
ORGANIZATION AND MANAGEMENT

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INTRODUCTION

Organization and management involve the procedures for the documentation of staff time at the State level devoted to the various WIC functions, the evaluation and selection of local agencies, the documentation of local agency staffing standards and data, as well as disaster planning. The following sections provide a brief overview of the information that is required by federal regulations to be included in State Plans. The questions that follow are designed to assist the State agencies in submitting compliant State Plans for FNS approval. State agencies are encouraged to review each federal regulation in its entirety. A. State Staffing 7 CFR 246. 3(e), 246. 4(a)(4) and (24): describe the information relating to State level staff requirements and utilization as it relates to WIC Program functions and how the State agency will provide a drug-free workplace. B. Evaluation and Selection of Local Agencies 7 CFR 246. 4(a)(5)(i) and (7) and 246. 5: describe the procedures and criteria utilized in the selection and authorization of local agencies. C. Local Agency Staffing 7 CFR 246. 4(a)(4): describe the State staffing standards which apply to the selection of local agency staff and the means used by the State agency to track and analyze local level staffing data. D. Plan of Alternate Operating Procedures (Disaster Plan) 7 CFR 246. 4(a)(30) the plan of alternate operating procedures in preparation for a disaster and/or public health emergency.

A. State Staffing

1. State Level Staff (7 CFR 246. 3(e))

a. Record below the current total full-time equivalent staff (FTEs) available for each position listed or attach equivalent information in the section s Appendix noted here:

IV Org and Mgmt Appendix 1 FTEs FY2027 and
IV Org and Mgt Appendix 2 CNS Org Chart FY2027

Note the following when completing this section. State agencies should consider best practices to meet their optimal operating goals: A full-time WIC director is required when monthly participation levels are 1,500 or half-time or equivalent when participation exceeds 500. A full-time Nutrition Coordinator is required when participation exceeds 1,500 or half-time or equivalent when participation exceeds 500. A full-time or equivalent Program specialist for each 10,000 participants above 1,500 up to 8 staff.

Program	FTE WIC	FTE In-Kind	Total FTE
Director			
Nutrition Coordinator			
Vendor Specialist			
Program Specialist			
Financial Specialist			
Breastfeeding Coordinator			
(MIS/EBT) Specialist			
Intern			

b. Does the State agency include a WIC organizational chart showing all positions (including position descriptions, titles, and staff names) in their State Plan?

☒ Yes

☐ No

c. Does the State agency describe the WIC Program's relationship within the State Health Department or Indian Tribal Organization in their State Plan?

☒ Yes

☐ No

2. Does the State agency estimate the average percent of State staff time devoted to fulfilling the following functions?

☒ Yes

☐ No

on This is not applicable for my state agency

Function	Percent of Total Staff Time
Certification, including nutrition risk determination	0
Breastfeeding training/promotion and support	8
Nutrition education	7
State food list	5
Monitoring of local agencies	12
Fiscal reporting	4
Food delivery system management	7
Vendor management, including vendor training	18
Staff training and continuing education	16
(MIS/EBT) system development and maintenance	15

Civil Rights	3
Coordination with and referrals to other assistance programs and social service agencies	5
Total staff time	100

3. Drug-Free Workplace (7 CFR 246. 4(a)(25))

a. Does the State agency have a plan to achieve a drug-free workplace?

- ☒ Yes
- ☐ No

B. Evaluation and Selection of Local Agencies

- ☐ Does not apply because the State agency has only one location or no local agency(ies). (PROCEED TO NEXT SECTION)

1. Local Agencies Authorized

Number of local agencies authorized to provide WIC services last fiscal year:

85

Number of local agencies planned to provide WIC services this fiscal year:

84

2. When does the State agency accept applications from potential local agencies?

☐ Annually

☐ Biennially

☐ On an on-going basis

☒ Other

Specify: All 100 counties served.

3. Does the State agency require existing local agencies to reapply and compete with new applicant agencies for authorization? (if yes, what is the frequency?)

