

## Chapter 6 - Local Agency Monitoring

### TABLE OF CONTENTS

<b>MONITORING</b> .....	1
<b>Review of Local Agency Operations</b> .....	1
<b>Local Agency Monitoring Procedures</b> .....	3
On-Site Visits.....	3
<u>Local Agency Monitoring Standards</u> .....	3
<u>Local Agency Self-Assessment</u> .....	4
<u><b>Disqualification of Local Agencies</b></u> .....	4
<u>Appeal of State Agency Decisions</u> .....	5
<u>Notification of Sanctions</u> .....	5
Requirements and Procedures.....	5
<b>LOCAL AGENCY MONITORING REVIEW FORM</b> .....	6
<b>Organization of WIC Local Agency Monitoring Standards</b> .....	6
<b>Organization of WIC Local Agency Monitoring Standards</b> .....	7
<b>Participant Interview Form</b> .....	57



<b>Local Agency Reviews</b>
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## MONITORING

### Review of Local Agency Operations

Federal WIC regulations require the Alaska WIC Program Office conduct a management evaluation of each local WIC agency at least once every two years.

The state agency on-going monitoring system includes:

- the monitoring of local agency operations;
- the review of local agency financial and participation reports;
- on-site visits; and
- the development of corrective action plans to resolve program deficiencies.

The Alaska WIC Program goals align with the focus of the Management Evaluation. Local Agency reviews assess how the WIC Local Agency is doing in reference to their nutrition education plan and related areas stipulated on their WIC Grant.

The Alaska WIC Program Strategic Plan Goals are:

- Goal 1**      Meet or exceed federal caseload targets
- Goal 2**      Assure program continuity in the face of flat federal funding levels
- Goal 3**      Support and sustain quality nutrition programs
- Goal 4**      Reduce the Prevalence of Overweight and Obesity among Alaskan Children (Healthy Alaska 2010 Nutrition Indicator #2)

Monitoring includes the review of WIC functional areas, supporting documents and on-site observations.

The WIC Functional areas are:

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing and Organization
- 6.0 Organizational Structure and Management Practices
- 7.0 Food Delivery/Food Instrument Accountability
- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10. Financial Management

The ME reviews 9 WIC Functional Areas to assess how the Nutrition Services Standards are met, using several supporting ME documents.

WIC Functional Areas	Nutrition Services Standards	ME Supporting Documents
1.0 Nutrition Services	Staffing Qualifications NS Plan & Evaluation Nutrition Education Contacts Nutrition Education Materials Participant Centered Education Breastfeeding Education/Support Clinic Environment Data Collection Nutrition Assessment Food Package Prescription	<ul style="list-style-type: none"> <li>◆ Local Agency Self Assessment</li> <li>◆ Previous SFY and Current WIC Grant</li> <li>◆ Current SFY Quarterly Reports</li> <li>◆ Chart Reviews</li> <li>◆ Previous and Current SFY WIC Nutrition Reports 340 and 346</li> </ul>
2.0 Clinic Operations	Staffing Customer Service Clinic Environment Nutrition Education Contacts Nutrition Assessment Referrals Nutrition Education Contacts and Evaluation	<ul style="list-style-type: none"> <li>◆ WIC 505a Participation Report</li> <li>◆ Previous SFY and Current WIC Grant</li> <li>◆ Current SFY Quarterly Reports</li> <li>◆ Chart Reviews</li> </ul>
3.0 Caseload Management & Outreach	Program Outreach & Marketing Staffing Patterns Nutrition Education Contacts	<ul style="list-style-type: none"> <li>◆ Local Agency Self Assessment</li> <li>◆ Current SFY Quarterly Reports</li> <li>◆ Chart Reviews</li> </ul>
4.0 Civil Rights	Nutrition Education Contacts	<ul style="list-style-type: none"> <li>◆ Local Agency Self Assessment</li> </ul>
5.0 Staffing and Organization	Staffing Patterns, Recruitment & Retention Staff Training	
6.0 Organizational Structure and Management Practices	Staffing Patterns, Recruitment & Retention	
7.0 Food Delivery/Food Instrument Accountability	WIC Food Selection & Authorization Food Package Prescription	
8.0 Vendor Relations		<ul style="list-style-type: none"> <li>◆ Local Agency Self Assessment</li> <li>◆ Vendor Management Report</li> </ul>
9.0 Farmers' Market Nutrition Program		<ul style="list-style-type: none"> <li>◆ Local Agency Self Assessment</li> </ul>
10.0 Financial Management		<ul style="list-style-type: none"> <li>◆ Current SFY Financial Information</li> <li>◆ Last SFY Time Studies</li> <li>◆ Last SFY Inventory</li> </ul>

11.0 Information Management System		◆ Local Agency Self Assessment
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**Local Agency Monitoring Procedures**

**On-Site Visits**

**On-Site Visits**

The state agency conducts monitoring reviews of each local agency at least once every two years. The reviews 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 may conduct such additional on-site reviews as the state agency determines to be necessary in the interest and effectiveness of the program.

The state agency will provide advance notice of an on-site monitoring visit. The on-site visit may be made by a single individual or by a team, depending on the size of the local agency. If a team is involved, one individual will be designated as the team leader. Team members will be responsible for specific components of the review, such as Nutrition Services or Financial Management. Team members may or may not make on-site visits as a group.

Review findings will be discussed with the local agency staff on-site at the end of the review. If the review is done by a team, the team leader will discuss results of the review. A written review report will be sent to the local agency within 30 days of the completion of the review.

**Corrective Action Plans**

Local agencies are required to submit a corrective action plan to redress deficiencies identified during the review by the state agency, within 60 days of receipt of the written report.

