

V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

(Please indicate) State Agency: West Virginia

for FY 2023

NSA expenditures involve the process of allocating, documenting and monitoring the distribution of administrative funds to local agencies, including the monitoring of nutrition education costs, and State and local agency direct/indirect costs.

During a disaster or public health emergency, the State agency may request to implement existing WIC regulatory and programmatic flexibilities to support the continuation of Program benefits and services. State agencies should consider the overarching authority, i.e., Stafford Act or provision(s) authorized by Congress, before developing a policy and procedure. The State agency must provide a detailed description of how it plans to operationalize the flexibility through their procedure manual where applicable. Please note the State Plan Guidance is not intended to capture a description of waivers authorized by Congress with separate reporting requirements, i.e., the Families First Coronavirus Response Act (PL 116-127).

More recently, Executive Order (EO) 13988, "*Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*," was issued to all Federal Agencies. The EO set out policies that all persons are entitled to dignity, respect, and equal treatment under the law, no matter their gender identity or sexual orientation. The EO does not usurp section 17 of 42 U.S.C, as amended or applicable regulations. However, where appropriate, State agencies may update their policies and procedures to align with the contents of the EO

A. [Funds Allocation-246.4\(a\)\(13\); \(14\)\(ix\)](#): describe the policies and procedures used to allocate administrative funds to local agencies, including start-up funds, and conversion of food funds to NSA funds.

B. [Local Agency Budgets/Expenditure Plans-246.4\(a\)\(2\)](#): describe the policies and procedures for preparing and submitting local agency budgets and expenditure plans and the services that are entirely supported by WIC Program funds.

C. [State and Local Agency Access to Funds-246.4\(a\)\(13\)](#): describe the procedures and method(s) of distribution/ reimbursement of NSA funds to local agencies.

D. [Reporting and Reviewing of State and Local Agency Expenditures-246.4\(a\)\(11\)\(iv\); \(12\); and \(13\)](#): describe the policies and procedures used to report, monitor, and review State and local agencies' expenditures, including the documentation of staff time, local agency report forms, on-site reviews of local agencies' NSA expenditures, and in-kind contributions.

E. [Nutrition Education Costs-246.4\(a\)\(9\)and 246.14\(c\)\(1\)](#): describe the plans and procedures used to meet the nutrition education expenditure requirements, including monitoring activities, local agency reports, and assurances that the special nutrition education needs of migrant farmworkers and their families, Indians, and homeless persons are met.

F. [Indirect Costs-246.4\(a\)\(12\)](#): describe the policies and procedures used to document and monitor indirect cost rates and services at the State and local level.

A. Funds Allocation

1. Allocation Process

- a. **The State agency has established and provided written procedures to local agencies describing the process for allocation of NSA funds among local agencies.**

Yes No Not applicable, State agency does not have separate local agencies. (Proceed to A. 2. *Conversion of Food Funds to NSA Funds*)

- b. **Local agencies were involved in developing these procedures via:**

Task force/committee of selected local agencies
 Comment on proposals made available to all local agencies
 Other (describe): Committee of State and Local Agencies developed the allocation methodology.

- c. **The State agency allocates NSA funds to local agencies through the use of:**

A negotiated budget Flat cost per participant Statewide
 Formula (variable) Other method (describe):

- d. **The allocation procedure takes the following factors into account (check all that apply):**

Staffing needs
 Number of participants
 Population density
 Cost-containment initiatives
 Availability of administrative support from other sources
 Other (specify):

- e. **The State agency methodology for funds allocations to local agencies includes a mechanism for reallocation.**

Yes Monthly Quarterly Semiannually
 No
 Other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

2. Conversion of Food Funds to NSA Funds

- a. **The State agency converts food funds to NSA funds:**

Based on a plan submitted to FNS to reduce average food costs per participant and to increase participation above the FNS-projected level for the State agency.
 The State agency achieves, through acceptable measures, increases in participation in excess of the FNS-projected level for the State agency.
 Describe measures used to increase participation:
 Not applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

3. The State's Fiscal Year runs from July 1st to June 30th.

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

B. Local Agency Budgets/Expenditures Plans

1. Local Agency Budgets/Expenditure Plans

Not applicable, State agency does not have separate local agencies.
(Proceed to C. State and Local Agency Access to Funds.)

a. **The State agency requires its local agencies to prepare and submit administrative budgets.**

Yes No

If yes, the State agency requires that local agency budgets include the same cost categories as those used for State-level budget preparation.

