

Idaho WIC Program

WIC Vendor Guide

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IDAHO DEPARTMENT OF HEALTH & WELFARE
DIVISION OF PUBLIC HEALTH



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What is WIC?

WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children. It is a short term program designed to influence a lifetime of nutrition and health. The purpose of the WIC Program is to prevent health problems and improve the health and nutritional well being of our nation's women, infants, and children (WIC) during critical growth periods.

Special supplemental foods high in iron, protein, calcium, vitamins A, C, and D, and minerals have been carefully selected and are individually prescribed to meet the nutritional needs of the WIC customer. Authorized by the United States Department of Agriculture (USDA), WIC is administered by the Idaho State WIC Program, Department of Health & Welfare, Division of Public Health, Bureau of Clinical and Preventive Services. WIC is a 100% federally funded program that provides nutritious food via prescriptive vouchers (Idaho uses checks) and cash value vouchers (CVV). WIC checks are printed for specific food items and cash value vouchers are printed with a maximum dollar amount for the purchase of fruits and vegetables to meet the key nutrient needs of pregnancy and early childhood growth and development.

WIC is available to pregnant, breastfeeding, and postpartum women, and infants and children up to age 5. To participate in Idaho, these individuals must meet the following criteria:

- Be a resident of Idaho
- Meet income guidelines
- Be at nutritional risk

WIC services are provided at no cost to eligible families and include:

- Healthy foods
- Health screening
- Health and nutrition classes
- Referrals to community support services
- Breastfeeding information and support
- Individual counseling with licensed registered dietitians
- Recipes, newsletters, and educational materials



Role of the Vendor

Authorized WIC vendors play a unique role in the WIC Program and are critical to the success, integrity, and effectiveness of the program. The decision to become an authorized WIC vendor is an important one and is appreciated by the State of Idaho.

Local WIC agencies issue WIC checks printed for specific foods designed to supplement the WIC customer's nutritional needs. The vendor's role is to ensure that the WIC customer purchases what is printed on the WIC check. Most WIC customers select a vendor that will provide the remainder of their shopping needs and provide good customer service. Current studies show WIC customers spend an additional three to four dollars in cash or SNAP (Supplemental Nutrition Assistance Program, formerly food stamps) benefits for every WIC dollar spent.

TRAINING

The purpose of this vendor guide is to provide instruction on proper management practices and requirements to assist vendors and their staff in reducing errors and improving the integrity of each WIC transaction. Authorized vendors must send a representative to attend mandatory training sessions per the Vendor Agreement. Failure to attend the mandatory training sessions will result in termination from the Idaho WIC Program.

Most correspondence from the State WIC Office will be sent to the store manager or owner. Please remember that any correspondence sent by the State WIC Office is urgent and should be opened immediately.

Training dates, times, and locations will be announced in advance. At the time of training a Training Verification form is provided and must be signed by the vendor representative and returned to the State WIC Office. By signing this form, the vendor representative verifies that all personnel have been trained on the material presented.

It is the vendor's responsibility to ensure all employees are trained on WIC policies and procedures, especially if there is a large employee turnover. The vendor shall be held accountable for the actions or inactions of its owners, officers, managers, agents, and employees who commit vendor violations in the redemption of WIC checks and the provision of WIC approved foods and infant formula.

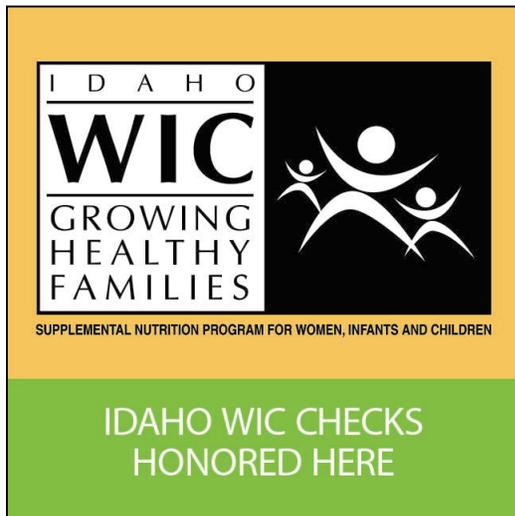
If an English interpreter is needed during the training session, it is the responsibility of the vendor to obtain one and to pay for the services.



All training materials may be reproduced. Additional copies can be requested from the State WIC Office or found at www.wic.dhw.idaho.gov.

WIC VENDOR SIGN

The vendor should post the “Idaho WIC Checks Honored Here” sign by the front doors or windows of their business, at all times, or indicate in signage that WIC is an accepted method of payment so that WIC customers can identify the store as an authorized Idaho WIC vendor. Door signs are provided by the State WIC Office.



Cashier Information

THE WIC AGREEMENT

WIC authorized stores have a Vendor Agreement with the Idaho WIC Program to provide specific foods to WIC customers. The Agreement explains the requirements for being a WIC authorized store and the consequences for not following the terms of the Agreement.

It is important for all store employees to follow WIC requirements so the store's WIC checks can be paid. Stores that do not follow WIC requirements can be issued sanctions and penalties, and can be disqualified from the Idaho WIC Program. Stores disqualified from WIC are also disqualified from SNAP (formerly known as Food Stamps). Cashiers have an important role in making sure WIC transactions are completed correctly.

WIC CUSTOMERS

A WIC customer may not be discriminated against for participating in WIC, be sent to a special checkout line, or have restricted shopping times. WIC customers should be treated with the same level of customer service and respect as every other shopper in your store. Negative or derogatory comments are not acceptable.

WIC customers are not permitted to cause a disturbance in stores, abuse store employees, or violate WIC check processing procedures. If you have difficulty with a WIC customer, follow your store policy and procedures for denial of service. Store management may wish to file a WIC complaint form.

CUSTOMER CONFIDENTIALITY

Any information learned about a WIC customer during a WIC transaction must be kept confidential. WIC customer information must not be posted in any area where other customers can see it.

Examples of a confidentiality breach include but are not limited to:

- Telling another person, "Did you know that Wendy is on WIC?"
- Announcing over the PA system that you need help with a WIC item or transaction
- Telling another store employee that your customer is a WIC customer in a voice loud enough for others to hear



Be patient with WIC customers who bring unauthorized foods to the check stand; they may be new to the WIC Program and unsure which foods they can choose.

Cashier Information

WIC CHECKS

There are two types of WIC checks: food checks and cash value vouchers (CVVs). Food checks have specific food items and quantities printed on them. CVVs are made out for a specific dollar amount of fresh fruits and vegetables.