The state agency will evaluate the adequacy of the corrective action plan and follow-up with the local agency to ensure corrective action measures are implemented. The state agency will send the local agency written notification of closure of the review.

If the Correct Action Plan (CAP) is not provided after the LA has received a follow up reminder letter, the State will withhold LA payments until receipt of the CAP. Unapproved CAPs or unresolved finding are reported in the Grant Performance Evaluation, after the close of the fiscal year. Performance Evaluations can influence grant award recommendations to any State-issued grant solicitations, including WIC.

**Monitoring Standards**

Local Agency Monitoring Standards

<http://www.nal.usda.gov/wicworks/Topics/WICnutStand.pdf>

The USDA, Food and Nutrition Services WIC Nutrition Services Standards published October 2001 are incorporated into the LA Self-Assessment document. It simplifies

and streamlines the self-assessment process. The NSS becomes the Alaska WIC standard for LA ME review.

Some assessment of performance may be conducted prior to an on-site review, by examination of local agency financial reports, computer data sent to the state agency, and similar records. A copy of the standard review form is included at the end of the section.

#### Local Agency Self-Assessment (See Pages 8-13)

### **Self-Assessment**

Local agencies are required to complete the self-assessment, using the Local Agency Self-Assessment Standards document. LAs need to check “Yes” if the NSS is met. Check “No” if the NSS is not met, and check “NA” if the NSS does not apply. A space is provided for brief comments. The completed form is due in the state agency office a week prior to the scheduled ME.

#### Disqualification of Local Agencies

The state may disqualify a local agency when the state:

- Determines noncompliance with Program and state regulations;
- Determines Program funds are insufficient to support the continued operation of all existing local agencies at their current participation level; or
- Determines following a review of local agency credentials, that another local agency can operate the Program more effectively and efficiently.

### **Local Agency Disqualification**

The state will consider:

- The availability of other community resources to participants and the cost efficiency and cost effectiveness of the local agency in terms of both food and administrative and program services costs;
- The percentages of participants in each priority level being served by the local agency and the percentage of need being met in each participant category; Do we actually do this? I don't believe I ever have. How do we help LA meet the percentage we want and what percentage is that? Thanks. Perhaps we need to put this on the chart review form also?
- The special populations served by the local agency;
- The capability of another local agency or agencies to accept the local agency's participants; and
- The local agency's past record of performance.

When disqualifying a local agency under the program, the state will:

- Make every effort to transfer affected participants to another local agency without disruption of benefits;
- Provide the affected local agency with written notice not less than 60 days in advance of the pending action which includes an explanation of the reasons for disqualification, the date of disqualification, and, except in cases of the expiration of a local agency's agreement, the local agency's right to appeal; and

- Ensure that the action is not in conflict with any existing written agreements between the state and local agency.

Disqualification will be made in accordance with Chapter 78 of the Alaska Administrative Code (7 AAC 78.290).

#### Appeal of State Agency Decisions

Local agencies may appeal state decisions which adversely affect the local agency. A local agency may appeal a state agency decision if the state agency:

- denies the local agency's application to act as a WIC local agency;
- disqualifies, suspends or otherwise imposes sanctions on the local agency during the term of the state WIC office's agreement with the local agency; or
- makes a decision to require a WIC local agency to refund money that was granted to the WIC local agency under a WIC grant.

### Appeals

#### Notification of Sanctions

When the state agency intends to impose sanctions on a local agency or denies a local agency's application to participate, the state agency will send written notice to the local agency by certified mail at the last address provided by the local agency. If the state agency proposes to disqualify a local agency, the state agency will send notice to the local agency at least 60 days before the pending action will take place.

### Sanction Notification

In the notice the state agency will set forth:

- the reason for denial of the local agency's application; or if applicable;
- the nature of the discrepancies or violations;
- the dollar value of the discrepancies or violations;
- the method of computing the dollar value;
- notice of further actions to be taken or sanctions to be imposed by the state WIC agency;
- the effective date of the action;
- notice of any actions required of the local agency;
- the local agency's right to a formal hearing; and
- the time and place at which each hearing on the action is scheduled to be held.

In the notice the state agency will state whether or not it intends to withhold payments on pending and subsequently received requests by the local agency for grant payments in an amount reasonably calculated.

#### Requirements and Procedures

The state agency will provide a hearing procedure in accordance with the provision as stated in CFR part 246.18.

## **LOCAL AGENCY MONITORING REVIEW FORM**

### **Organization of WIC Local Agency Monitoring Standards**

The WIC Functional areas are:

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing and Organization
- 6.0 Organizational Structure and Management Practices
- 7.0 Food Delivery/Food Instrument Accountability
- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10.0 Financial Management

The standards are organized to cover the major areas of federal and state regulations and policies. Each section includes several program characteristics. Each program characteristic has several standards. The standards are perhaps the most relevant indices for measuring program performance. The LA Monitoring Review Form compares the AK WIC ME Standards to the Nutrition Services Standard (NSS). Whenever they are inclusive of each other numbers and letters referencing the NSS appear under the (NSS) columns.

Each standard has program indicators. Indicators are intended to give the reviewers and the local agency staff suggestions of how the standard can be interpreted and evaluated. They are not fully inclusive or exclusive, and are most useful as guidelines.

A rating scale (Standard Met?: Yes, No, Partial, and Not Applicable [N/A]) is next to each program standard. The intent of the rating scale is to allow the reviewer some flexibility in determining whether or not the standard was met. In addition, the forms include areas for narrative comments that can highlight positive things the program is doing or provide constructive feedback in cases where the standard was not entirely met.

