

## **FFY2021 COVID-19 Local Agency Program Review Process Modifications**

USDA guidance states - The State agency shall conduct monitoring reviews of each local agency at least once every two years. Such reviews shall include on-site reviews at a minimum of 20 percent of the clinics in each local agency or one clinic, whichever is greater. The State agency may conduct additional on-site reviews as the State agency determines to be necessary in the interest of efficiency and effectiveness of the program. The State agency shall require local agencies to establish management evaluation systems to review their operations and those of associated clinics or contractors.

In an effort to comply with state safety measures to include travel restrictions, social distancing, and regulatory flexibilities during COVID-19, Georgia will complete all program reviews virtually using Telehealth, to include Microsoft Teams and phone observation.

The FNS clinic monitoring waiver permits modifications to the formal onsite monitoring protocols and processes during Federal Fiscal Year 2021. The process for conducting virtual program reviews is described in the table below.

Virtual Program Review Modifications:

Program Review Category	FFY 2020 Requirements	FFY 2021 Modifications State Office Program Reviews	FFY 2021 Modifications Local Agency Self-Reviews
Entrance Conference	Entrance conference conducted virtually. Local agency notified which clinics will be visited during this call as well as the date and time.	No modifications made to the format of entrance conference.	No modifications.
Self-Reviews	Local agency required to submit all completed self-reviews by September 30 <sup>th</sup> for all clinics.	State WIC will accept any self-reviews completed during FFY2020 as meeting required standards.	Local agency self reviews were reduced from an estimated 50% of all clinics to be reviewed in FFY 2021 to 20% of clinics for FFY 2021.

Program Review Category	FFY 2020 Requirements	FFY 2021 Modifications State Office Program Reviews	FFY 2021 Modifications Local Agency Self Reviews
Staffing Standards/FTE Spreadsheet	Review staffing to ensure there is enough staff to cover participants. Submitted through SharePoint.	No modifications made for reviewing clerical staffing standards.	Staffing Standards are not a Local agency evaluation criterion. Criteria is not part of the local agency self-review.
Gateway Security Affidavits	Review Staff Gateway Affidavits to ensure all staff working in Gateway has completed current affidavit. Submitted through SharePoint.	No modifications made for review of Gateway Security Affidavits.	No modifications made for review of Gateway Security Affidavits.
List of all Employees	Review list of staff to ensure staffing standards are met, and review employees/relative file. Submitted through SharePoint.	No modifications made for reviewing employee/relative files.	<u>No modification made to this requirement.</u>
Staff Meeting File	Review file for district staff meetings to ensure staff is updated on changing requirement. Submitted through SharePoint.	No modification made for reviewing staff meeting files.	<u>No modification made to this requirement.</u>
Employee Organizational Chart	Review for current organization structure. Submitted through SharePoint.	No modification made to reviewing the current organization structure.	No modification made to this requirement.
District Created Posters, Flyers and Brochures	Ensure any district created materials were approved by SWO and meet current guidelines with NDS. Submitted through SharePoint.	No modification made for reviewing District created posters, flyers, and brochures.	<u>No modification made to this requirement.</u>
Special Project Agreements	To ensure any projects were approved by SWO and meet requirements. Submitted through SharePoint.	No modification made for reviewing Special Project Agreements.	<u>No modification made to this requirement.</u>
<b>Program Compliance and Integrity</b>			
Participant Abuse Files	To ensure claims and sanctions notices were kept on file to prevent participants from being placed on the program during the	No modification to reviewing participant abuse files.	<u>No modification made to this requirement.</u>

	disqualification period. Submitted through SharePoint.		
Employee/Relative Disclosure Forms	Ensure all staff performing WIC services has current employee/relative disclosure on file. Submitted through SharePoint.	No modifications to reviewing Employee/Relative Disclosure Forms.	<u>No modification made to this requirement.</u>
Separation of Duties Log	Ensure separation of duties is being followed. Submitted through SharePoint.	Ensure updated requirements are followed for reporting COVID-19 waiver requirements for staff shortages and clinic closures are documented properly.	Ensure updated requirements are followed for reporting COVID-19 waiver requirements for staff shortages and clinic closures are documented properly.
Action Memo Trainings	Submitted through SharePoint.	No modification made to this requirement.	No modification made to this requirement.
Procedures Manual Trainings	Submitted through SharePoint.	Modification – Local Agency Procedures Manual Training will not be reviewed for FFY 2020. No updated policies sent out for FFY 2020.	<u>No modification made to this requirement.</u>
Clerical Staff Training File	Submitted through SharePoint.	Modification – Local Agency Staff Training attendance sheets submitted for clerical trainings will be reviewed.	<u>No modification made to this requirement.</u>
Civil Rights Training Files	Submitted through SharePoint.	Modification – Local Agency Civil Rights Training attendance sheets submitted for clerical trainings will be reviewed.	No modification made to this requirement.
Complaint File	Submitted through SharePoint.	Modification – Local Agency submitted complaints will be reviewed at the state agency.	Ensure all complaints are completed
<b>Clinic Services</b>			
District participant retention and caseload management plan	Submitted through SharePoint.	Modification – District participant retention will be verified by reviewing the State VMARS Dashboard and Reports.	<u>No modification made to this requirement.</u>
Quarterly Processing Standard Reports	Submitted through SharePoint.	Modification-State agency will review reports submitted for processing standards from local agency.	<u>No modification made to this requirement.</u>

