Attachment 8: WIC Vendor Management Agency Workplan

APPENDIX D – WIC VENDOR MANAGEMENT AGENCY WORKPLAN

I. CONTRACTOR SERVICE AREAS

The Contractor identified on the cover page of this Grant Contract is responsible for providing all required vendor management activities for the following service areas:

«Area_Served»

The State may, at its discretion, reassign service areas resulting in an increase or decrease to the areas served.

II. SUMMARY STATEMENT

The purpose of WIC vendor management is to authorize and provide oversight to the vendors (retail food stores and pharmacies) used in the delivery of prescribed foods to WIC Program participants. Vendor management activities include application processing, the establishment of contracts, reauthorization, training and monitoring, and representation at fair hearings. Vendor management agencies (VMAs) must enroll an appropriate number of vendors to ensure participant access to prescribed foods. The WIC VMAs also must develop cooperative working relationships with vendors to ensure compliance with contractual and regulatory requirements, and must establish and maintain effective communication with WIC local agencies.

III. PROGRAM GOALS

The Contractor will provide WIC vendor management services to vendors within the Department of Health assigned service area in accordance with New York State WIC Program policy. The Contractor will perform all duties outlined in this Appendix and provide all reports required in Appendix C. The Contractor will comply with all Federal WIC Regulations prescribed by 7 CFR 246, New York State WIC requirements and regulations, policies and procedures as described in the New York State WIC Program Manual, WICSIS Communiqué and ongoing policy and procedure changes incorporated through New York State WIC and WIC VMA memorandum.

IV. SPECIFIC DELIVERABLES

The Contractor will have responsibility for the following required deliverables and all associated tasks:

Initial Vendor Contact

Respond to inquiries from retail food vendors and pharmacies seeking applications and information on enrolling and participating in the WIC Program within three working days.

Analyze the demographics of the assigned service area and recruit and authorize an adequate and appropriate number of vendors to ensure participant access to WIC Program services. Unique participant demographics, such as ethnic and religious factors, must be considered during vendor contract initiation.

Receipt of Vendor Applications

Receive and review WIC vendor applications and ensure that all requested information is provided.

Return incomplete applications to vendors, within three working days of receipt, with a written request for the necessary additional information.

Develop and maintain tracking systems to monitor the status of applications throughout the various stages of the enrollment process to identify areas of routine errors in the application process and, where possible, reduce the rate of error through improved directions to vendor Applicants.

Processing Vendor Applications

Process complete WIC vendor applications within seven working days of receipt. This process includes all required activities related to the review of applications to determine if required enrollment criteria have been met. Examples of enrollment criteria include, but are not limited to: verification of vendor/participant ratios, adequate stock, reasonable hours and prices.

- Determine if store was previously a contracted NYS WIC vendor and if Applicant owner owns or has owned another store that was previously a contracted NYS WIC vendor; obtain clarification from Applicants on information that appears inaccurate or contradictory (i.e., obtain written statement).

- Forward applications to the next level of approval (i.e., to the State) within the prescribed timeframe.

- Notify vendors in writing of approval or denial within forty-five calendar days.

Develop and maintain quality assurance systems to ensure applications are reviewed using established criteria and records are documented completely and within prescribed timeframes.

Vendor Authorization

Authorize, in accordance with WIC Program rules, regulations, policies and procedures, an adequate and appropriate number of vendors to ensure participant access to WIC Program services.

Enter into contracts with approved vendors, using the contract developed by the State.

Coordinate authorization activities with the State and the Bureau of Special Investigations, as required by Program rules, regulations, policies and procedures.

Issue to authorized vendors, the required documents, stamps, training information and education materials.

Maintain the WICSIS database of all authorized vendors for use by WIC local agencies to assist them in advising participants of the location and availability of authorized vendors.

Develop quality assurance systems to ensure vendors are authorized using established criteria and records are documented completely and within prescribed timeframes.

Vendor File Maintenance

Maintain current and historical files (both paper and electronic) of all vendor applications for reference and documentation in accordance with record retention requirements.

- Ensure all required documents are obtained and filed.
- Maintain file systems to permit ready access and cross-referencing.
- Make all vendor-related files available to the State for review.

Maintain an original copy of the current NYS WIC Vendor Contract and the most recent expired NYS WIC Vendor Contract, if one exists, and any appendices, amendments and/or attachments, signed and dated by the WIC VMA and the vendor.

Maintain a central file for vendor training, application denials and application withdrawals for the prescribed timeframe.