A monitoring review includes an audit of participant files. The forms used for this audit are in final section of the review form. The reviewer will determine whether the information in the files meets the standard.

A monitoring review includes a participant survey by the state agency. At the time of an on-site review, a random survey of WIC participants will be made. The survey format is in the final section of this review form.





## Participant Centered Services (PCS) Local Agency (LA) Management Evaluation (ME)

Alaska WIC is striving to incorporate the Participant Centered Services (PCS) business model in all aspects of the WIC program. For the LA ME process, state staff are identifying linear information versus behavioral information with regard to the ME. For example: Linear information can be found in financial reports, time studies, equipment inventories, policies and procedures, and grant files. Linear information can be obtained in advance, and used for a preliminary desk audit in preparation for the on-site ME. Behavioral information is gathered by observation, with regard to implementing Value Enhanced Nutrition Assessment, Breastfeeding and Nutrition Education, Referrals, Issuance of Food Packages/WIC Benefits and Participant Centered Education, which differ with every single interaction between a Competent Professional Authority (CPA) and a WIC participant. AK WIC is using an ME approach which gathers linear information via a desk audit prior to the LA ME visit, allowing more time to be spent for observations, technical assistance and mentoring.

Tools to complete a LA ME Desk Audit:

- WIC Local Agency Monitoring and Self-Assessment Narrative (Pages 6-3 to 6-6)
- BFPC LA ME Mentoring and Self-Assessment Narrative (Pages 6-7 to 6-8)
- WIC Local Agency Monitoring and Self-Assessment Form (Pages 6-9 to 6-25)
- WIC Local Agency Management Evaluation Preparation Materials (Page 6-26)
- Abbreviations used in the document, (page 6-27)

### Local Agency (LA) Management Evaluation (ME) and Self-Assessment Narrative (Page 6-3 to 6-9)

These two pages are open ended questions to gather information on the LA's Nutrition Education and Services Plan, the program's successes, challenges and ways the state can best assist the WIC LA program.

**Local Agency Monitoring and Self-Assessment Form (Pages 6-10 to 6-25) covers the following WIC Functional areas:**

- 1.0 Nutrition Services
- 2.0 Clinic Operations
- 3.0 Caseload Management and Outreach
- 4.0 Civil Rights
- 5.0 Staffing
- 6.0 Organization
- 7.0 Food Delivery/Food Instrument Accountability
- 8.0 Vendor Relations
- 9.0 Farmers' Market Nutrition Program
- 10.0 Financial Management
- 11.0 Information Management System

The USDA, Food and Nutrition Services WIC Nutrition Services Standards

<http://www.nal.usda.gov/wicworks/Topics/WICnutStand.pdf>

published in October 2001 are incorporated into the LA Self-Assessment document. It simplifies and streamlines the self-assessment process. The NSS becomes the Alaska WIC standard for LA ME review.

The standards are organized to cover the major areas of federal and state regulations and policies. Each section includes several program characteristics. Each program characteristic has several standards. The standards are perhaps the most relevant indices for measuring program performance. The LA Monitoring Review Form compares the AK WIC ME Standards to the Nutrition Services Standard (NSS). Whenever they are inclusive of each other numbers and letters referencing the NSS appear under the (NSS) columns.

Each standard has program indicators. Indicators are intended to give the reviewers and the local agency staff guidance to interpret and evaluate the standard. They are not fully inclusive or exclusive, and are most useful as guidelines.

A rating scale [Is the standard met?: Yes, No, Partial, and Not Applicable (N/A)] is next to each program standard. The intent of the rating scale is to allow the reviewer some flexibility in determining whether or not the standard was met. In addition, the forms include areas for narrative comments that can highlight positive things the program is doing or provide constructive

feedback in cases where the standard was not entirely met. The last column includes numbers designated for items, documents, data, policies or procedures that may be needed to be sent to the State reviewer. The number corresponding to the requested items are listed on **page 6-26**.

**Local Agency (LA) Management Evaluation (ME) Preparation Materials (Page 6-26)**

This page is the reference for the last column on the WIC Local Agency Monitoring and Self-Assessment Form, which includes numbers designated for items, documents, data, policies or procedures that may need to be sent to the State reviewer.

## Local Agency (LA) Monitoring and Self-Assessment Narrative

Local Agency: \_\_\_\_\_ Date: \_\_\_\_\_  
Written by: \_\_\_\_\_

**1. What are your organization's biggest challenges and how do these challenges affect the WIC program?**

**2. How can the WIC Program Office help you achieve your program goals?**

**3. What state or federal regulations or policies create barriers to providing high quality effective services to WIC participants?**

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**Other Comments**

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**4. What are your processes from when a client arrives to when they leave? Describe the complete process and attach copies of forms. If you have off-site clients that receive mailed applications, please describe that complete process as well.**

**Other Comments**

**5. How have you used your most recent client surveys to improve program services?**

**Other Comments**

*For Local Agencies with subcontracts for WIC services within the past 6 months:*

- a. How are you monitoring subcontracts?**
- b. How do you ensure compliance with program requirements?**
- c. Describe the duties the subcontractor performs and any reporting requirements.**
- d. Please complete a separate LA Self-Assessment form for each sub-contractor and complete only the sections that apply to the subcontractor's services.**



<b>Other Comments</b>

**6. Tell us your best practices.**

**Other Comments**

**FMNP Local Agency (LA) Management Evaluation (ME)**

**Local Agency (LA) Monitoring and Self-Assessment Narrative**

Local Agency: \_\_\_\_\_ Date: \_\_\_\_\_

Written by: \_\_\_\_\_

<p><b>1. Please describe specific procedures for issuing, securing, disposing of Farmer’s Market Nutrition Programs (FMNP) food instruments (FIs). How do you ensure clinic staff follows proper issuance procedures?</b></p>
<p><b>2. Please describe FMNP promotion and outreach activities you have done in the past year.</b></p>

