

DATE | April 10, 2025 TIME | 12:00 pm

LOCATION | CAPK Administrative Office | 1300 18th Street Suite 200

1300 18th Street Suite 20 Bakersfield, CA 93301

Audit & Pension Committee Agenda

1. Call to Order

2. Roll Call

Curtis Floyd Jonathan Mullings Gina Martinez Guadalupe Perez

3. Public Forum

The public may address the Committee on items not on the agenda but under the jurisdiction of the Committee. Speakers are limited to 3 minutes. If more than one person wishes to address the same topic, the total group time for the topic will be 10 minutes. Please state your name before making your presentation.

4. New Business

a. Pensionmark Q4 2024 Investment Review – *Info Item (p.2-15)*

Tracy Webster, Chief Financial Officer & Tom Ming, Pensionmark

b. CSBG Close Out Package – Contract 24F-3015- *Info Item* (p.16-17)

Tracy Webster, Chief Financial Officer

c. Adoption of Accounting Standards Update (ASU) 842 – *Action Item (p.18-21)*

Tracy Webster, Chief Financial Officer

d. WIC2024 Program Monitoring Corrective Action Plan – *Info. Item (p. 22-24)*

Marissa Ortiz-Cortez, WIC Program Administrator

5. Committee Member Comments

6. Next Scheduled Meeting

Audit & Pension Committee 12:00 pm August 7, 2025 1300 18th St. Suite 200 Bakersfield, CA

7. Adjournment

This is to certify that this Agenda Notice was posted in the lobby of the CAPK Administrative Office at 1300 18th Street, Bakersfield, CA and online at www.capk.org by 12:00 pm, April 7, 2025, Glyniel Campbell, Administrative Coordinator.





Audit & Pension
Committee Meeting
Q4 2024 Investment Review.

April 10, 2025

Pensionmark Financial Group, LLC ("Pensionmark") is an investment adviser registered under the Investment Advisers Act of 1940. Pensionmark is affiliated through common ownership with Pensionmark Securities, LLC (member SIPC).

Presented by: Thomas D Ming, AiF



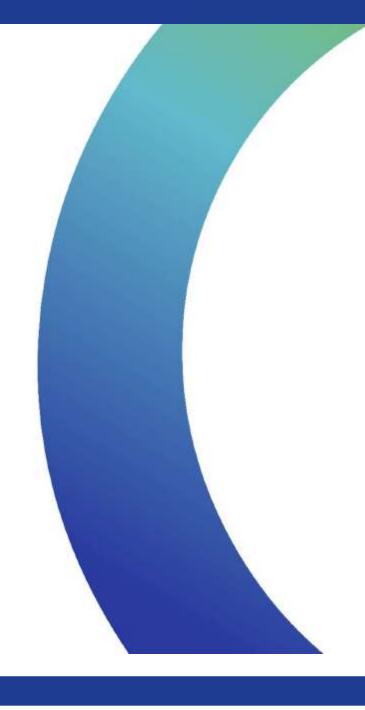






MARKET & ECONOMIC REVIEW

For Period Ending 12/31/2023





EQUITY MARKETS REVIEW

Domestic Equity

- US Equity indexes were higher in Q4 2024, extending the strong performance they
 exhibited in Q3. US stocks initially surged leading up to the election in early
 November but gave back much of their gains by quarter-end.
- Large Cap Growth equities continued to be the leaders of the pack, gaining
 another 7.07% in Q4 to end 2024 up over 33%. This builds on the gain of over 42%
 in 2023 after the large drawdown of -29.14% in 2022. The largest stocks in the
 Large Cap Growth category continue to drive most of the returns.
- Large Cap Value stocks were down -1.98% during Q4 but remained up over 14% YTD in 2024; Large Cap Value equities returned 11.46% in 2023. Small Cap equities were barely positive in Q4, gaining just 0.33%; however, they end 2024 up 11.54%, building on the solid returns of 16.93% in 2023. Both equity asset classes are interest rate sensitive and market fears of slowing Fed rate cuts contributed to their lagging returns in the quarter.



FIXED INCOME

Fixed Income

- Fixed Income indexes were mostly down in Q4 2024 as rates rose.
- US Treasuries and US Investment Grade Corporate Bonds were both down over -3% as rates increased across the yield curve. Both indexes ended positive in 2024. Municipal fixed income fell by -1.22% but remained slightly positive for 2024.
- High Yield ended slightly up in Q4, and ended 2024 as the biggest winner (8.19%) as spreads remain near historic lows and coupons average over 7%.
- Duration outweighed inflation for TIPS. The US TIPS Index was down 2.88% in Q4 but finished the year up 1.84%. Short-maturity (0-5 Years)
 TIPS were down only -0.11% and ended 2024 up 4.69% YTD.
- International Fixed Income was the big loser in Q4, decreasing by

 6.84%. The index is now in negative territory YTD at -4.22%.



