

New Hampshire WIC Policy & Procedure Manual

Chapter 10. MONITORING & EVALUATION

Local Agency Management Evaluation

Purpose	To assure local agencies understand and comply with federal and State regulations, policies, and procedures.
Policy	Each local agency's program operations, fiscal management, food delivery system and nutrition and breastfeeding services shall be monitored for compliance with State and federal regulations, rules and policies at least once every two years.
Authority	7 CFR 246.11 7 CFR 246.19(b)(4)
Procedure	The State agency shall conduct monitoring reviews of each local agency at least once every two years. Such reviews shall include on-site reviews of a minimum of 20 percent of the clinics in each local agency or one clinic, whichever is greater.

The State Agency reviews the following areas during the bi-annual management evaluation:

- Management and Staffing
- Civil Rights Compliance
- Outreach
- Referrals
- Participant Services
- Certification
- WIC Nutrition Education Services
- Breastfeeding Promotion and Support Services
- Inventory
- Computer Security and Maintenance
- WIC Food Delivery
- Customer Service and Clinic Environment

When conducting bi-annual Management Evaluations (ME) at the local agency WIC clinics, the State Agency will strive to determine if certain problems are common to all agencies or are particular to one agency. Problems of a general nature will be addressed through policy review and training provided by the State Agency. Problems of a specific nature will be resolved with the individual local agency through corrective action plans.

Management Evaluation Documents

Upon notification by the State Agency (SA) of a Management Evaluation Office Review visit, the local agency (LA) shall comply with all scheduled dates for returning requested materials and documents.

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Each local agency shall be assigned a State Agency staff member to serve as their ME lead person.

Prior to the scheduled visit the SA will review the most recent LA Management Evaluation findings.

At least eight (8) weeks prior to the first scheduled office review day, the SA will send all documents (including any updated forms for the current ME year) via email.

The Management Evaluation email will include:

- Cover letter
- ME Quick reference checklist
- ME Local Agency Questionnaire
- ME clinic observation form
- ME chart review form
- Director discussion guide
- Nutrition Coordinator discussion guide
- Breastfeeding Coordinator discussion guide
- Physical Inventory Reminder

The Management Evaluation Questionnaire and TOM Log must be completed and sent back via email to the State Agency lead person within six (6) weeks of receiving the documents. The return date will be specified in the cover letter. It is important to return the requested documents by the date specified.

The State Agency will conduct record reviews on a minimum of 30 records, which will be taken from a random list of women, children, and infants printed through a StarLINC Ad Hoc Report. The findings will be shared in the Local Agency ME Final Summary Report under Record Reviews. The local agency may request a copy of the completed record review forms for preparing their corrective action plan or other local agency Quality Improvement activities.

Office Review Visit

The Office Visit will be attended by a minimum of two state agency staff. This is typically a one-day visit that is used for random file audits of the daily files, to clarify information provided on the Management Evaluation Questionnaire, to do a physical inventory--an up to date copy of the LA's inventory must be sent to the SA—prior to office visit, to complete/review the 3 discussion guides (Director, Nutrition Coordinator and Breastfeeding Coordinator) and to review Local Agency Work Plan.

Refer to ME Record Review forms and ME Special Formula Review forms.

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Additional items requested for review include, but may not be limited to:

Administrative

- Up-to-date Policy & Procedure Manual
- Up-to-date Federal Regulations
- Up-to-date Policy & Procedure Manual for local agency (if applicable)
- Local Agency Work Plan (will review prenatal enrollment, child retention, innovative strategies to increase access for WIC retention and satisfaction of WIC services and caseload goals)
- Local agency Store List
- Participants found ineligible/over-income (will review 5 files)
- Participant suspensions/disqualifications (will review files for current fiscal year as available)
- Participant warnings (will review up to 5 files and LA letter as available)
- Civil Rights Training documentation for all staff
- Review of Separation of Duties/Conflict of Interest
- Single Staff Certifications—approved or random/unexpected clinics and required record reviews and log
- Canceled clinic log
- Training/Outreach/Meeting (TOM) log
- WIC job descriptions
- Current staff resumes
- Non-Discrimination Statement on outreach materials
- Missing electronic signature report
- No proof/ self-declaration forms (income, residency and identity, if applicable)
- Inventory
- Computer Security and Maintenance log