**3. Describe how you incorporate nutrition education into FMNP.**

**Other Comments**

**BFPC Local Agency (LA) Management Evaluation (ME)**

**Local Agency (LA) Monitoring and Self-Assessment Narrative**

Local Agency: \_\_\_\_\_ Date: \_\_\_\_\_  
Written by: \_\_\_\_\_

<b>1. What have been the successes and highlights of your BFPC program?</b>
<b>2. What have been the barriers to running your BFPC program? What have you done/are doing to overcome the barriers?</b>

**3. What are your recommendations for the Alaska WIC Breastfeeding Peer Counseling Program?**

**Other Comments**



## Local Agency (LA) Monitoring and Self-Assessment WIC Regulations (FR) and Nutrition Services Standards (NSS)

Local Agency: \_\_\_\_\_ Date: \_\_\_\_\_  
 Evaluator(s) \_\_\_\_\_

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>1. Nutrition Services FR 246.6b5 &amp; 246.11</b>							
<b>LA Nutrition Education Plan 1.1.0</b>	1.1.1 Follows currently approved Nutrition Education Plan per most recent competitive grant award	NSS 1A FD					
<b>Individual Care Plans</b>	1.1.2 All WIC participants must have completed S.O.A.P note	NSS 7A4; 14 A FD					
	1.1.3 Each participant must receive quarterly nutrition education contacts.	NSS 7A FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Contacts</b>	1.1.4 Whether in person or mailed, each participant in the household must receive nutrition education that is based on risk factors/goals, personal needs, household situation, educational level, and cultural preference. Education must be documented in the electronic chart.	NSS 7A5; 2C11 FD					
<b>Contacts (continued)</b>	1.1.5 Delivery of nutrition education must be interactive: face-to-face, telephone, or electronically	NSS 7A3 FD					
	1.1.6 LAs with rural clients have a plan to conduct 20% of their client certifications by video certification methods, providing nutrition education	LA memo 12-03 rev 1  (Removed FD)					



	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	1.1.7 If using video teleconferencing, a signed confidentiality release is in client's chart	LA Memo 12-05					
	1.1.8 Supportive reinforcement activities and resources are available: bulletin boards, newsletters, pamphlets.	NSS 7A3c					
	1.1.9 Nutrition ed. Follow-up must be interactive, examine client's progress towards goal/behavior changes, and occur before or at next certification	NSS 7A3; 7A5 LA Memo 12-05 FD					
	1.1.10 LA must make 2 attempts to contact clients to provide education before mailing FIs. Attempts must be documented in client's electronic	LA Memo 12-05					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Contacts (continued)</b>	record. (OneCall Now counts as the first attempt).						
	1.1.11 LA coordinates with other program partners to provide care and support for participants. For example: Public Health Nursing, Infant Learning Program, SNAP-ED, Homeless Shelters, Immunizations providers, Expanded Food and Nutrition Programs (EFNP), etc.	NSS 10A; 10B; 10C FD					
<b>Materials 1.2.0</b>	1.2.1 Materials available are accurate, relevant, and at an appropriate cultural and literacy level	NSS 7A2j; 2C11 FD					
	1.2.2 Materials offered address client's nutrition risk	NSS 7A5 FD					
<b>Participant Centered</b>	1.3.1 PCE model used when delivering	NSS 7A3					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Education (PCE) 1.3.0</b>	education services Establish rapport to begin a conversation. Practices active listening skills. Collects information without interrupting or correcting the participant. Paraphrases or reflects what was heard. Uses open ended sentences appropriately. Goal set by client.						
<b>Critical Thinking</b>	1.3.2 Staff uses critical thinking skills in organizing and synthesizing information to evaluate and to prioritize the information appropriately.	NSS 6C6					
<b>Breastfeeding 1.4.0</b>	1.4.1 Pregnant women are encouraged to breastfeed	NSS 7A; NSS 8 FD					
	1.4.2 BFW are counseled and supported	NSS 8 FD					
	1.4.3 Designated LA BF Coordinator	NSS 3I; 3J FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Breastfeeding 1.4.0 (cont.)</b>	Name: _____						
	1.4.4 LA BF Coordinator has at least 1 yr in counseling BFW and /or extended lactation training, CLC or IBCLC (BP)	NSS 3I; 3J					
	1.4.5 Workplace policies are breastfeeding-friendly (BP)	NSS 2B					
	1.4.6 LAs provide training to all staff about BF and their role in supporting PG and BF mothers	NSS 8A AK P & P Chap 2;  FD					
	1.4.7 LA tracks breast pumps & follow up per policy guidance.	NSS 3J7 AK P & P Chap 7; FD					
<b>Value Enhanced Nutrition Assessment 1.5.0 (VENA)</b>	1.5.1 Uses VENA principles to complete nutrition assessment	NSS 6; 7A3  FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>WIC Nutrition Risk</b>	1.5.2 CPA or RD uses national WIC Nutrition Risk Criteria to completely identify and document all nutrition risks prior to nutrition education	NSS 6A1; 6B5  FD					
<b>Dietary Assessment</b>	1.5.3 Critical thinking is used to review measurements and other information collected and combined with the focus of the participant. Staff shows competency in their interviewing and communication techniques, resulting in an effective WIC intervention for the participant which includes interacting with the WIC participant using VENA (see	NSS 6B8A-B  FD  (Item #3)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	competencies on abbreviations page)						
Anthropometric Assessment	1.5.4 Anthropometrics are current, recorded, reflect participant status and are assessed according to AK P & P	NSS 14B1; 6B3  FD  (Item #3)					
	1.5.5 Appropriate technique used and results interpreted correctly	NSS 14B1; 6B3  FD					
Hematological Assessment	1.5.6 Hematological assessments current, recorded, reflect participant status and assessed according to the standards in the AK P & P	NSS 14B1; NSS 6B3  FD  (Item #3)					
	1.5.7 Appropriate technique used, and results interpreted correctly; for both traditional screening and non-invasive screening	NSS 14B1; NSS 6B3  FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Medical/Health/Economic/Social</b>	1.5.8 Information is collected and assessed interactively with client at certification	NSS 6B (Item #3)					
<b>Food Prescription 1.6.0</b>	1.6.1 Food packages prescribed by qualified staff	NSS 3H2; 3N2; 13B 1-3; 13B8 FD (Item #3)					
	1.6.2 Tailored appropriately	NSS 13B1,2,5, 8 FD (Item #3)					
	1.6.3 Breastfeeding assessment is made and documented by a CPA or RD before changing a food package for a breastfeeding dyad	NSS 13B4, 5 FD					
<b>WIC CPA Roles/Responsibilities 1.7.0</b>	1.7.1 Identifies and refers high-risk participants to a qualified nutritionist	NSS 3H7; AK P & P Chap 2 FD (Item #3)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	1.7.2 Paraprofessionals complete a CPA competency based training program	NSS 3G2; 5C					
	1.7.3 CPA qualifications meet FR definition	NSS 3G1, 2 FD					
<b>Contract Formula Prescriptions 1.8.0</b>	1.8.1 Contract formulas are prescribed unless a non-contract formula ENPR is completed and in the chart	NSS 12B6 FD (Item #3)					
	1.8.2 Non-contract formula usage rate is <5%	NSS 12F; AK P&P Chap 3					
<b>High Risk 1.9.0</b>	1.9.1 Appropriate HR codes are identified and correctly assigned in the computer file	NSS3H7; AK P & P Chap 2 FD					
	1.9.2 HR SOAP notes are developed and identify appropriate nutrition education and support materials	NSS 3N3-6 FD					