A sample food check:

401	1629802	PARTICIPANT, WIC	00024616
		STATE OF IDAHO Department of Health and Welfare Account: 804201 75-1248 919	Void if Vendor Does Not Have a Valid Idaho WIC Contract First Day To Use: 10-01-15 Last Day To Use: 10-31-15
For Purchase Of Authorized WIC Foods Only 2 GALLON MILK, 1% OR FAT FREE/SKIM ONLY 2 PLASTIC JUICE 64 OZ PLASTIC CONTAINER - SEE FOOD LIST 36 OUNCE OR LESS CEREAL - SEE FOOD LIST 1 DOZEN EGGS WHITE, LARGE, MEDIUM, SMALL - SEE FOOD LIST 1 POUND CHEESE -SEE FOOD LIST 32 OUNCE OR LESS WHOLEWHEAT BREAD/OTHER GRAINS-SEEFOODLIST		Pay Exactly \$ VENDOR MUST DEPOSIT WITHIN 90 DAYS OF FIRST DAY TO USE DATE AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER	Pay To The Order Of: IDAHO WIC VENDOR NO. AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER
SECURITY STATE BANK HOWARD LAKE MN 55349		Improper Use Of This Check is Subject to Federal and State Prosecution	
@000 246 16 @ 109 19 1 248 21 804 20 1 @			

Only sell the items printed on the check, in the amounts indicated. WIC customers are not required to purchase everything on the WIC check; however, they cannot purchase more than what is printed on the check.

A sample CVV:

401	1629802	PARTICIPANT, WIC	00024618
		STATE OF IDAHO Department of Health and Welfare Account: 804201 75-1248 919	Void if Vendor Does Not Have a Valid Idaho WIC Contract First Day To Use: 10-01-15 Last Day To Use: 10-31-15
For Purchase Of Authorized WIC Foods Only 8 DOLLARS FRESH FRUITS AND/OR FRESH VEGETABLES-SEE FOOD LIST NOT TO EXCEED \$8.00 NO CHANGE GIVEN		Pay Exactly \$8.00 \$8.79 VENDOR MUST DEPOSIT WITHIN 90 DAYS OF FIRST DAY TO USE DATE AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER	Pay To The Order Of: IDAHO WIC VENDOR NO. AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER
SECURITY STATE BANK HOWARD LAKE MN 55349		Improper Use Of This Check is Subject to Federal and State Prosecution	
@000 246 18 @ 109 19 1 248 21 804 20 1 @			

Most CVVs are printed for \$8 or \$11. These checks should never be written for more than the amount printed on the check.

Cashier Information

THE WIC ID FOLDER

The only form of identification needed for a WIC transaction is the WIC ID Folder. Never ask for any other form of identification during a WIC transaction.

Correct Examples:

WIC Identification Folder

I.D.A.H.O. WIC GROWING HEALTHY FAMILIES

Family No. F10100

Bring this folder with you to every WIC appointment and each time you shop with WIC checks/CVVs.

WIC Participant #1 1679285
Participant Name Client No.

WIC Participant #2 2069345
Participant Name Client No.

Participant Name Client No.

Participant Name Client No.

W. Parr
Responsible Adult Signature

The goal of WIC is to improve the health of women and children by providing:

- health screenings
- nutrition education
- breastfeeding information and support
- nutrition counseling with registered dietitians
- nutritious supplemental foods
- referral to health care and other helpful services

Idaho

There can be 1 or 2 signers on an ID Folder. If there is 1 signer, the 2nd signature line is marked out. If there are 2 signers, each signature line will be signed only one time.

Incorrect Examples:

WIC Identification Folder

I.D.A.H.O. WIC GROWING HEALTHY FAMILIES

Family No. F10100

Bring this folder with you to every WIC appointment and each time you shop with WIC checks/CVVs.

WIC Participant #1 1679285
Participant Name Client No.

WIC Participant #2 2069342
Participant Name Client No.

Participant Name Client No.

Participant Name Client No.

W. Parr J. Smith
Responsible Adult Signature

The goal of WIC is to improve the health of women and children by providing:

- health screenings
- nutrition education
- breastfeeding information and support
- nutrition counseling with registered dietitians
- nutritious supplemental foods
- referral to health care and other helpful services

Idaho

If the 2nd signature line is marked out, there is only 1 valid signer - the Responsible Adult. There should not be 2 signatures side by side, or a signature on the Participant Name line. Both examples to the right are invalid. The shopper should return to the WIC clinic for a corrected ID Folder.

PROCESSING A WIC TRANSACTION

Request the ID Folder

- If the customer does not have their WIC ID Folder, the transaction cannot be completed. Please refer the customer to their local clinic to replace a lost or missing ID Folder.
- Often, the participant name printed at the top of the WIC check does not match the name on the “Authorized Signature” line because the participant may be an infant or a child. The participant’s name should match one of the names on the WIC ID Folder.

Check the Check

- Before ringing up a WIC transaction, look at each check. Only accept Idaho WIC checks--look for the Idaho WIC logo.
- Check the dates. Do not accept WIC checks before the “First Day to Use” or after the “Last Day to Use.” Checks accepted outside of these dates will not be paid.
- Don’t accept altered WIC checks. If dates, food items, or quantities have been changed, or if there is scribbling or correction fluid altering any area of the check, the check cannot be used.
- If a WIC check cannot be used for any reason, return it to the WIC customer and refer them to their local clinic for assistance.



First Day To Use	Last Day To Use
10-01-15	10-31-15

Ring Up the Items

- Handle each WIC check as a separate transaction. Do not combine the total purchase amounts on one check or divide the total purchase price equally among several checks.
- Verify that the food items to be purchased are listed on the WIC check. Make sure that the quantity of each item does not exceed the quantity listed on the check.
- Refer to the current Food List to make sure all of the selected foods are allowed. A current copy of the Food List should be available at each check stand or point of sale (POS) counter. (Some foods, such as infant formulas, are not pictured in the Food List, so the cashier must be careful to sell the exact food item printed on the WIC check.)
- WIC customers are not required to purchase everything on the WIC check; however, they cannot purchase more than what is printed on the check.
- Bring missing, forgotten, or incorrect items to the attention of the customer. The cashier must give the customer the opportunity to get the correct item(s) or ask the customer if someone can assist them in getting the correct item(s).

Cashier Information

- To help prevent overcharges, ring up the WIC food items in the order they appear on the WIC check. WIC customers are encouraged to group their food items by check.
- Many stores have registers that identify whether or not an item is WIC authorized. If an item is not ringing up as WIC authorized, but the customer believes the item is allowed, refer to the current Food List. If the item is allowed, ask a manager how to ring up the item so that the WIC customer is able to get all of the foods on their WIC check. Make sure to follow up with a manager to get the item's UPC (bar code) added as a WIC authorized item. This will help to keep the same item from causing problems for other cashiers as well.

