

## X. MONITORING AND AUDITS

(Please indicate) State Agency: West Virginia for FY 2023

Monitoring and Audits involves State agency efforts to review local agency/clinic activities on an ongoing and timely basis, and to track all audits involving WIC Program activity.

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. [Monitoring-246.19\(b\)](#): requires State agencies to establish a management evaluation system.
- B. [Audits-Subpart F to 2 CFR Part 200](#), as applicable: describe State agency audit responsibilities.

## X. MONITORING AND AUDITS

### A. Monitoring

1. **Local Agency/Clinic Monitoring Activity (to be updated each year). Skip this section if the State agency has no local agency(ies)**

a. **Local agencies/clinics monitored: (If State agency has one local agency, specify the date it was last monitored.**

8 local agencies total

8 local agencies monitored last annual period

17 clinics monitored last annual period

4 Number of local agencies to be monitored this current annual period

7 Number of clinics to be monitored this current annual period

Specify last annual period, from: **10/1/2021** to **9/30/2022** (month/day/year – month/day/year; must be applied consistently)

Specify current annual period, from: **10/1/2022** to **9/30/2023** (month/day/year – month/day/year; must be applied consistently)

b. **Number of local agencies/clinics required to submit Corrective Action Plans (CAPs) to address deficiencies identified during monitoring last year: 8 (Number)**

c. **The State agency uses a tracking device, such as a chart or spreadsheet, which summarizes the reviews of all local agencies.**

Yes       No

**If the State agency uses a tracking device, it shows (check all that apply):**

Date of most recent review for each local agency/clinic

Number of clinics reviewed in most recent review for each local agency/clinic

Listing of findings for most recent review of each local agency/clinic

Date of State agency notice of findings in most recent review for each local agency/clinic

Date of local agency/clinic corrective action plan in most recent review for each local agency and/or clinics

Outcome of corrective action plan

Whether the review was conducted virtually or onsite

d. **In preparing to conduct a local agency review, the State agency reviews data reports on:**

No-shows by category

Administrative costs claimed

Financial reports

Priorities served

Caseload

Racial/ethnicity

Staff/participant ratios

Participant nutrition surveillance data for participants in that local agency/clinic

## X. MONITORING AND AUDITS

Other (specify): **Processing Standards, High Risk Follow-up Report, Special Formula Participants, Computer Security**

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):** Policy and Procedure 9.01 – State Agency Review of Local Agency Program; 9.01 – State Agency Review of Local Agency Program, Attachments #1 - 4

### 2. Local Agency/Clinic Monitoring Procedures

#### a. The State agency uses an established protocol when it monitors local agencies/clinics.

Yes       No

**If yes, please provide the citation of where it can be found in the appendix or procedure manual:**

Policy and Procedure 9.01 – State Agency Review of Local Agency Program; 9.01 – State Agency Review of Local Agency Program, Attachments #1 - 4

**This monitoring protocol includes:**

- Advance notification of monitoring visit
- Determination of timeframes for conducting the review
- Designation of local agency/clinic staff to assist State agency staff during review
- Discussion of review findings on-site with local agency/clinic
- Specified time frame for providing written review report
- Specified time frame for local agency/clinic submission of corrective action plan, not to exceed 60 days from receipt of State agency's report
- Instructions or guidance for preparation of corrective action plan (e.g., inclusion of implementation time frames)
- Evaluation of adequacy of corrective action
- Follow-up with local agency/clinic to ensure corrective action measures are implemented
- Written notification of closure of the review
- Other (specify):

#### b. Monitoring of local agencies/clinics is conducted by (check all that apply):

- State WIC staff
- District or regional staff
- Other health programs
- Other (specify): BPH Central Finance Unit Monitoring and Audit Staff

#### c. Specialists in the following areas monitor the areas of their expertise:

- Certification and eligibility determination
- Caseload management
- Nutrition service
- Breastfeeding promotion and support
- Targeting and outreach policies
- Financial management of administrative funds
- Food delivery system

## X. MONITORING AND AUDITS

- Vendor management
- Civil rights
- Information Systems security
- Other (specify):

## X. MONITORING AND AUDITS

If the State agency uses reviewers to monitor areas in which they do not have expertise and/or prior knowledge, describe how the State agency trains or equips its reviewers to conduct the review:

d. The State agency uses a standard local agency/clinic review form.

Yes       No

If yes, please provide the citation of where it can be found in the appendix or procedure manual: Policy and Procedure 9.01 – State Agency Review of Local Agency Program; 9.01 – State Agency Review of Local Agency Program, Attachments #1 - 4

If yes, the review form covers the following areas:

- An assessment of local agency/clinic management
- An assessment of patient flow
- Certification case file reviews, including procedures for determining adjunctive income eligibility
- Caseload management
- Training of local agency and clinic staff
- Nutrition education
- Breastfeeding promotion and support
- Targeting and outreach policies
- Financial management of administrative funds
- Validation of staff time spent on WIC
- Food instrument accountability
- Vendor training and monitoring, if these functions are delegated to a local agency/clinic
- Civil rights compliance
- Other (specify):

e. The State agency has developed procedures for local agencies/clinics to use when they evaluate:

- Their own operations
- Subsidiary/satellite operations (e.g., county health department clinic)
- Subcontractors (e.g., community action program, hospital)
- Homeless facilities/institutions
- Other (specify):

If you selected any of the options above, please provide the citation of where it can be found in the appendix or procedure manual and answer the following questions: Policy and Procedure 9.01 – State Agency Review of Local Agency Program; 9.01 – State Agency Review of Local Agency Program, Attachments #2 and 4; Policy and Procedure 7.07

Do these procedures include a monitoring tool?

