

8.08 Routine Monitoring

POLICY:

The West Virginia WIC Program shall ensure overt monitoring on a minimum of five percent (5%) of the number of vendors authorized by West Virginia as of October 1 of each fiscal year. The goal is not to create a punitive mechanism but is intended to reinforce the training given to vendors and to ensure the nutritional goals of the Program are met through food delivery.

Monitoring will ensure: 1) retailers selected to redeem WIC food benefits are capable of fulfilling the responsibilities of appropriate food benefit redemption in a timely manner; 2) selected retailers pricing structure on WIC food items allow for maximum participation of eligible WIC participants as well as maintains competitive cost selection criteria; and 3) retailers selected are operating within the framework of acceptable business practices including all WIC retailer selection criteria.

Monitoring visits shall be conducted by an identified representative of the federal, state or local WIC Agency. Each applicant will receive monitoring prior to authorization, and authorized WIC vendors will receive monitoring at least once during a three-year agreement period. Monitoring may also occur as follow up to determine if cited or identified violations have been corrected, or in response to complaints from participants or Local Agency staff.

Visits will not be announced in advance, but the WIC representative will inform the store manager or other member of the managerial staff of his/her presence at the time of the visit. WIC customers in the store may be questioned or an educational buy may occur to assess store training procedures and employee knowledge of WIC transaction procedures. An Educational Buy follows the same procedure as the Compliance Buy with one exception. Once the WIC transaction is completed, the WIC representative will identify his/herself and the results of the buy will be reviewed with the appropriate store personnel. If a problem is discovered, no sanctions will result, but the violation will be documented in the routine monitoring report.

Vendors are required to cooperate with the WIC representative during the routine monitoring visit; refusal to do so will result in termination of the agreement.

PROCEDURE:

- A.** Pre-authorization monitoring is required for each new vendor applicant, during which the State Agency will assess the applicant's location in order to determine if the applicant meets the current selection criteria and is able to ensure adequate participant access to supplemental foods. Applicants which meet the current selection criteria will be selected for authorization through a probationary 6-month agreement.
- B.** Authorization monitoring occurs within six (6) months of initial authorization (prior to the expiration of the 6-month probationary agreement) to make a final determination of compliance with the current selection criteria and terms of the probationary period. Vendors which meet the current selection criteria with no agreement violations during the six-month probationary period will be granted a three-year agreement.
- C.** Routine monitoring may be conducted with one-third of authorized vendors annually to ensure each retail location is monitored at least once during a three-year agreement period. In addition, authorized vendors receiving a warning, mandatory retraining or a

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sanction within the most recent fiscal year will receive routine monitoring within 18 months following the violation.

- D. Follow-up monitoring may be conducted on any authorized vendor who passed routine monitoring within the most recent calendar year but was issued a warning or mandatory retraining on-site for a violation which was corrected prior to the WIC representative completing the monitoring visit. The purpose of this monitoring is to ensure the vendor does not develop a pattern of violations which could lead to a sanction during the agreement period.
- E. An educational buy may occur at vendor locations with a record of participant complaints or at the request of a Local WIC Agency. An education buy is the same procedure as the compliance buy with one exception. Once the WIC transaction is completed, the WIC representative will identify his/herself and the results of the buy will be reviewed with the appropriate store personnel.
- F. Prior to conducting a monitoring visit, each investigator must complete the required training provided by the Vendor Manager or designee. Training will include, but is not limited to, an interactive training session utilizing the Monitoring Standard Operating Procedures, and on-site job shadowing. Training will stress the need for clear and accurate observations while in the store and how to complete all reports. The investigator will be trained sufficiently to be able to document any unexpected violations at the store as well as educate store personnel on-site regarding violations and state policy.
- G. The State Agency will utilize a Monitoring Visit Form, Inventory Survey by Peer Group and Redemption by Category Report to document information including the date of the visit, the name and signature of the reviewer, and the nature of the any problem(s) detected. Documentation will be maintained in the vendor's file within the Crossroads Management Information System.
- H. The Redemption by Category Report contains the highest priced item in each food category redeemed at the retail location within the last 30 days. The report is specifically designed to capture vendor prices, monitor that Electronic Benefit Transfer redemption requests do not exceed shelf prices, and ensure authorized vendors' prices meet competitive price selection criteria.
- I. The vendor will be advised in writing when a monitoring visit reveals a violation outlined in the State Sanction Schedule.
- J. For each fiscal year, the State agency will send a summary of the results of routine monitoring to the United States Department of Agriculture Food and Nutrition Services headquarters by February 1 of the following fiscal year.

REFERENCES:

1. WIC Regulations 7 CFR 246.4 State Plan
2. WIC Regulations 7 CFR 246.12 Food Delivery Methods