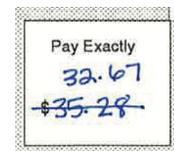
Cash Value Vouchers (CVVs)

- CVVs can be handled as a separate transaction or combined by totaling the purchase price and dividing the total price among multiple CVVs.
- Verify that the fruits and/or vegetables to be purchased are WIC eligible by checking the Idaho WIC Authorized Food List.
- If the total purchase price of the selected fruits and/or vegetables is less than the amount pre-printed on the CVV, change cannot be given to the WIC customer.
- If the total purchase price of the selected fruits and/or vegetables is more than the amount printed on the CVV, the cashier must allow the customer the choice to
 - a) put items back until the total is at or below the amount printed on the CVV (the dollar amount written in the "Pay Exactly" box cannot be more than the maximum allowable amount printed on the CVV).
 - b) pay the difference, plus tax, with any chosen form of payment.
- Sales tax may only be charged on the amount that exceeds the dollar amount printed on the CVV. This amount, plus tax, is paid by the participant. For example, the total price of all fruits and vegetables comes to \$9.50. The maximum value of the CVV is \$8.00. If the customer chooses to pay the difference of \$1.50, tax should be charged on \$1.50 only.

Cashier Information

Fill in the “Pay Exactly” Box

- Once the total purchase price has been calculated, write the total in the “Pay Exactly” box. This should be completed before the WIC customer signs the check. Use black or blue ink.
- If a mistake is made when filling out the “Pay Exactly” box, put a single line through the incorrect amount and write the correct amount in the box. Do not use correction fluid (Wite-Out®) or completely scribble out the incorrect information.



Match the Signature

- Unsigned checks will not be paid.
- Once the amount to pay has been entered, ask the WIC customer to sign the check in the signature box. Make sure that the customer uses a blue or black ink pen. If the customer signs in the wrong spot, ask them to sign the check a second time in the signature box. The bank will consider the check unsigned if the signature is not in the signature box.
- Compare the signature on the check to one of the signatures on the ID Folder. The signatures must be a reasonable match. If the signature on the check is markedly different, ask the customer to sign the check a second time. If the second signature is also not a reasonable match, the transaction cannot be completed. Cancel the transaction and return the check to the customer. Refer the customer to their local clinic to get a replacement check and/or a new ID Folder with an accurate signature.
- Do not accept a pre-signed check. A check signature must be witnessed by the cashier and compared to the WIC ID Folder.

Finish the Transaction

- After all the WIC transactions are completed, return the WIC ID Folder to the customer.
- Every WIC customer must be given a receipt. If WIC is not preprinted on the receipt, write “WIC” on the receipt before giving it to the customer.
- If the WIC customer has any questions, comments, or concerns regarding WIC procedures, policies, or authorized food items, please refer them to their local clinic for assistance.

8 Easy Steps to Completing a WIC Transaction

401 1674186 PARTICIPANT, WIC

WIC GROWING HEALTHY FAMILIES

STATE OF IDAHO Department of Health and Welfare

Account: 804201 75-1248 8/9

Void If Vendor Does Not Have a Valid Idaho WIC Contract

00024595

First Day To Use 10-01-15 Last Day To Use 10-31-15

Pay Exactly 32.67 ~~35.28~~

Pay To The Order Of:

VENDOR MUST DEPOSIT WITHIN 60 DAYS OF FIRST DAY TO USE DATE

IDAHO WIC VENDOR NO. 6

AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) W. [Signature]

SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER

For Purchase Of Authorized WIC Foods Only

2 GALLON	MILK, 1% OR FAT FREE/SKIM ONLY
2 PLASTIC	JUICE 64 OZ PLASTIC CONTAINER - SEE FOOD LIST
36 OUNCE	OR LESS CEREAL - SEE FOOD LIST
1 DOZEN	EGGS WHITE, LARGE, MEDIUM, SMALL - SEE FOOD LIST
1 POUND	DRY BEANS/PEAS/LENTILS
32 OUNCE	OR LESS WHOLEWHEAT BREAD/OTHER GRAINS-SEEFOODLIST

SECURITY STATE BANK HOWARD LAKE MN 55349

Improper Use Of This Check is Subject to Federal and State Prosecution

① ② ③ ④ ⑤ ⑥

1. Request the WIC ID Folder and WIC checks being used during the transaction. The transaction cannot be completed without the WIC ID Folder.
2. Check the dates. Checks used outside of the “First Day to Use” and “Last Day to Use” dates will not be paid.
3. Ring up the items. Sell only what is listed on the check, in the correct amount. Use the current Authorized Food List as a guide.
4. Say yes to coupons, specials, and discount cards.
5. Write the purchase price in the “Pay Exactly” box. If you make a mistake, put a single line through the amount and write the correct amount in the box.
6. Ask the customer to sign the check. The customer must wait to sign the check until after the “Pay Exactly” amount is filled in. Unsigned checks will not be paid.
7. Compare the signatures on the check and the ID Folder. It should be a reasonable match.
8. Give the customer a receipt and return the WIC Folder.

Processing WIC checks is

EASY

if you:

- Check the check
- Rely on the food list
- Call if you have questions

COUPONS

Federal regulations state that WIC customers are to be treated the same as other customers; thus they must be entitled to the same opportunity to use manufacturer coupons, in-store coupons, store membership discount cards, and benefit from specials such as “Buy One, Get One Free” or “Extra Ounces” promotions. It is the vendor’s responsibility to ensure the correct procedure is used and that no sales tax is charged to the WIC Program.

Should the vendor accept taxable coupons, the vendor may choose to subtract the tax from the amount of the WIC purchase. For example, if a coupon is worth \$0.50 and the tax is \$0.03, the amount charged to the WIC Program will be reduced by \$0.47.

For “Buy One, Get One Free” promotions, the food item purchased must be an Idaho WIC authorized item printed on the WIC check. The advertised free item does not have to be an authorized food item. An example would be to buy an 18 ounce box of Cheerios and get a free sample size box of detergent.

Free additional ounces offered through “Buy One, Get One Free” or “Extra Ounces” promotions are not counted towards the maximum number of ounces printed on the WIC check. For example, in a promotion to buy an 18 ounce box of cereal and get an additional free 18 ounce box of cereal, the free 18 ounces does not count against the amount specified on the check. The same is true for “Extra Ounces” promotions. The free ounces included in the package do not count towards the amount specified on the check.

SUBSTITUTIONS

Substitutions are not allowed. Substitutions are considered “unauthorized food items” (federal violation) and carry a sanction penalty that could result in termination of vendor authorization from both the WIC Program and SNAP (see Appendix A, Vendor Sanction Schedule). WIC food items and infant formula are carefully selected to meet certain nutritional requirements for each WIC customer. If the food item cannot be described on the face of the WIC check, allowable brands and varieties will be listed on the current Idaho Authorized Food List. If a WIC customer has questions or concerns about which items are WIC authorized, please direct them to their local WIC clinic.

INFANT FORMULA

For healthy infants, breastfeeding is always our first recommendation, as breast milk contains all the nutrients a baby needs for the first year of life. However, some mothers are unable to breastfeed or choose not to. If a WIC customer is purchasing infant formula with a WIC check, they are only allowed to purchase the specific can, type, and brand of infant formula printed on the check. The sizes printed on the WIC check are exact; no rounding or substitutions are allowed. WIC customers who come into the store with a formula prescription or change request should be directed to the local WIC clinic.