Maintain a WICSIS vendor contact log which is a complete and permanent record of all contacts with vendors, including those reported by other WIC local agency staff and State staff. Include a brief summary of the substance of the contact.

Enter detailed notes in WICSIS that are complete and grammatically correct. Notes must include: a relevant subject heading; a summary of the information given to or received from the store; an explanation of the actions taken or decisions made; pertinent dates; and names/titles of store representatives and WIC VMA staff involved.

On-Going Review of Vendor Contract Compliance

Conduct ongoing reviews of vendor compliance with terms of the NYS WIC Vendor Contract and Program rules and regulations. Review should include: the routine analysis of vendor redemption patterns and vendor pricing information; the results of periodic announced and unannounced on-site vendor monitoring visits; and reports received from participants, other local agencies and other vendors.

Communicate issues of detected and potential non-compliance to the State, regional office and the Bureau of Special Investigations (for all issues involving program integrity, fraud and abuse).

Vendor Monitoring

Conduct all mandated initial, routine and ad hoc vendor monitoring activities, in accordance with Program rules and regulations, administrative decisions and in consultation with the Bureau of Special Investigations. Use prescribed forms and maintain comprehensive documentation of all monitoring activities for reporting purposes.

Complete and document initial, routine and ad hoc reports on monitoring activities in WICSIS within established time frames.

Schedule monitoring visits in a manner to ensure efficiency, maximize staff time and minimize travel time and costs.

Develop quality assurance systems to ensure vendor monitoring visits are conducted in accordance with established criteria and that records are documented completely and within prescribed timeframes.

Vendor Training

Conduct all mandated initial, routine and ad hoc vendor training in accordance with Program rules and regulations. Ensure comprehensive training is provided to vendors.

Schedule training to accommodate a sufficient number of vendors to maximize training resources while ensuring adequate personal attention is provided in the training sessions.

Utilize the standardized training curriculum developed by the Program.

Conduct an assessment of training results to measure the adequacy of training provided and take the necessary corrective action in response to observed deficiencies.

Respond to requests and demands for ad hoc training resulting from hearings, stipulations and orders, and Program requests.

Maintain adequate evidence of training compliance in each vendor's file and document training activities in WICSIS.

Maintain a centralized training file in accordance with Program policy and complete and submit all required reports of training activities.

Schedule training visits in a manner to ensure efficiency, maximize staff time and minimize travel time and costs.

Develop quality assurance systems to ensure vendor training sessions are conducted in accordance with established criteria and records are documented completely and within prescribed timeframes.

Contract Renewal and Non-Renewal

Perform an annual review of vendor contracts to determine continued authorization or non-renewal in accordance with program rules and regulations. The review will include, but is not limited to, an analysis of available reports, results of monitoring visits, the current vendor/participant ratio, vendor price stock survey information and vendor redemption information.

- Obtain all necessary documentation from the vendor.
- Document the renewal/non-renewal recommendation.
- Notify vendors of non-renewal decisions within prescribed timeframes.

Develop quality assurance systems to ensure contract renewal/non-renewal decisions are made in accordance with established criteria and records are documented completely and within prescribed timeframes.

Vendor Reauthorization

Provide vendors with reauthorization packets 120 days prior to contract expiration.

Review and process complete reauthorization packets within prescribed timeframes. Ensure all requested information is present and the vendor meets the reauthorization criteria.

- Notify vendors in writing of approval or denial within prescribed timeframes.

Develop and maintain effective tracking system to monitor the status of reauthorizations throughout the contract period.

Develop and maintain a quality assurance system to ensure reauthorizations are processed in accordance with established criteria and records are documented completely and within prescribed timeframes.

Vendor Hearings

Process vendor requests for hearings in accordance with established program standards governing timeliness, notification and appearances.

Provide representation at hearings conducted in accordance with 10 NYCRR 60.1 regarding the denial of vendors for enrollment in the WIC Program and termination of existing vendors.

- Testify using the pre-recorded results of vendor monitoring visits, including price stock surveys; statements taken from the vendor; information contained in statistical formats and supplied by the Program; other relevant information; and consultations with staff of the Bureau of Special Investigations.

Develop and maintain quality assurance systems to ensure fair hearings are processed in accordance with established criteria and records are documented completely and within prescribed timeframes.

Confidentiality

Implement a system to ensure confidentiality of vendor records (electronic and paper). WIC VMA staff is responsible for maintaining the security of vendor records and must store all vendor files in a secure location.

Develop and implement policies and procedures to ensure Applicant/vendor information is only disclosed to those individuals are allowed access consistent with Federal regulations.

