

1.0 Administration

Effective Date 9/10/13

1.11 Annual Quality Services Review

PURPOSE: To establish an annual local agency process to ensure the delivery of high quality services that meet the needs of clients and that are in compliance with state policies and federal regulations at each WIC clinic/agency.
Authority 7 CFR Part 246.19 b 6

(6) The State agency shall require local agencies to establish management evaluation systems to review their operations and those of associated clinics or contractors.

A. POLICY

1. As part of a quality assurance plan, each local agency (LA) shall conduct an annual review of each primary clinic (including subcontractors) that encompasses the following to ensure that WIC services are provided in accordance with MDCH/WIC policies and federal regulations:
 - a. Program administration* (ALL clinic sites should be reviewed)
 - b. Certification
 - c. Nutrition education
 - d. Civil rights, referrals and outreach
 - e. Recordkeeping: Food benefit and WIC Bridge Card accountability
 - f. Record review
 - g. Project Fresh, if applicable (for the agency)
 - h. Minimum Program Requirements (MPR) as stated in local agency agreements.

2. Conduct annual quality services reviews using the most current MDCH/WIC Management Evaluation (ME) checklists and chart review tools (or local agency equivalents).
 - a. The reviews can occur throughout the fiscal period.
 - b. Review facilities at ALL clinic sites each fiscal year (See Administration ME chapter and “Breastfeeding Friendly” checklists. See MI-WIC Policy 4.03 Clinic Environment).
 - c. Access the current ME tools from the MDCH/WIC website at www.michigan.gov/wic, WIC Providers link.
 - d. Review subcontracted sites at least annually by the Local Agency to:
 - i. Ensure they meet the minimum program requirements
 - ii. Comply with any corrective plans of action approved by MDCH/WIC for the agency, and
 - iii. Train and monitor to address any subsequent findings.
 - e. Staff evaluation may include the Competent Professional Authority (CPA) and Clerical Observation Checklists and Client Centered Nutrition Education Checklists, available on the ME tool website. Staff may utilize these checklists for self-evaluation.

3. After the evaluation, develop a corrective plan of action to address the findings/deficiencies identified. The corrective plan of action may include:
 - a. Staff training and/or technical assistance from MDCH/WIC.
 - b. Record reviews, observations and other monitoring.
 - c. Timelines for correction of problems.
 - d. Follow up activities.
4. The Corrective Plan of Action shall be appropriate for the findings. For example:
 - a. If only one staff member is having problems with measurements, it is appropriate to make a Corrective Plan of Action to train or work individually with that one staff member.
 - b. If several CPAs are having difficulty with certification or nutrition education/breastfeeding, it is appropriate to plan staff training.
5. Retain the clinic evaluations, the Corrective Plan of Action and training or feedback provided to staff at the local agency for a minimum of three years and 150 days after the completed fiscal year of the evaluation.

B. GUIDANCE

1. Quality assurance (QA) activities are an opportunity to develop or improve systems for the delivery of WIC services. QA may include staff self-assessment, record reviews, observation of services, interviews/surveys with clients, and interviews/surveys with staff.
2. Training provides one way to disseminate information to staff; however, additional ongoing methods of ensuring improved service delivery should be considered such as staff self-assessment/observations, role playing and client surveys.

C. DEFINITIONS

1. Primary clinics are clinic sites that provide comprehensive WIC services on a regular basis (e.g., several days a week).
2. Secondary clinics provide WIC services periodically (e.g., weekly, monthly or bi-monthly) and are staffed from the primary clinic.
3. Subcontracted clinics are sites staffed by other agencies with whom the Local Agency contracts to provide WIC services within their jurisdiction.

References:

Federal Regulations: 7 CFR Part 246.19(b)(6)

Cross References:

- 1.05 Management Evaluation
- 4.03 (Breastfeeding) Clinic Environment