document all monitoring visits on the Vendor Monitoring Report form (DHHS 2925) and must complete the following monitoring activities: (WPM Chapter 11)* Monitor each vendorat least once every three federal fiscal years, as well as monitor at least one third (33.3%) of their vendors each federal fiscal year (*October 1 - September 30).*
* Monitor new vendors by the end of the federal fiscal year following the date of their authorization approval.
* Perform a follow-up monitoring within 21 days of the date of a monitoring visit in which findings were identified.
* Monitor vendors that have had two (2) or more violations assessed (same or different) in the previous federal fiscal year or have been disqualified from the program within the last three (3) years and are now participating.
* Monitor a vendor within seven (7) days of a request to do so by the CNSS WIC Vendor Unit.

Method of Review: * Review the vendor monitoring status report included in the local agency monitoring packet and discuss with staff.
* ***It is an automatic finding if the agency has any vendor(s) reported as being out-of-compliance with vendor monitoring requirements.  The local agency CAP must state how the non-compliance occurred for each vendor listed, how the non-compliance will be resolved, and what steps will be taken to assure future compliance with vendor monitoring requirement(s).  If the local agency can prove they completed the vendor monitoring as required, the agency must submit this proof immediately to the CNSS WIC Vendor Unit.***
* Interview staff about the tracking system used by the agency to determine when a vendor needs to be monitored and when the activity is completed.

**Finding:**      **Required Actions:**       |

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| * 1. **Has the local WIC agency assured that there is no conflict of interest between a vendor/vendor applicant**

**and/or an employee of said vendor/vendor applicant and the State WIC Agency or the local WIC agency?**Minimum Standard: Vendor/Vendor Applicants shall not have any owner(s), officer(s), or manager(s) who areemployed, or who have a spouse, child, or parent who is employed by the State WIC program or the local WIC program serving the county in which the vendor conducts business. A vendor/vendor applicant also shall not have an employee who handles or transacts WIC food benefits or cash-value benefits who is employed or who has a spouse, child, or parent who is employed by the state WIC Program or local WIC program serving the county in which the vendor/vendor applicant conducts business. (WPM Chapter 11 and Terms of Vendor Agreement)Method of Review: * Interview local agency WIC Director regarding the possibility of conflict of interest with any vendor/vendor applicants and local WIC agency staff.

**Finding:**       **Required Actions:**       |

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| * 1. **Has the local WIC agency assured that confidential vendor information is only shared with appropriate entities?**

Minimum Standard: Confidential vendor information is any information about a vendor (whether it is obtained from the vendor or another source) that individually identifies the vendor, except for vendor’s name, address, telephone number, web site/e-mail address, store type, and authorization status. Except as otherwise permitted by this section, the State agency must restrict the use or disclosure of confidential vendor information to:* Persons directly connected with the administration or enforcement of the WIC Program or SNAP who the State agency determines have a need to know the information for purposes of these programs. These persons may include personnel from its local agencies and other WIC State and local agencies and persons investigating or prosecuting WIC or SNAP violations under Federal, State, or local law;
* Persons directly connected with the administration or enforcement of any Federal or State law or local law or ordinance. Prior to releasing the information to one of these parties (other than a Federal agency), the State agency must enter into a written agreement with the requesting party specifying that such information may not be used or redisclosed except for purposes directly connected to the administration or enforcement of a Federal, or State law; and
* A vendor that is subject to an adverse action, including a claim, to the extent that the confidential information concerns the vendor subject to the adverse action and is related to the adverse action.
* At the discretion of the State agency, all authorized vendors and vendor applicants regarding vendor sanctions which have been imposed, identifying only the vendor’s name, address, length of the disqualification or amount of the civil money penalty, and a summary of the reason(s) for such sanction provided in the notice of adverse action. Such information may be disclosed only following the exhaustion of all administrative and judicial review, in which the State agency has prevailed, regarding the sanction imposed on the subject vendor, or the time for requesting such review has expired.

Method of Review**:** * Interview local agency WIC Director regarding the procedures followed to ensure that confidential vendor information is only disclosed to the appropriate entities.