☐ Yes

☒ No

4. Selection Criteria

a. The State agency uses the following criteria in selecting local agencies in new service areas and/or in reviewing applications from existing service areas: (Check all that apply)

	New Service Areas	Existing Service Areas
Coordination with other health care providers		X
Projected cost of operations/ability to operate with available funds		X
Location/participant accessibility		X
Financial integrity/solvency		X
Relative need in the area		X
Range and quality of services		
History of performance in other programs		X

Ability to serve projected caseload		X
Non-smoking facility		X
Americans with Disabilities Act (ADA) compliance		X

Services provided to pregnant women and young children		X

b. The State agency conducts studies (provide a link to or copy of the most recent study: N/A Local agencies are autonomous.) of the cost-effectiveness of local agency operations that examine:

- ☐ Location and distribution of local agencies in proportion to new applicants/participants
- ☐ Clinic procedures to optimize participant access/service (Patient Flow Analysis, etc.)
- ☐ Staff-to-participant ratios and related staffing analyses
- ☐ Comparative analyses of local agency/clinic costs

☒ Other

5. Does the State agency have a formal written agreement or contract with each local agency? (7 CFR 246. 6)

☒ Yes

Specify: 12 months. 3 FFY and 81 SFY

☐ No

6. Does the State agency have statewide fair hearing procedures for local agency appeals? (7 CFR 246. 4(a)(18))

☒ Yes

Specify: NC WIC Program Manual, Chapter 14 Administrative Appeals

☐ No

7. Does the State agency maintain a list of clinic sites that include the following information? If available, please attach and/or reference the location of the listing: North Carolina Local WIC Agency Directory, see link below
chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www. ncdhhs. gov/public-health-nutritionist-directory/download?attachment

☒ Location

☐ Type of site (e.g., hospital, health department, community action program)

☒ Service area

☒ Hours of operation

☒ Days of operation

☒ Health services provided on-site

☒ Social services provided on-site

☒ Participation

☒ Other

Specify: Physical address and telephone number

C. Local Agency Staffing

- ☐ Does not apply because the State agency has only one location or no local agency(ies). (PROCEED TO NEXT SECTION)

1. Staffing Standards (7 CFR 246. 3(e))

a. Which local agency staffing standards are prescribed by the State agency?

- | | | |
|---|---|---|
| ☒ Credentials | ☒ Staff levels | Designation of WIC Director, Breastfeeding Coordinator, Designated Breastfeeding Expert (DBE) Breastfeeding Peer Counseling Manager (as applicable), National Voter Registration Act contact, Section 504 Coordinator (agency with 15 or more employees). and ADA Coordination (agency with 50 or more employees) |
| | ☐ Staff-to-participant ratio standards | |
| ☒ Staff levels | ☐ Time spent on WIC functions | |
| | ☒ Other | |
| ☒ Functions of CPAs | | |
| ☐ Paraprofessional requirements | | |
| ☒ Separation of duties to ensure no conflicts of interest | | |
| ☐ Other (specify) | | |
| ☐ Not applicable | | |

b. Does the State agency s ensure local agency(ies) credentials are in line with the Nutrition Services Standards?

- ☒ Yes
☐ No

c. Does the State agency maintain copies of local agency(ies) CPA position descriptions, classified in terms of Nutrition Services Standards, i. e. , federal requirements, recommended criteria, best practices?

- ☐ Yes
☒ No

d. Do local agency(ies) follow staffing standards established by unions or local governmental authorities?

☐ Yes

☒ No

e. Does the State agency maintain copies of local agency designated breastfeeding expert (DBE) position descriptions?

☐ Yes

☒ No

2. Local Level Staffing Data

a. When/how is data collected and analyzed by the State agency to determine staff-to-participant ratios? (Check all that apply):

☒ At regular intervals

☒ At regular intervals

☐ Monthly

☐ Quarterly

☐ Annually

☐ Program management

☐ Food delivery

☐ Certification

☐ Nutrition education

☐ Breastfeeding promotion and support

☐ By function

☒ Each clinic or local agency

☐ Monthly

☐ Quarterly

☐ Annually

☒ Each clinic or local agency

☐ At other intervals

☒ Other

Agency Profile Sheet is completed at least annually IV Org and Mgmt
Appendix 3 Sample Local Agency Profile FY2027

b. Are results of analyses from data collected to determine staff-to-participant ratio reported back to local agency(ies)?