Establish a procedure for the destruction of WIC vendor records that will not be stored in the WIC VMA record retention system. This includes records that are being removed from the WIC VMA record retention system.

Communication

Maintain routine and ongoing communication with State staff.

Ensure the availability of WIC VMA staff during core business hours.

Establish and maintain cooperative working relationships, including ongoing communication, with all WIC local agencies within the vendor service area to ensure effective participant education regarding authorized vendors. Provide training to local agency staff, as requested.

Develop a plan for regular contact, including on-site visits, with WIC local agencies within the vendor service area. Document contacts and provide to the State, upon request, information regarding the type and frequency of contacts with the WIC local agencies.

Respond to WIC local agency and participant complaints, questions and comments regarding vendors within its service area, and product availability.

Document and refer complaints and information that may adversely impact WIC Program integrity to the Bureau of Special Investigations.

Coordinate and cooperate with the Bureau of Special Investigations at both the regional and central office levels.

Attend scheduled meetings with State staff (applies to WIC VMA Director). In certain circumstances, the WIC VMA Director may delegate attendance to a designated representative, and the State may request the attendance of multiple staff from the WIC VMA.

Cooperate with State staff oversight activities. State oversight includes agency site visits, accompanying WIC VMA staff on field visits, and regularly scheduled meetings.

Participate on State work teams for project development and participate in training conferences and meetings as requested by the State.

Provide assistance to WIC local agencies in locating special formulas.

Provide means for regular communications to WIC VMA staff concerning revisions to WIC policies and procedures and WICSIS information.

WIC VMA Training

Ensure WIC VMA staff attends mandatory training.

Permit and facilitate the participation of WIC VMA staff in all WICSIS training at designated location(s) and through various forms of training medium (i.e., videos, DVDs) so that all WIC VMA staff are proficient in the WIC automated system.

WIC Statewide Information System – WICSIS

Utilize the New York State WIC Statewide Information System (WICSIS) software, hardware, and communication devices according to State policies.

Ensure no software or hardware is added, modified, or removed from any State issued automated data processing (ADP) equipment (WICSIS infrastructure) without prior notification to and written consent from the State.

Assume responsibility for damage or theft of State issued ADP equipment and maintain insurance for all ADP equipment. Reimbursement or recoupment for loss, damage or replacement of any State issued ADP equipment will be sought through a mechanism at the State's discretion.

Return or dispose of State issued software, ADP equipment, and communication devices as directed by the State.

Establish and maintain an inventory of all WICSIS equipment and supplies. The inventory should be maintained in a manner that can be reported to the State as required.

Assume responsibility for safeguarding the confidentiality of WIC Program information located or transmitted on WICSIS equipment which the WIC VMA controls.

Develop and implement policies and procedures that ensure the backup of WICSIS data as prescribed by the State.

Develop and maintain an emergency response plan which includes the State's backup system to be implemented when necessary.

Maintain an adequate inventory of WICSIS supplies to ensure continued systems operation.

Personnel

Maintain personnel files.

Recruit, hire, and train staff dedicated to vendor management functions.

- WIC VMA staff must be assigned solely to vendor activities, with no duties assigned to WIC Program activities. The only exception to this requirement will be WIC VMA staff assigned to take part in WIC Program participant education.

- Limit WIC VMA staff's role in participant education to providing education in the areas of food instrument redemption activities and vendor/participant relations.

Consider and address the predominant language and communication needs of the vendors in the service area. Multi-lingual staff may be required to ensure adequate communication with non-English speaking vendors.

Have one full-time equivalent (FTE) WIC VMA Director and sufficient vendor liaisons and support staff to manage the vendor population of the WIC VMA's service area.

- Recommended minimum staffing levels include one vendor liaison for every 200 vendors.

- Provide sufficient clerical support to ensure the efficiency of the WIC Vendor Management Agency.

Designate one full-time WIC VMA staff person to be trained and serve as an assistant to the WIC VMA Director to handle program issues and serve as backup to the director with authority to make decisions.

Ensure staff are cross-trained on all vendor management functions.

Maintain current job descriptions, specific to WIC vendor management responsibilities, and update annually.

- Submit and obtain approval by the State Contract Manager all duty descriptions of positions prior to posting and filling. Establishment of positions must be made in consideration of vendor demographics.

Maintain funded staffing pattern. Fill vacant staff positions in a timely manner.

- Notify the State Contract Manager within 15 days when a vacancy occurs and when a vacant staff position is filled.

