

Section 1.9: Compliance Monitoring of Local Agencies

09/2018

References: 7CFR 246.9

Policy: Local agencies participate in a Management Evaluation and Financial Review every two (2) years or more frequently if necessary.

Purpose: To ensure compliance with federal regulations.

Procedures

Local Agency Coordinators monitor staff and provide ongoing training, to assure compliance with federal regulations.

- In cooperation with Local Agency WIC Coordinators, Administrators, and Financial Management staff, State WIC staff will schedule the activities necessary to complete the Management Evaluation and Financial Review.
- Local Agency staff will cooperate with State WIC staff to assure that necessary activities are carried out during monitoring visits: observing clinic procedures, examining office records, providing access to necessary records, performing chart reviews, and assessing compliance with regulations.
- Local Agency WIC and financial management staff will cooperate with State WIC staff during Financial Reviews to assess compliance with federal and state regulations regarding WIC expenditures.
- If required actions are identified during the Management Evaluation (including against Civil Rights requirements) and/or Financial Review, Local Agency staff will submit a corrective action plan for each required action within 30 days. It is the responsibility of the WIC Coordinator to implement the corrective action plan. The Local Agency may request technical assistance from State WIC staff for resolving required actions.
- State Staff will follow-up with Local Agency staff to ensure that the corrective action plan is completed, which may include an additional site visit by State Staff to a Local Agency clinic/office site.

Guidance

Local Agency WIC Coordinators consult with and seek advice from State WIC staff, as needed, especially before implementing changes related to policy, staffing structure or clinic function.

WIC Coordinators perform ongoing self-evaluation of their agencies' compliance with federal regulations and of program effectiveness, using available tools in (MOM – [Chapter 4: Local Agency Management and Staffing](#)) for staffing and various WIC Information System reports to monitor their performance. See:

- Exhibit 4-G: [Staff Monitoring Plan](#)
- Exhibit 4-H: [Checklist for Certification Observations](#)
- Exhibit 4-J: [Chart Audit Form](#)
- [Exhibit 1-L: State Role in Participant Violations](#)

Related policies:

- [Section 4.2: Local Agency Management](#)
- [Section 4.6: CPA Monitoring and Oversight](#)
- [Section 2.1: Introduction](#) Program Costs

Reference – Complete Listing of Hyperlinks

[Chapter 4: Local Agency Management and Staffing](#)

(<https://www.health.state.mn.us/people/wic/localagency/mom.html#staffing>)

[Exhibit 4-G: Suggested Monitoring Plan](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4g.pdf>)

[Exhibit 4-H: Checklist for Certification Observations](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4h.pdf>)

[Exhibit 4-J: Chart Audit Form](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4j.pdf>)

[Exhibit 1-L: State Role in Participant Violations](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex1/1l.pdf>)

[Section 4.2: Local Agency Management](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch4/sctn4_2.pdf)

SECTION 1.9: COMPLIANCE MONITORING OF LOCAL AGENCIES

Section 4.6: CPA Monitoring and Oversight

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch4/sctn4_6.pdf)

Section 2.1: Introduction

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch2/sctn2_1.pdf)

Minnesota Department of Health - WIC Program 625 Robert St N, PO BOX 64975, ST PAUL MN 55164-0975; 1-800-657-3942, health.wic@state.mn.us, www.health.state.mn.us. To obtain this information in a different format, call: 1-800-657-3942

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