Three ways to avoid errors when handling a WIC formula check:

1. Know the difference – most formula checks are issued for powder, not liquid. Go down the formula aisle and make sure you know the difference between powder, concentrate, and ready-to-feed containers.
2. Check the check – read the check carefully. Only sell the number of cans, the size, the brand, and the type (powder, concentrate, ready-to-feed) printed on the check.
3. More than \$250, check again – if the check total is more than \$250, stop and check the check again. Look carefully at the full check description. The most costly error is selling powder when concentrate is printed on the check.

CASH, CREDIT, REFUNDS OR EXCHANGES

Unauthorized food items, non-food items, cash or credit, rain checks, or gift cards cannot be given in exchange for WIC checks. If a food item is unavailable or out of stock when a WIC customer is attempting to redeem a check, the following options are available:

- The WIC customer may choose to go to another store.
- The WIC customer may choose to return to the store once the item is back in stock.
- The WIC customer may choose to purchase the rest of the items on the check and forfeit the out-of-stock item.

Refunds should not be given for infant formula or food items purchased with WIC checks. Vendors should ask for a receipt to verify that the formula or food items were not purchased with WIC checks. Exchanges for unauthorized formula or food items are also not allowed.

Exchanges for identical formulas or food items are permitted when the original item is defective, spoiled or has exceeded its “sell by,” “best if used by,” or other date limiting the sale or use of the food item. An identical food item means the exact brand and size as the original authorized food item obtained and returned by the participant. If a WIC customer requests to exchange a food item or formula for any other reason, direct them to their local WIC clinic for a new check. An example is if a WIC customer requests to exchange infant formula for another brand, stating that the baby is allergic to the current brand.

WIC Cashier Quiz

TRUE or FALSE

- 1. The signature on the WIC check must match the WIC ID Folder Responsible Adult Signature or Authorized Signer line.
- 2. If a WIC customer attempts to violate WIC rules, a cashier should report it by using the Idaho WIC Program Complaint or Incident Report form.
- 3. WIC customers may redeem manufacturer coupons, in-store coupons, participate in the "Buy One Get One Free" specials, and use their store membership discount cards.
- 4. A WIC customer's driver's license may be used as WIC identification instead of the WIC ID Folder.
- 5. WIC customers may purchase less food than what is printed on the WIC check (for example, they may choose not to purchase the dry beans printed on the WIC check).
- 6. WIC checks can be presented to the cashier with the signature line pre-signed.
- 7. WIC customers may return infant formula or other WIC food items for a refund, no receipt required.
- 8. WIC customers should sign the WIC check only after the dollar amount has been written in the "Pay Exactly" box.
- 9. The WIC customer must buy everything listed on the WIC check.
- 10. Each WIC check should be treated as a separate transaction.
- 11. If the store is out of the exact type, brand, and size infant formula printed on the WIC check it is okay to substitute a different type, brand, and size.
- 12. It is okay to give WIC customers cash back if they did not spend the entire maximum amount printed on the cash value voucher. Example: The maximum price on the cash value voucher is \$8.00 the customer only spent \$7.25 you can give the WIC customer \$0.75 in change.
- 13. If the cashier knows the WIC customer, the cashier does not need to ask for the WIC ID Folder.
- 14. The cashier may use pencil when writing in the dollar amount on the WIC check. This makes it easier to correct a mistake.
- 15. The store can allow the WIC customer to substitute any non-WIC approved foods as long as it is comparable in price to a WIC approved food.
- 16. It is okay to redeem WIC checks before the "First Day to Use."

WIC Cashier Quiz Key

TRUE or FALSE

- T 1. The signatures must be a reasonable match.
- T 2. Speak with a manager about filling out a complaint form.
- T 3. WIC customers should be given the same opportunities to use coupons, discounts, and specials as any other customer.
- F 4. If the customer does not have the WIC ID Folder, the transaction cannot be completed. The WIC ID Folder is the only form of ID that can be used for a WIC transaction.
- T 5. The WIC customer can choose which items on the check they would like to purchase. They cannot get more than what is printed on the check.
- F 6. Do not accept pre-signed checks. The WIC customer must sign the check at the end of the transaction.
- F 7. WIC Customers cannot get refunds for a WIC transaction. They may exchange for the exact same type, brand, and size, if there is an issue with the product.
- T 8. The WIC customer should not sign the check until after the dollar amount has been written in the "Pay Exactly" box.
- F 9. The WIC customer may choose which items on the check they would like to purchase. They cannot get more than what is printed on the check.
- T 10. Each WIC check should be treated as a separate transaction.
- F 11. Substitutions are not allowed. If the store is out of the exact formula or item needed, the customer may choose to come back when the item is in stock or use the check at another store.
- F 12. Change should never be given for a WIC transaction. The check should be written for \$7.25.
- F 13. A WIC customer must have their WIC ID Folder for every WIC transaction.
- F 14. Please use only blue or black ink pen. Pencil cannot be read by the bank scanner and the check will be returned unpaid.
- F 15. Only WIC approved items can be sold in the type and quantity printed on the check.
- F 16. Checks that are redeemed before the "First Day to Use" will not be paid.

Bookkeeping Information

WIC VENDOR STAMP

Upon authorization, the Idaho WIC Program will provide each vendor with two vendor identification stamps. The vendor ID number is specific to the store and the current owner. The vendor must use a regular black ink pad and keep the stamp cleaned and in a secure location to prevent fraudulent use. The vendor ID number cannot be hand written on the check. If a vendor hand writes or completes a partially stamped vendor ID number, the WIC check will be rejected by the bank.

Replacement stamps may be requested by calling the State WIC Office at (208) 334-5948 or toll free at (866) 347-5484.

If the store closes or is disqualified from the WIC Program, the vendor stamps must be returned to the State Office within 15 calendar days.

DEPOSITING WIC CHECKS

Before depositing WIC checks, please complete the following:

- Review for valid start and end dates.
- Ensure the price is written clearly in the “Pay Exactly” box.
- If a cash value voucher is written for more than the amount printed on the check, put a single line through that amount and write in the maximum allowable amount instead.
**This is the only time that the “Pay Exactly” amount can be adjusted.*
- Make sure the check was signed. Unsigned checks will not be paid.
- Clearly stamp your vendor number in the “Pay to the Order of” box. Be sure to use sufficient ink and be careful not to smear or double stamp the image.

Deposit WIC checks within 60 calendar days of the “First Day to Use” date printed on the check.