The Importance of Diversification

THE IMPORTANCE OF DIVERSIFICATION

					10-			112011	IOA		
1000	REIT 2.1	Small Cap 21.3	EM Equity 37.8	Cash 1.8	Large Cap 31.5	Small Cap 20.0	REIT 40.0	Commodities 16.1	Large Cap 26.3	Large Cap 25.0	Large Cap 25.0
	Large Cap 1.4	High Yield 14.3	DM Equity 25.6	Fixed Income 0.0	REIT 28.2	EM Equity 18.7	Large Cap 28.7	Cash 1.5	DM Equity 18.9	Small Cap 11.5	Small Cap 11.5
	Fixed Income 0.5	Large Cap 12.0	Large Cap 21.8	REIT -3.9	Small Cap 25.5	Large Cap 18.4	Commodities 27.1	High Yield -12.7	Small Cap 16.9	Asset Allo- cation	Asset Allo-
	Cash 0.0	Commodities 11.8	Small Cap 14.6	High Yield -4.1	DM Equity 22.7	Asset Allo- cati	Small Cap 14.8	Fixed Income -13.0	Asset All	High Yield 9.2	High Yield 9.2
	DM Equity -0.4	EM Equity 11.6	Asset Allo- cat	Large Cap -4.4	Asset Aller cation	DM Equity 8.3	cation 12.8	Asset Alle	High Yield 14.0	EM Equity 8.1	EM Equity 8.1
	Asset Allo- cation	REIT 9.4	High Yield 10.4	cation -5.6	EM Equity 18.9	Fixed Income 7.5	DM Equity 11.8	DM Equity -14.0	REIT 11.5	Commodities 5.4	Commodities 5.4
	High Yield -2.7	cation 8.6	REIT 9.3	Small Cap -11.0	High Yield 12.6	High Yield 7.0	High Yield 1.0	Large Cap -18.1	EM Equity 10.3	Cash 5.3	Cash 5.3
	Small Cap -4.4	Fixed Income 2.6	Fixed Income 3.5	Commodities -11.2	Fixed Income 8.7	Cash 0.5	Cash 0.0	EM Equity -19.7	Fixed Income 5.5	REIT 4.7	REIT 4.7
	EM Equity -14.6	DM Equity 1.5	Commodities 1.7	DM Equity -13.4	Commodities 7.7	Commodities -3.1	Fixed Income -1.5	Small Cap -20.4	Cash 5.1	DM Equity 4.3	DM Equity 4.3
2000	Commodities -24.7	Cash 0.3	Cash 0.8	EM Equity -14.2	Cash 2.2	REIT -6.0	EM Equity -2.2	REIT -25.0	Commodities -7.9	Fixed Income 1.3	Fixed Income 1.3
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	YTD

Large Cap: S&P 500; Small Cap: Russell 2000; EM: MSCI EM; Commodities: Bloomberg Commodity; High Yield: Barclays Global High Yield; Fixed Income: Barclays US Agg Bond; DM: MSCI EAFE; Cash: Barclays US Treasury Bill 1-3 Month; REIT: FTSE NAREIT; "Asset Allocation" portfolio assumes 25% S&P 500, 10% Russell 2000, 15% MSCI EAFE, 5% MSCI EM, 25% Barclays US Agg Bond, 5% Barclays Global High Yield, 5% US Treasury Bill 1-3 Month, 5% Bloomberg Commodity, and 5% FTSE NAREIT.

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Plan Investments- Scoring Summary

EXECUTIVE SUMMARY

Investment Scoring Summary

Investment Additions

Investment Name	Status	Morningstar Rating			
No current investment additions					

Investments on Watch

Investment Name	Status	Quarters Failing Criteria	Morningstar Rating		
No investments are currently on the watch list					

Investments Targeted for Review

Investment Name	Status	Morningstar Rating					
2	No investments are currently targeted for review						

Review : Watch : Addition : 0

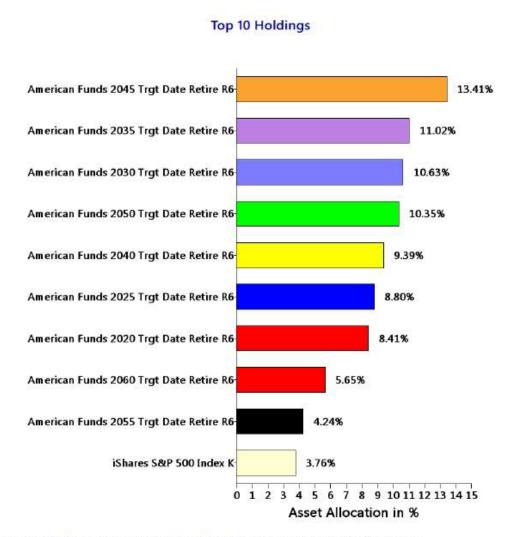
For source information, please see the "Important Disclosures" section of this report.