**Finding:**      **Required Actions:**       |

**5. Civil Rights**

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| **5.1 Do all locally developed print materials, internet sites, print and electronic media announcements that describe the WIC Program include the current nondiscrimination policy statement?****Do locally developed letters/notifications related to program eligibility include the nondiscrimination statement and the fair hearing notice?**Minimum Standard: The current nondiscrimination statement must appear on locally printed publications; print, television and radio announcements; and local websites whenever they describe the WIC Program and are intended for public information, public education, or public distribution. The nondiscrimination statement on the WIC program website should not be translated using an automated translation method software. If any locally developed notices are used to inform the applicant/participant of his/her eligibility, the notices must present the nondiscrimination statement and the right to a fair hearing statement in a language that the WIC applicant can understand. (WPM Chapter 4 and 14)Method of Review: * Review the local agency web site and locally printed WIC publications.
* Review copies of all submitted and published media releases, scripts and broadcast schedules for radio and television media releases.
* If applicable, review locally developed notices used to inform applicants/participants of eligibility status.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **5.2 Do applicants/participants receive required notifications according to program policy?**Minimum Standard: Clients must receive required notifications and there must be documentation in the Crossroads record of the client receiving the notification. Required notifications include: application ineligibility, North Carolina WIC Program Notice, missed initial certification appointment, and missed subsequent certification appointment. (WPM Chapter 6D)Method of Review: * Review documentation of notices in Crossroads using the records that were accessed for the clinical review and document findings on Appendix 2 and 3, Item 5.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **5.3 Has local agency assured civil rights compliance according to federal requirements?**Minimum Standard: Local agencies must operate in compliance with civil rights nondiscrimination guidelines that are outlined to receive federal funds. The USDA “And Justice for All” poster and the “Fair Hearing” poster (dated 9/2019 & 8/2020, English & Spanish versions) must be prominently displayed where it may be read by those who receive WIC services. The local agency must not deny an individual the right to file a complaint of discrimination and must provide complainants with guidance about how to file a complaint and/or assistance with completing and filing the complaint form (WPM Chapter 4 and Chapter 14) Method of Review: * View location(s) of posters.
* Interview staff regarding use of posters in satellite sites.
* Interview staff about how they handle civil rights complaint(s) of discrimination.
* *It is an automatic finding if/when the agency has unreported discrimination complaint(s).*

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **5.4 Is the local agency making a reasonable effort to serve non-English speaking or limited English proficiency**  **(LEP) participants?**Minimum Standard: Programs and services supported in whole or part with federal funds must provide qualified interpretation services at no charge to non-English speaking clients and those with LEP. Consolidated Agreement at  <https://www.dph.ncdhhs.gov/lhd/docs/LHDs-ConsolidatedAgreement.pdf>Qualified bi-lingual staff and written materials in primary languages of client base are other indicators of reasonable effort to serve clients with limited English proficiency. (WPM Chapter 4)Method of Review: * Interview staff about efforts to accommodate LEP/non-English speaking clients.
* Review availability of qualified interpreters and/or bi-lingual staff.
* Review availability of written materials and nutrition education resources in other languages.
* View location of poster.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **5.5 Is staff collecting racial/ethnic information from clients in a manner that complies with Federal guidelines?**Minimum Standard: Local Agencies must ensure that ethnic and racial data is collected and documented for all individuals at the time of initial application for WIC Program services. Before collection, it must be explained and the applicant understands that the collection of this information is voluntary, kept confidential and solely for the purpose of determining the State’s compliance with Federal civil rights laws and has no effect on the determination of their eligibility to participate in the program. Self-identification by the applicant is the preferred method of obtaining ethnic and racial information. The applicant may select one ethnic category, but multiple racial categories. If an applicant declines to self-identify, staff must inform the applicant that another method will be used to collect this information, including visual identification. (WPM Chapter 4)Method of Review: * Observe 3-5 participants being certified using Appendix 1, item 4 to document findings.
* Interview staff about procedures they routinely use to collect racial/ethnic data.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **5.6 Does all staff receive annual civil rights training?**Minimum Standard: All staff who interact with program applicants/participants and their supervisors must participate in annual civil rights training which addresses the USDA required content areas. (WPM Chapter 4)Method of Review: * Review the training materials used for most recent annual training session(s).
* Review documentation of staff having completed the training.
* Interview staff about how they apply their civil rights training.