AUTOMATIC CLEARING HOUSE (ACH) PAYMENTS

WIC checks returned for “Excessive Dollar Amount” or over-maximum will be paid automatically with an ACH payment. Checks rejected because the dollar amount written in the “Pay Exactly” box exceeds the maximum amount allowable for that check are saved as a batch and paid at the end of each week. This payment is a lump sum deposited directly in the vendor’s account as an ACH payment. The vendor will receive a detailed ACH statement. Checks returned for “Excessive Dollar Amount” do not need to be submitted to the State Office.

Bookkeeping Information

Excessive dollar amount checks may be caused by, but are not limited to:

- The vendor providing more food than what is printed on the check.
- Unauthorized food items being purchased.
- Dollar amounts being transposed or multiple WIC check transactions taking place.
- Illegible handwriting in the “Pay Exactly” box.

CHECK ERRORS

All cashiers must be retrained on returned checks to prevent future check error problems.

The State will not reimburse the vendor for WIC checks that have the following errors:

- Post dated – checks accepted before the “First Day to Use” date printed on the check.
- Stale dated – checks accepted after the “Last Day to Use” date printed on the check.
- Altered check – if any area of the check has been altered, correction fluid has been used anywhere on the check, or any printed information has been written over or crossed out.
- Missing signature – each check must be signed at the end of the transaction.
- Unauthorized vendor – if the vendor is not a WIC authorized store.

If a check is returned unpaid and it was not for any of the above reasons, the vendor may send the check to the State Office for a second level review.

WIC checks returned for “Missing Vendor Number” may be stamped and redeposited in the vendor’s bank. Do not send these returned checks to the State Office. The store will be paid faster by redepositing the WIC check.

Once the WIC customer has left the store, the vendor cannot contact the customer to have them sign a check missing a signature. Also, the vendor cannot seek full or partial payment or restitution from a WIC customer or through a collection agency if the WIC checks are not paid or are partially paid by the bank. This type of action is a violation of the Vendor Agreement.



Because of federal Check 21 regulations, banks have the option of sending a legal electronic copy of the WIC check called an Image Replacement Document (IRD) back to the vendor rather than the original document when returning a rejected WIC check. This legal copy is about 2/3 the original size (the bank can print the IRD on plain white paper or on yellow paper) and is to be used in the same manner as the original WIC check. This legal copy must be submitted to the State WIC Office for possible reimbursement. Do not cut the IRD or send photocopies of the legal IRD as they will be rejected by the State WIC Office.

Manager Information

CIVIL RIGHTS (DISCRIMINATION)

“In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W. Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provide and employer.”

The vendor shall comply with all applicable provisions of the Americans with Disabilities Act of 1990 and with the nondiscrimination provisions of Departmental regulations (Parts 15, 15a, and 15b of this title).

The vendor agrees to offer WIC participants, parents, or caretakers of infant or child participants and proxies the same respect, customer services, and courtesies offered to other customers.

PURCHASE OF INFANT FORMULA BY WIC VENDORS

The vendor must purchase infant formula from the list provided in Table 2 of the Idaho WIC Program Vendor Agreement. Vendors failing to purchase their infant formula from this list will be given a warning letter with 15 calendar days to comply with this regulation.

Documentation of where the vendor is purchasing their infant formula must be sent to the State WIC office upon initial authorization and at anytime there after if requested. This documentation must include an original or copy of a dated invoice with the vendor's name or parent company and a list of the infant formulas purchased. The vendor cannot self-declare this information. Noncompliance could result in termination of the Vendor Agreement.

FOOD INVENTORY AND STOCK REQUIREMENTS

The vendor must continuously stock and maintain the required minimum quantities of WIC foods according to the current Minimum Stock Requirements in Table 3 of the Agreement. Failure to maintain the required minimum stock of approved food items could result in termination of the Agreement and/or disqualification from the WIC Program.

The vendor may choose to use WIC shelf tags provided by the State or create their own with prior approval. The vendor is responsible for ensuring that the WIC shelf tags are properly placed to correctly identify food items listed on the current Idaho Authorized Food List. Shelf tags should be checked regularly.

Manager Information

The vendor is required to submit a completed WIC Price Survey within 30 calendar days of the State's request. Vendors are required to submit the WIC Price Survey at least twice a year or more frequently as determined by the State. Failure to do so will result in a sanction penalty for noncompliance.

The vendor's prices for WIC approved foods must be comparable to the prices charged by other stores within the vendor's peer group. Current prices must be clearly marked either on the product container or on the shelf. The State will provide the vendor with the Idaho Authorized Food List each time it is revised.

CLAIMS

In addition to claims collection, the vendor may be sanctioned for violations in accordance with the sanction schedule (see Appendix A, page 25). Sanctions may include administrative fines, disqualification, and civil money penalties in lieu of disqualification (see Appendix B, page 30).

The State will send written notification of a claim for transactions involving errors that affect payment to the vendor, including the total purchase price of non-approved food or non-food items. The vendor shall be given 30 calendar days from receiving the notice to make the payment. The State may authorize a longer repayment schedule. If a fair hearing is requested by the vendor, the time period for payment shall not begin until the date the hearing officer issues a decision.

The State reserves the right to offset a claim against current and subsequent amounts owed to a vendor if the vendor fails to pay a claim.

RECORD RETENTION

The vendor shall retain inventory records used for federal tax reporting purposes and records related to disputes, litigation, or settlement of claims arising out of the performance of the Vendor Agreement until such time as these matters have been finally resolved or four (4) years, whichever is longer. Upon request, the vendor must make available to representatives of the State, the U.S. Department of Agriculture, and the Comptroller General of the United States, at any reasonable time and place for inspection and audit, all WIC checks in the vendor's possession and all program-related records.

The vendor shall retain all invoices or receipts of infant formula and food sales for four (4) years and shall, at the vendor's own expense, provide a legible copy of all such records to the State Office. The original of all such records shall also be retained and available for inspection and audit when needed to verify the authenticity of a copy.

The vendor shall maintain, and make available upon request, a record of all store employees who received annual WIC training and the date(s) the training occurred. Training records shall be kept for four (4) years.

EXPIRATION OF THE VENDOR AGREEMENT

Neither the vendor nor the State are obligated to renew the Vendor Agreement at the time of expiration or termination. The expiration of this Agreement is not subject to appeal.

The State will provide at least 15 calendar days advance written notice of the expiration of the Vendor Agreement.

MORATORIUM ON NEW STORE AUTHORIZATIONS

The transition from paper WIC checks to electronic benefits transfer cards (eWIC) has been federally mandated for implementation by the year 2020. The Idaho WIC Program has not yet announced a timeline for implementing the transition to eWIC. During the transition, a moratorium on the authorization of new stores may be necessary. If a moratorium is imposed, vendors will be notified in advance.

CHANGE OF OWNERSHIP

The vendor must notify the State in writing within 60 calendar days of any change in vendor operations (closure, selling of the business, etc.) and/or ownership (whole or controlling interest), vendor name, address, or telephone number.