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Portfolio Holdings & Sector Allocation

PORTFOLIO | HOLDINGS & SECTOR ALLOCATION



Sector Allocation 24.52% % Technology % Communication Services 8.00% % Consumer Cyclical -9.43% 6.46% % Consumer Defensive 13.07% % Industrials 3.49% % Basic Materials % Financial Service -12.67% % Real Estate 1.75% % Healthcare 13.66% 4.11% % Energy % Utilities 2.81%

5

10

15

Sector Weighting in %

20

For source information, please see the "Important Disclosures" section of this report.

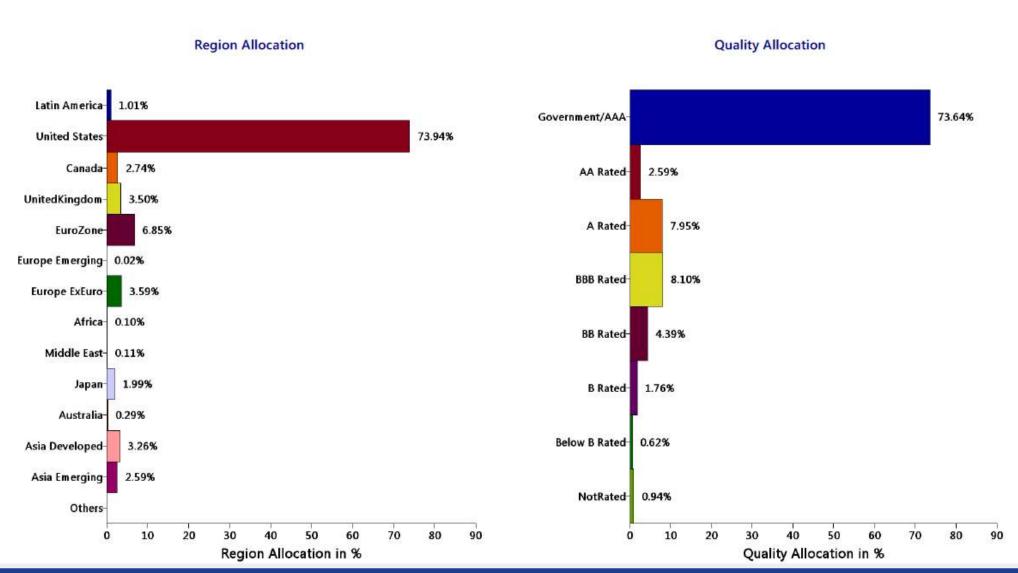
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Portfolio Region & Quality Allocation

PORTFOLIO | REGION & QUALITY ALLOCATION

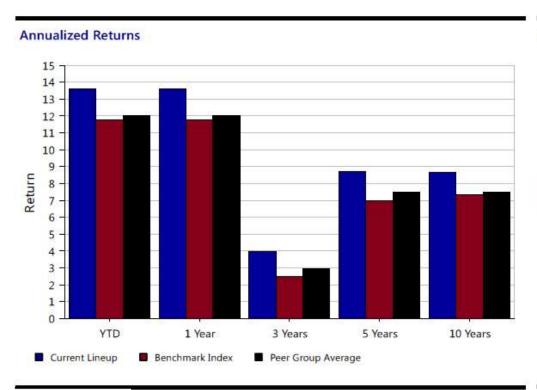


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Portfolio Returns Q3 2024

PORTFOLIO | RETURNS



Calendar Year Returns 20 15 10 -5 -Return -5 -10 -15 -20 -25 2020 2022 2021 2023 2024 YTD Current Lineup Benchmark Index Peer Group Average