☒ No

☐ Yes, in a single report comparing all local agencies

☐ Yes, in a local agency-specific report (no comparative data)

3. Local Agency Breastfeeding Staffing Requirement

a. List the number of local agency(ies) with a designated staff person to coordinate breastfeeding promotion and support activities.

84

b. The State agency maintains approved copies of local agency(ies) Breastfeeding Coordinator and Peer Counselor position descriptions as outlined in the WIC Breastfeeding Support guide?

☐ Yes

☒ No

c. Number of local agencies with breastfeeding peer counselors.

80

d. Number of local agencies with Designated Breastfeeding Experts (DBE).

84

D. Plan of Alternate Operating Procedures (Disaster Plan) Per 7 CFR 246. 4(a)(30), developing a plan of alternate operating procedures (AOPs), previously referred to as Disaster Plans, is required. This provision requires State agencies to include policies and procedures for operations when regular operations are disrupted, which may include disasters, emergencies, public health emergencies, and supply chain disruptions that can impede delivery of WIC benefits. For the purposes of this section, the term program disruption is used to refer to when regular operations are disrupted due to a disaster, emergency, public health emergency, or supply chain disruption, unless otherwise specified.

1. Has the State agency developed AOPs separate from a broader plan developed by the State agency s administering Department (e. g. , Health Department)?

- ☒ Yes Attach or list the location of the plan:
☐ No IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027;
NC WIC Program Manual, Chapter 1

2. Does the State agency have AOPs that are part of a broader Health Department or Indian Health Services plan or have policies that are partnered with other State agency(ies) during disasters?

- ☐ Yes
☒ No

List the location and sections of these plans that are not part of the State agency s WIC-specific AOPs: on This is not applicable for my state agency

☒ **This is not applicable for my state agency**

3. Has the State agency shared their AOPs with its local agency(ies) and clinics? on This is not applicable for my state agency

☒ Yes

☐ No

4. Section a-g is a guide for the types of policies and procedures that may be needed in preparation for and during program disruptions. Not all items listed will be applicable to each State agency.

a. Coordination and Communication.

i. Does State agency have a designated emergency contact for program disruptions?

☒ Yes

☒ Yes

Please list designee's contact information:

Jennifer Bailey, Assistant Director
jennifer.bailey@dhhs.nc.gov
919.745.1330

☐ No

☐ Other

ii. Does State agency coordinate with the following organizations to support data informed approaches when responding to program disruptions? (Select all the apply.)

☒ State/Local emergency operation centers (EOC)

☐ Relief organizations (such as Red Cross, Southern Baptist, Salvation Army, etc.)

☐ Federal Emergency Management Agency (FEMA)

☐ N/A

☐ Other Organizations

iii. Does the State agency have a communication plan with its local agencies? (7 CFR 246.4a(30)(vii))

- ☒ Yes IV Org and Mgt Appendix 4 Plan of
Alternate Operating Procedures FY2027
- ☐ No
- ☐ N/A State agency does not have local agencies.

iv. Does the State agency have a communication plan with its vendors? (7 CFR 246.4a(30)(vii))

- ☒ Yes
Specify: IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027
- ☐ No

v. Does the State agency have a communication plan with its FNS Regional Office? (7 CFR 246.4A(30)(viii))

- ☒ Yes
- ☐ No

If yes, select the information shared with the Regional Office after a disaster?

- ☐ N/A
- ☐ Call down roster
- ☒ Clinic Damage Assessment
- ☒ Status/Number of Participants impacted
- ☒ Clinic location
- ☒ Open Shelters
- ☐ Feeding Organizations
- ☒ Clinic closure
- ☒ Alternate clinic sites
- ☒ Request for Program assistance (waiver request)
- ☐ Other operating procedures

vi. Does the State agency have a communication plan to notify participants and other program partners of AOPs? (7 CFR 246. 4a(30)(vii))

- ☒ Yes ☒ Yes IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027
☐ No Attach or List the location of the plan:
☐ Other

vii. Does the State agency have a plan to inform receiving State agencies of where they may obtain a verification of certification for displaced participants during program disruptions?