The State will terminate the Vendor Agreement if there is any change in vendor operations (closure, selling of the business, etc.) and/or ownership (whole or controlling interest) and location. (The State may permit vendors to move short distances without terminating the agreement.)

The new owner must re-apply and will be subject to the criteria and terms contained in the Agreement.

POSSIBLE ABOVE 50% VENDORS

Idaho WIC does not authorize vendors who derive or are likely to derive more than 50% of their annual food sales from the sale of foods obtained with WIC checks. Such "above 50% vendors" will only be authorized if the State determines that lack of authorization would result in participant access hardship.

INCENTIVE ITEMS

Vendors may not give incentive items exclusively to WIC customers. Incentive items include, but are not limited to: cash prizes, lottery tickets, transportation, or other free food or merchandise. Minimal customary courtesies of the retail food trade, such as bagging or loading food into the customer's vehicle are exceptions.

APPEALS

Vendors aggrieved by any adverse action by the State may request a fair hearing as provided in the Department's Rules Governing Contested Case Proceedings, IDAPA 16.05.03. The State will provide this document upon request and at the time of the adverse action. See the Vendor Agreement for further details.

WIC AND THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

The State will disqualify a vendor who has been disqualified from SNAP (formerly the Food Stamps Program). The disqualification shall be for the same length of time as the SNAP disqualification. The WIC disqualification may begin at a later date than the SNAP disqualification and is not subject to administrative or judicial review under the WIC Program.

The State may disqualify a vendor who has been assessed a civil money penalty for hardship in SNAP. The length of such disqualification shall correspond to the period for which the vendor would otherwise have been disqualified in SNAP.

The State will not accept voluntary withdrawal to avoid a civil money penalty or disqualification.

The State will notify the vendor in writing at least 21 calendar days prior to the effective disqualification date. A permanent disqualification due to conviction of trafficking or illegal sales is effective immediately upon notification.

Disqualification from the WIC Program may also result in disqualification as a vendor in SNAP. Such disqualification may not be subject to administrative or judicial review under SNAP.

Disqualified vendors forfeit their current authorization and must wait until the expiration of the disqualification period before becoming eligible to reapply during the next open enrollment period.

USING THE COMPLAINT OR INCIDENT REPORT

WIC customers are not permitted to cause a disturbance in your store, abuse store employees, or violate the procedures for redeeming WIC checks.

If a WIC customer becomes argumentative, uses abusive language, or verbally or physically threatens store employees, the store should follow their existing policy or procedures for removing the customer from the premises, including calling the police if necessary. An incident report should be filed so that the local agency or the State WIC Office can follow-up with the WIC customer.

The State WIC Office will provide copies of the Complaint or Incident Report form to each vendor during training. Additional copies can be requested from the State Office or printed from the vendor section of the Idaho WIC website at www.wic.dhw.idaho.gov. Submit the original copy to the State WIC Office and make a copy for the vendor file.

This form may be used to document other situations such as not separating WIC foods per WIC check or from non-WIC purchases, attempting to use WIC checks early (post dated) or after they have expired (stale dated). Please provide as many details about the incident as possible and include the following information found at the top of the WIC check.

Clinic number 401	Client number 1681284	WIC Participant's name PARTICIPANT, WIC	00024600
		STATE OF IDAHO Department of Health and Welfare Account: 804201 75-1248 919	Void If Vendor Does Not Have a Valid Idaho WIC Contract First Day To Use: 10-01-15 Last Day To Use: 10-31-15
For Purchase Of Authorized WIC Foods Only 8 DOLLARS FRESH FRUITS AND/OR FRESH VEGETABLES-SEE FOOD LIST NOT TO EXCEED \$8.00 NO CHANGE GIVEN		Pay Exactly \$	Pay To The Order Of: IDAHO WIC VENDOR NO.
SECURITY STATE BANK HOWARD LAKE MN 55349		Improper Use Of This Check is Subject to Federal and State Prosecution	VENDOR MUST DEPOSIT WITHIN 60 DAYS OF FIRST DAY TO USE DATE AUTHORIZED SIGNATURE (MUST BE SIGNED AT VENDOR COUNTER) SIGNATURE MUST MATCH SIGNATURE ON ID FOLDER
⑈00024600⑈ ⑆091912482⑆ 804201⑈			

Idaho Local WIC Clinics

Clinic No.	Location	Phone No.
101	Hayden	415-5130
104	Saint Maries	245-4556
107	Kellogg	786-7474
108	Sandpoint	263-5159
110	Bonnars Ferry	267-5558
111	Post Falls	415-5130
201	Lewiston	779-0390
202	Moscow	882-7353
203	Grangeville	983-2842
204	Orofino	476-7850
206	Kamiah	935-2124

Clinic No.	Location	Phone No.
301	Caldwell	455-5330
302	Payette	642-9321
303	Council (Weiser)	549-2370
304	Emmett	365-6371
306	Weiser	549-2370
308	Grand View (Caldwell)	455-5330
311	Homedale	337-4931
312	Teen Parent Program (Caldwell)	455-5330
315	Farmway Village (Caldwell)	455-5330
316	Wilder (Caldwell)	455-5330
401	Boise	327-7488
402	Mountain Home	587-4409
404	McCall	634-7194
405	Idaho City (Boise)	327-7488
406	Glenn's Ferry (Boise)	327-7488
408	Cascade (McCall)	634-7194
409	Horseshoe Bend (Boise)	327-7488
410	Garden Valley (Boise)	327-7488
415	Garden City Community Clinic	372-7478

Idaho Local WIC Clinics

Clinic No.	Location	Phone No.
501	Twin Falls	727-5923
502	Burley	678-8608
503	Shoshone (Jerome)	324-1323
505	Gooding	934-4477
506	Jerome	324-1323
507	Bellevue	788-4335
601	Pocatello	239-5263
602	Blackfoot	785-2160
604	Preston	852-0478
605	Montpelier	847-3000
606	Malad	766-4764
607	Soda Springs	547-4375
609	American Falls	226-5096
610	Aberdeen	397-3764
611	Arco	527-3463
614	Fort Hall	238-5448
615	Pocatello Mobile WIC	478-9297
701	Idaho Falls	522-3823

Clinic No.	Location	Phone No.
702	Rigby	745-0346
703	St. Anthony	624-7585
704	Driggs	354-2220
705	Rexburg	356-9594
706	Dubois	374-5216
707	Salmon	756-2123
708	Challis	879-2504
709	Terreton	663-4860
881	Lapwai (Nez Perce)	843-2271
882	Kamiah (Nez Perce)	935-0733
1101	Benewah Medical Center, Plummer	686-1931

If you still have questions call:

Telephone: (866) 347-5484

Telephone: (208) 334-5948

FAX Number: (208) 332-7362

Appendix A

Idaho WIC Program – Vendor Sanction Schedule

Authorized Vendors are monitored for potential compliance violations, fraud, and abuse committed by the Vendor, its owners, officers, managers, employees, or agents. Sanctions will be assessed from both Federal and State Violations in accordance with the Vendor Sanctions Schedule below. Monitoring activities include, but are not limited to, compliance buy investigations, routine monitoring, and inventory audits.