**Finding:**       **Required Actions:**       |

 **6. Caseload Management**

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| **6.1. Does the agency submit the required annual media release publicizing the availability of WIC and program** **benefits?**Minimum Standard: On an annual basis, each local agency must send a media release or general advertisement to relevant print and/or broadcast media. The announcement must include WIC eligibility criteria, program benefits, locations of the local agency, and USDA nondiscrimination statement. The local agency must maintain documentation of the media release that includes a copy of the submitted media release and a copy of the printed media release or a copy of the broadcast schedule for radio or television. (WPM Chapter 10) Method of Review: * Review documentation and content of the submitted and published annual media release.

**Finding:**       **Required Actions:**       |

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| **6.2 Does the agency have the Local Agency Retention and Outreach Plan on file for the current year?**Minimum Standard: Local agencies must develop an annual outreach plan to build and sustain caseload and improve delivery of service. At a minimum, the Local Agency Retention and Outreach Plan must include the agency’s plans to target services to the highest priority groups and the plans for breastfeeding promotion and support for pregnant and breastfeeding women. (WPM Chapter 10)Method of Review: * Review the current annual outreach plan. (WPM Chapter 10, Attachment 5)

**Finding:**       **Required Actions:**       |

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| * 1. **Does the agency maintain documentation of all agency retention and outreach efforts?**

Minimum Standard: Local agencies are required to maintain documentation (electronic or hard copy) of all retention and outreach efforts. Documentation of outreach efforts should include information on program marketing efforts (print, social, and media releases), caseload management strategies, efforts to build community partnerships, activities to increase program awareness, efforts to improve customer service and increase program accessibility and established referral arrangements. (WPM Chapter 10)Method of Review:* + - Review WIC Program Outreach Activity Log (Attachment 6) and compare to the Local Agency Retention and Outreach Plan. Ensure the outreach efforts include who, what, when, where and the evaluation of efforts are documented. Ensure the goals are related to the target audience.
		- Interview staff regarding the WIC Program Outreach activity results as relates to the Strategic Retention and

 Outreach Plan Goals. **Finding:**      **Required Actions:**       |

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| * 1. **Does the local agency monitor no-show rates and use this information when evaluating program operations?**

Minimum Standard: Local agencies must monitor no-show rates monthly. Local agency staff must evaluate current practices and implement strategies to reduce no-show rates. (WPM Chapter 10)Method of Review:* + - Review two months of no-show rates in the master calendar.
		- Interview appropriate staff on what strategies are used to reduce no-show rates.

**Finding:**      **Required Actions:**       |

**7. Fiscal Management**

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| **7.1 Have all subcontracted services received prior approval from the Regional Nutrition Consultant?**Minimum Standard: Prior to being signed, all sub-contracts (new or renewal) must be approved in writing by the local agency’s Regional Nutrition Consultant. (WPM Chapter 3) Method of Review: * Compare the date each agreement was initiated or renewed with the date it was approved by the Regional Nutrition Consultant.

**Finding:**      **Required Actions:**       |

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| * 1. **Does the local agency account for WIC Program expenditures according to program requirements?**

Minimum Standard: The local agency must maintain documentation that supports expenditures, billing expenditures to the appropriate activity budget including a separate activity budget for Breastfeeding Peer Counselor Program expenditures and assuring that expenditures are allowed under program policy. Unless jointly purchased, all items purchased by the WIC Program must be used solely by WIC. (WPM Chapter 12) Method of Review: * Review one month of expenditure records and supporting documentation and review time sheets of all staff (including non-WIC staff) charging time to the WIC Program.
* Interview staff about process used to manage WIC Program expenditures including the coding of purchases to activity budgets.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **7.3 Does the local agency’s cost allocation plan to determine WIC expenditures comply with WIC Program policy?**Minimum Standard: The local agency must use an acceptable method to determine cost sharing between programs. Common sources of shared expenses include but are not limited to:

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| * duplicating
* printing
* phone services
 | * internet services
* office supplies
* janitorial & maintenance services
 | * utilities
* equipment
* clinic costs
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Source documentation must be available and be retained in accordance with the DHHS retention and disposition schedule. (WPM Chapter 12) Method of Review: * Compare cost allocation plan & supporting documentation for each expense that is cost shared between programs.
* Interview staff about cost allocation plans.