- ☒ Yes [North Carolina WIC Program Manual, Chapter 6E: Certification in Special Situations](#)
☐ No
☐ Other

viii. Does the State agency provide participants with instructions for obtaining their verification of certification?

- ☒ Yes Specify: North Carolina WIC Program Manual, Chapter 6D: Participant Notifications
☐ No

ix. Does the State agency have a plan to determine if an emergency period or supply chain disruption as declared by the Secretary of Agriculture exists? An emergency period is defined as (1) a presidentially declared major disaster as defined under Section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act, 42 U. S. C. 5121 et seq.), (2) a presidentially declared emergency as defined under the Stafford Act, (3) a public health emergency declared by the Secretary of Health and Human Services under Section 319 of the Public Health Service Act (42 U. S. C. 247d), or (4) a renewal of such a public health emergency.

- ☒ Yes Specify: IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027
☐ No

x. Does the State agency have a plan for how it would determine if a waiver is necessary to continue WIC services?

☒ Yes

Specify: IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

☐ No

b. Continuation of Benefits When a disaster occurs, State agencies must continue to serve participants. This section lays out a plan to collect required information from participants.

i. The State agency will continue to serve participants during a disaster by: (Select all that apply)

☒ Remote certification for new applicants and recertification for current participants

☒ Physical presence exemption, if applicable

☐ Temporary certification for applicants temporarily displaced

☐ Temporary certification for applicants eligible for Disaster Supplemental Nutrition Assistance Program (DSNAP) benefits

☐ Expedited certification for displaced participants

☒ Issue VOC (verification of certification) to applicants that must evacuate (7 CFR 246.7(k))

☒ Issue VOC (verification of certification) to evacuees returning to the originating State

☒ Alternate clinic locations (within the disaster area, if possible)

☒ Mobile clinics or satellite clinics (grassroot organizations, etc.)

☐ Provide participants access to program records to relocate

☐ Provide nutrition assessments and referrals to other organizations when clinic operations are disturbed

☐ Other

Describe or attach a plan for each method the State agency plans to implement during a disaster:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

ii. The State agency has alternate procedures to collect the following during program disruptions (Select all that apply)

- ☒ Anthropometric data (7 CFR 246.7(e)(1))
- ☒ Medical documentation (7 CFR 246.10(d))
- ☒ Bloodwork data (7 CFR 246.7(e)(1)(i)(B))
- ☒ Income documentation (7 CFR 246.7(d))
- ☒ Residency documentation (7 CFR 246.7(c))
- ☒ Adjunct or Automatic eligibility documentation 7 CFR 246.7(d)(2)(v)(A))
- ☒ Verification of certification (VOC) documentation (7 CFR 246.7(k))
- ☒ Signature for Rights and Obligations and other required documentation (7 CFR 246.7(i))
- ☐ Other

Describe or attach a plan for each method the State agency plans to implement during a disaster:

North Carolina WIC Program Manual, Chapter 1: Introduction to WIC, IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

iii. The State agency allows the certification of participants affected by a disaster to submit for certification: (Select all the apply) (7 CFR 246. 7(d)(2)(v)(C))

- ☒ A signed statement
- ☐ Letter from the employer
- ☐ Other

iv. How will the State agency collect information from participants when using remote certification?(Select all the apply)

☒ Secure website upload

☒ Mobile device screen share

☒ Mail

☒ Secure email

☒ Video conference

☐ Other

Describe or attach a plan for each method the State agency plans to implement during a disaster

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

v. The State agency has a Memorandum of Understanding/Agreement with WIC-affiliated agencies (such as Medicaid) to collect WIC eligible documentation during a disaster?

☐ Yes

☒ No

☐ Not applicable

c. Benefit Issuance and Redemption.

i. How will the State agency issue Food Instruments (i. e. , EBT cards) during a disaster? (Select all that apply)

☒ Clinic pickup

☐ Certified Mail

☒ Other

Specify: Regular mail via FIS call center.