The Idaho WIC Program may initiate administrative action to disqualify, impose a civil monetary penalty in lieu of disqualification, or assess sanctions against a Vendor for noncompliance on the basis of one incident of a violation or a pattern of violations, as allowed by Federal regulations and denoted in the Sanctions Schedule below. An incident is defined as one isolated event in a single point in time or any single occurrence of a violation. A pattern is defined as two or more incidents of a violation. If, during the course of a single investigation, the State determines that a Vendor has committed multiple types of violations, the State will disqualify the Vendor for the length of time corresponding to the most serious violation. Disqualified Vendors will be considered as having forfeited their current authorization. A disqualified Vendor may be eligible to reapply for authorization during the next open enrollment period after serving the term of their disqualification.

When an investigation reveals an initial violation for which a pattern is required for sanction, the State will send the Vendor a warning letter and required corrective action before the investigation is continued. The State will not send a warning letter in cases where it determines notifying the Vendor will compromise an investigation. Warning letters will not be sent for the following Federal violations listed on this Sanctions Schedule: 2, 3, 8, 9, and 10, as a single incident of any of these violations will result in mandatory disqualification.

When a pattern of violations results in sanction, the State will send a certified letter stating the violation information, the administrative action taken, the effective date of the action, and if applicable, the process for requesting a fair hearing. Upon receipt of the certified letter, the Vendor must follow the instructions stated therein.

Prior to disqualifying a Vendor, the State agency will review each case to determine if disqualification would result in participant access hardship. If the State determines that participant access hardship would result, a civil money penalty will be imposed in lieu of disqualification.

A Vendor who has been disqualified from the Supplemental Nutrition Assistance Program (SNAP) will also be disqualified from WIC. The disqualification will be for the same length of time as the SNAP disqualification but may start at a later date. The State may also disqualify a Vendor that has been assessed a civil money penalty by SNAP. The length of such disqualification will be for the same amount of time the Vendor would otherwise have been disqualified from SNAP. A Vendor disqualified from the WIC Program may also be disqualified from SNAP. The disqualification will be for the same length of time as the WIC disqualification but may start at a later date. Such disqualifications are not subject to administrative or judicial review.

Appendix A

Idaho WIC Program – Vendor Sanction Schedule

The State may not accept a Vendor's voluntary withdrawal from the WIC Program as an alternative to disqualification for any of the Federal violations listed in this Sanctions Schedule. In addition, the State may not use non-renewal of the Agreement as an alternative to disqualification.

If a Vendor is assessed a second mandatory Federal sanction for violations 1 through 9 below, the second sanction will be doubled. Civil Money Penalties in lieu of disqualification for a second mandatory Federal sanction may be doubled up to the limits allowed in 7 CFR 3.91(b)(3)(v). The State must double the third and all subsequent mandatory Federal sanctions 1 through 9. The State may not impose civil money penalties in lieu of disqualification for third or subsequent sanctions for Federal violations 1 through 9. (See Appendix B: CMP Procedures; Federal Regulations 7 CFR 246.12)

Appendix A

Idaho WIC Program – Vendor Sanction Schedule

FEDERAL VIOLATIONS

Mandatory Federal Violations	Number of Incidents	Length of Disqualification
<p>1. Unauthorized Food Items: Pattern of providing unauthorized food items in exchange for food instruments (checks and/or cash value vouchers), including charging for supplemental food provided in excess of those listed on the food instrument. Example: Charging for 40 oz. of WIC-approved cereal when only 36 oz. is written on the check.</p>	3	1 year
<p>2. Sale of alcohol, alcoholic beverages or tobacco products: One incident of the sale of alcohol or alcoholic beverages or tobacco product in exchange for food instruments (checks and/ or cash value vouchers).</p>	1	3 years
<p>3. Claiming reimbursement in excess of documented inventory: A pattern of claiming reimbursement for the sale of an amount of a specific supplemental food item which exceeds the store’s documented inventory of that supplemental food item for a specific period of time.</p>	1	3 years
<p>4. Overcharging: A pattern of charging WIC participants more for authorized food items than non-WIC customers, charging participants more than the current shelf price, and/or charging for food items not received by the participant.</p>	3	3 years
<p>5. Outside of authorized channels: A pattern of receiving, transacting and/or redeeming food instruments (checks and/or cash value vouchers) outside of authorized channels, including the use of an unauthorized Vendor and/or an unauthorized person.</p>	3	3 years
<p>6. Supplemental foods not received: A pattern of charging for supplemental food not received by the participant.</p>	3	3 years

Appendix A

Idaho WIC Program – Vendor Sanction Schedule

Mandatory Federal Violations	Number of Incidents	Length of Disqualification
<p>7. Credit or non-food items: A pattern of providing credit or non-food items, other than alcohol, alcoholic beverages, tobacco products, cash, firearms, ammunition, explosives, or controlled substances in exchange for food instruments (checks and/or cash value vouchers).</p>	3	3 years
<p>8. Trafficking WIC food Instruments: One incident of buying or selling food instruments (WIC checks) for cash (trafficking), or one incident of selling firearms, ammunition, explosives, or controlled substances in exchange for food instruments (WIC checks).</p>	1	6 years
<p>9. Illegal Sales: One incident of selling firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802 in exchange for food instruments (checks and/or cash value vouchers).</p>	1	6 years
<p>10. Convicted of trafficking/illegal sales: The State must PERMANENTLY disqualify a Vendor convicted of trafficking WIC food instruments (checks and/or cash-value vouchers) or selling firearms, ammunition, explosives, or controlled substances [as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)] in exchange for food instruments (checks and/or cash value vouchers). A Vendor is not entitled to receive any compensation for revenues lost as a result of such violation. The State may impose a Civil Money Penalty in lieu of a disqualification for this violation when it determines, in its sole discretion, and documents, that a) disqualification of the Vendor would result in inadequate participant access, or b) the Vendor had at the time of the violation an effective policy and program in effect to prevent trafficking; and the ownership of the Vendor was not aware of, did not approve of and was not involved in the conduct of the violation.</p>	1	Permanent

Appendix A
Idaho WIC Program– Vendor Sanction Schedule

STATE VIOLATIONS

State Violations	Number of Incidents	Length of Disqualification
<p>1. Improper Check Cashing Procedure</p> <p>A. Acceptance of pre-signed WIC check or cash value voucher: The cashier accepted a pre-signed check or cash value voucher.</p> <p>B. Failure to check a WIC Identification (ID) Folder or verify signature on check or cash value voucher: The cashier failed to ask for the WIC ID Folder prior to beginning the WIC transaction, and/or did not verify the signature on the check or cash value voucher matches the signature on the WIC ID folder.</p> <p>C. Sales tax: The cashier added sales tax to the WIC check or cash value voucher.</p>	4	1 year
<p>2. Failed to provide requested forms/information: The Vendor failed to return forms or information requested by the State WIC Office. This includes Price Surveys, training documentation, or any other documents requested by the State WIC Office.</p>	4	1 year
<p>3. Inadequate stock: The Vendor failed to continuously stock and maintain the mandatory minimum variety and inventory requirements of WIC-approved foods.</p>	3	1 year
<p>4. Altered a food instrument or cash value voucher: The cashier or store personnel changed dates or added signatures.</p>	3	1 year

Appendix B

Idaho WIC Program – Civil Money Penalty Procedure

IMPOSING A CIVIL MONEY PENALTY

A civil money penalty may be imposed in lieu of disqualification only in cases where the State determines disqualifying the Vendor would result in inadequate participant access. See Participant Access Hardship below.

