



**Onondaga County Health Department of Special
Supplemental Nutrition Program for Women, Infants and
Children, WIC**

September 4, 2024

By Onondaga County Comptroller Martin D. Masterpole

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SECTION I INTRODUCTION

Introduction

The Onondaga County Health Department - Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides supplemental nutritious foods, at no cost to low-income pregnant, breastfeeding, and postpartum women, infants, and children up to age five who have been determined to be at nutritional risk. WIC promotes breastfeeding as the feeding method of choice for infants, provides support through education, peer counselors, nutrition education and referrals to other related social services of healthy living.

WIC is a federal reimbursement program and subject to a Federal Single Audit pursuant to the Code of Federal Regulations, (7 CFR 246). The WIC reimbursements for year-ending 2023 was \$9.3 million dollars. Expenditures include payments to recipients and funding for the administration of all WIC related program functions.

Onondaga County operates six WIC sites located in Camillus, LaFayette, Liverpool, Onondaga Nation, and two in Syracuse to facilitate eligibility determinations, which is based on category, residency, financial and nutritional risk. Once deemed eligible a WIC a Nutrition Assistant or a Nutritionist will conduct the nutritional risk assessment. Eligible applicants also receive nutrition education, including breastfeeding support, and referrals to other health care services as needed through their local WIC clinic.

WIC participants receive benefits to purchase items from a food package tailored to their specific nutritional needs. eWIC Cards are pre-loaded with food items based on their particular nutritional needs on a tri-monthly basis for use at authorized retail stores. If cards are lost, stolen, or damaged cards are canceled and a new card will be reissued.

In an effort to make County residents aware of the WIC Program, the Health Department distributes pamphlets to all other health agencies within the County as well as private medical practices and other public buildings. In addition, the WIC program has an official outreach program, which targets specific concentrations of individuals.

SECTION II BACKGROUND

Background

In response to the growing public concern regarding the many low-income people suffering from malnutrition, various studies identified hunger as the major problem. The outcomes were:

- The Child Nutrition Act of 1966 enacted by President Lyndon B. Johnson began addressing the concern.
- In 1972, the Special Supplemental Food Program for Women, Infants, and Children, (WIC) was formally authorized by an amendment to the Child Nutrition Act of 1966.
- The same year, legislation started the WIC program as a 2-year pilot project.
- The WIC program was established, as a permanent program in 1974 to safeguard the health of low- income women, infants and children up to five years of age to provide supplemental nutritious food to assist during such critical times of growth and development and to help prevent the occurrence of health problems.

The WIC program has proven to be effective over the years in improving the health of pregnant women, new mothers, and their infants and is now available in all 50 states. Numerous studies show that women who participated in the program during their pregnancies had lower medical costs for themselves and their babies than did women who did not participate. WIC participation was also linked with longer gestation periods, higher birthweights and lower infant mortality.

WIC is a 100% federal grant program for which Congress authorizes a specific amount of funds each year for the program. The United States Department of Agriculture, (USDA)'s Food and Nutrition Service, (FNS) administers WIC at the federal level and makes funds available to participating state agencies. Local agencies such as Onondaga County WIC facilitate the program and determine eligibility. The primary focus is safeguarding the health of low- income women, infants and children up to five years of age by providing supplemental nutritious food to assist during such critical times of growth and development and to help prevent the occurrence of health problems.

SECTION III EXECUTIVE SUMMARY

Executive Summary

The Onondaga County Comptroller's Office engaged in an audit of the Special Supplemental Nutrition Program for Women, Infants and Children, (WIC) to ensure the programs internal controls are operating sufficiently and in compliance with federal regulations to provide reasonable assurance that only eligible individuals receive WIC under the federal award programs in accordance with program requirements supported by proper documentation.

Over the course of the audit, we tested for compliance requirements to this specific federal program. Findings included:

- Some cases contained no documentation of height or length and weight measurements and/or no documentation of hematological testing. Nutritional risk assessment could not be assessed accurately.

SECTION IV

SCOPE AND METHODOLOGY

Scope:

The purpose of this report is to provide Onondaga County's Health Department administrators and WIC program managers with information and recommendations on the internal controls and operating effectiveness as it pertains to eligibility for the WIC program. In order to gain an understanding of their current process we analyzed a variety of data during the audit period of January 1, 2023 through December 31, 2023.

Our objectives for the audit were to:

- Determine if expenditures associated with Special Supplemental Nutrition Program for WIC, made on behalf of eligible individuals for allowable activities and costs.
- Determine if expenditures associated with Special Supplemental Nutrition Program for WIC were allowable expenditures expended in the period of availability and the claims properly reported to NYS.

Methodology:

In order to complete our objectives we:

- Reviewed applicable laws, policies, procedures and regulations to attain an understanding of the WIC Program.
- Interviewed staff and management responsible for oversight and implementation of the aforementioned laws, policies, procedures and regulations.
- Selected and tested a sample of client cases in order to determine if internal controls are operating effectively to properly determine eligibility for the WIC Program.
- Selected and tested a sample of expenditures associated with the WIC Program to ensure they were allowable expenditures and properly reported to NYS.
- Discussed draft findings and recommendations with WIC administrators for their input and evaluation.
- Finalized our findings and recommendations and included them in this report.

