

X. MONITORING AND AUDITS

State Agency: West Virginia for FY 2025

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 disasters, emergencies, public health emergencies, or a supply chain disruption, including infant formula recalls, the State agency may request to implement existing and allowable regulatory flexibilities or waivers to support the continuation of Program benefits and services. Waivers granted under Access to Baby Formula Act of 2022 (codified at 7 CFR 246.4a(30)) or temporary provision(s) authorized by Congress are not permanent amendments to the State Plan; however, State agencies should consider any historical amendments as the result of waivers granted under prior waiver authority to develop policies and procedures for current and future disasters.

- 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.

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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. Number of local agencies (for FFY2024)

3. Number of local agencies monitored last annual period

6. Number of clinics monitored last annual period

5. Number of local agencies to be monitored this current annual period

8. Number of clinics to be monitored this current annual period

Specify the last annual period, from: 10/01/2023 to 9/30/2024. (month/day/year – month/day/year; must be applied consistently)

Specify current annual period, from: 10/01/2024 to 9/30/2025 (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: 0**

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

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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
- Other (specify): Processing Standards, High risk follow up Report, RTF issuance, WV WIC 53 Expiration, Computer Security

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): [P&P 9.01 and 9.01 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: Appendix-A-9.01 State Agency Review of Local Agency Program Updates; X Appendix-B-9.01 Attachment #1 Nutrition Entrance Interview Questions; X Appendix-C-9.01 Attachment #2 Operations Entrance Interview; X Appendix-D-9.01 Attachment #3 Nutrition Monitoring Forms Clinic Observation; X Appendix-E-9.01 Attachment #4 Operations Clinic Monitoring Checkoff Sheet

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

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Other (specify): N/A.

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
- Vendor management
- Civil rights
- Information Systems security
- Other (specify): N/A.

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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:

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: X Appendix-A-9.01 State Agency Review of Local Agency Program Updates; X Appendix-B-9.01 Attachment #1 Nutrition Entrance Interview Questions; X Appendix-C-9.01 Attachment #2 Operations Entrance Interview; X Appendix-D-9.01 Attachment #3 Nutrition Monitoring Forms Clinic Observation; X Appendix-E-9.01 Attachment #4 Operations Clinic Monitoring Checkoff Sheet

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): Staff observation, chart reviews

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): N/A.

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: Appendix-A-9.01 State Agency Review of Local Agency Program Updates; X Appendix-B-9.01 Attachment #1 Nutrition Entrance Interview Questions; X Appendix-C-9.01 Attachment #2 Operations Entrance Interview; X Appendix-D-9.01 Attachment #3 Nutrition Monitoring Forms Clinic Observation; X Appendix-E-9.01 Attachment #4 Operations Clinic Monitoring Checkoff Sheet

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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
Appendix-B-9.01 Attachment #1 Nutrition Entrance Interview Questions; X Appendix-C-9.01
Attachment #2 Operations Entrance Interview; X Appendix-D-9.01 Attachment #3 Nutrition
Monitoring Forms Clinic Observation; X Appendix-E-9.01 Attachment #4 Operations Clinic
Monitoring Checkoff Sheet

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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): Identify operating procedures that vary due to some LA's are run by the private sector

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

[9.01 State Agency Review of Local Agency Program](#)

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 FY2023 : 8

b. 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.)
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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.)
WV Department of Health and Human Resources/Bureau for Public	Ernst & Young	6/30/2023	Complete

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Health/Office of Nutrition Services	LLP		
Clay County Board of Health (Central)	David L. Howell, CPA	06/30/2023	Complete
Mid-Ohio Valley Board of Health	Perry & Associates, CPA, A.C.	06/30/2023	Complete
Monongalia County Health Department	Ferrari & Associates, PLLC	06/30/2023	Complete
Randolph Elkins Board of Health	David L. Howell, CPA	06/30/2023	Complete
Shenandoah Valley Medical System, Inc.	SEK & Co., LLC	04/01/2023 - 03/31/2024	Audit Occurring
Valley Health Systems, Inc.	Hayflich, CPAs	05/31/2023	Complete
West Virginia Emergency Medical Services, Technical Support Network, Inc. (TSN)	Herman & Cormany CPA, A.C.	06/30/2023	Complete
Wheeling-Ohio County Board of Health	Ferrari & Associates, PLLC.	06/30/2023	Complete

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)

Reason Entity Not Audited

N/A – Not applicable

All eight Local WIC Agencies and the State Agency were audited for FY ending June 30, 2023.

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

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.

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- State agency visits local agency.
- Other (specify): [Click or tap here to enter text.](#)

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): [Click or tap here to enter text.](#)

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): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

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: [WV Office of Shared Administration – Office of Internal Control and Policy Development](#) Division of Compliance and Monitoring. All audits are scanned and made available on the [WV State Auditor’s Office 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

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audits.

Other (specify): [Click or tap here to enter text.](#)

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 State of WV A-133 Audit, WIC was not considered a major program in SFY 2023 ending 6/30/2023 but it was pulled and considered a major program for SFY 2024 ending 6/30/2024.](#)

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): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): P&P 6.17, 6.18, 6.19