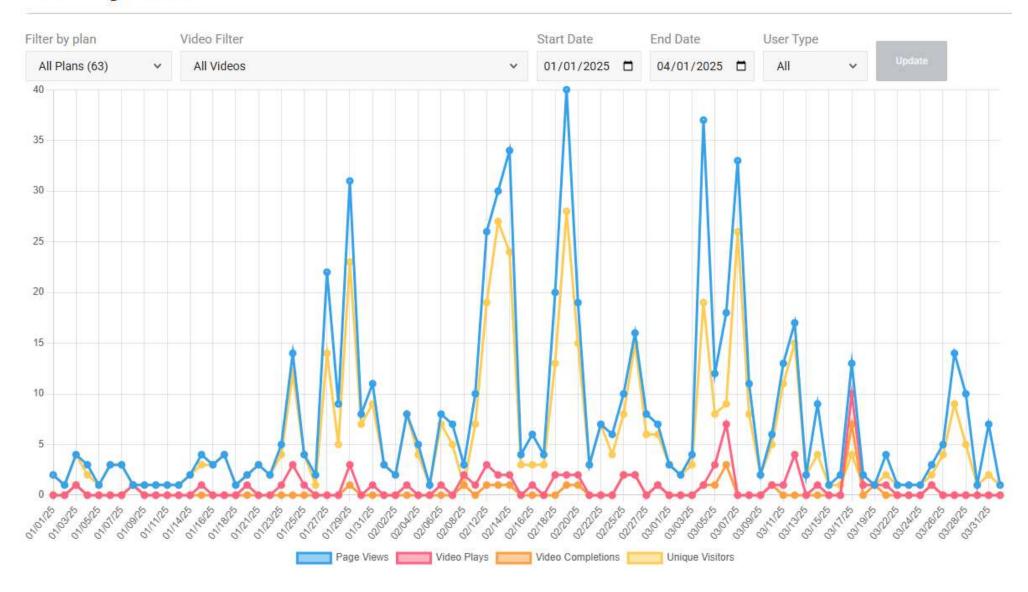
Trailing Returns								
-	YTD	1 Year	3 Years	5 Years	10 Years	Net Exp.Ratio		
Current Lineup	13.60	13.60	3.96	8.73	8.66	0.35		
Benchmark Index	11.77	11.77	2.50	6.96	7.34	NA		
Peer Group Average	12.02	12.02	2.96	7.46	7.48	0.70		

	2020	2021	2022	2023	2024	YTD	Net Exp.Ratio
Current Lineup	17.33	15.30	-15.86	17.54	13.60	13.60	0.35
Benchmark Index	13.91	14.12	-16.90	15.95	11.77	11.77	NA
Peer Group Average	14.82	14.33	-16.52	16.72	12.02	12.02	0.70

Calendar Year Returns



SMARTMAP Retirement Portal Analytics 1-1-25 to 3-31-25



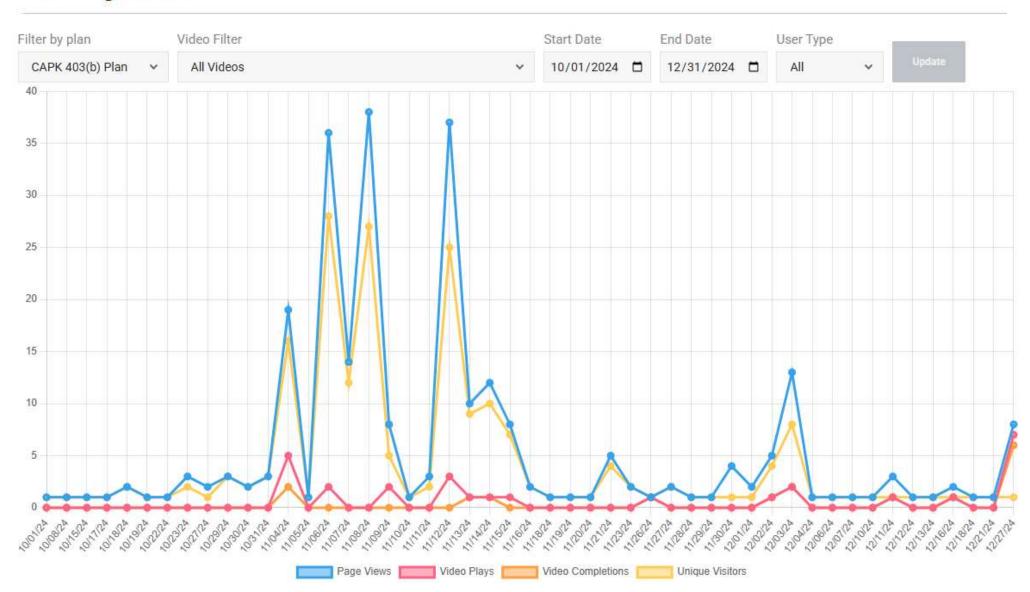


SMARTMAP Retirement Portal Analytics 1-1-25 to 3-31-25

PLAN NAME	VIDEO TYPE	PAGE VIEWS 🖟	VIDEO PLAYS	VIDEO COMPLETIONS	UNIQUE VISITORS
CAPK 403(b) Plan	Płan Video	244	15	3	12
CAPK 403(b) Plan	Educational Video	39	18	13	1
Showing 1 to 2 of 2 entrie	s				
CSV					Previous 1 Next
LINK TYPE		LABEL			COUNT
		LABEL Enroll / Login Here		± 7	COUNT \$
Recordkeeper Button			ns.com	± 7	
Recordkeeper Button Recordkeeper		Enroll / Login Here	ns.com	± 7	52
Recordkeeper Button Recordkeeper Recordkeeper		Enroll / Login Here nationwideretirementplar	ns.com		5.
Recordkeeper Button Recordkeeper Recordkeeper Recordkeeper Recordkeeper Recordkeeper		Enroll / Login Here nationwideretirementplar Account Access / Enroll		± 7	55