Yes No

b. **Local agencies' budgets are broken out by (check all that apply):**

Line items

- | | |
|---|--|
| <input type="checkbox"/> Accounting | <input checked="" type="checkbox"/> Maintenance and repair |
| <input type="checkbox"/> ADP services | <input checked="" type="checkbox"/> Materials and supplies |
| <input type="checkbox"/> Breastfeeding aids | <input checked="" type="checkbox"/> Memberships, subscriptions, and professional activities |
| <input checked="" type="checkbox"/> Capital expenditures | <input checked="" type="checkbox"/> Printing and reproduction |
| <input type="checkbox"/> Clinic/lab services | <input checked="" type="checkbox"/> Training and education |
| <input type="checkbox"/> Communications | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Employee salaries | <input checked="" type="checkbox"/> Travel |
| <input checked="" type="checkbox"/> Employee fringe benefits | <input checked="" type="checkbox"/> Other (specify): Contractual, Indirect, Utilities |
| <input checked="" type="checkbox"/> Lease or rental of space | <input checked="" type="checkbox"/> Breastfeeding promotion/support (e.g., breastfeeding aids) |
| <input checked="" type="checkbox"/> Functions | <input checked="" type="checkbox"/> Client services |
| <input checked="" type="checkbox"/> General administration/
Program management | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Food Delivery | |
| <input type="checkbox"/> Certification | |
| <input checked="" type="checkbox"/> Nutrition education | |
| <input type="checkbox"/> Other (specify): | |

c. **The State agency has an established formal process for local agencies to follow when requesting amendments or modifications to their budgets.**

Yes No

d. **To prepare the federally required WIC administrative budget, the State agency:**

- Uses local agency budgets or prior year expenditures
- Uses a state agency information system to collect and compile expenditure and cost data
- Extracts or consolidates data reported under other State or local agency systems to group costs under the federal line items and functions

Other (describe):

ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation): Policy and Procedure 6.01 - Funding-Initial Amount; 6.02 - Budgeting - Initial

C. State and Local Agency Access to Funds

1. The State Agency manages its NSA Grant on a/an:

Cash basis Accrual basis

Other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

2. Reimbursement/Provision of Funds to Local Agencies

a. The State agency provides local agencies with funds in advance.

Yes (state conditions): Quarterly advance payments only paid when monthly and quarterly expenditure reports are submitted showing funds are being spent consistently.

No

Not Applicable (Proceed to next section.)

If yes, advances must be reconciled to incoming claims. Local agency claims are submitted:

Monthly Quarterly

b. In order to qualify for payment, an expenditure must be (check all that apply):

At or below the level of its approved budget line item

Supported by appropriate documentation (e.g., check or receipt)

A reasonable and necessary expense for WIC

Other (specify):

c. If an expenditure exceeds the budget provided for that particular line item, the State agency requires the local agency to (check all that apply):

Submit a supplemental request

Provide a justification for exceeding the budget line item

Make an offsetting adjustment to another line item in its budget

Request approval of a budget modification

Other (explain): Sufficient funds must remain in the grant agreement's overall budget as well as each category

d. Local agencies receive payment via:

Electronic funds transfer State treasury check/warrant

Other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.12 - Reporting and Projection-Monthly Reporting; 6.14 - Payment to the Local Agency

D. Reporting and Reviewing of State and Local Agency Expenditures

1. Documentation of Staff Time

- a. How does the State agency determine the percentage of staff time devoted to WIC tasks to document allowable staff costs under the WIC Program (check all that apply):

At SA At LA

- | | | |
|-------------------------------------|-------------------------------------|------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 100 percent reporting |
| <input type="checkbox"/> | <input type="checkbox"/> | Random moment sampling |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Periodic time studies: |
| <input type="checkbox"/> | <input type="checkbox"/> | 1 week/month |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1 month/quarter |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): |

- b. The State agency last evaluated its time documentation protocol on (specify date). 12/2004 .
If available, please attach a copy of the protocol to this section or cite Procedure Manual reference.

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

2. Please indicate below the services that are entirely supported by WIC funds:

- Anthropometric measurements
- Nutrition counseling/education
- Breastfeeding promotion/support
- Immunization status assessments
- Referrals to health and/or social services
- Hematological assessments
- Other (specify):

ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation): Policy and Procedure 6.06 - Expenditure - Nutrition Education/Breastfeeding Promotion and Support; 6.08 - Expenditure - Client Services

3. Local Agency Report Forms

- a. The State agency specifies standard forms and/or procedures for local agencies to use in reporting monthly local-level expenditures.

Yes No Not Applicable (Proceed to next section)

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.12 - Reporting and Projection-Monthly Reporting; 6/14 - Payment to the Local Agency

4. On-Site Review of Local Agencies' Administrative Expenditures

- a. The State agency conducts on-site reviews of local agency administrative expenditures:

- Annually Every two years Every three years
 Other (specify):

The review is conducted by:

- WIC State agency staff

- State Department of Health fiscal or audit staff
- CPA or audit firm
- Other (specify):

b. **The State agency utilizes a standard format/guide to review local agencies' NSA expenditures.**

- Yes No

If yes, the standard review guide includes the following procedures (check all that apply):

- Verification of at least one monthly billing/claim/expenditure report against source
- Documents
- Tracking written approval of procurements
- Requesting records of ordering, receipt, billing, and payment
- Determination that costs were necessary, reasonable and appropriate
- Determination that costs were properly allocated among WIC and other programs
- Determination that personnel costs charged to WIC were appropriate
- Determination that local agencies' indirect costs were appropriately charged
- Other (specify):

c. **If available, please attach a copy of the State agency's NSA expenditure review guide.**

d. **The State agency notifies local agencies of findings and establishes claims for unallowable costs, as appropriate.**

