

**SECTION: ADMINISTRATIVE POLICIES AND PRACTICES**

**SUBJECT: Program Compliance Monitoring**

**ITEM: Access to Administrative and General Program Records**

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## **Purpose**

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

## **Policy**

The local agency is required to make all administrative, general program, and fiscal records available to representatives of the State Agency (SA), 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 local agency is required to also promptly transmit to the SA all requests for any administrative, general program or fiscal records.

With the prior approval of the SA, a local agency may make available all administrative, general programs, and fiscal records to the general public and local/other state/other federal government entities who have a legitimate purpose in viewing such records.

The local agency is required to follow the policy and procedures delineated in Section 120-20 regarding a subpoena or search warrant.

## **Authority**

7 CFR 246.25

## **Definitions**

**Legitimate purpose:** a fully justified written request made by a person or organization to view specific non-confidential WIC record(s) for which there is a general public interest context/reason to view such records. For disclosure of participant records, see Section 110-30.

**General public interest context/reason includes:**

- A. general knowledge, including general documentation on its effectiveness, of the WIC program;
- B. a government auditing organization that has a legitimate reason to audit the local agency (i.e., auditors or the County Auditor/State Controller's Office, government tax organizations, etc.);
- C. government criminal and civil investigators investigating WIC employees, WIC business practices, etc.;
- D. universities and other legitimate organized research entities conducting studies on the WIC program or public assistance programs;
- E. individuals who are conducting a legitimate study on the WIC program or public assistance programs;
- F. media representatives conducting legitimate study on the WIC program or public assistance programs; and
- G. inquiries from legislators and/or their staff.

## **Administrative, general program, and fiscal records**

For purposes of this policy, administrative, general program, and fiscal records include the following:

- A. financial operations records including accounting records, reports, and source documents;
- B. equipment purchases and inventory documents;
- C. general nutrition and breastfeeding education materials (i.e., charts, pamphlets, written handouts, nutrition guides, etc.);
- D. food Instrument issuance/reporting documents;
- E. discrimination complaint procedures;
- F. fair hearing procedures; and
- G. general WIC information (such as statistics on number of participants served, ethnic composition of population served, copies of policies governing the WIC program, etc.)