**Finding:**      **Required Actions:**       |

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| **7.4 Was prior approval obtained for any purchase within the past 2 years of equipment greater than $500 and of any medical equipment, computers, and computer accessories (including software)?**Minimum Standard: All purchases of equipment costing greater than $500, medical equipment, and computers/computer accessories (including software) must have prior approval. Within 60 days of the date of approval to purchase equipment,thelocal agency must submit to CNSS a written report of the purchase of equipment with an acquisition cost of $500 or more. (WPM Chapter 12)Method of Review: * Interview staff about the process for purchases which require CNSS approval.
* Review correspondence requesting the purchase of equipment (with WIC funds) within the past two years and review subsequent approval and correspondence for each purchase reporting its acquisition.

**Finding:**      **Required Actions:**       |

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| **7.5 Does the local agency manage their WIC fixed assets in accordance with program policy?** Minimum Standard: Local agency staff must maintain a list of fixed assets that were purchased with local WIC funds. Staff must submit completed Equipment Disposal Forms to CNSS for equipment being surplused. (WPM Chapter 12) Method of Review: * Interview staff about the process of maintaining inventory of fixed assets purchased with local WIC funds.
* Review the locally maintained fixed asset inventory list, ensuring that all purchases of fixed assets with local WIC funds appear on the list.
* Interview staff about the process they use to surplus equipment including the submission of equipment disposal forms to CNSS.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**8. Policies and Procedures Management**

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| **8.1 Are the North Carolina WIC Program Manual and local agency policies current and readily available to local** **agency staff?** Minimum Standard: The WIC Director is responsible for ensuring that all copies of the WIC Program Manual are  maintained with the most current information. The WIC Director is also responsible for ensuring that staff is aware of changes in WIC Program policy and procedures. Local agency policies must be readily available to staff. Local agency policies should be signed by the WIC Director (and any other staff per agency protocol) and dated. Policies  should be reviewed at least every two years and updated as needed. (WPM Chapter 1) Method of Review: * + - Review copy(ies) of WIC Program Manual and local agency policies to see if they are current.
		- Interview staff about their access to and use of the WIC Program Manual and local agency policies.
		- Interview WIC Director about protocol for local agency policy development and review.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **8.2 Does the local agency have a disaster policy?**Minimum Standard: At a minimum, the local agencies must have a written policy describing a plan to serve participants in the event that the provision of WIC services is interrupted due to a disaster situation. (WPM Chapter 1)Method of Review: * Interview staff about how they serve participants in the event of a disaster situation.
* Review the local agency’s disaster policy.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **8.3 Does the agency conduct a local agency self-assessment of the WIC Program operations in accordance with program policy?**Minimum Standard: Each local agency must complete a self-assessment of program operation in years in which they are not being monitored by CNSS. Staff must write a report of any findings that reflect non-compliance with program regulations, rules and policies and a specific corrective action plan (CAP) for each finding of non-compliance. For each self-assessment, the local agency must retain on file all the working papers, a copy of the written report of findings and CAP, correspondence from the CNSS Nutrition Program Consultant or Regional Nutrition Consultant and documentation of CAP implementation (e.g., training agenda and date) on file. (WPM Chapter 15)Method of Review: * Interview staff about the process they use to complete the local agency self-assessment.
* Review working papers, report of findings, the CAP, and correspondence from most recent local agency self-assessment.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**9. Nutrition Assessment**

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| **9.1 Are required nutrition assessments completed for each certification period?**Minimum Standard: A nutrition assessment conducted by a CPA must be completed for each applicant/participant at the initial certification and at each subsequent certification. For both infants and breastfeeding women, an additional nutrition assessment is required five to seven months after birth/delivery. For children, an additional nutrition assessment is required five to seven months after certification. To complete a nutrition assessment, staff must collect and assess the following information per program guidelines:

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| * Anthropometric
* Biochemical
 | * Clinical
* Dietary & Physical Activity
 | * Eco-social
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Staff must organize, integrate, and synthesize the information gathered during the nutrition assessment process and write a brief statement which summarizes the findings of the nutrition assessment, including problems and potential problems. Staff is required to document the nutrition assessment in the Crossroads system. Local agencies must have a written protocol for immunization screening and referral. (WPM Chapter 6C)Method of Review: * Observe 3-5 individuals being certified using Appendix 1, item 13 to document findings.
* Review the records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should include participants receiving exempt infant formulas or WIC-eligible nutritionals.
* Review local agency policy regarding immunization screening and referral.