SMARTMAP Retirement Portal Analytics 1-1-25 to 3-31-25





SMARTMAP Retirement Portal Analytics 10-1-24 to 12-31-24

PLAN NAME	VIDEO TYPE	PAGE VIEWS +	VIDEO PLAYS +	VIDEO COMPLETIONS	UNIQUE VISITORS
CAPK 403(b) Plan	Plan Video	251	14	5	145
CAPK 403(b) Plan	Educational Video	19	14	11	11
Showing 1 to 2 of 2 entri	es				Previous 1 Next
CSV					HICHOUS I NOAL
LINK TYPE		LABEL			COUNT ÷
Recordkeeper Button		Enroll / Login Here			36
Recordkeeper		nationwideretirementplar	ns.com		2
Contact		smartmap@Pensionmark	c.com		2



Retirement Portal QR Code





State of California-Health and Human Services Agency DEPARTMENT OF COMMUNITY SERVICES AND DEVELOPMENT 2389 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833 Telephone: (916) 576-7109 | Fax: (916) 263-1406

Telephone: (916) 576-7109 | Fax: (916) 263-1406 www.csd.ca.gov



March 6, 2025

Jeremy Tobias, Executive Director Community Action Partnership of Kern, CAP Kern JTobias@capk.org

VIA EMAIL ONLY

SUBJECT: CSBG CLOSE-OUT PACKAGE - CONTRACT 24F-3015

Dear Mr. Tobias:

The Department of Community Services and Development's ("CSD") Field Operations Unit ("FOU") has received your agency's Close-out Report for contract 24F-3015. My analysis of the Close-out information indicates the following:

CAA

- The agency fully expended the \$1,802,115 contract allocation.
- The agency reported **no** program income for the program year.
- The agency reported **no** interest for the program year.
- The agency reported purchasing **no** equipment for the program year.
- The programmatic reports associated with this contract have been reviewed and accepted.

Discretionary

- The agency fully expended the \$26,000 contract allocation.
- The agency reported **no** program income for the program year.
- The agency reported <u>no</u> interest for the program year.
- The agency reported purchasing <u>no</u> equipment for the program year The
 programmatic reports associated with this contract have been reviewed and
 accepted.

Community Action Partnership of Kern CAP Kern Page 2

FOU considers this contract closed and the Close-out Report has been forwarded to CSD's Financial Services Unit for processing. However, this contract is subject to a final review by CSD's Audit Unit. If you have any questions concerning this report, please call me at (916) 576-0941 or e-mail your comments to Andrea Vogler at Andrea.Vogler@csd.ca.gov.

Sincerely,

Andrea Vogler

Andrea Vogler

Field Operations Representative

CC: Wilmer Brown, Jr., Branch Chief



Helping People... Changing Lives.

MEMORANDUM

TO: Audit & Pension Committee

FROM: Tracy Webster, Chief Finance Officer

DATE: April 10, 2025

Subject: Agenda Item 4c: Adoption of Accounting Standards Update (ASU) 842 – **Action**

Item

Community Action Partnership of Kern (CAPK) has opted to waive the adoption of ASU 842 during the last two fiscal years. This has resulted in the issuance of a qualified opinion from Daniells, Phillips, Vaughn & Bock (DPVB). The primary reason for not adopting ASU 842 has been the increased cost and the significant effort required for its implementation.

ASU 842 Explanation:

ASU 842 primarily aims to enhance transparency and comparability in financial reporting of lease transactions. The update requires organizations to recognize most leases on their balance sheets, with a right-of-use (ROU) asset and a corresponding lease liability, effectively changing how operating leases were previously treated. The key changes include:

- Balance Sheet Impact: Leases longer than 12 months must be recognized on the balance sheet.
- **Classification**: Leases are classified as either finance leases (similar to capital leases under previous standards) or operating leases.
- **Income Statement**: The method for recognizing lease expense differs based on the lease classification.
- **Disclosures**: Organizations must provide detailed disclosures about leasing arrangements, including maturity of lease liabilities.

Proposed CAPK Adoption of ASU 842:

In order to obtain an unqualified opinion for fiscal year 2024-25, CAPK would need to fully adopt ASU 842. Adoption of the standard would require further engagement with DPVB. CAPK typically has between 70 – 90 operating leases. DPVB estimates that the level of work required for each

Audit & Pension Committee Adoption of Accounting Standards Update (ASU) 842 April 10, 2025 Page 2 of 2

lease is between \$625 to \$750 per lease (\$45,000 to \$54,000 estimated annual cost). They have submitted a proposal for this engagement, which is attached for your review.