Describe or attach a plan on how the State agency will issue Food Instruments during a disaster:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

ii. Does the State agency have a reciprocal agreement to accept EBT cards with bordering States?

- ☐ Yes
- ☒ No
- ☐ Other

iii. Does the State agency have a plan to replace lost, stolen, or damaged Food Instruments during a disaster? 7 CFR 246. 4(a)(14)(xix)

- ☒ Yes
- ☐ No
- ☐ Not Applicable

Describe or attach a plan on how the State agency will replace Food Instruments during a disaster:

North Carolina WIC Program Manual, Chapter 1: Introduction to WIC, IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

iv. Does the State agency keep replacement Food Instruments on hand?

- ☐ Yes
- ☐ No
- ☒ Not applicable

v. Does the State agency have a policy to replace a participant's supplemental foods if destroyed during a disaster?

☒ Yes

☐ No

Describe or attach the policy on how the State agency will replace destroyed supplemental food(s) for participants:

Affidavit Attesting to Food Benefit Loss, see WPM, Chapter 1,
Attachment 3, IV Org and Mgt Appendix 4 Plan of Alternate
Operating Procedures FY2027

vi. Does the State agency have a direct distribution or home delivery system in place as an alternative to using the retail food delivery system during normal program operations?

☐ Yes

☒ No

If yes, does the direct distribution and home delivery system include provisions reasonable to institute during recalls and/or supplemental food shortages?

☐ Yes

☐ No

☒ Not applicable

Describe or attach the policy on direct distribution or home delivery systems:

N/A

vii. Does the State agency have a policy to implement direct distribution to participants during disasters?

☐ Yes

☐ No

☒ Not applicable

viii. Does the State agency have a policy to implement direct distribution or direct home delivery model to participants during program disruptions?

- ☐ Yes
- ☐ No
- ☒ Not applicable

ix. Does the State agency have a policy to implement direct distribution of ready-to-feed, liquid concentrate, or powder infant formula to participants?

- ☐ Yes
- ☐ No
- ☒ Not applicable

Describe or attach a plan on how the State agency will implement direct distribution of ready-to-feed, liquid concentrate, or powder infant formula:

d. Vendor Management Requirements. , 246. 4(a)(14)(xv).

i. Does the State Agency have a plan to adjust vendor minimum stocking requirements (MSR) for the variety and quantity of supplemental foods during a disaster? (7 CFR 246. 12(g)(3)(i)

- ☒ Yes
- ☐ No
- ☐ Not applicable

Describe or attach the policy on how the State agency will implement MSR:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

ii. Does the State agency have a plan to adjust authorization requirements for new vendor applicants and/or authorized vendors during a disaster?

- ☒ Yes
- ☐ No
- ☐ Not applicable

If yes, which parts of the selection criteria will the State agency adjust?

☐ N/A

☒ State agency business integrity requirements

☒ State agency minimum stocking requirements

☐ Competitive price selection criteria and/or maximum allowable reimbursement levels

☐ Other State agency-imposed criteria

iii. Does the State agency have a plan to meet the annual vendor routine monitoring and compliance investigation requirements during a disaster? 7 CFR 246. 4(a)(14)(iv)

☒ Yes

☐ No

☐ Not applicable

e. Nutrition Services. (7 CFR 246. 4(a)(30)(ii), 246. 7(j)(2)(iii), 246. 10(d), 246. 10(i), 246. 10(e) and 246. 16a(5).

i. Does the State agency have a designated emergency contact to address the needs of participants with qualifying conditions receiving Food Package III?

☒ Yes

☒ Yes

Please list the designee's contact information

NC WIC Program Director, Jennifer Bailey,
jennifer.bailey@dhhs.nc.gov

☐ No

☐ Other

ii. Does the State agency have a plan to support participants within the following groups? (Select all the apply.)

