

Section 4.6: CPA Monitoring and Oversight

5/2023

References: 7 CFR 246.19 (b)(6); 246.6(b) (2); FNS/USDA WIC Nutrition Service Standards: Standard 1 (Sec. C, D, & F); Standard 3 (Sec. A & B); Standard 8 (Sec. A & B); Standard 10 (Sec. A & B); and Standard 13 (Sec. B, C & D).

Policy: The local agency must have a plan for supervising and monitoring CPA staff that assures CPAs are performing WIC functions according to MN WIC policies and procedures, and in compliance with federal WIC regulations.

Purpose: To ensure that the Local Agency is in compliance with WIC federal requirements and that quality nutrition services are provided to WIC participants.

Definitions

Reviewer: The person responsible for monitoring and evaluation of CPA staff. The reviewer should be someone with expertise in nutrition and extensive knowledge of WIC requirements and procedures. In most local agencies the reviewer will be the WIC Coordinator or Nutrition Education Coordinator. However, if more appropriate because of knowledge and skills, a CPA may be delegated this responsibility. In such a case, the designated CPA should meet the qualifications of a **high-risk CPA** (see [Section 4.3: Competent Professional Authority \(CPA\) Qualifications and Responsibilities](#) or [Chapter 6: Nutrition Education](#) for high-risk CPA qualifications).

Procedures

Monitoring

Each local agency must monitor and evaluate CPA staff and maintain documentation of the monitoring.

Monitoring Plan

- An agency must indicate in their Nutrition Education Plan how they will implement and document CPA staff monitoring. An agency may follow the state-developed *Staff Monitoring Plan* ([Exhibit 4-G](#)) or follow agency-specific monitoring protocols/procedures as indicated in their Nutrition Education Plan.
- If a local agency develops a plan, it should be customized to fit its specific staffing situation. Monitoring and evaluation should be based on the qualifications and activities of each CPA

and meet the minimum requirements as indicated in the *Staff Monitoring Plan* ([Exhibit 4-G](#)).

Monitoring Frequency

- The *Staff Monitoring Plan* ([Exhibit 4-G](#)) uses a graduated schedule of monitoring. In this plan, monitoring is more frequent and intensive during the initial months of employee training. This allows the reviewer to assess an employee's performance and progress toward attaining the necessary skills and provide constructive feedback. As an employee demonstrates mastery of CPA competencies, the frequency and intensity of monitoring can be decreased. The schedule of monitoring should be customized and adjusted for each employee as needed.
- Monitoring plans developed by the local agency should also utilize a graduated schedule of supervision and include the following:
 - After attaining CPA competencies, an evaluation of CPA proficiency must be done annually at a minimum.
 - CPAs qualified under the classifications Paraprofessional CPAs or LPNs-Prior Approval (hired before January 1, 2001) have additional, more intensive supervision requirements. See [Exhibit 4-G: Staff Monitoring Plan](#) for the minimum supervision requirements for these classifications.

Monitoring Activities

- The *Staff Monitoring Plan* ([Exhibit 4-G](#)) includes a variety of activities that provide opportunities for evaluating all CPA functions. These functions include certification, additional education contacts, and high-risk contacts. Local agency developed monitoring plans must include a variety of activities and opportunities for evaluating all CPA functions. A monitoring plan should include the following activities:
 - **Observation of certifications and other clinic activities.** The reviewer should be present for the entire certification process to observe all data collection, assessment, counseling and education, referrals, food package assignment, and documentation completed by the CPA. The *Checklist for Certification Observation* ([Exhibit 4-H](#)) or a similar form may be used.
 - **Chart reviews.** A chart review is an examination of a participant chart and includes documentation of areas reviewed. Areas that should be reviewed are outlined on the *Chart Review Form* ([Exhibit 4-J](#)). This form or a similar form may be used. See guidance below.

Oversight

Each local agency must provide oversight of CPA staff via on-site supervision.

On-site supervision

On-site supervision means the reviewer is available to observe certification counseling activities, provide guidance, and answer questions. When providing in-person services, the reviewer is present in the counseling area and when staff are working remotely, the reviewer is available at all times for consultation with the CPA. In the initial phases of training, in-person supervision is encouraged with both the reviewer and CPA present.

Continuous on-site supervision

- CPA staff must have continuous supervision until they demonstrate competencies for all phases of New Staff Training.
- Paraprofessional CPAs must be supervised *at all times* and may not work alone. See [Section 4.3](#) for Competent Professional Authority Requirements.

Procedures

- The reviewer conducting on-site supervision must be physically present in the counseling area when staff are working in-person. The reviewer may be involved in other work but should be aware of the general counseling environment and observe counseling interactions.
- The reviewer conducting on-site supervision when staff are working remotely must be available at all times for consultation with the CPA and be able to observe counseling interactions via audio or video.
- The reviewer should also be available to the CPA for consultation on any questions that arise during certifications or other clinic activities.
- As needed, the reviewer should discuss activities observed during “on-site supervision” to support or coach the CPA for improved performance.
- Ideally, the reviewer should provide all on-site supervision. If the reviewer is not available, another CPA may provide the supervision. However, Paraprofessional CPAs and LPNs **may not** provide on-site supervision.
- Follow-up: This is a system for providing feedback to the CPA. The reviewer should discuss with the employee their strengths and areas for skill development identified during monitoring activities. Ideally, this follow-up occurs shortly after the information is gathered. Suggested procedures for follow-up include:
 - Discuss observations made during on-site supervision, chart review, and/or certification. The reviewer should identify the CPA’s strengths, as well as any needed changes in performance.
 - Develop a workplan identifying skills to be developed and specifying timeframes.
 - Check progress on the workplan as appropriate.

Documentation

Each local agency must maintain documentation of the monitoring and evaluation of local agency CPA staff.

Guidance:

- **Peer review** may be used for conducting the CPA monitoring. This may be particularly helpful in small agencies.
- **A registered dietitian** who is contracted by the agency may complete the monitoring activities. The registered dietitian should be familiar with WIC policy and procedures.
- **Information System reports** may be used for identifying specific areas to monitor.
- **For chart reviews**, reviewers are encouraged to evaluate records for participants with additional documentation requirements (for example: high risk participants, participants on medical formula, new participants).
- **Additional monitoring** for quality is encouraged. The *Rubric for Assessment and Counseling Skills* ([Exhibit 4-M](#)) or a similar tool may be used to guide CPA staff in developing and advancing assessment and counseling skills.
- **Peer Breastfeeding** support supervision requirements can be found in [Section 6.12: Peer Breastfeeding Support](#).

Reference – Complete Listing of Hyperlinks

[Section 4.3: Competent Professional Authority \(CPA\) Qualifications and Responsibilities](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch4/sctn4_3.pdf)

[Chapter 6: Nutrition Education](#)

(<https://www.health.state.mn.us/people/wic/localagency/mom.html#education>)

[Exhibit 4-G: Staff Monitoring Plan](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4g.pdf>)

[Exhibit 4-H: Checklist for Certification Observations](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4h.pdf>)

[Exhibit 4-J: Local Agency Chart Review Form](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4j.pdf>)

[Section 6.12: Breastfeeding Peer Support](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch6/sctn6_12.pdf)

SECTION 4.6: CPA PERFORMANCE EVALUATION

Exhibit 4-M: Rubric for Assessment and Counseling Skills

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4m.pdf>)

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