Adopting ASU 842 will result in enhanced financial transparency and a more accurate representation of CAPK's lease obligations.

Lease Accounting Going Forward:

CAPK implemented SageIntacct on January 1, 2025. SageIntacct has a lease accounting module that can handle many of the calculations required for the implementation of ASU 842. However, the full implementation of this module will not be completed in time for the current audit period. As such, we will still need to engage DPVB for a portion of the work in the 2024-25 fiscal year.

Recommendation

It is recommended that the Audit and Pension Committee approve the adoption of ASU 842 and the engagement with DPVB for the audit of CAPK's financial statements for fiscal year 2024-25. This will ensure that we comply with the new accounting standard and secure an unqualified opinion for the upcoming audit.

Attachment:

DPVB ASU 842 Engagement Proposal



Member of AICPA Division for Firms Private Companies Practice Section

SHANNON M WEBSTER

February 27, 2025

Board of Directors **Community Action Partnership of Kern** 1300 18th Street, Suite 200 Bakersfield, California 93301

Thank you for the opportunity to submit our proposal on the audit services for the **Community Action Partnership of Kern**. We are delighted at the prospect of serving you, and we are committed to providing continuous, top-quality service at a fair fee.

We are enthusiastic about working with you and your personnel and believe we can contribute to your operational efficiency. We use highly skilled people, structured quality procedures and proprietary technology to keep costs low, improve turnaround time, and maintain quality. Our emphasis is on value-added service – service that goes beyond what is unexpected – service you will always receive from us. In this regard, the following characteristics distinguish Daniells Phillips Vaughan & Bock:

- **Your needs will be met** We have prepared financial statements for numerous not-for-profit organizations.
- **Familiarity with your operations** Our team is knowledgeable about accounting operations such as yours due to involvement with similar operations of other organizations.
- We respond quickly Our practice is one of the largest in Kern County with an office in Bakersfield since 1956, with approximately 60 professionals. As a member of the Professional Services+ Collaborative, we have resources immediately available to us at a national and international firm level. In short Daniells Phillips Vaughan & Bock has all of the support of a large global firm, but acts as a highly focused, independent client service organization locally.
- **We emphasize communication** Our approach is to communicate frequently and openly to be in a position to discuss and resolve issues at an early date to avoid surprises.
- **You will not have to train us** Many of the people who we work with continue to express a great deal of satisfaction with the way our engagements are conducted, the way our team interacts with client personnel and the timeliness and quality of the information we deliver.
- You can measure our value Our fees are reasonable and fair.

Adoption of Accounting Standards Update (ASU) 842

We have made an evaluation of the effort necessary to prepare the calculations for the Organization's leases in order to adopt ASU-842 based upon a review of your current leases as well as discussions with you. Based upon this review and information provided to us, our proposed fee range for the engagement is as follows:

Based upon an estimated 72 leases at \$625 to \$750 per lease:

\$ 45,000 to \$54,000

This estimate is based upon our understanding that your personnel will provide timely response to inquiries.

We believe a foundation for an excellent working relationship has been established. We look forward to continuing our long-term association – one based on mutual respect and understanding. Simply stated, we want to continue to work closely with you to help you achieve your goals. If we can provide any additional information, please feel free to call me at 834-7411.

Very truly yours,

Shannon M. Webster

Certified Public Accountant

Thanna M. Webste



Community Action Partnership of Kern

Helping People. Changing Lives.

APPROVED

By Pui Tong at 12:12 pm, Feb 10, 2025

Pui Tong, MS RD Public Health Nutrition Consultant Women, Infants, and Children Division California Department of Public Health Submission Date: 1/10/2025 Resubmission Date: 1/24/2025