	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>High Risk (cont.)</b>	needed						
	1.9.3 HR nutrition education contact with RD must take place during certification period	AK P & P Chap 2; NSS3N FD					
	1.9.4 LA uses a tracking system to ensure HR clients are referred and seen by appropriate staff.	NSS 3N6					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>2. Clinic Operations (FR 246.6b8)</b>							
<b>Certifications 2.1.0</b>	2.1.1 Follows certification Policies & Procedures for all applicants <ul style="list-style-type: none"> <li>• Applicant meets WIC categories</li> <li>• Applicant supplied proof of residency</li> <li>• Applicant supplied proof of identity</li> <li>• Applicant is physically present or documented reason for absence</li> <li>• Applicant is income eligible (observe income determinations)</li> </ul>	AK P & P Chap. 1 <b>FD</b> (Item #2)					
	2.1.2 Income verification and risk factor assignment procedures are separated	AK P & P Chap 1 <b>FD</b> (Item #3)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
Referrals Assessed/ Documented 2.2.0	2.2.1 Provides written referrals to Medicaid/Denali Kid Care. Provide verbal/written referrals to SNAP, ATAP, Well Child (EPSDT), Immunizations, and CSE. (As need is identified by assessment)	NSS 11A; 11B  FD (Item #6)					
	2.2.2 Provides & documents follow-up to referrals (BP)	NSS 6B7, 3H8, NSS11B (Item #3)					
	2.2.3 Scans income documents and applications into SPIRIT (BP)	AK P & P Chap 1					
	Referrals Assessed/ Documented 2.2.0 (cont.)	2.2.4 Maintain and provide a list of current resources for drug and other harmful substance abuse. Information must be given at each new pregnancy, PP and	NSS 7A2k , 11A3 FD				

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	BF women, and parents/caregivers of infants and children certification.						
	2.2.5 Immunizations for children under age 2 are documented in SPIRIT.	Alaska P &P Chap 1 FD					
	2.2.6 Voter Registration preference is documented in SPIRIT, matches application and appropriate action is taken.	Alaska P &P Chap 1					
<b>Program Benefits 2.3.0</b>	2.3.1 Participants relocating out of state receive VOC	Alaska P &P Chap 1 FD					
	2.3.2 New participants are oriented to selecting WIC foods, locating WIC vendors and program Rights and Responsibilities	Alaska P &P Chap 1 (Item #7)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	2.3.3 Rights and Responsibilities summarized verbally by clinic staff and participants are given the opportunity to read and ask questions at every certification or recertification	Alaska P &P Chap 1 (Item #7)					
	2.3.4 AK P & P and regulations are followed for mid-cert terminations and clients not recertified	Alaska P &P Chap 1 (Item #8)					
	2.3.5 Benefits assigned at certification and based on certifications timeframes	Alaska P &P Chap 1					
	2.4.1 Clinic schedules serve caseload and accommodate missed contacts by	NSS 2C FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Clinic Organization 2.4.0</b>	including extended hours to better serve participants, providing assistance or referrals with transportation and accommodating cultural preference.						
	2.4.2 Meets federally required application processing timelines	NSS 2C1 FD					
	2.4.3 Clinic setting is suitable and supports breastfeeding	NSS 2B FD					
	2.4.4 Clinic provides appropriate reinforcement materials i.e., videos, interactive bulletin boards, posters, puzzles, etc. (BP)	NSS 7A3C					
	2.4.5 Participant surveys improve services	NSS7C5					
	2.4.6 The local clinic provides breastfeeding	NSS 2B FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
Clinic Organization 2.4.0 (cont.)	supportive environment						
	2.4.7 Ensure all areas where staff obtains participant information and anthro. data maximize privacy to prevent others from overhearing conversations, viewing documents or viewing participant information on computer screens	NSS 2A2 FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>3. Caseload Management &amp; Outreach</b>							
<b>Caseload 3.1.0</b>	3.1.1	Maximum served with current funding appropriate for staffing and participation levels	Alaska P & P Chap 8				
	3.1.2	Reviews and assesses effectiveness of the system for scheduling nutrition ed. contacts and accommodations for missed contacts	NSS 7C4 (Item #9)				
	3.1.3	Coordination of appointments for the participant or family members with other services delivered at the same site ( <b>BP</b> )	NSS; 2C9				
	3.2.1.	Public Notification	Alaska P & P Chap 8				



