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X. MONITORING AND AUDITS

Policy

The Guam WIC Program complies with all federal and local regulations, statutes, policies and instructions. To ensure this compliance, the program has developed an internal monitoring system and sponsors organization-wide audits.

A. MONITORING

Monitoring Activity:

1. Monitoring Activity:

Mandated by the 7 Code of Federal Regulation 246.19(b)(3), the State agency will conduct monitoring reviews of each local agency/clinic 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 may conduct such additional on-site reviews as the State agency determines to be necessary in the interest of the efficiency and effectiveness of the program.

The Clinic Review will be conducted by the Management Analyst III of the Quality Assurance Section and the WIC Specialist Nutrition Coordinator (who monitors all nutrition education compliances).

- The State agency will review at least one (1) of its clinic sites: Northern WIC clinic (Dededo), Central WIC clinic (Tiyán), or Southern WIC clinics (Inarajan & Santa Rita). The clinic review shall include a review of the clinic environment and chart review. .
- The State agency requires the local clinic(s) selected for review to submit a Corrective Action Plan (CAP) within sixty (60) days of receiving the report.
- The State agency does not use a tracking device, such as chart or spreadsheet, which summarizes the review of all local clinics.
- The State agency reviews prior clinic review documents in preparation for a clinic review.
 - No show category
 - Staff/participant ratios

2. Monitoring Procedures:

- Forms



Questions and checklists are prepared using the State Plan and the federal regulations regarding clinic management, certification, nutrition services and civil rights. Program operations will then be observed to ascertain conformity with applicable standards or necessity for the rescission of procedures. The criteria used in this evaluation system will be objective at all times. These forms can be found in the appendix at the end of this section.

- Report

The purpose of the report is to provide technical assistance to the clinic. Proper use of the report would be to use it as a tool to identify program operations requiring attention. Once program operations are identified as needing improvement, clinic management should then develop strategies to improve and strengthen program operations.

- a. **The following are the established protocol required by the State agency when a clinic is to be monitored:**

Procedures:

- State agency will provide an advanced notification to the clinic management and staff. This notification shall contain the specific time frames or dates during which the monitoring activity will proceed.
- The State agency will discuss the review findings on-site with local clinic.
- The State agency will forward the clinic review report to the WIC site Supervisor and Public Health Nutrition Specialist within forty-five (45) days after the completion of the clinic review report. This report will address areas requiring improvement, areas in compliance but requiring attention and areas, which are in non-compliance. This report shall contain corrective action taken or to be taken for each identified problem and the date by which the corrective action is to be implemented or completed.
- Evaluation of adequacy of corrective action.
- The WIC site supervisor is required to submit a corrective action plan, including implementation timeframe within sixty (60) days after the clinic review report meeting. The response is submitted to the Management Analyst III and the Public Health Nutrition Specialist.
- The Management Analyst III provides feed back and/or follow-up to the responses of the WIC site supervisor(s) as needed.
- The Management Analyst III documents the status/progress on fulfillment of the responses with anticipated completion dates (i.e. completed, in progress, pending action, case closed, etc.)
- The Management Analyst III, Public Health Nutrition Specialist, or WIC site supervisor shall consult with the WIC Program Coordinator IV and/or WIC Director as needed to facilitate the implementation of any planned changes necessary identified in the clinic review report and/or response to the clinic



review report.

- The Management Analyst III maintains a file of the reviews, responses, and the status of the responses.

b. The Management Analyst III conducts the monitoring of the local clinics.

c. Specialist in the following areas is used to monitor the areas of their expertise.

- Program Coordinator IV is responsible for the vendor management, food delivery system, caseload management, food funds management, financial management and nutrition services and administration expenditures.
- Public Health Nutrition Specialist is responsible for nutrition services, including breast feeding promotion and support and certification and eligibility determination.
- Management Analyst III is responsible for the civil rights and monitoring and audits.

d. The following monitoring tools are utilized when a review/evaluation is being performed by the State Agency Quality Assurance staff. They are: Clinic Review and Certification Observation. They consist of the following areas:

Clinic Review Form:

- Administration
- Clinic Policies and Procedures
- Program Integrity
- Logs
- Civil Rights
- Customer Service
- Breastfeeding Friendly
- Lab Environment
- Farmer's Market Nutrition Program Coupons

Certification Observation

- Intake
- Family Information
- Client Registration
- Certification (Cert Action)
- Anthropometrics
- Health
- Nutrition Questionnaire
- Care Plan



- Follow-up/Nutrition Education
- Food Package
- FI Issuance/On Demand
- Appointment Scheduler
- Interviewing Techniques/Customer Services
- Documentation

e. The State agency has developed procedure for local clinic to use when they evaluate.