Nutrition

- Nutrition Education Materials (developed since last review) including newsletters, pamphlets, board displays
- Breastfeeding rates for local agency
- Local Agency Work Plan (will review nutrition and breastfeeding goals)
- Second Contacts (will review written procedures, documentation and master topic files)
- Local Agency High Priority procedure, if different from SA policy
- Hemocue maintenance log
- Electric Breast Pump tracking tool/log

Refer to the ME Quick Reference Checklist and Annual Requirements for WIC staff document.

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Clinic Observation Visit

Ideally, Clinic Observation visits will be conducted prior to the Office Review day when feasible. Depending on the size of the local agency, there may be one to four or more clinics observed. The Clinic Observation Visit will include a minimum of four certification and/or mid-certification appointments. This may also include observation of second nutrition contacts (FUN appointments) and food benefit issuance appointments. Clinic environment is observed and noted for accessibility, safety, flow, and adherence to civil rights compliance.

The SA ME team will aim to include at least one of each category (prenatal, postpartum or breastfeeding, infant and child) during the observation visit. The observation worksheets are provided ahead of time for LA staff to review and be aware of what is being observed on the day of the visit.

The SA nutrition staff will review:

- anthropometrics,
- hematology,
- health interview,
- assessment and assignment of risk factors,
- nutrition and breastfeeding education by nutritionist,
- breastfeeding support by peer counselor,
- food package assessment and assignment, and
- referrals.

The SA operations staff (when available) will review the same families and focus on the following:

- clinic flow,
- scheduling,
- eligibility (proof of income, residency, identity and category),
- rights and rules,
- referrals, and
- benefit issuance.

If SA operations staff are not available SA nutrition staff will review these areas.

Refer to the ME Clinic Observation form and ME Clinic Customer Service form.

Final Summary Report

Upon completion of the Clinic Observation and Office Review visit, the SA ME team will meet to review the findings, observations and noteworthy items.

The SA ME team will send a ME Final Summary report and letter no

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later than 4 to 6 weeks from the Local Agency Office Review visit or Clinic Observation Visit, whichever is the later of the two. The ME Final Summary report will indicate all findings, observations and note-worthy initiatives. A conference call is offered between the SA ME team and the LA Director, Nutrition Coordinator and Breastfeeding Coordinator. A conference call may be required between the SA ME team and the LA Director, Nutrition Coordinator and Breastfeeding Coordinator if findings are significant, if so the LA WIC Director shall encourage their agency's executive director and other appropriate personnel to attend the follow-up conference call.

The conference call will address major findings, noteworthy initiatives and offer the local agency an opportunity to ask questions regarding the ME Final Summary Report. If necessary an in-person meeting will be requested by the State Agency.

Final Summary Report Definitions:

Findings are instances of non-compliance with State regulations and require a formal corrective action plan. The recommendation contains a specific action that the local agency must take to correct the finding.

Observations are instances where the quality of program operations can be improved. An observation does not require corrective action, however, the local agency shall respond to the suggestions.

Noteworthy Initiatives represent program policies and practices that the State Agency considers worthy of modeling and replication.

Upon receiving the Final Summary Report, the Local Agency shall respond to each *Finding* with a formal corrective action plan and each *Observation* with a written response and submit it to the State Agency via email within *60 days*.

Upon receiving the Local Agency Response and Corrective Action Plan for each ME finding, the State Agency shall review the plan and may request additional information or explanation from the LA. This may be done via conference call or email.

The State Agency will send a formal notification of acceptance of each corrective action plan, and a final letter to the local agency director indicating the LA Management Evaluation is closed.

The LA shall maintain documentation of all corrective action plans, technical assistance received, and training attended in accordance with the SA-approved corrective action plan for 2 years, or until the next ME.

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The SA will continue to monitor the LA program implementation of the corrective action plan until all findings have been resolved.

Exception

No exceptions

Best Practice

The local agency shall use their monthly QI and bi-annual Self Evaluation summary to assist with completing their Management Evaluation.