Community Nutrition Services Section (CNSS)
Protocol for WIC Program Monitoring of Local Agencies

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- The monitoring schedule is based on the Federal Fiscal Year – October 1 through September 30.
- All correspondence to and from the LA is filed in the LA's monitoring folder on the CNSS share drive.

Preparation for Remote LA Monitoring	
Annually, prior to the start of the federal fiscal year	CNSS prepares a schedule of on-site monitoring reviews. The schedule identifies the local agencies (LA), the month of their review, the team lead (typically the LA's Regional Nutrition Consultant (RNC)) and the assigned monitoring review partner(s).
3 to 4 months prior to monitoring review	**Scheduling the Monitoring** RNC contacts the CNSS monitoring review partner(s) and the local WIC Director to identify potential monitoring dates. RNC confirms with the local WIC Director the selected dates, times, site(s) to be visited, and how the monitoring will be conducted. Unless designated on the schedule, the review team negotiates clinical reviewer and administrative reviewer responsibilities.

2 months prior to the start of the monitoring review	**Monitoring Packets**
	WIC Nutrition Services Unit (WNSU) Administrative Specialist II prepares in coordination with Policy Team the monitoring packet to include pdf versions of or links to:
	• CNSS Reports in local agency folder (pdfs):
	  ○ Formula Orders Received by Agencies
	  ○ Vendor Monitoring Status Report
	  ○ List of Authorized Vendors
	
	• WIC Program Digital Monitoring Tool (link)
	• Local Agency Monitoring Documentation Checklist (pdf)
	• A list of reports for CNSS staff to run for the monitoring review:
	  ○ Random Listing of Participants Report Women
	  ○ Random Listing of Participants Report Infants
	  ○ Random Listing of Participants Report Children
	  ○ Random Listing of Participants Report Exempt Formula/WEN
	  ○ Detail Initial Certification Appointments Made Outside of Processing Standards
	
	WIC Nutrition Services Unit (WNSU) Administrative Specialist II emails the monitoring review team (cc WIC Policy & Quality Assurance Team Lead and Lead RNC) notification of the monitoring review packet.

4 to 6 weeks prior to the start of monitoring review	**Intro Letter** RNC emails a *'WIC Intro Letter'* to the Health Director of the LA with a copy to the WIC Director, WIC Director's supervisor, other review team members, WNSU Manager and lead RNC. The template for this letter includes the 'Items Requested for WIC Program Monitoring'. Attachments are individualized for the agency's review.
At least 15 business days prior to start of the monitoring review	Review team receives originally requested information from the LA. Clinical reviewer chooses and reviews: • A minimum of 15 records (5 women, 5 infants, 5 children) with at least 5 records from the Random Listing of Participants Report Exempt Formula/WEN report. • A minimum of 5 BFPC records. Administrative reviewer reviews locally developed policies and procedures and Detail Initial Certification Appointments Made Outside of Processing Standards report.
Final week prior to the start of the monitoring review	Review team receives additional requested information from LA as listed in the 'Items Requested for WIC Program Monitoring'. Administrative reviewer reviews items in areas 1-8. Clinical reviewer reviews items in areas 9-12. Review team schedules individual calls with LA staff to complete review areas that include interviewing staff as the method of review. Calls should take place during the dates originally scheduled for the monitoring visit.

Remote LA Monitoring	
Entrance conference with LA staff (optional)	If the local agency requests an entrance conference, the RNC or team lead schedules a conference before proceeding with the review to introduce the review team and provide an overview of the monitoring process and activities.
Monitoring	Reviewers complete all areas of the digital monitoring tool and appendices. This is done onsite and using staff interviews, submitted documents, photos, and other means as able. For items with observation as the ONLY method of review for evaluating an area of review, note on the monitoring tool the method of review used to determine compliance.
Team Member Conference	After completion of monitoring activities but before the exit conference with local agency staff, review team members meet to compare and coordinate findings from their respective review areas.
Exit conference with LA staff	RNC or team lead arranges for and leads discussion in an in person meeting, phone call, or video conference, with each reviewer reporting the findings of his/her review areas. The Health Director, WIC Director, designees, and other staff identified by the WIC Director should/may attend.

Report of Findings *(State Agency has 30 days to report to Local Agency)*	
Within 10 days of completing the monitoring review	Review team exchanges drafts of the monitoring report for review and comment, ensuring NO confidential or personally identifiable information is included.
Within 30 days of completing the monitoring review	RNC finalizes the WIC Monitoring Report and emails it to the LA with a '*WIC Report Cover Letter'*, specifying that the LA corrective action plan (CAP) is due within 30 days from the date of the letter. If there are no findings, a *'WIC Close-out Letter'* is emailed to the LA. RNC completes Local Agency Monitoring Documentation Checklist within the monitoring folder. Submit email notification to the WIC Policy & Quality Assurance Team Lead or their designee (cc WNSU Manager) indicating completion. *Staff ensure there is no confidential or personally identifiable information included in monitoring packet.* CNSS administrative staff scans complete monitoring packet into Docushare.

LA Corrective Action Plan (CAP) *(Local Agency has 30 days to respond then State Agency has 20 days to respond back to the Local Agency)*		
By the CAP due date	LA emails a written CAP to each member of the review team.	
After CAP receipt	Within 20 days of receiving the CAP	Review team reviews the CAP and RNC leads team discussion on content. • If CAP is acceptable, RNC emails LA a CAP Acceptance letter. • If CAP is not acceptable, RNC leads discussion with the LA WIC Director, outlining clarifications/additional information required in a revised CAP. RNC emails the LA a '*WIC CAP Revision Request Letter'.*
	Within 15 days of the discussion that a revised CAP is required	LA emails the written revised CAP to each member of the review team.
	Within 15 days of receiving a revised CAP	Review team reviews the revised CAP and RNC leads team discussion on content. • If revised CAP is acceptable, RNC emails LA a *'WIC CAP Acceptance Letter*'. • If revised CAP is not acceptable, RNC leads discussion with the LA WIC Director, outlining necessary clarifications/additional information. RNC emails the LA another *'WIC CAP Revision Request Letter'.*
If a CAP or CAP revision is not received from the LA within the designated time frame, RNC calls LA to provide a verbal reminder and sends a follow-up letter to the LA with a response deadline of 10 days past date of letter.		

Follow-up on CAP Implementation & Monitoring Close-out *(State Agency has 6 months from monitoring event to assess CAP implementation)*	
Within 6 months of the date of monitoring review	RNC or team lead assesses CAP implementation through a visit to the LA or a conference/video call with staff, and a review of CAP implementation documentation.
Within 15 days of visit/call to assess CAP implementation	**If the CAP has been fully implemented,** RNC emails a *'WIC Close-out Letter'* to LA. **If CAP has <u>not</u> been fully implemented,** RNC emails a '*WIC CAP Revision Request Letter'* to LA outlining CAP activities that have not been fully implemented, the date for a return RNC visit/call, and the LA actions to be completed by that date.
Within 15 days of the date of the Close-out letter	RNC creates single pdf including the monitoring documentation checklist and all items contained therein following the naming "<<Agency name>>_<<FY>>_WIC_Monitoring Packet" RNC emails notification of the complete monitoring file to the WIC Policy & Quality Assurance Team Lead, RNC Team Lead, and cc WNSU Manager indicating completion. *Staff ensure there is no confidential or personally identifiable information included in monitoring packet.* CNSS administrative staff files complete monitoring packet in Docushare.