

Maine Center for Disease Control and Prevention WIC Nutrition Program

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Policy No. MA-2

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Monitoring

Authority

7 CFR §246.19(b)

22 MRSA §255 and §1951

10-144 Chapter 286, Section II.B

Policy

1. The State Agency shall be required to conduct a Management Evaluation Review (MER) of each Local WIC Agency once every two (2) years.
2. Local Agency reviews shall be conducted by State Agency staff.
3. Local Agencies shall provide information requested by the State Agency within 30 days of the first request for information.
4. The State Agency shall provide the Local Agency with written documentation of findings on non-compliance with program requirements within sixty (60) days after last MER visit.
5. The Local Agency shall respond with a corrective action plan (CAP), including timeframes for implementation, within sixty (60) days of receipt of the State Agency's findings.
6. The State Agency shall monitor Local Agency implementation of corrective action plans.
7. The State Agency may conduct additional on-site reviews (off-year MER) as necessary.
8. Each Local Agency shall establish internal procedures to monitor operations of all its clinics.
9. The State Agency shall update the audit process as necessary to maintain program integrity.

Procedures

1. The State Agency shall utilize the following protocol when it monitors Local Agencies.
 - 1.1. Advance notification of monitoring visit, sent electronically, 60 days prior to visit.
 - 1.2. Local agency program evaluations, including site visits and participant file and financial record reviews, shall be completed within 30 days of the start of the MER, unless unforeseen circumstances arise.

- 1.2.1. The Local Agency MER shall start on the day the first site visit is conducted.
 - 1.3. The State Agency shall provide a final MER report to the Local Agency within sixty (60) days of the last site visit.
 - 1.4. The State Agency shall schedule an exit conference with Local Agency staff prior to submitting the final MER report.
 - 1.5. The exit conference shall include discussion of findings and opportunity for Local Agency staff input.
 - 1.6. The Local Agency must submit a corrective action plan (CAP) within sixty (60) days of receiving the final MER report from the State Agency if the MER has identified noncompliance with federal regulations.
 - 1.7. The State Agency shall include recommendations for corrective action in the final MER report.
 - 1.8. The State Agency shall evaluate the adequacy of the Local Agency's CAP within sixty (60) days of receipt.
 - 1.9. If the State Agency accepts the Local Agency's CAP, an acceptance letter shall be sent to finalize the MER.
 - 1.10. If the State Agency does not accept the Local Agency's CAP, the Local Agency shall submit a revised CAP within thirty (30) days for consideration and approval.
 - 1.11. The State Agency shall verify implementation of the Local Agency's corrective action plan, including off-year visit(s) and/or participant file and financial record review(s) as necessary.
 - 1.12. All letters and documents pertaining to the MER shall be transmitted electronically.
2. State Agency staff shall monitor their areas of expertise, utilizing the standard MER form (Appendix MA-2-A):
 - 2.1. Clinic Management
 - 2.2. Caseload Management
 - 2.3. Civil Rights
 - 2.4. Organization and Management
 - 2.5. Management Information Systems
 - 2.6. Food Delivery System
 - 2.7. Farmers Market Nutrition Program

- 2.8. Breastfeeding
 - 2.9. Breastfeeding Promotion and Support
 - 2.10. Breastfeeding Peer Counselor Program
 - 2.11. Finance
 - 2.12. Financial Management
 - 2.13. Nutrition
 - 2.14. Certification and Eligibility
 - 2.15. Nutrition Services
 - 2.16. Food Instrument Issuance
3. The State Agency shall utilize the Local Agency Annual Report (Appendix MA-2-B) as well as Cognos and SPIRIT reports in the Local Agency MER, including but not limited to:
 - 3.1. No Shows
 - 3.2. Administrative Costs Claimed
 - 3.3. Financial Reports
 - 3.4. Caseload
 - 3.5. Priorities Served
 - 3.6. Culturally Competent Practices
 - 3.7. Outreach
 - 3.8. Referrals
 - 3.9. Returned/Reissued Formula Logs
 - 3.10. Medical High Risk Referral Log
4. The State Agency shall utilize Local Agency review data to:
 - 4.1. Track individual Local Agency performance
 - 4.2. Compare administration costs
 - 4.3. Compare staffing levels among all Local Agencies
5. State Agency staff may visit Local Agencies and clinic sites at any time.
 6. The State Agency shall use a tracking document to summarize Local Agency reviews for each fiscal year. The tracking document shall include the following information for each Local Agency MER:

- 6.1. Date of initial contact and summary of schedule
- 6.2. Percent of clinics visited
- 6.3. Date of completion for each review section
- 6.4. Date of exit conference
- 6.5. Date State Agency final MER report sent
- 6.6. Date Local Agency corrective action plan due
- 6.7. Date late notice sent, if applicable
- 6.8. Date Local Agency corrective action plan received
- 6.9. Date of Local Agency corrective action plan acceptance
- 6.10. Date of follow up visit, if applicable