Yes       No

Are all local agencies/clinics required to follow these procedures?

Yes       No (specify basis for exemptions):

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):**

## X. MONITORING AND AUDITS

### 3. Use of Local Agency/Clinic Review Data

a. The State agency analyzes the results of local agency/clinic monitoring visits to determine whether deficient areas are common among its local agencies/clinics.

- Yes       No

b. The State agency utilizes local agency/clinic review data to (check all that apply):

- Identify outstanding operational approaches that could be shared with other local agencies/clinic
- Track individual local agency/clinic performance
- Compare administrative costs/expenses among local agencies/clinics
- Compare staffing and organization among local agencies/clinics
- Other (specify)

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):**

### B. Audits

Do not include management evaluations or other reviews conducted by FNS regional offices or by WIC State agencies. This section concerns the audits conducted under [Subpart F to 2 CFR Part 200](#) and audits conducted by USDA's OIG, per [7 CFR 246.20 \(a, b\)](#).

1. Audits (Federal, State, and Local)

a. Number of audits conducted during FY-2020: 8.

b.

action, etc.

Entities audited (includes both State and Local Agencies)	Auditor(s)	Period of Audit	Status/ disposition of audit at this time (management decision, final action, etc.)
Clay County Board of Health (Central)	David L. Howell, CPA	06/30/2021	Complete
Mid-Ohio Valley Board of Health	Perry & Associates, CPA, A.C.	06/30/2021	Complete
Monongalia County Health Department	Ferrari & Associates, PLLC	06/30/2021	Complete
Randolph Elkins Board of Health	David L. Howell, CPA	06/30/2020**	Complete
Shenandoah Valley Medical System, Inc.	SEK & Co., LLC	03/31/2021	Complete
Valley Health Systems, Inc.	Hayflich, CPAs	05/31/2021	Complete
West Virginia Emergency Medical Services, Technical Support Network, Inc. (TSN)	Herman & Cormany CPA, A.C.	06/30/2021	Complete
Wheeling-Ohio County Board of Health	Perry & Associates, CPA, A.C.	06/30/2020**	Complete

## X. MONITORING AND AUDITS

**\*\*Note:**

Randolph Elkins Board of Health and Wheeling-Ohio County Board of Health have not yet submitted the annual audit for year ending 06/30/2021. The reports are not due yet since the OMB provided all recipients and subrecipients with a blank extension and submission of the Single Audit reporting package (OMB Memorandum 21-20) to six months beyond the normal due date. The original due date was 03/31/2022 but the extension gives them until 09/30/2022 to have them submitted and be considered on-time.

If additional audits were conducted, please provide separately.

**c. Entities not audited and reason (e.g., local office is not a subrecipient local agency, non-federal entity did not expend \$750,000 or more in Federal funds during the fiscal year, etc.)**

**Entities not audited (includes both State and local agencies)**

N/A – Not applicable

**Reason Entity Not Audited**

All 8 entities were audited for the FY's in 2020 and 6 out of 8 have been received for the FY's ending in 2021; 2 reports have yet to be submitted due to extension of end date by OMB.

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):**

**2. Audit Management Decision**

**a. Methods used by the State agency to ensure that corrective action is taken on audit findings include (check all that apply):**

- State agency has a copy of the corrective action plan on file.
- State agency tracks audits to determine if the same problems are recurring from year to year.
- Local agency must file periodic reports.
- State agency contacts local agency by phone or in writing periodically.
- State agency visits local agency.
- Other (specify):

**b. State agency actions taken to ensure that all claim amounts are recovered include (check all that apply):**

- Local agency files periodic reports.
- State agency contacts local agency by phone or in writing.
- State agency monitors receipt of a check in the amount of an audit claim.
- State agency establishes and employs billing/offsetting of account procedures.
- Other (specify):

**c. State agency accounting procedures for claim amounts recovered:**

- Recovered claim amounts from prior fiscal years are returned to FNS.
- Recovered claim amounts are reallocated if collected within the same fiscal year.
- Claim amounts are verified with local agency.
- Other (specify):

## X. MONITORING AND AUDITS

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):**

### 3. Availability of Audit Reports

a. **The State agency receives and maintains for at least three years copies of all organization-wide audits involving the WIC Program and maintains a listing of those audits.**

- Yes       No, copies are retained by: WVDHHR – Office of Internal Control and Policy Development – Division of Compliance and Monitoring. All audits are scanned and made available on the DHHR intranet website.

b. **Procedures used for maintaining files to reflect the trail from the receipt of the audit to final action include:**

- Detailed breakdown of each audit finding is tracked separately.
- Individuals are assigned to monitor each audit.
- One individual is assigned to monitor all audits.
- Other (specify):

c. **The State agency maintains a listing of all planned audits for the coming Fiscal Year.**

- Yes       No

**(Indicate recent FYs which included WIC in the single audit report):**

On the WVDHHR Statewide A-133 Audit conducted for State Fiscal Year (SFY) 2022 ending 06/30/2022, WIC was pulled and considered a major program.

d. **The State agency ensures WIC participation in the single audit and other audits by (check all that apply):**

- Developing a tracking system that monitors the status of each audit
- Establishing a contact person for each audit
- Including this audit requirement in the local agency contract
- Other (specify):

**ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation):** Policy and Procedure 6.17 – Monitoring and Audits-Substantiation of One Invoice/Contract; 6.18 – Monitoring and Audits-Fiscal Review; 6.19 – Monitoring and Audits-Audits