List of Outreach Materials purchased	Submitted through SharePoint.	Review purchase orders and contracts to ensure approved material were purchased.	<u>No modification made to this requirement.</u>
List of clinic openings, closings, renovations and relocation	Submitted through SharePoint.	Review file to ensure all clinics met requirements for opening, closings, relocations, or renovations.	No modification made to this requirement.
Record Review	Reviewed virtually- Minimum of ten records to ensure signatures, income, identification, residency, and disclosures are documented properly. Ensure initial contact dates and breaks in service documented correctly.	Record review may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.	Record reviews may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.
Employee Relative File	Reviewed virtually- review records of all employees and family members receiving WIC that are listed on the employee disclosure form to ensure the certification was completed by someone other than the staff and vouchers were issued correctly.	Record reviews may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.	Record reviews may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.

Observations-Check in procedures explained, Rapport, Signature Authorization, Income Review, closure of certification, Check-out procedures explained	Performed virtually- to review the interaction between staff and participant, ensure good customer service was provided, intake procedures conducted, explanation of program and forms provided, voucher issuance explained, area grocery stores, voucher redemption explained, and next appointment given and explained.	Modification – Observations may be completed virtually (phone or video) by connecting the participant, WIC state staff and local agency reviewer.	Modification – Observations may be completed virtually (phone or video) by connecting the participant, district staff and local clinic reviewer.
Ineligible/ Termination, Thirty Day Files	Reviewed virtually- review for termination procedures followed, forms completed accurately, and no over issuance of vouchers provided to participant.	Modification – Record reviews may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.	Modification – Record reviews may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.
Clinic Environment-Check for all Posters: No Smoking, And Justice for All, No Charge for WIC Services, Notice of Free Interpretation Services, How to File a Complaint, VOC-Moving Poster, Outside WIC Signage with clinic hours.	Reviewed virtually-ensure all required poster are in areas that are visible to participants.	Modification – Observations may be completed virtually (phone or video) by connecting the WIC state staff and local agency reviewer.	Modification – Observations may be completed virtually (phone or video) by connecting the district staff and local clinic reviewer.

Staff Questions	Performed via phone or video to ensure staff are competent regarding WIC certification procedures.	Modification – Observations may be completed virtually (phone or video) by connecting the WIC state staff and local agency reviewer.	Modification – Observations may be completed virtually (phone or video) by connecting the district staff and local clinic reviewer.
VMARS Accountability-Stock Paper	Reviewed virtually- to ensure stock paper is secure and properly accounted for.	Modification – Where physical inventories are required, connect with local clinic over a camera phone after obtaining scanned copies of that day's inventory record. Follow the below procedure: 1.) Verify security of supplies. 2.) Count and verify inventory by phone. 3.) Match verified inventory to current day's records.	Modification – Where physical inventories are required, connect with local clinic over a camera phone after obtaining scanned copies of that day's inventory record. Follow the below procedure: 1.) Verify security of supplies. 2.) Count and verify inventory by phone. 3.) Match verified inventory to current day's records
Gateway Processing Rate and Usage	Reviewed virtually to ensure staff are using Gateway for participant eligibility instead of the frontend system.	Review State VMARS/Gateway Dashboard and use of Teams or camera phone.	Review State VMARS/Gateway Dashboard and use of Teams or camera phone.
Mailed Voucher Review	Reviewed virtually- to ensure mailed voucher procedures are followed and performed by required staff and one person is not completing the entire process.	Mailed Voucher Report may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.	Mailed Voucher Report may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.
Client Statement Record Review	Reviewed virtually- review records of participant who could not provide	Record reviews may be conducted through digital means (i.e. reviewing	Record reviews may be conducted through digital means