☒ Participants in rural areas

☐ Tribal populations

☒ Medically fragile participants (i.e., participants with documented qualifying conditions receiving Food Package III)

☐ Other

Describe or attach a plan on how the State agency will support medically fragile participants, participants in rural areas, tribal populations, and other priority populations, as applicable:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

iii. Does the State agency have a plan to review and update supplemental foods authorized by their program at least annually for reasons including, but not limited to: ensuring continued marketplace availability of authorized foods in package sizes that provide the maximum monthly amount and being responsive to evolving participant needs?

☒ Yes

☐ No

iv. Does the State agency have a plan to communicate temporary changes to participant authorized food packages when there is limited availability of certain food items offered on the agency's approved food list during a disaster? (i. e. , exercise allowable regulatory flexibilities that don't require a waiver) (includes informing participants, vendors, etc.)

☒ Yes

☐ No

v. Does the State agency have a plan to support breastfeeding participants during a disaster? Support would include, but not limited to: Supporting participants with breastfeeding initiation, relactation, and breastfeeding challenges as well as assisting with breast pump acquisition. This support may include referrals outside of WIC.

☒ Yes

☐ No

Describe or attach a plan on how the State agency will implement breastfeeding support during a disaster.

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vi. Does the State agency have a plan for implementing infant formula cost containment contract remedies during an infant formula recall?

- ☒ Yes
- ☐ No
- ☐ Not applicable

Describe or attach a plan on how the State agency will implement infant formula cost containment remedies during an infant formula recall

IVOrg and MgtAppendix 4Plan of Alternate Operating Procedures

f. Allowable Cost. (7 CFR 246. 14(d)) and (7 CFR 246. 14(c)(1)(i))

i. Does the State agency have a plan to request the necessary health and safety equipment needed during disasters (e. g. , Personal Protect Equipment)?

- ☒ Yes
- ☐ No
- ☐ Not applicable

ii. Does the State agency plan to use State/local agency staff to support disaster recovery efforts?

- ☐ Yes
- ☒ No
- ☐ Not applicable

iii. Does the State agency have a cost sharing agreement with other agencies to use staff during a disaster?

- ☐ Yes
- ☐ No
- ☒ Not applicable

g. Additional Elements of AOPs. State agencies should consider any policies and procedures necessary to continue Program operations. For instance, certain policies may generate Management Information System (MIS) changes. Planning is key. The State agency's AOP should support any request for Program flexibilities that impact their MIS.

i. Does the State agency have a plan to monitor local agency(ies) during a disaster?

- ☐ Yes
- ☒ No
- ☐ Not applicable

ii. Does the State agency have a plan for MIS recovery?

- ☒ Yes
- ☐ No
- ☐ Not applicable

iii. Does the State agency have a plan for MIS backup filing system?

- ☒ Yes
- ☐ No
- ☐ Not applicable

iv. Does the State agency have a plan to backup computer systems?

- ☒ Yes
- ☐ No
- ☐ Not applicable

v. Does the State agency have a plan to manage alternate procedures in the MIS?

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ Other

vi. Does the State agency have a plan for a backup power system?

- ☐ Yes
- ☒ No
- ☐ Not applicable

Describe or attach a plan for each method the State agency plans to implement during a disaster:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

5. At what frequency will the State agency plan to train staff and test the readiness of their approved disaster plans? State agencies that do not encounter disasters regularly should test their plan at a minimum every two years to learn about any MIS updates. For example: State agencies can test readiness by requesting to participate in State-lead (emergency operating centers) disaster exercises that would include the Health Department or Indian Health Services.

☐ Semi-annually

☐ Annually

☒ Every 2 years

☐ Other

Please describe or attach how the State agency plans to conduct its readiness testing:

IV Org and Mgt Appendix 4 Plan of Alternate Operating Procedures FY2027

6. Does the State agency require local agencies/clinics to have individual disaster plans.

- ☒ Yes
- ☐ No

If yes, such plans are reviewed for compliance and consistency with the State agency disaster plan.

- ☒ Yes
- ☐ No
- ☐ Not applicable

ADDITIONAL DETAIL: Organization Management Appendix and/or Procedure Manual (citation):

Each local agency is autonomous. During each annual review, a local agency disaster plan is reviewed by state staff (onsite review) or local agency staff (local agency self assessment).