 **Finding:**       **Required Actions:**      **Suggestion:**       |

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| **9.2 Are all eligible nutrition risk criteria for each participant identified and are criteria being used correctly?** Minimum Standard: All eligible risk criteria are identified and documented in each participant’s record. Nutrition risk criteria must be used in accordance with how each criterion is defined. (WPM Chapter 6C)Method of Review: * Observe 3-5 individuals being certified using Appendix 1, item 14 to document findings.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should be of participants receiving exempt infant formulas or WIC-eligible nutritionals.

**Finding:**      **Required Actions:**       **Suggestion:**       |

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| **9.3 Does staff use correct procedures for weighing and measuring infants, children, and women on**  **maintained equipment?** Minimum Standard: Standard techniques for weighing and measuring individuals must be used. All staff has been trained on standard procedures for weighing and measuring. (WPM Chapter 6C) Method of Review: * Observe at least one (1) infant, one (1) child, & one (1) woman being weighed and measured using Appendix 1, item 12 to document findings. When applicable, observe more than one (1) person doing the weighing and measuring.
* Interview staff to determine protocol/procedure for staff training.

**Finding:**      **Required Actions:**       **Suggestion:**       |

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| **9.4 Does staff make sure the scales are tested and maintained annually based on policy?**Minimum Standard: Weighing and measuring equipment must meet specifications outlined by the State. Scales must be tested by the NC Department of Agriculture annually and inaccurate scales removed from service until they can be calibrated, repaired, or replaced. (WPM Chapter 6C)Method of Review: * Check stadiometers for accuracy of height (i.e. placement on the wall).
* View all scales in agency.
* Review receipt for annual test of scales
* Interview staff to determine the protocol for testing of scales and the process used to determine if a scale needs to be repaired or replaced.

**Finding:**      **Required Actions:**       **Suggestion:**       |

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| **9.5 When required, is medical documentation obtained for exempt infant formula, WIC-eligible**  **nutritionals and whole milk per policy guidelines?**Minimum Standard: Medical documentation which meets policy requirements is required for a participant to receive a food package with an exempt infant formula or WIC-eligible nutritional or whole milk. The prescription must be scanned into the participant’s Crossroads record. (WPM Chapter 7) Method of Review: * Review medical documentation records of at least five (5) clients receiving exempt infant formula, WIC-eligible nutritionals using Appendix 2 and Appendix 3 to document findings.
* Review medical documentation found in the record review of any prescribed food package modifications using Appendix 2 and Appendix 3 to document findings.
* Interview staff to determine whether the correct policy and procedures are being followed when issuing exempt infant formula and WIC-eligible nutritionals.
* Interview staff to determine if the correct process is being followed when a formula has been changed or if a medical document needs to be clarified.

**Finding:**      **Required Actions:**       **Suggestion:**       |

**10. Plan of Nutrition Care**

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| **10.1 Is an individualized Plan of Care documented for each client using standardized documentation practices?**Minimum Standard: Based on the summary of nutrition problems and potential problems, staff must work with the participant to establish a plan of care. The required components are: goals, nutrition education, breastfeeding support, food prescription, and follow-up. There must be a standard list of abbreviations or outside publications used by staff when documenting in the records. Local agencies must use standard procedures for correcting documentation errors. (WPM Chapter 6C)Method of Review: * Observe 3-5 individuals being certified using Appendix 1, item 14 to document findings.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should be of participants receiving exempt infant formulas or WIC-eligible nutritionals.
* Review standard list of abbreviations or outside publication used by the agency.
* Review procedures for documentation (coordinate with findings from record review & review of administrative documents such as logs).

 **Finding:**       **Required Actions:**       **Suggestion:**       |

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| * 1. **Is the local agency maintaining referral sources, referring as needed and documenting in the Care Plan?**

Minimum Standard: * Local agencies must maintain a current list of local health and mental health resources for referral for diagnosis and treatment of maternal depression.
* Local agencies must maintain a current list of local counseling and treatment resources for substance abuse and make the list available to all pregnant, breastfeeding and postpartum women participating in WIC (WPM Chapter 5)
* Individuals not currently participating in Medicaid but who appears to be income eligible shall be referred to Medicaid. (WPM Chapter 6C)
* Staff is required to document any referrals in the care plan.

