



POLICY: The state WIC program will conduct onsite monitoring reviews of each local WIC program at least every two years to assure program operations are carried out in compliance with federal and state requirements. Local WIC programs will establish self-evaluation procedures to review their own operations and those of associated clinics and/or contractors at least every other year.

PURPOSE: To monitor compliance with federal and state regulations for program operations according to the state program manual. To assist local programs in assuring consistency and effectiveness of service delivery to participants.

RELEVANT REGULATIONS: 7CFR §246.19(b)(1-6)—Management evaluation and monitoring reviews

OREGON WIC PPM REFERENCES: ♦716—Breastfeeding Peer Counseling: State and Local Program Responsibilities
♦1100—Farm Direct Nutrition Program: Local Program Responsibilities

PROCEDURE: 1.0 The Child Nutrition Act of 1966 requires the state WIC program to review local WIC programs at least biennially. An appropriately trained state reviewer, usually a state WIC nutrition consultant, performs an onsite review of local WIC programs every two years. This review is coordinated with the Department of Human Services (DHS), Public Health Division triennial review whenever possible. Because the DHS triennial review is done every three years, the state WIC program often needs to schedule WIC reviews independently to meet the biennial monitoring requirement.

1.1 If applicable, the Farm Direct Nutrition Program (FDNP) and/or the Breastfeeding Peer Counselor Program (BFPC) biennial reviews will be performed at the same time as the WIC program review. Refer to ♦716 and ♦1100 for more information on the BFPC and FDNP reviews.

Review tools 2.0 Current copies of all WIC review tools are available on the Oregon WIC Web site at www.oregon.gov/dhs/ph/wic/clinicforms.shtml.

Review criteria 3.0 The reviewer uses a standard set of criteria in conducting all reviews.

Compliance 3.1 All local programs are reviewed for compliance with USDA regulations and performance requirements from the current state of Oregon Financial Assistance Contract for the WIC program.

3.2 Topics covered during the review include: program management, certification, nutrition education, breastfeeding promotion and support, program integrity and fiscal management.

Fiscal review 3.3 Staff from DHS Financial Services review local program fiscal operations in conjunction with the WIC program review.

LOCAL PROGRAM MONITORING AND REVIEW, cont.

- (Fiscal review:)* 3.3.1 For more information on the fiscal review, refer to the WIC program section of your current contract with the state of Oregon, DHS Public Health Division.
- Quality assurance* 3.4 We recommend that local programs choose to be reviewed for quality assurance in addition to the compliance review.
- Before review* 4.0 Before the onsite review, the state reviewer shall:
- 4.1 Conduct a review of electronic client records using the TWIST data system and the Client Record Review Tool.
 - 4.2 Review local program materials sent to the state WIC office as requested in the pre-visit survey and WIC personnel summary.
 - 4.3 Review additional TWIST and program reports.
- During review* 5.0 During the onsite review, the state reviewer shall:
- 5.1 At a minimum, observe WIC daily clinic operations at the main clinic site, at permanent sites that offer full service and have unique staff, and possibly at a satellite clinic.
 - 5.2 Review materials and TWIST reports that were collected prior to the onsite visit.
 - 5.3 Review quarterly time studies for individual employees.
 - 5.4 Complete the WIC Review Tool, Observation Review Tool and Client Record Review Tool.
 - 5.5 Discuss topics and concerns relevant to completing the WIC review with participants, WIC staff, the program's business manager and local health department administrators.
- Exit interview* 6.0 The state reviewer shall schedule an exit interview to discuss the review findings and recommendations with all who wish to attend, including local WIC program staff, nursing supervisors and administrators. The reviewer will leave a draft copy of the completed review tool with local program staff.
- Written report* 7.0 The WIC review team will work toward a goal to mail the final monitoring report to the local WIC agency within 60 days (optimally within 30 days) after the final exit interview. The monitoring report will identify commendations, quality assurance recommendations and compliance findings. The most recent WIC monitoring report will also be included in the DHS triennial review written report.
- Corrective action plan* 8.0 If compliance findings are identified during the review, the local program must submit a corrective action plan.
- 60-day requirement* 8.1 The corrective action plan, including implementation time frames, must be submitted to the state WIC office within 60 days of receipt of the biennial monitoring report.

LOCAL PROGRAM MONITORING AND REVIEW, cont.

Follow-up 9.0 Per CFR §246.19(b)(4), state WIC staff must continue to monitor the local program's implementation of the corrective action plan until all findings have been resolved.

Ongoing evaluation 10.0 Local WIC programs must establish self-evaluation management systems to review their own program operations and those of associated clinics or contractors. The intent of this self-evaluation is to evaluate program operations for compliance with federal and state requirements. At a minimum, self-evaluations must be completed every other year. This self-evaluation must include the following components:

- program management,
- certification,
- nutrition education,
- breastfeeding promotion, and
- program integrity.

10.1 Documentation of the local program self-evaluations must be kept on file for three years and must be available for review by state WIC staff during biennial WIC reviews.

10.2 We encourage local programs to consider utilization of TWIST reports and the state-developed WIC review tools. The most current review tools are posted on the Oregon WIC Web site.

EXAMPLE: Jane, the WIC Coordinator for Hoppin' John County WIC Program, planned her self-evaluation in June in the year between her state biennial WIC reviews. Jane made the decision to use the following state WIC tools to conduct her self-evaluation: "*Observation Review Tool*" and "*Client Record Review Tool*."

In May, Jane ran the TWIST report, "*Local Agency Chart Review*," to randomly select WIC clients meeting certain criteria and within a current certification. In preparation for her self-review, Jane also pulled the monitoring report from her most recent biennial state WIC review to check for past compliance issues identified so she could pay particular attention to these areas during her evaluation.

Using the TWIST report, Jane conducted a client record review of a number of WIC participants' TWIST records representative of a variety of staff and WIC categories for her program. Jane documented her results on the state program's "*Client Record Review Tool Tally Sheet*."

LOCAL PROGRAM MONITORING AND REVIEW, cont.

(EXAMPLE:) In both her Coffeerville Clinic and her Peaville Clinic, Jane used the state’s “*Observation Review Tool*” to document observations made during several certification appointments as well as two types of nutrition education classes.

After completing her self-review, Jane determined her program’s strengths, areas for improvement, and identified issues to be addressed. She utilized this information to plan staff trainings, modify clinic procedures, and give staff specific feedback on their strengths.

Jane then placed the completed tools and her evaluation of the self-review in her clinic management files so it would be easy to retrieve when requested during the state WIC review the following summer. ★

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