	proof of income, residency, and identification to ensure procedures are followed and client statement form is completed accurately.	scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.	(i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.
EVOC Inventory Logs	Reviewed virtually- reviewed to ensure proper documentation of EVOC issuance.	Submitted through SharePoint.	EVOC logs may be conducted through digital means (i.e. reviewing scanned documents provided electronically, reviewing via Microsoft Teams screen sharing, or reviewing records in the WIC Frontend System, Georgia WIC Information System-GWIS, or Georgia Gateway). Confidentiality and adherence to DPH HIPPA requirements will be followed when sharing participant information during the review.
Clinic Facility Review-Participant privacy, waiting areas, ADA accessible	Reviewed virtually- to ensure facility is clean and inviting, waiting areas are properly maintained, clinic is ADA compliant, has adequate privacy for participant during intake screening.	Review of facility may be completed virtually (phone or video) by connecting the WIC state staff and local agency reviewer.	Review of facility may be completed virtually (phone or video) by connecting the district staff and local clinic reviewer.
Security Measures- Check for: 1) Security of WIC Identification	Reviewed virtually- ensure WIC folders, computers, printers, and stock paper is not accessible to WIC participants and unauthorized personnel.	Review of Security Measures may be completed virtually (phone or video) by connecting the WIC state staff and local agency reviewer.	Review of Security Measures may be completed virtually (phone or video) by connecting the district staff and local clinic reviewer.



<p>(ID) Folders and confirmation that voucher paper is appropriately stored in a location separate from the WIC ID folders.</p> <p>2) MICR Printers are in a secure location and not accessible to non-WIC staff.</p>			
---	--	--	--

NUTRITION - District			
Program Review Category	FFY 2020 Requirements	FFY 2021 Modifications State Office Program Reviews	FFY 2021 Modifications Local Agency Self Reviews
Secondary Education	No modifications made to policy NS 200.03 Participant Nutrition Education.	No modifications made for secondary education.	No modifications made for secondary education.
Nutrition Education Materials	Verify Local Agencies are only using materials from the State Approved Education materials list.	No modifications made for nutrition education materials.	No modifications made for nutrition education materials.
Orientation Checklists	Verify all new Competent Professional Authorities (CPA) staff have a complete orientation checklist.	No modifications made for orientation checklists.	No modifications made for orientation checklists.
Staffing Standards	Evaluate local agencies ability to meet CPA and High-Risk staffing standards for Registered and Licensed Dietitians (Policy OM 420.01)	No modifications made for staffing standards.	No modifications made for staffing standards.
Continuing Education	Evaluate adherence to policy NS 220.03 Staff Continuing education.	No modifications made for continuing education.	No modifications made for continuing education.
Staff Observations	Evaluate adherence to policy NS 220.04	<p>Modification – The requirement for local agencies to complete staff observations was waived for FFY 2020 due to COVID 19.</p> <p>Modification for FFY 2021 - Local agencies are required to complete at least 25% of the required staff observations. Policy NS 220.04 Staff Observations</p> <ul style="list-style-type: none"> <li>• CPA – One certification per year for all CPAs modified to at least 25% of CPAs must receive a certification observation in FFY 2021.</li> <li>• Breastfeeding Peer Counselors – Quarterly Peer Counselor</li> </ul>	Modification – Local agency must apply state approved modifications at a minimum for staff observations for FFY 2020 and FFY 2021, however local agencies can complete additional observations as needed based on findings.

		<p>observations (4x a year) modified to one (1) peer counselor observation per Peer in FFY 2021.</p> <ul style="list-style-type: none"> <li>• Nutrition Assistant – Quarterly low risk Individual or group nutrition observations (4x a year) modified to one (1) observation per Nutrition Assistant in FFY 2021.</li> </ul>	
<b>Nutrition - Clinic</b>			
<b>Program Review Category</b>	<b>FFY 2020 Requirements</b>	<b>FFY 2021 Modifications State Office</b>	<b>FFY 2021 Modifications Local Agency</b>
Record Review	Record review completed according to WIC policy.	Modification – Record review to be completed virtually by local agency sharing WIC system screens over TEAMS or securely shared WIC files by electronic means. Hard copy files to be shared by secure digital HIPAA compliant means.	Modification – In person or virtual record reviews are allowed.
High-risk Record Review	High-risk record review completed according to WIC policy.	Modification – High-risk record review to be completed virtually by local agency sharing WIC system screens over TEAMS or securely shared WIC files by electronic means. Hard copy files to be shared by secure digital HIPAA compliant means.	Modification – In person or virtual high-risk record reviews are allowed.
Observations	Program review observations completed using the state approved monitoring tool.	Modification – Program Review observations will be observed virtually. Local agency district and local clinic staff to assist with connecting state program review staff with listening in on and or viewing certification and secondary contacts provided during program reviews.	Modification – Program review observations can be observed in person or virtually.

