### ADMINISTRATIVE POLICIES AND PRACTICES WPPM #110-30

**Subject: Program Compliance Monitoring** 

Item: Access to Administrative and General Program Records

#### **PURPOSE:**

To define that full and complete records are available to answer all questions related to program operations.

#### **POLICY:**

- I. The local agency (LA) is required to make all administrative, general program, and fiscal records available to representatives of the California Department of Public Health/Women, Infants and Children Division (CDPH/WIC), the California Department of Health Care Services' Audits and Investigations, State Controller's Office, USDA, and other authorized state or federal representatives designated by federal WIC regulations/statutes during normal business hours for the purpose of inspecting, auditing, and/or photocopying such records. The LA is required to also promptly transmit to the CDPH/WIC all requests for any administrative, general program or fiscal records.
- II. With the prior approval of CDPH/WIC, a LA may make available all administrative, general program, and fiscal records to the general public and local/other state/other federal government entities who have a legitimate purpose in viewing such records.
- III. The LA is required to follow the policy and procedures delineated in WPPM 120-20 regarding a subpoena or search warrant.
  - A. General public interest context/reason include:
    - 1. General knowledge, including general documentation on its effectiveness, of the WIC program.
    - 2. A government auditing organization that has a legitimate reason to audit the LA (e.g., auditors or the County Auditor/State Controller's Office, government tax organizations, etc.).
    - Government criminal and civil investigators investigating WIC employees, WIC business practices, etc.
    - 4. Universities and other legitimate organized research entities conducting studies on the WIC program or public assistance programs.
    - 5. Individuals who are conducting a legitimate study on the WIC program or public assistance programs.
    - Media representatives conducting a legitimate study on the WIC program or public assistance programs.
    - 7. Inquiries from legislators and/or their staff.

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- B. Administrative, general program, and fiscal records as related to this policy include:
  - 1. Financial operations records including accounting records, reports, and source documents.
  - 2. Equipment purchases and inventory documents.
  - 3. General nutrition and breastfeeding education materials (e.g., charts, pamphlets, written handouts, nutrition guides, etc.).
  - 4. Food Instrument issuance/reporting documents.
  - 5. Discrimination complaint procedures.
  - 6. Fair hearing procedures.
  - 7. General WIC information (such as statistics on number of participants served, ethnic composition of population served, copies of policies governing the WIC program, etc.).

### **AUTHORITY:**

7 CFR §246.25

### **CROSS REFERENCE:**

WPPM 120-20 Subpoenas and Search Warrants WPPM 970-10 Glossary