

## SECTION 4.6

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### **Subject: CPA Performance Evaluation**

**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.

### **Procedures:**

1. Each local agency must monitor and evaluate CPA staff and maintain documentation of the monitoring.
2. 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 Suggested Monitoring Plan ([Exhibit 4-G](#)) or follow agency-specific monitoring protocols/procedures as indicated in their Nutrition Education Plan.
3. Refer to [Section 6.12](#) for Peer Breastfeeding support supervision requirements.

### **Guidance:**

Each local agency should have and implement a plan for the monitoring and evaluating CPA staff. This plan must be described in the local agency Nutrition Education Plan.

1. **The reviewer:** The person responsible for monitoring and evaluation of CPA staff is referred to as the “reviewer” in this policy. 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 4.4](#) or [Chapter 6](#) for high-risk CPA qualifications).

**The Monitoring Plan:** The local agency may develop its own monitoring plan or adapt/modify the state-developed Suggested Monitoring Plan ([Exhibit 4-G](#)).

1. If a local agency develops a plan, the plan should be customized to fit its specific staffing situation. Monitoring and evaluation should be based on the qualifications and activities of each CPA.

### Frequency of Monitoring:

The Suggested 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 to 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 *LPNs-Prior Approval* (hired before January 1, 2001); *Locally Trained CPAs*; or *Certifier, Prior Approval* (hired before October 1, 1987) have additional, more intensive supervision requirements. See [Exhibit 4-G](#) for the minimum supervision requirements for these classifications.

2. **Monitoring Activities:** The Suggested 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 audits.** A chart audit is an examination of a participant chart (paper and/or electronic) and includes documentation of areas reviewed. Areas that should be audited are outlined on the Chart Audit Form [Exhibit 4-J](#). This form or a similar form may be used.

**On-site supervision as needed.** On-site supervision means the reviewer is present in the counseling area to observe certification counseling activities.

- **Continuous on-site supervision** is required for: *Locally Trained CPAs* and *Certifier, Prior Approval* (hired before January 1, 2001). (See [Section 4.3](#)) for Competent Professional Authority Requirements.)
- **Continuous on-site supervision** means that the CPA must be supervised *at all times* and may not work alone. Procedures for the reviewer conducting on-site supervision:

- Be physically present in the counseling area. The reviewer may be involved in other work, but should be aware of the general counseling environment and observe counseling interactions.
- While present in the counseling area, 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, *LPNs, Locally Trained CPAs* and *Certifier, Prior Approval* **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 audit, 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.

3. **Documentation:** Each local agency should maintain documentation of the monitoring and evaluation of CPA staff. See sample form *Record of CPA Monitoring* ([Exhibit 4-I](#)). Local agencies may develop their own form for documenting CPA monitoring.

4. **Other considerations:**

- **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.