Substantiate and document all personnel issues and transactions, including time and attendance and time distribution records that record work hours of employees who work part-time for the WIC vendor program and part-time with another program of the sponsoring agency. Employees who work solely for one Federal program are required to complete a certification at least every six months stating that they worked only on the one Federal program.

Space

Maintain a site central to the assigned geographic service area that serves to minimize excessive travel time for monitoring and training activities. Any exception to this requirement must be approved by the State.

Maintain an integrated space that includes a working office for staff and vendor training areas.

Provide adequate and appropriate space for the equipment necessary for the implementation of the WIC Statewide Information System (WICSIS).

Notify the State of any planned changes or modifications to the space.

- All site moves and expansions must be pre-approved by the State.

- Follow the WIC Site Development Guide for all site moves, closures, consolidations and new site requests. Provide sufficient time for site development in accordance

with the guide and ensure all pertinent parties are notified in a timely manner of the need for the site move or closure. Develop a work plan for site moves that includes a contingency plan for provision of services during the site move process.

- Assume responsibility for preparing any new site in accordance with a site modification plan prepared by the Department of Health (HVAC, electrical renovations, cabling, telecommunications, etc.) for WICSIS.

Records and Reports

Document all vendor contacts, including those relative to training, monitoring, contract renewal and reauthorization, in WICSIS using standardized notes. Enter notes in accordance with program policies and procedures.

Conduct an annual "Time Motion Study" as directed by the State.

Conduct a "Biennial Self-Assessment" as directed by the State.

Retain records for specified timeframes.

Develop and submit monthly fiscal reports and expense vouchers within 45 days of the end of the month.

- Fiscal reports should include the expenses for all budget line items and a breakdown of the individual expense categories summarized under the "Other Non Personal Service" budget line (Program Operations, Travel, Equipment, etc.).

Provide monthly, a report on the number of authorized positions, the current vacancy rate, and activities underway to fill vacant positions.

- This report should be submitted concurrent with the monthly fiscal report and expense voucher.

- Evidence of recruiting efforts through advertising, publishing and postings should be submitted with the report to justify extended vacancies.

Submit a Corrective Action Plan responding to the Management Evaluation program review findings to the State Contract Manager, as specified. Promptly implement corrective action plans for any deficiencies identified.

Provide to the State**,** upon request, the number of vendors denied participation and the reason for the denial.

Develop and maintain a WIC VMA procedure manual based on State WIC VMA policy.

Maintain centralized files accessible to WIC VMA staff that include the current NYS WIC

Program Manual; WIC Vendor Bulletins, Local Agency Memoranda; WIC VMA Memoranda; WICSIS Communiqué and the manual of WIC VMA policies and procedures.

- Ensure WIC VMA staff know how to access all material that is distributed by the NYS WIC Program.

- Implement a policy to distribute WIC Program material that is not readily accessible to WIC VMA staff.

Cooperate fully with Bureau of Special Investigations staff and other authorized persons, agencies, and entities identified in Appendix A, Standard Clauses for all New York State Contracts.

Financial Accountability

Establish and maintain a financial management system that ensures accountability for all WIC Program funds and meets the applicable requirements of OMB circulars A-87, A-21 and A-122; Federal WIC Regulations 7 CFR 246.14(a)(1); the WIC Program Manual; and the WIC VMA contract.

Develop and implement approved cost allocation methodologies that ensure accurate accounting for any costs shared by the WIC VMA and other local agency programs. Personal Service costs must be supported by time distribution records adequate to trace employee effort to each cost objective or funding source.

Develop and submit an annual WIC VMA administrative budget proposal in the format required by the Department of Health by the established deadline. The budget will include all WIC VMA administrative costs and will include clear and complete written justification for all budgeted items.

Submit budget change requests, with a full justification, in the required format and within established timeframes.

Submit accurate monthly vouchers and statements of expenditures in accordance with established timeframes and maintain supporting documentation that substantiates expenses claimed. Failure to comply with Federal closeout requirements will jeopardize voucher reimbursement.

Maintain time and attendance records for all WIC VMA funded staff. Implement an acceptable methodology to certify time and attendance records.

Provide in-kind services and support as may be necessary to develop and support a viable WIC VMA program operation.

Transition Requirements

Develop and submit for State approval, a WIC VMA transition Workplan to ensure an orderly and controlled transition of operations to a successor Contractor or to the State. The Workplan must include a contingency plan for provision of services during the transition.

Continue to provide services and notifications to WIC vendors as directed by the State during the transition period.

Maintain staffing adequate to meet obligations under the contract during the transition period.