X (A). MONITORING AND AUDITS

GOAL:

Update the monitoring policy 9.01, 9.02, and nutrition policy 5.05, to reflect updates to business processes within Crossroads. External and internal monitoring tools will be updated for compatibility with Crossroads as well. State Agency (SA) monitors will provide training to local agency directors and/or designated staff regarding revised monitoring tools and business processes.

METHODOLOGY: Until such time that the pending change request and tickets are resolved related to the Monitoring and Analysis section within Crossroads, West Virginia will not have the capability to complete monitoring within the Crossroads application. The SA will continue to provide training to Local Agency Directors on the new paper monitoring tools, as well as, the working functions of the Monitoring and Analysis section of Crossroads.

> The revised monitoring tools are used to increase effectiveness of the monitoring process, both internal and external. Even though the Monitoring and Analysis section of Crossroads is not fully functioning, the web-based aspect of the program still will increase flexibility and provide opportunities to complete major portions of chart reviews prior to onsite visits, thereby reducing disruption of clinic flow created by the monitoring visits.

EVALUATION:

The evaluation process will consist of monitoring training sessions and responding to training evaluations. Evaluation will also be completed after the end of the fiscal year by reviewing agency internal monitoring reports, as well as, the number of written monitoring findings and responses utilizing the new tools.

STATUS:

The monitoring tools have been updated. This goal remains ongoing, as the monitoring tools will continue to be updated as we move forward, and policy changes are received.

This goal is ongoing for FY 2021.

X (B). MONITORING AND AUDITS

GOAL: Implement quality improvement strategies to ensure program integrity and

quickly identify, respond and decrease participant fraud and program abuse.

METHODOLOGY: All reports of potential fraud or the sale/attempted sale of WIC benefits will

be investigated to determine if the items offered for sale match benefits issued from WIC. Social media sites will be routinely monitored for advertisements of infant formula and/or infant foods. All information listed in the advertisements will be matched against participant information to determine if WIC benefits have been offered for sale. Participants found to be selling foods which were purchased with their WIC benefits, will be sanctioned and requested to repay the program for the benefits that were

misused or return the items offered for sale back to the clinic site.

EVALUATION: The SA Program Integrity Coordinator will track the number of reported

and substantiated fraud and abuse investigations by the varying investigative measures (i.e. social media, phone referrals, local clinic reports, etc.) to assess which processes are most effective and determine

additional means that may be employed to further reduce program abuse.

STATUS: Social media postings and referrals of potential fraud from local agency staff remain relatively low. Participants receiving sanction notices continue

to choose to make restitution, either monetary or by returning to the clinics the infant formula and foods that were offered for sale. In 2019, \$16.79 in food funds, as well as 17 cans of baby formula were recouped through

restitution.

This goal is ongoing for FY 2021.