Method of Review: * Observe 3-5 individuals being certified using Appendix 1, item 14 to document findings.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. record selection should include five (5) each of women, infants & children. Five participants should be receiving exempt infant formulas or WIC-eligible nutritionals.
* Review list of local health and mental health resources
* Review list of local resources for substance use counseling and treatment
* Review documentation of referrals in the care plan.

**Finding:**      **Required Actions:**       **Suggestion:**        |

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| * 1. **Is the food package being prescribed in accordance with program policy?**

Minimum Standard: A CPA must prescribe the food package at each certification including when modifications to the food package are requested or required. (WPM Chapter 7) Method of Review: * Observe 3-5 individuals having a food package prescribed to them using Appendix 1, item 15 to document findings.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five participants should be receiving exempt infant formulas or WIC-eligible nutritionals.

**Finding:**      **Required Actions:**       **Suggestion:**        |

 **11. Nutrition Education**

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| **11.1 Do participants receive the required number of nutrition education contacts per certification?**Minimum Standard: During each certification period:* At least two nutrition education contacts must be made available to pregnant and postpartum women and infants certified at greater than 6 months of age.
* One nutrition education contact must be made available for every three months of participation to infants certified at less than 6 months of age, to breastfeeding women certified through one year postpartum, and to children.
* If the client refuses to participate in nutrition education, the refusal must be documented. (WPM Chapter 5)

Method of Review: * Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should be of participants receiving exempt infant formulas or WIC-eligible nutritionals.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **11.2 Is nutrition education accurate, relevant, and appropriate for the needs of the participants?** Minimum Standard: The content of and method used to provide nutrition education must be accurate and relevant to the participant’s age, nutritional needs, interests, household situation, cultural preferences, language spoken and any special considerations the participant might have such as being a migrant; being homeless; having vision, hearing or learning impairments; and/or having limited English proficiency. (WPM Chapter 5)Method of Review: * Observe 3-5 educational sessions with participants using Appendix 1, item 15 to document findings.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should be of participants receiving exempt infant formulas or WIC-eligible nutritionals.
* Review nutrition education resources used by staff for accuracy, relevancy, and appropriateness.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **11.3 Do participants receive education on required topics based on participant category?** Minimum Standard: * Women must receive verbal and written information on the five (5) required education topics at least once during their WIC participation.
* All parents/caretakers of infants and children participating on the WIC Program must receive information about the dangers of substance abuse at least once during the infant’s/child’s WIC participation, preferably at the initial certification.

Method of Review: * Review written educational materials of the required topics used by the local agencies.
* Review records of at least fifteen (15) clients using Appendix 2 & Appendix 3 to document findings. Record selection should include five (5) each of women, infants & children. Five records should be of participants receiving exempt infant formulas or WIC-eligible nutritionals.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **11.4 Are mini-lessons being implemented in accordance with program policy?**Minimum Standard: Mini-lessons can be provided by a CPA or by WIC management support or other non-CPA staff who have been trained in the use of mini-lessons. Mini-lessons must be developed by a CPA and have a written outline on file which includes the target audience; one educational objective; information to be communicated, and a copy of any educational handout. Local agencies that use management support or other non-CPA staff to provide mini-lessons must have a written policy for doing so as outlined in WIC Program policy. (WPM Chapter 5)Method of Review* Observe at least two mini-lessons, if used as a routine method of providing nutrition education to low-risk clients.
* Review mini-lessons for required components and to confirm a CPA developed them.
* Review documentation that management support staff and/or non-CPA staff was trained to provide mini-lessons, including date of training.
* Review local agency policy regarding mini lessons.

**Finding:**      **Required Actions:**      **Suggestion:**       |
| **11.5 Are class outlines on file when group education is provided?** Minimum Standard: Agencies that conduct group education must have class outlines with required components: target audience, objectives, outline of presentation, and educational materials/activities used. Outlines should be reviewed periodically and updated as needed to assure they are relevant and accurate. (WPM Chapter 5)Method of Review: * Review class outlines for required components, relevancy and accuracy.
* Observe a group class, if available.