	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Effective Outreach 3.2.0</b>	informing all potential participants, minorities & women in early months of pregnancy	(Removed Finding) (Item #10)					
	3.2.2 On-going contact with physician's offices, medical, public health, tribal clinics and major referral sources	NSS 10B					
<b>Collaborations to Improve access 3.3.0</b>	3.3.1 Written agreements are in place between LA and other community service agencies	NSS 10B3  FD					
	3.3.2 Current MOU with homeless facilities are current or documentation of an annual visit is available.	Alaska P & P Chap 1  FD					
<b>Marketing 3.4.0</b>	3.4.0 Uses marketing strategies to promote participation in WIC						

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>4. Civil Rights (FNS Instruction 113-1)</b>							
<b>Rights &amp; Responsibilities 4.1.0</b>	4.1.1. Client has read and signed the rights and responsibilities form						
	4.1.2. Current "Justice For All" poster in anthropometric room, waiting area, classroom, or any area where services are offered	FD— if not posted at all					
<b>Nondiscrimination Laws &amp; Regulations 4.2.0</b>	4.2.1 Documentation showing that staff have received annual civil rights training. Include list of staff who attended training, agenda, and date	FD (Item #12)					
	4.2.2 No qualified person is subject to employment discrimination	FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Nondiscrimination Laws &amp; Regulations 4.2.0 (cont.)</b>	4.2.3 Clients who have been determined ineligible must be advised of their right to a fair hearing	FD					
	4.2.4 Racial/ethnic participation data are collected	FD					
	4.2.5 Individuals that have civil rights complaint must be assisted in completing that complaint. The written complaint must be forwarded to state office within 5 calendar days of complaint.	FD (Item #11)					
<b>Nondiscriminatory Services 4.3.0</b>	4.3.1 Information available in appropriate languages	NSS 7A2j; 7A2b FD					
	4.3.2 Services are not discriminatory to any applicant based on race, color, national origin, age, sex, or handicap	FD					
	4.3.3 Procedures, locations,	FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
	appointment schedules and hours of operation do not discriminate						
	4.3.4 Literacy and language skills of staff are appropriate to address needs of diverse participants	NSS 3G3; 3I1; 3K1; 3J8; 3S1 (Removed finding)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>5. Staffing (FR 246.6b2)</b>							
<b>Staff 5.1.0</b>	5.1.1	Appropriate staffing structure	NSS 3				
	5.1.2	Staffing education and experience are appropriate for assigned responsibilities	NSS 3A; 3C; 3E; 3M <b>FD-state</b> (Item #14)				
	5.1.3	Paraprofessional CPAs are "State or medically trained" or complete a State approved CPA Training Program	NSS 3G  <b>FD</b>				
	5.1.4	Professional and paraprofessional staff have documentation supporting their CEU requirements. CEUs are collected by coordinator in binder.	NSS 5E, 5H  <b>FD</b>				

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>6. Organization</b>							
<b>Organizational Structure &amp; Mgmt. Practices 6.2.0</b>	6.2.1 New staff orientation documented	(Item #17)					
	6.2.1 Grantee must ensure that their staff are regularly trained on USDA and State policies.	(Item #12)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>7. Food Delivery/Food Instrument Accountability (FR 246.10 &amp; FR 246.12)</b>							
<b>Adequate Warrant Stock Controls 7.1.0</b>	7.1.1 Receipt of blank warrants are thoroughly tracked	FD (Item #18)					
	7.1.2 Warrants are securely stored	FD (Item #18)					
	7.1.3 Warrant and Check Tracking forms are maintained daily	(Item #19)					
<b>Warrants Issuance 7.2.0</b>	7.2.1 Warrants are printed according to MIS standards	(Item #18)					
	7.2.2 WIC warrants and FNMP FI's are issued only to eligible clients	FD (Item #19)					
<b>Warrant Controls 7.3.0</b>	7.3.1 Voided WIC warrants are handled according to AK P & P	FD (Item #18)					
	7.3.2 Lost or stolen WIC warrants are handled according to AK P & P	FD (Item #18)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>Mailed Warrants Controls 7.4.0</b>	7.4.1 WIC warrants and FMNP FI's are mailed to participants according to AK P & P	(Item #19)					



