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.).
   3. 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.
   6. Media representatives conducting a legitimate study on the WIC program or public assistance programs.
   7. Inquiries from legislators and/or their staff.
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.).
  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