**Finding:**      **Required Actions:**      **Suggestion:**       |

**12. Breastfeeding Promotion & Support**

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| **12.1 Does the local agency promote & support breastfeeding?** Minimum Standard: There must be:* A designated individual, who meets training requirements, serving as the breastfeeding coordinator to manage breastfeeding promotion and support activities within the agency.
* A positive clinic environment which endorses exclusive breastfeeding as the normal method of infant feeding and ensures that women have access to breastfeeding promotion and support activities during the prenatal and postpartum periods.
* Practices are followed to assure families feel comfortable nursing within the agency and are informed of the availability of private space for nursing upon request. (WPM Chapter 9)
* A written policy for breastfeeding consultation and referral for WIC staff when staff encounter breastfeeding situations outside their scope of practice. This plan must be updated as changes occur (a minimum of once a year) and dated at time of update. **(**WPM Chapter 9)

Method of Review: * Interview designated breastfeeding coordinator and staff about procedures they use to support a breastfeeding friendly clinic environment and maintenance of internal and external partnerships to support breastfeeding including how they ensure the point of contacts for the community and health care providers are accurate.
* Interview one processing assistant (other WIC staff), peer counselor (if applicable), competent professional authority, and WIC-designated breastfeeding expert and have each position direct you to the consultation and referral policy and ask them to describe the referral process when a breastfeeding situation requires consultation and referral.
* Ask a minimum of two WIC staff (other than the WIC Director, Breastfeeding Coordinator, Peer Counselor Program Manager) to direct you to the local agency’s private breastfeeding space. Observe offices, waiting areas, classrooms, and any other place where WIC participants may spend time to assess if the clinic environment supports breastfeeding.
* Do local agency processes integrate breastfeeding as an important and routine part of WIC program services? WIC staff must present exclusive breastfeeding as the normative standard for all families, ask open-ended questions about breastfeeding for pregnant and postpartum women, share the benefits of the fully breastfeeding food package, and demonstrate a positive attitude about breastfeeding despite any personal beliefs.
* Observe signage informing mothers of their right to breastfeed anywhere in the clinic and of the availability of a private breastfeeding space, should breastfeeding families request.
* Review local agency policy regarding a breastfeeding friendly workplace.
* Review local agency consultation and referral policy.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **12.2 Does new WIC staff receive task-appropriate training in breastfeeding promotion and support as part of their**  **orientation and ongoing training?** Minimum Standard: All WIC staff who provide direct services to WIC participants/applicants and their supervisors receive task-appropriate breastfeeding orientation to breastfeeding promotion and support activities and annual continuing education on breastfeeding as defined by State policy.* Staff completion of orientation for new employees, students, volunteers, and contractors to task appropriate breastfeeding promotion and support activities.
* Staff participation in task-appropriate annual continuing education on breastfeeding.

Method of Review: * Verify documentation of required WIC Breastfeeding Support curriculum and local agency breastfeeding program operations within 4 months of employment for all new WIC staff, students, volunteers, etc.
* Verify documentation of required annual breastfeeding continuing education for all WIC staff for the two previous fiscal years.
* Verify documentation of required orientation and continuing education training for the following staff consistent with their role: Breastfeeding Coordinator, Peer Counselor Program Manager, and Peer Counselor(s).

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **12.3 Does the local agency maintain inventory of breastfeeding supplies in accordance with program policy?** Minimum Standard: * The system must demonstrate current inventory, status, and maintenance of both required and optional breastfeeding supplies. Returned multi-user breast pumps must be checked immediately upon return and cleaned by WIC staff within one business day of their return.
* Staff must reconcile the amount on hand of each type of breastfeeding supply with the inventory records in the Crossroads system. This reconciliation should be done quarterly. For purposes of the multi-user electric and pedal pumps, staff must assure the items are accounted for by being in the agency, on loan to a participant, or out-of-commission (e.g., damaged, lost, stolen).

 Method of Review: * Review the agency inventory for each required and optional (if available) breastfeeding supply and reconcile the inventory with the quantity available in the agency.
* Interview staff about the process for checking and cleaning returned pumps before adding back to inventory. Review cleaning logs to ensure pumps are cleaned within one business day of their return.
* Review Quarterly Breastfeeding Supplies Inventory (February, May, August, and November).