- Yes No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.16 - Record Keeping; 6.19 - Monitoring and Audits - Audits

5. **The State agency requires local agencies to document the sources and values of in-kind contributions.**

- Yes No

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

E. Nutrition Education Costs

1. **The State agency documents that it meets its nutrition education and breastfeeding promotion expenditure requirements per [7 CFR 246.14\(c\)\(1\)](#) via:**

- Activity reports Time studies Itemizing expenditures
- Other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.12 - Reporting and Projection-Monthly Reporting

2. **The State agency monitors expenditures for the following activities related to breastfeeding promotion and support at the State and/or local level (check all that apply):**

At SA At LA

Breastfeeding promotion coordinator's salary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Written educational materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Participant education/counseling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Staff training	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Breastfeeding promotion activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Direct support costs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Breastfeeding aids and equipment (e.g., breast pumps purchased with NSA funds)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

(If other, specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.06 - Expenditure - Nutrition Education/Breastfeeding Promotion and Support; the WIC accountant also monitors expenditures as the local agency invoices come in via the State Accounting System

3. In the event that the State agency uses funds from other sources in meeting minimum expenditure requirements for nutrition education (NE) and breastfeeding promotion and support (BFPS), please provide below the source of these funds, the amount, and the method the State agency will use to document the use of these NE and BFPS funds. (Federal WIC food funds used to purchase/rent breast pumps, and expenditures from breastfeeding peer counseling funds, cannot be counted toward the nutrition education and breastfeeding expenditure requirement.)

Does not apply. *(Proceed to E. 4. Local agencies report nutrition education and breastfeeding promotion and support costs.)*

Source

Amount

Method(s):

- Activity reports Time studies Itemizing expenditures
 Other (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):

4. Local agencies report nutrition education and breastfeeding promotion and support costs:

- Does not apply
 When they report routine NSA costs
 Through a different system (specify):

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.14 - Payment to the Local Agency

F. State and Local Agency Indirect Costs

1. Indirect Cost Rate and Services

a. Please list below indirect cost/cost allocation agreements in which the State agency is included:
West Virginia Department of Health and Human Resources (WVDHHR)

b. The State agency's indirect cost rate(s) is 33.70 (%) and is based on:

- Salaries Direct costs for administration Both
 Other (specify): Salaries and wages only, excluding all fringe benefits

c. If applicable, cite the effective date of the State agency's executed cost allocation plan for indirect cost: 07/01/2021 .

If applicable, cite the expiration date of the State agency's most recent executed indirect cost allocation plan: 06/30/2023

d. The State agency receives the following types of services under the indirect cost rate agreement(s):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Budgeting/accounting | <input checked="" type="checkbox"/> Personnel/payroll |
| <input checked="" type="checkbox"/> ADP | <input type="checkbox"/> Space usage/maintenance |
| <input checked="" type="checkbox"/> Communication/phone/mail | <input type="checkbox"/> Central supply |
| <input checked="" type="checkbox"/> Legal services | <input type="checkbox"/> Procurement/contracting |
| <input type="checkbox"/> Printing/publication | <input checked="" type="checkbox"/> Audit services |
| <input checked="" type="checkbox"/> Equipment usage/maintenance | <input type="checkbox"/> Other (specify): |

e. The State agency allows local agencies to report indirect costs.

- Yes No Not Applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.10 - Expenditure - Administrative Overhead; Appendix U - Indirect Cost Rates_SF2021

2. Review of Indirect Cost Documentation

a. The State agency and local agencies ensure that services received and paid for through indirect costs benefit WIC, and are not also charged directly to WIC by comparing direct charges by line item to a listing of services paid by funds collected through the application of the indirect cost rate:

- Done for State agency level indirect costs (frequency):
 Done for local agency level indirect costs (frequency): Annually
 Not done at either level.

b. State and local agency WIC management have access to and review the following documents as applicable to ensure that indirect cost services are not also charged directly to WIC (check all that apply):

	At SA	At LA
Indirect cost agreements/plans	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
The accounting mechanism used to ensure the propriety of indirect cost charges	<input type="checkbox"/>	<input type="checkbox"/>
A copy of the cost allocation plan	<input type="checkbox"/>	<input type="checkbox"/>
A list of all services paid from indirect costs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other documentation related to the establishment	<input type="checkbox"/>	<input type="checkbox"/>

and charging of indirect costs

Not applicable

c. When the State agency reviews the local agencies' indirect cost rate agreements, the review includes (check all that apply):

- Required submission of indirect cost agreement by the local agency to the State agency
- Assessment of how the rate or method is applied (correct time period, percentage, and base)
- Verification that the State agency had previously approved the local agency to negotiate such an agreement
- Post-review or audit to ensure the rate was applied correctly
- Other documentation related to the establishment and charging of indirect costs (list):
- Not applicable

ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation): Policy and Procedure 6.10 - Expenditure - Administrative Overhead