If a Vendor is imposed a second civil money penalty for Federal violations 1 through 9, the penalty amount will be doubled up to the limits noted below and specified in Federal Regulations 7 CFR 3.91.

Regardless of participant hardship, the State agency may not impose a civil money penalty in lieu of disqualification for third or subsequent sanctions for Federal violations 1 through 9

Procedure for Notifying the Vendor

If a civil money penalty is to be imposed, the State agency will send the Vendor written notification of:

- a) The cause(s) for the disqualification resulting in civil money penalty
- b) The effective date of the action.
- c) The amount of the alternative civil money penalty.
- d) The method of payment of the civil money penalty available to the Vendor.
- e) The Vendor's right to appeal.
- f) The procedures to be followed to file for an appeal.

The State agency will schedule a meeting to review the terms of the civil money penalty and advise the Vendor of the following:

- a) All non-compliance issues, not just those that brought about the disqualification
- b) Acceptance/payment of the civil money penalty does not relieve the Vendor of its obligation to stay in compliance with the Agreement they signed with the State agency or protect the Vendor from further sanctions in case of non-compliance. The Vendor must resolve to correct any and all violations identified.
- c) The Vendor has fifteen (15) calendar days after the meeting to accept, in writing, the alternative civil money penalty in lieu of disqualification.
- d) The civil money penalty settlement does not prohibit further WIC investigations.

Appendix B Idaho WIC Program – Civil Money Penalty Procedure

Procedure for Calculating Money Payment

All civil money penalties issued by the State agency will be calculated using a standard formula. However, the penalty shall not exceed \$11,000 per violation or \$49,000 per single investigation, even if the formula indicates a higher penalty is warranted. The formula is as follows:

Step 1:	Determine the Vendor's average monthly redemptions for at least the six (6) month period ending with the month immediately preceding the month during which the notice of administrative action is dated. (Unusual circumstances may warrant a modification of the formula, e.g., vendor on the program for only three (3) months, etc.).
Step 2:	Multiply the average monthly redemptions figure by 10% (.10).
Step 3:	Multiply the product from Step 2 by the number of months the Vendor would have been disqualified.

Example:

The Vendor is notified of a one-year disqualification starting October 2015.

A civil money penalty in lieu of disqualification would be calculated as follows:

Monthly redemption for at least the six (6) month period ending with the month immediately preceding the month during which the notice of administrative action is dated:

September	\$ 4,650
August	4,075
July	5,120
June	5,580
May	4,890
April	<u>4,990</u>

Step 1 = TOTAL \$ 29,305/6 = \$4,884.17 monthly average

Step 2 = \$ 4,884.17 x 10% = \$488.42

Step 3 = \$ 488.42 x 12 months = \$5,861.04

If the calculation results in an amount greater than \$11,000, the State agency will impose the maximum amount of \$11,000 for each violation up to \$49,000 per single investigation. A single investigation could result in several violations.

Appendix B

Idaho WIC Program – Civil Money Penalty Procedure

Procedure for Payment of Civil Money Penalties

The payment of the civil money penalty must be made by one of the following methods as determined by the State agency. All payments (either lump sum or installment) must be made by certified check or money order payable to the Idaho Department of Health & Welfare WIC Program and must include the Vendor's name and WIC Vendor number. Payments must be sent by certified mail to:

Department of Health & Welfare
Idaho WIC Program
450 West State Street, 1ST Floor
P.O. Box 83720
Boise, ID 83720-0036

- a) A lump sum payment of the civil money penalty must be received on or before the date the disqualification is to be effective, or
- b) Installment payments of equal amounts, the total number of which cannot exceed one half the numbers of months of the disqualification, must be paid with interest authorized by State law.

The first installment must be received by the State agency on or before the date the disqualification was to be effective. The subsequent payments must be received on the first day of the month for all subsequent months until final payment is received. If a Vendor does not pay, only partially pays, or fails to timely pay a civil money penalty assessed in lieu of disqualification (either a lump sum or installment payment), the State will disqualify the Vendor for the length of the disqualification corresponding to the violation for which the civil money penalty was assessed (for a period corresponding to the most serious violation in cases where a mandatory sanction included the imposition of multiple CMPs as a result of a single investigation).

If a Vendor fails to make any scheduled installment payment by the due date, they must pay the entire balance of the civil money penalty within twenty (20) calendar days in order to avoid being disqualified for the length of the disqualification which would have been imposed; the State agency will provide this notification to the Vendor, in writing, after a payment has been missed.

ASSESSING PARTICIPANT ACCESS HARDSHIP

Participant access hardship will be the determining factor in assessing a civil money penalty. Participant access is not a legitimate or acceptable issue for a Vendor to raise when appealing a State agency disqualification.

To be considered participant access hardship rather than just participant inconvenience, one of the following conditions must be indicated:

1. Ten (10) or more WIC participants would be required to travel to an authorized vendor in another geographic area (defined below) in order to receive their supplemental WIC foods.
2. Geographical barriers or conditions which would make normal travel to another authorized WIC vendor impossible (for example, an unabridged river, an expressway or airport with limited access for crossing, or frequent road closure due to inclement weather).
3. The participant has a physical handicap that cannot be accommodated by alternative vendors, (for example, the vendor in question has a wheelchair ramp while other vendors in the area are not so equipped and a wheelchair-bound participant regularly shops at that vendor). For this condition to apply, the handicapped participant must have done more than half of her/his WIC shopping in the previous six (6) months at the vendor's location.

DEFINING GEOGRAPHIC AREAS

For the purpose of assessing participant access, a geographic area is defined as a travel distance in excess of fifteen (15) miles in a rural area from the local agency clinic or the participant's residence or ten (10) blocks in an urban area to reach an authorized vendor.

Urban Area – territory, population, and housing units in an area which has a population density of at least 1,000 people per square mile and surrounding blocks with an overall density of at least 500 people per square mile.

Rural Area – territory, population, and housing units located outside the urban areas.