**Finding:**      **Required Actions:**      **Suggestion:**       |

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|  **12.4 Does the local agency issue breastfeeding supplies in accordance with program policy?** Minimum Standard: * All clinics must maintain a minimum inventory of required breastfeeding aids or demonstrate that participants have access to the required breastfeeding aids without additional burden on the participant.
* Breastfeeding participants are eligible for breastfeeding supplies based on the completion of a breastfeeding assessment conducted by a competent professional authority or WIC-designated breastfeeding expert.
* All clinics must have one or more staff members who have completed the Community Nutrition Services Section (CNSS) training requirements for pump issuance available at each clinic.
* Participants must receive the minimum education and follow-up required for breastfeeding supply issuance.

(WPM Chapter 9)Method of Review: * Interview the WIC staff to ensure that the local agency issues breastfeeding supplies to eligible WIC participants.
* Observe at least 1 issuance of a breastfeeding supply, if possible.
* Use the Breast Pump Issuance Detail Report to identify 2-3 multi-user electric breast pumps that have been issued and review the corresponding records of participants who were issued the multi-user electric breast pumps

using Appendix 4 to document findings.* Use the detail report of non-serialized products to identify 3-5 single-user breastfeeding supplies and review the corresponding records of participants who were issued a single-user breastfeeding supply using Appendix 4 to document findings. Include at least two single-user electric breast pumps.

**Finding:**      **Required Actions:**      **Suggestions:**       |

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| **12.5 Do peer counselors complete breastfeeding care plans for required contacts for women enrolled in the** **breastfeeding peer counselor program?**Minimum Standard: Peer counselors must create a care plan that organizes the information gathered during the prenatal or postpartum contact and write a brief statement which summarizes the findings and plans to support participant’s breastfeeding goals. The peer counselor is required to document in the Breastfeeding Peer Counselor Care Plan in the Crossroads system. (WPM Chapter 9)The Breastfeeding Peer Counselor Care Plan must include the following information:* Breastfeeding education and support is accurate, relevant and appropriate to meet need(s) of the participant.
* Appropriate topics discussed that are within the peer counselors’ scope of practice.
* Appropriate client referrals.
* Appropriate plans for follow-up.

 To assess whether women enrolled in the breastfeeding peer counselor program are receiving the required number of contacts, review the following:* A Breastfeeding Peer Counselor Program Letter of Agreement must be signed by the participant and by the WIC staff person completing the enrollment. Women enrolled prenatally must receive their initial contact within 30 days.
* A pregnant woman must receive a second prenatal contact between 37 and 38 weeks of the expected delivery date.
* Breastfeeding women must receive two contacts in the first week post-delivery and one contact weekly for the remainder of the first month post-delivery. (WPM Chapter 9)

 Method of Review: * Review five (5) records of participants who have received breastfeeding peer counselor services through at least the first month post-delivery using Appendix 5 to document findings.

**Finding:**      **Required Actions:**      **Suggestion:**       |

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| **12.6 Does the local agency provide consistent and quality breastfeeding peer counseling program services in**  **accordance with program policy?**Minimum Standard: A written policy outlining the local agency’s service delivery model that ensures the provision of consistent and quality breastfeeding peer counseling program services. Peer counselors must receive adequate supervision to ensure operation within the scope of practice. The service delivery model must be evaluated for effectiveness. (WPM Chapter 9)Method of Review:* ***Review local agency Service Delivery Model Policy to ensure it addresses the required aspects including: how to refer participants to the breastfeeding peer counselor program, where peer counselor services will be provided, when peer counselors will be provided, how peer counselor will communicate with participants, and how peer counselor service will be provided when a peer counselor is unavailable.***
* Review one month of record reviews or spot checks conducted by the peer counselor program manager.
* Interview the local agency’s peer counselor program manager on how the peer counselor receives adequate supervision and how the service delivery model is evaluated for effectiveness for the peer counselor to communicate with enrolled participants.
* Interview the local agency’s peer counselor program manager, WIC-designated breastfeeding expert(s), peer counselor(s), and WIC staff about each of the provisions of the service delivery model and compare to the local agency written policy.

**Finding:**      **Required Actions:**      **Suggestion:**       |