<p>Formula Log: NS 210.21</p> <ul style="list-style-type: none"> <li>Returned Formula Tracking Log</li> </ul> <p>NS 210.14</p> <ul style="list-style-type: none"> <li>State Ordered Special Formula Participant Tracking Log</li> <li>State Ordered Formula Inventory Tracking Log</li> </ul>	<p>Formula log review completed according to WIC policy.</p>	<p>Modification – Physical inventories will not be reviewed; however, logs will be reviewed.</p> <p>Returned Formula Tracking Log:</p> <p>1.) Verify policy NS – 210.21 Returned Formula and Nutritionals has been fully implemented.</p> <ul style="list-style-type: none"> <li>Verify Formula Tracking Logs reflect disposal of all returned formulas.</li> <li>Review Returned Formula Tracking Logs to verify formula is disposed of in the month it was received.</li> </ul> <p>1) Review at least 2 State ordered Formula Participant Tracking Logs and State Ordered Formula Inventory Tracking Log for compliance with Policy NS 210.14.</p>	<p>Modification – Review physical inventories when available. Review formula logs for compliance with state policy.</p>
<p>Anthropometric Observations</p>	<p>Anthropometric observations conducted according to policy.</p>	<p>Modification – Anthropometric observations waived.</p>	<p>Modification – Anthropometric observations waived.</p>
<p>Hemoglobin Observations</p>	<p>Hemoglobin observations conducted according to policy.</p>	<p>Modification – Hematological observations waived.</p>	<p>Modification – Hematological observations waived.</p>
<p>Equipment:</p> <ul style="list-style-type: none"> <li>Scales</li> <li>Length and height boards</li> <li>Hematological</li> </ul>	<p>Anthropometric and hematological equipment monitored according to policy.</p>	<p>Modification – Anthropometric and hematological equipment will not be monitored.</p> <ul style="list-style-type: none"> <li>Yearly calibration of scales waived for FFY 2020 and 2021.</li> <li>Yearly accuracy verification for length and height boards waived for FFY 2020 and 2021.</li> </ul>	<p>Modification – Anthropometric and hematological equipment monitoring can be waived for FFY 2021.</p>

Breastfeeding - District			
Program Review Category	FFY 2020 Requirements	FFY 2021 Modifications State Office	FFY 2021 Modifications Local Agency
Breastfeeding Promotion and Support <ul style="list-style-type: none"> <li>• Peer Counseling Supervision</li> <li>• Breastfeeding Continuing Education</li> <li>• Breast Pumps and Supplies' Management Reconciliation</li> <li>• Referral Procedures</li> <li>• Prenatal Class Outline and Scheduling Procedures</li> </ul>	All Breastfeeding Promotion and Support criteria monitored according to policy.	Modification – Breast pump inventory maintenance and reconciliation will be verified virtually utilizing Microsoft Teams or DPH Webex.	Modification – Breast pump inventory maintenance reconciliation may be verified virtually.
Tailoring Breastfeeding Food Packages	All Breastfeeding Food Packages monitored according to policy.	No modifications made to Breastfeeding Food Packages.	No modifications made to Breastfeeding Food Packages.
Peer Counseling <ul style="list-style-type: none"> <li>• Caseload Size</li> <li>• Participant Surveys</li> <li>• Observation Checklists</li> </ul>	All Breastfeeding Peer Counseling criteria monitored according to policy.	Modification – See Nutrition Observation modifications listed above for Peer Counselors.	Modification – See Nutrition Observation modifications listed above for Peer Counselors.
Breastfeeding - Clinic			
Clinic Evaluation <ul style="list-style-type: none"> <li>• Clinic Environment</li> <li>• Designated Nursing Mother Space</li> <li>• Peer Counselor Availability</li> <li>• Breastfeeding Classes</li> </ul>	All Breastfeeding Clinic criteria monitored according to policy.	Modification – Assessment of the clinic environment (including a designated nursing space tour), review of breast pump issuance forms, and reconciliation of breast pumps and supplies will be conducted utilizing Microsoft Teams or DPH Webex.	Modification – Clinic environment assessment, breast pump issuance audits, and breast pump inventory reconciliation may be conducted virtually.

<ul style="list-style-type: none"> <li>• Referral System Description</li> <li>• Breast Pump Issuance</li> <li>• Breast Pumps and Supplies Inventory</li> <li>• Resource List Availability</li> </ul>			
Peer Counselor Record Review	All Breastfeeding Peer Counseling criteria monitored according to policy.	No modifications made to Peer Counselors' Record Review.	No modifications made to Peer Counselors' Record Review.
Breast Pump Record Review	All Breastfeeding Peer Counseling criteria monitored according to policy.	No modifications made to Breast Pumps' Record Review.	No modifications made to Breast Pumps' Record Review.