2024 Program Monitoring Corrective Action Plan

PMV Finding	Corrective Action	Timeline	Monitoring
-	Plan		
1. Our review of a sample of 20 WIC WISE participant certification records found one (1) record in which Medi-Cal Eligibility Data System (MEDS) Interface was selected as proof of residence and one (1) record was selected as proof of identity, but there was no indication that the required MEDS interface had occurred. In order to use MEDS Interface as proof of residency or identity, an interface with Medi-Cal Eligibility Data System (MEDS) must occur, and the user must verify that a member of the family is currently	Our local agency will retrain all supervisors. and staff. The team will be required to complete the new CDPH WIC LMS training "Determining WIC eligibility". In addition, we will use a new training model and technique to support staff. WPPM Policy: WPPM 210-02, WPPM 210-06, WPPM 270-20	Retrain all supervisors at the eligibility training on the following dates • 1/17/25 • 1/24/25 Retrain all staff at the eligibility training on the following dates • 1/22/25 • 1/29/25 • 1/29/25 • 2/5/25 • 2/12/25	The Program Administrator, Program Manager, and Division Director will be responsible for in- person observations. Four (4) will be conducted per staff, per quarter until we meet 100% compliance then we will reduce observations to once per quarter, per staff. In addition, five (5) supervisors will be responsible for auditing (5) participant files per staff, per month. We will conduct 5 file audits until we meet 100% compliance then decrease to 2 files per staff per month. We will meet with individual staff if staff continue to make errors using (MEDS). Progressive disciplinary may be initiated for failure to comply with standard and policy. The expected outcome is 100% compliance.
2.Our review of participant records and observations of onsite sessions found additional policy violations related to adjunctive eligibility and income determination. • Our review of a sample of 20 WIC WISE participant certification records found four (4) records in which the Medi-Cal number used in the MEDS Interface was that of a different family member, which resulted in adjunctive eligibility not being documented correctly in WIC WISE. • Our review of onsite appointments found one (1) instance where the MC number used in the MEDS interface was that of a different family member. Staff must use deemed eligible infant to document infant adjunctive eligibility. • Our team noted one (1) instance onsite where staff overrides the MEDS interface data. Staff ran MEDS interface, information came back not eligible for participant but staff changed the adjunctive eligibility chart for MediCal to 'yes'. • Our team noted one (1) instance onsite where staff used net income instead of gross income. WIC Policy requires gross income. • Our team noted one (1) instance onsite where staff used zero income without further probing of household's current income. WIC Policy requires the full household income	Our local agency will retrain all supervisors and staff. The team will be required to complete the new CDPH WIC LMS training "Determining WIC eligibility". In addition, we will use new training techniques and model to support staff. Training will include • Scenario reenactment • Pre/Post assessment concurrent with trainings dates • Additional training material aside from the LMS training WPPM Policy: WPPM 210-02, WPPM 210-03	Retrain all supervisors at the eligibility training on the following dates 1/17/25 1/24/25 Retrain all staff at the eligibility training on the following dates 1/22/25 1/29/25 2/5/25 2/12/25	The Program Administrator, Program Manager, and Division Director will be responsible for in- person observations. Four (4) will be conducted per staff, per quarter until we meet 100% compliance then we will reduce observations to once per quarter, per staff. In addition, five (5) supervisors will be responsible for auditing (5) participant files per staff, per month. We will conduct 5 file audits until we meet 100% compliance then decrease to 2 files per staff per month. We will meet with individual staff if staff continue to make errors using (MEDS). Progressive disciplinary may be initiated for failure to comply with standard and policy. The expected outcome is 100% compliance.



1300 18th Street, Suite 200, Bakersfield, CA 93301 (661) 336-5236 Toll Free (8) 445-0090 Fax (661) 322-2237

www.capk.org

PMV Finding	Corrective Action Plan	Timeline	Monitoring
3.Our review of participant records	We will provide staff with	R&R report is	The Program Administrator,
and observations of onsite sessions	isolated training for R&R	currently initiated	Program Manager, and Division
found policy violations related to the	procedures. We will develop a	everyday	Director will be responsible for
administering of the Rights and	new procedure and tool to	Cvcryday	in-person observations. Four (4)
Responsibilities document. • Our	demonstrate to staff how to	R&R training on	observations will be conducted
review of a sample of 20 WIC WISE	accurately complete R&R		per staff, per quarter then we will
participant certification records		• 3/19/25	reduce observations to once per
found one (1) record where the	Trainings will include • Scenario reenactment		
Know Your Rights and	Pre/Post assessment		quarter, per staff. The duration will be until 100% accuracy is
Responsibilities (R&R) form was			retained. The expected outcome is
not signed and present in WIC	concurrent with trainings date WPPM Policy:		100% compliance due to this
WISE. • Our review of onsite	WPPM 260-40		being a repeat finding. One
appointments found multiple staff	W F F W 200-40		supervisor is currently responsible
did not read all the information in			for running the current R&R
the signature box to the participant			report daily. The report is run
before the document was signed and did not offer a copy of the R&R			twice daily to ensure staff rectify the error on the same day. We will
form to the family representative			retrain all staff and meet with
/caretaker. This is a repeat finding			individual staff if a member of
/caretaker. This is a repeat finding			staff continues to miss the R&R.
			Progressive disciplinary may be
			initiated for failure to comply
4. Our review of onsite	All amountages and staff will	Retrain all	with standard and policy. The Program Administrator,
appointments found one (1) instance	All supervisors and staff will be required to complete the	supervisors on the	Program Manager, and Division
	new CDPH WIC LMS training	LMS training	
where an in-person signature was not obtained for the Self Declaration	"Determining WIC eligibility"	"Determining WIC	Director will be responsible for in-person observations. Four (4)
Statement (SDS). An SDS must be	Determining wic engionity	eligibility."	observations will be conducted
created whenever any of the		Supervision	per staff, per quarter then we will
following choices are selected for		trainings will be	reduce observations to once per
verification of residency, income,	WPPM Policy: WPPM 210-03,	completed on	quarter, per staff. In addition, five
and/or identity during certification	WPPM 210- 06, WPPM 270-	completed on	(5) supervisors will be responsible
or recertification: • Cash payment •	20, WPPM 1000-140	1/17/25	for auditing (5) participant files
Disaster Victim • Pregnant teen	20, W11 W1 1000-140	• 1/17/25	per staff, per month for 6 months
turned out of home • Homeless •		• 1/24/25	until 100% accuracy then
Migrant • No Proof Provided •		D	
Remote/rural area with no mail		Retrain all staff	decrease to 2 files per staff per
delivery		using the LMS	month. We will retrain staff or
denvery		training	meet with individual staff if 100%
		"Determining WIC	compliance is not met.
		eligibility" on the	Progressive disciplinary may be
		following dates	initiated for failure to comply
		• 1/22/25	with standard and policy. The
		• 1/29/25	expected outcome is 100%
		• 2/5/25	compliance.
		• 2/12/25	
		 Isolated 	
		SDS	
		training on	
		1/29/25	