	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>8. Vendor Relations (FR 246.12)</b>							
<b>Vendor Relations 8.1.0</b>	8.1.1 Conflict of interest between WIC staff and vendors does not impair WIC services	FD					
<b>Vendor Training 8.2.0</b>	8.2.1 LA provides adequate training and technical assistance to vendors according to AK P & P	FD					
<b>Vendor Monitoring 8.3.0</b>	8.3.1 LA monitors at least 5% of authorized vendors per year	FD					
<b>Mailed Food Boxes 8.4.0</b>	8.4.1 LA follow AK P & P regarding assigning MOV packages	FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>9. Farmers' Market Nutrition Program (FMNP)</b>							
<b>FMNP 9.1.0</b>	9.1.1 Farmers are monitored seasonally, per state request						
	9.1.2 Report complaints and respond to State of Alaska requests timely						
	9.1.3 Correctly document FMNP benefits in SPIRIT	(Item #3)					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>10. Financial Management (FR 246.6b7, FR 246.13 &amp; FR 246.14)</b>							
<b>State Agency Records 10.1.0</b>	10.1.1	Required single audits are completed and WIC findings are addressed promptly <b>FD</b> (Item #21)					
	10.1.2	All grantee subcontracts are reviewed and approved by state and records are available for review <b>FD</b> (Item #22)					
	10.1.3	Indirect costs are claimed according to federal and state policies <b>FD</b> (Item #23)					
	10.1.4	Time studies are completed by each WIC employee the first week of every month <b>FD</b>					
	10.1.5	CFR are done in accordance with grant award requirements <b>FD</b>					
	10.1.6	Each fiscal year AK P & P					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
State Agency Records 10.1.0 (cont.)	approximately 17% of grantee expenditures must be for nutrition education activities and BF promotion	Chapter 7 FD					
	10.1.7 Inventory records are tracked according to state policies and submitted Feb 15 each year	FD					
Administrative Expenditures Documentation	10.2.1 Personnel expenses are allocated correctly	FD (Item #24)					
Effective Property Management System 10.3.0	10.3.1 Equipment and supplies are managed according to federal regulations and AK P & P	FD					

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>11.0 Information Management System</b>							
<b>11.1.0 Systems security</b>	11.1.1 There is adequate physical security for system hardware, and software	FD					
	11.1.2 Confidentiality is maintained.	FD					
	11.1.3 Grantee has adequate security software to operate the WIC system	FD					
<b>11.2.0 Hardware</b>	11.2.1 There is adequate IT support for the WIC grantee						

	AK WIC ME Standard	Nutrition Services Standard (NSS)/Code of Federal Regulations (FR) ME Review Finding (FD) (ME Item #)	Y	N	N/A	Partial	Comments
<b>12.0 Breastfeeding Peer Counseling</b>							
<b>12.1.0 STAFFING</b>	12.1.1 Qualified BFPC coordinator on staff	NSS 3I, 3J8 FD					
	12.1.2 Qualified BFPC on staff	FD					
	12.1.3 Peer counselors who provide BFPC services have completed all required training	NSS 3I 1-4 FD					
	12.1.4 An up-to date BFPC training log documents that peer counselor(s) meet with the BFPC coordinator						
	12.1.5 BFPC peer counselors are used according to BFPC peer standards and BFPC plans	NSS 3R					
	12.2.1 The required minimum BFPC contacts are made						

<p><b>12.2.0 SERVICES</b></p>	<p>and are within the appropriate time frames during the prenatal and postpartum period</p>							
<p><b>12.2.0 SERVICES (cont.)</b></p>	<p>12.2.2 BFPC are available during non-clinic hours</p>	<p>NSS 3R2 FD</p>						
	<p>12.2.3 Peer counselors stay within their scope of practice and make appropriate referrals</p>	<p>NSS 3R4 FD</p>						
	<p>12.2.4 LA has a referral protocol for peer counselors and a list of referral resources for their agency/community</p>	<p>NSS 3 R4 FD</p>						
<p><b>12.3.0 DOCUMENTATION</b></p>	<p>12.3.1 BFPC contacts are documented appropriately</p>	<p>FD</p>						
<p><b>12.4.0 FISCAL</b></p>	<p>12.4.1 BFPC staff time is excluded from the "BF Promotion" WIC activity on the monthly time study</p>	<p>FD</p>						
	<p>12.4.2 BFPC and WIC funds and expenditures are segregated, and reported separately</p>	<p>FD</p>						

## WIC Local Agency (LA) Management Evaluation (ME) Preparation Materials

Local Agency Reviewed \_\_\_\_\_ Review  
 Dates \_\_\_\_\_ Reviewers \_\_\_\_\_

Item	Documents or Materials	Date Received	Date Reviewed	Comments
1.	LA Nutrition Education Plan, Service Plan, and/or Nutrition Education Contact policy changes, if applicable ( <i>send only if changes</i> ) <b>S</b>			
2.	LA Individual Care Plan Policies ( <i>send only if different than State</i> ) <b>S</b>			
3.	Client Chart Data (signed R & Rs, ENPRs, applications for clients on chart review form). ( <i>Scan into SPIRIT and have charts available for onsite review</i> ) <b>S, OS</b>			
4.	Client nutrition education handouts ( <i>available on-site</i> ) <b>OS</b>			
5.	Unless included in current grant agreement, Memorandum of Agreements <b>S</b>			
6.	Current referral flyer/letter <b>S</b>			
7.	New participant letter/flyer <b>S</b>			
8.	Copy of termination letter, if not using Spirit letter <b>S</b>			
9.	Copy of No Show appointments communications letter/fax/email <b>S</b>			
10	Copy of current Public Notification ad/flyer <b>S</b>			
11	Copies of letters or log of current year civil rights complaints <b>OS</b>			
12	Copies of current staff training agenda and handouts (including annual civil rights training) <b>OS</b>			
13	Copies of or log of current year clients' vendors complaints <b>OS</b>			
14	If different than grant agreement, staff background and staffing chart <b>S</b>			
15	Copies of management training (agendas only) <b>OS</b>			
16	If different than current grant agreement, staff responsibility changes <b>S</b>			
17	Staff orientation process/policies/checklist <b>OS</b>			
18	LA warrant log <b>OS</b>			
19	Copies of client confirmation receipts samples for current year <b>OS</b>			
20	MOV nutrition education materials examples <b>OS</b>			
21	All current LA WIC services subcontracts <b>S</b>			
22	If different than current grant agreement, copy of current indirect cost rate plan <b>S</b>			
23	Support documentation for one month of purchases in the current fiscal year. Support documentation must align with GEMS. <b>S</b>			
24	Personnel reports to justify a time study report for this SFY. <b>OS</b>			