- The Guam WIC Program has established an on-going management evaluation system in accordance with federal regulations. The essential focus of this internal monitoring system is to ensure compliance with both federal and local regulations and policies, to access the efficiency and effectiveness of program operations, as well as, the achievement of program goals and objectives. This system is analogous to the regional management evaluation system called the State Management Evaluation Review. The results of these systems are designed to assist management in identifying areas for improvement and assure program integrity, as well as strengthening the positive behavioral impact change in program applicants and participants.
- Responsibility of this system is tasked to the Quality Assurance Section of the Guam WIC Program. The management evaluation system is comprised of a clinic review and administrative support review as the Guam WIC Program is both the State and Local Agency. Format of the review is in an objective question and checklist format with measurements.
- Questions and checklists are prepared from the State Plan and the federal regulations regarding clinic management, certification, nutrition services, civil rights, financial management system, EBT card accountability and control and food delivery system. Program operations are then observed to ascertain conformity with applicable standards or necessity for the rescission of procedures. The criteria used in this evaluation system are objective at all times.

3. Use of Clinic Review Data:

The State agency will provide the local clinic the report of the clinic review findings. The clinic review findings consist of recommendations in areas requiring improvement, areas in compliance but requiring attention and non-compliance areas.

The report will be discussed at the appropriate in-service training meeting. Training,



if needed, will be provided based on the report findings.

- a. The State agency analyzes the results of the local clinic monitoring visits to determine whether deficient areas are common among its local clinics.**
- b. The State agency utilizes local clinic review data.**

To ensure compliance with both federal and local regulations and policies, to access the efficiency and effectiveness of program goals and objectives, to assist management in identifying areas for improvement, to assure program integrity, and to strengthen the positive behavioral impact change in program applicants and participants.

- c. The State agency reviews data in the following report to conduct its local clinic review.**

- The “no show rate” report, in HANDS contains data of participants that missed their appointment. This report is utilized by the State agency to monitor if the local clinics are complying with the follow-up procedures when a participant fails to come in for their appointment.

4. Chart Review

Chart Review is conducted in conjunction with the Clinic Review. A total of 10 participant charts are reviewed.

B. AUDITS

In accordance with OMB Circular A-133 (Audits of State and Local Governments), the Department of Public Health and Social Services Guam WIC Program seeks annual organization-wide audits. All staff understands these audits are necessary to ensure program integrity and will cooperate with auditors. The Quality Assurance Section will be the Program liaison for the auditors. Audit results will be made available to staff and will be a basis for training in areas identified in the report as needing improvement.

1. Audits:

State audit

The State Single Audit of the Guam WIC Program is conducted by a private firm contracted by the Government of Guam, Office of the Public Auditor.

- a. A Single Audit review for the year ending September 30, 2021 began on October 1, 2021. The audit is still on-gong as of July 12, 2022, pending the report from the auditor.**

**b. State audit**

A Single Audit review for the year ending September 30, 2021 began on October 1, 2021 and the report has not been completed by the contracted auditor as of July 12, 2022. A private firm is contracted by the Government of Guam, Deloitte & Touche LLP conducted the audit.

2. Audit Management Decision

- a. The method used by the State agency to ensure that corrective action is taken on audit findings is to keep a copy on file.**
- b. State agency corresponds with the Bureau of Budget and Management Research (BBMR) on actions taken to ensure that all claims amounts are recovered.**

The State agency monitors receipt of a check in the amount of an audit claim. The State agency provides the Administrative Services Officer (ASO) of the Department of Public Health and Social Services (DPHSS) a copy of the audit claim. The audit claim is then forwarded to the Bureau of Budget and Management Research (BBMR) will networks with the ASO of the DPHSS on the status of the audit claim. The State agency corresponds with the ASO on actions taken to ensure that all claims amount is recovered.

- c. State agency corresponds with the Department of Administration (DOA) on the accounting procedures for claim amounts recovered.**

Recovered claim amounts from prior fiscal years are returned to FNS. The State agency will identify a Government of Guam local account for reimbursement to FNS. A direct payment is processed and forwarded to the Department of Administration for payment processing. A check number, date of check and claims amount is provided to the State agency for record keeping.

3. Availability of Audit Reports

- a. The Department of Public Health & Social Services, Business Office receives and maintains all organization-wide audits involving the Guam WIC Program.**
- b. The Administrative Services Officer (ASO) of the Department of Public Health & Social Services, Business Office maintains the files to reflect trail from the receipt of the audit to final action.**
- c. The State agency does not maintain a listing of all planned audits for the coming Fiscal Year.**



d. The State agency ensures WIC participation in A-133 and other audits by establishing a contact person for each audit.

The Management Analyst III serves as a liaison person for single state audits and USDA's Management Evaluation Reviews (ME Review) to provide auditors with necessary information and to schedule meetings as needed to facilitate the auditors review.

The Management Analyst III oversees the preparation of all audit responses to the reviewer(s) by the designated deadline.

e. **The State agency assures exclusion of confidential information from public report resulting from records review.**

Any and all reports or documents released from the Guam WIC Program for public review must received prior approval from the Guam WIC Director. Such approval is to ensure that such report(s) do not contain confidential applicant or participant information.

