

X. MONITORING AND AUDITS

(Please indicate) State Agency: **Wisconsin**

for FY **2024**

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.

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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.)

64 Number of local agencies

33 Number of local agencies monitored last annual period

42 Number of clinics monitored last annual period

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

31 Number of clinics to be monitored this current annual period

Specify last annual period, from: 01/01/2021 to 12/31/2021 (month/day/year – month/day/year; must be applied consistently)

Specify current annual period, from: 01/01/2022 to 12/31/2022 (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: 32 (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

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- Other (specify): participant file reviews, nutrition and quality assurance (QA) outcome measures

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): Appendix X.A.1.d.: File Review Tool, File Review Tool Instructions, Local Agency ME Checklist, ME Criteria Tool, Observation Tools

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 X.A.2.a. Instructions for Regional Consultants

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): [Nutrition and quality assurance measures](#)

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):

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

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- Civil rights
- Information Systems security
- Other (specify): All areas except vendor management are reviewed by the regional consultants; state office staff assists as needed

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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:

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: Appendix X.A.1.d.

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): Vendor training and monitoring if followed up by the WIC Vendor Unit as a separate function

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: Appendix X.A.2.e.: WIC Customer Satisfaction Survey; Appendix X.A.1.d. ME Criteria Tool

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): Its use is optional

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): Appendix X.A.2.e. WIC Customer Satisfaction Survey; Appendix X.A.1.d. ME Criteria Tool; Appendix X.A.2.a. Instructions for Regional Consultants

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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):

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- 21 : 67.

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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State of Wisconsin

Internal Audit sect. Annually

If additional audits were conducted, please provide separately.

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- 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

ADDITIONAL DETAIL: Monitoring & Audits Appendix and/or Procedure Manual (citation): Appendix X.B.1.b. Wisconsin WIC Local Agencies Audit Summary

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): applies to oldest year not closed out

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

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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:

- 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): audit reports are submitted to the Internal Audit Section of OIG. Any findings are reported to the specific program area.

- 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): **FYs 18-21**

- 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):