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25	Any Local Agency specific forms that have been developed within the last six months <b>S</b>			
26	Copy of any current subcontracts for WIC services <b>S</b>			

\***S** indicates items to be sent to State Office for pre-review, **OS** indicates items to have available for on-site review

## Abbreviations Used in the LA Self-Assessment Form

AK P & P	State of Alaska WIC Policy and Procedure
ATAP	Alaska Temporary Assistance Program
BP	Best Practices
BF	Breastfeed
BFPC	Breastfeeding Peer Counselor
BFW	Breastfeeding Woman
CPA	Competent Professional Authority
CSE	Child Support Enforcement
EPSDT	Early Periodic Screening, Diagnosis and Treatment, usually performed by Public Health Nursing
FD	Finding
FMNP	Farmer's Market Nutrition Program
FR	Federal regulations
LA	Local Agency
ME	Management Evaluation
MIS	Management Information System
MOV	Mail Order Vendor
NSS	Nutrition Service Standards
Nutr ed	Nutrition education
PCE	Participant Centered education
PCS	Participant centered services
PGW	Pregnant Women
SFY	State Fiscal Year
RD	Registered Dietitian
VENA	<p>Value Enhanced Nutrition Assessment</p> <p><i>VENA Competencies:</i></p> <ul style="list-style-type: none"> <li>• Principles of life cycle nutrition</li> <li>• Nutrition Assessment Process</li> <li>• Anthropometric and hematological data collection techniques</li> <li>• Communication</li> <li>• Multicultural awareness</li> <li>• Critical thinking</li> </ul>

### **Participant Interview Form**

Date: \_\_\_\_\_ Clinic: \_\_\_\_\_

I work at the state WIC office. We are doing a survey of WIC client satisfaction, to help us improve WIC services. I would like to know if you would be willing to answer some questions about your experience with the WIC clinic. If you are no longer a WIC client, it would still be helpful for you to answer these questions, if you are willing. Your name and any information you give me will be kept completely confidential. This will not affect your eligibility for the WIC Program in any way.

Would you be willing to answer my questions? (If yes, proceed. If no, politely thank the client, and tell him or her this will have no effect on eligibility for the WIC Program.)

1. How did you first hear about the WIC Program?
  
  
  
  
  
  
  
  
  
  
2. Are you still a client with the WIC Program? (If not, ask why not. See if the person will continue to answer the questions about their experience when they were a WIC client.)
  
  
  
  
  
  
  
  
  
  
3. When you make appointments for the WIC Program, are they at times that are convenient for you?
  
  
  
  
  
  
  
  
  
  
4. Is the location of the WIC clinic convenient for you?
  
  
  
  
  
  
  
  
  
  
5. When you arrive at the WIC clinic, do (did) you and your children feel welcome and comfortable?

6. Do you feel the WIC staff deals with WIC clients in a respectful and professional way?

7. After you arrive at the clinic, do (did) you have to wait a long time to be seen?

8. Do (did) you have any problems filling out the WIC forms?

9. Do (did) you have enough time to ask questions during your WIC appointment?

10. How does (did) the WIC staff treat you?

11. What is your opinion of the nutrition education you get (got) at the WIC clinic?

12. What is your opinion of the foods you get (got) from WIC?

13. Have you ever asked for any WIC services that you did not get? (If yes, ask what kind of services.)

14. Have you had any problems cashing your WIC checks? If yes, what kind of problems?

15. Are (were) you treated with respect when you cash your WIC checks at the grocery store? (If no, ask for details.)

16. What do you think is the best thing about the WIC Program?

17. What do you think is the worst thing about the WIC Program?

18. Is there anything else you would like to tell me about the WIC Program?

Thank you very much for taking the time to answer my questions. Your answers will be kept completely confidential. This will be very helpful to us in finding ways to improve the WIC Program.

Alaska WIC Local Agency (LA) Management Evaluation (ME)  
Preparation Materials (Current SFY)

Local Agency Reviewed \_\_\_\_\_ Review Dates \_\_\_\_\_  
Reviewers \_\_\_\_\_

Materials	Location	Date Reviewed	Comments
1. Last LA ME Report	WIC Adm. folder		
2. Last LA ME Report Response	WIC Adm. folder		
3. Current SFY Grant Application	Grant file		
4. Current SFY Nutrition Education Plan	Grant file		
5. Current SFY Quarterly Reports	WIC Adm. folder		
6. Current LA Self-Assessment	Mailed by LA before ME		
7. Current SFY Nutrition Reports	AK WIC MIS Nutrition Reports		
8. Last SFY Inventory	WIC Accountant		
9. Last SFY Time Studies	WIC Accountant		
10. Current SFY Financial Information	WIC Accountant		

11. ENPR Report Usage Rate	ENPR database		
12. Current SFY Vendor Monitoring Reports	Vendor Coordinator		
13. Chart Reviews	AKWIC MIS		