SECTION V FINDINGS AND RECOMMENDATIONS

During the course of the audit, we noted the following exceptions to the 2023 compliance requirements subject to audit as defined by the Federal Government's Office of Management and Budget.

1. We noted 18 of 40 cases tested for compliance, the nutritional risk could not be assessed accurately according to the Administrative Directive and the American Rescue Plan Act Waiver Guidance.

Waivers related to the Physical Presence and Remote Issuance, NYS WIC 07/23 - #31 requires the (staff) Competent Professional Authority (CPA's) to obtain anthropometric or hematological data used to determine nutrition risk, or obtained from an allowable source. Self-reported data may *not* be accepted. The determination of nutritional risk factor must be based on the current referral data provided by a competent professional authority who is not on the WIC staff per (7 CFR sections 246.2 & 246.7(e)), nutritional risk. A CPA must determine that the applicant is a nutritional risk. At minimum, the CPA must perform and/or document measurements of each applicant's height or length and weight. In addition, a hematological test for anemia must be performed and documented at certification.

- For 10 cases tested, there was no documentation of height or length and weight measurements and/or no documentation of hematological testing. Additionally there was no indication of providing client with a Medical Referral form to obtain the information.
- For 7 cases tested, verbal height or length and weight measurements was documented, however no hematological information provided.
- For 1 case tested, the medical referral form was completed by physician; however, data was not entered in to the NYSWIC system.

Recommendation:

We recommend WIC administration and staff re-familiarize themselves with the above waivers and eligibility documentation requirements.

2. We noted, 1 of 40 cases WIC did not comply with the Administrative Directive to provide applicant with Form AD-3027, "Benefits Discontinued Letter" informing them of the missed

appointment and the discontinuation of benefits if certification appointment is not made within 60 days.

Recommendation:

We recommend the department staff comply with Administrative Directives to provide applicant with Form AD-3027, "Benefits Discontinued Letter" when applicant has missed appointment and has not picked up benefits within 60 days.

SECTION VI MANAGEMENT RESPONSE



Onondaga County Health Department

J. Ryan McMahon, II, County Executive
Kathryn Anderson, MD, PhD, MSPH, Commissioner of Health

Healthy Families – WIC · 307 Gifford Street, Syracuse, NY 13204
Phone 315.435.3304 · Fax 315.435.2224



September 3, 2024

Mr. Martin Masterpole
Onondaga County Comptroller
421 Montgomery Street, 14th Floor
Syracuse, NY 13202

Re: Response to Audit Report on Onondaga County Health Department's Women, Infants, and Children (WIC) Program

Dear Mr. Masterpole,

This letter is in response to the findings and recommendations in the above referenced report.

- 1) 18 of 40 cases tested for compliance, the nutritional risk could not be assessed accurately according to the Administrative Directive and the American Rescue Plan Act (ARPA) Waiver Guidance.

WIC administration (myself and the Senior Nutritionist) are well-versed with the ARPA Waiver Guidance. We agree with your recommendation that we need to re-familiarize WIC staff with this information. In November 2023, we re-reviewed the guidance document with all WIC staff. Internal record review conducted does indicate improvement with documentation of attempts to obtain weight, height and hematological data. Obtaining actual data continues to present a problem for us, despite implementing a process in November 2023 that allows WIC participants to text screenshots from a Health Care Provider Visit Summary or their Patient Portal of anthropometric and hematological information. As indicated in the ARPA waivers; however, benefits must not be denied, withheld, or limited based solely on the lack of anthropometric or hematologic data.

- 2) 1 of 40 cases WIC did not comply with the Administrative Directive to provide applicant with Form AD-3027, "Benefits Discontinued Letter" informing them of the missed appointment and the discontinuation of benefits if certification appointment is not made within 60 days.

We agree with the finding; however, this statement is worded incorrectly. The Benefits Discontinued Letter informs the participant that their WIC benefits are being discontinued because they have not claimed benefits for 60 consecutive days as a result of a missed appointment(s). The Benefits Not Picked Up in At Least 60 Days Report indicates who we need to provide the Benefits Discontinued Letter to. This letter must be provided to the participant within the required timeframe as indicated by the NYS DOH WIC Program. Prior to January 2024, this report had been run on a monthly basis; however, we found that occasionally a participant would not be provided the mandated letter within the required timeframe. In January 2024, a procedural change was made in that this report is now run daily. Staff assigned to run the report contact participants on the report, attempt to complete an "on-demand" appointment, and if

unable to reach the participant to complete an on-demand appointment, staff mail or text the Benefits Discontinued Letter. This new process ensures we do not miss providing this mandatory letter within the required timeframe.

Please let me know if you have any questions or would like more information.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'KS', with a long horizontal flourish extending to the right.

Kristina Schoonmaker
WIC Program Coordinator

10/2/2023