PMV Finding	Corrective Action Plan	Timeline	Monitoring
5. Our review of onsite	WIC Training Coordinator and	Retrain all staff at the	The Program Administrator,
appointments found that the	WIC Program Manager will be	orientation training on	Program Manager, and Division
required program orientation	responsible for creating a new tool	the following date	Director will be responsible for in
topic and assessment was	that will be added to the	• 1/29/25	person observations. Four (4)
inadequate in four (4)	"Orientation to WIC" which is a		observations will be conducted
observations and in one (1)	pre-existing material that staff can		per staff, per quarter until 100%
case incorrect. LA staff must	use at orientation to assess		compliance, then we will reduce
assess the participant's	participant's understanding of		observations to once per quarter,
understanding of WIC	WIC authorized food and use of		per staff. We will retrain staff or
authorized food and use of the	the WIC card. This tool will		meet with individual staff if 100%
WIC card. More specifically,	specifically address the orientation		compliance is not met. Expected
staff should cover all required	finding. In addition, staff will		outcome is 100% compliance.
topics to ensure the participant	cover all required topics to ensure		Progressive disciplinary may be
understands how to use WIC	the participant understands how to		initiated for failure to comply with
benefits and purchase WIC	use WIC benefits and purchase		standard and policy.
food.	WIC food. WPPM Policy: WPPM		
	270-40		
6. Our review of participant	Provide staff with an isolated	Retrain all staff at the	The Program Administrator,
records and observations of	training for care plan training will	care plan training on	Program Manager, and Division
onsite sessions found policy	include	the following date	Director will be responsible for
violations related to the	Scenario reenactment	• 2/19/25	in-person observations. Four (4)
documentation of a Care Plan.	• Pre/Post assessment		observations will be conducted
• Our review of 20 WIC WISE	Concurrent with trainings dates.		per staff, per quarter until we
participant certification	In addition, provide staff with job		meet 100% compliance then we
records found one (1) record	aid to assist with appropriate times		will reduce observations to once
where staff documented the	to add the care plan while		per quarter, per staff. In addition,
care plan one day late. The	conducting an appointment		five (5) supervisors will be
Care Plan must be completed	WDDM D 1' WDDM 400 12		responsible for auditing (5)
by the end of day. • Our	WPPM Policy: WPPM 400-12		participant files per member of
review of onsite appointments			staff, per month. The duration of
found one (1) instance in			auditing files will be for 6 months
which the Care Plan did not			until 100% accuracy is retained
meet required minimum			then decrease to 2 files per
standard. The assessment was			staff per month. We will retrain
missing.			staff or meet with individual staff
			if 100% compliance is not met.
			The expected outcome is 100%
			compliance
7. Our review of onsite	Will provide staff with several	Retrain all staff at the	The Program Administrator,
appointments found four (4)	isolated trainings for risk codes.	risk code trainings on	Program Manager, and Division
staff assigning inappropriate	Trainings will include • Scenario	the following dates	Director will be responsible for in
manual risk codes. An	reenactment • Pre/Post assessment	• 2/26/25	person observations. Four (4)
accurate indicator of	concurrent with trainings date	• 3/5/25	observations will be conducted
nutritional risk is necessary for	WPPM Policy: WPPM 200-01,	• 3/12/25	per staff, per quarter until we
certification.	210-10, 210- 11, 21012, 210-13	• 3/19/25	meet 100% compliance then we
			will reduce observations to once
			per quarter, per staff. We will
			retrain staff or meet with
			individual staff if 100%
			compliance is not met. The
			expected outcome is 100%
			compliance.