IX. FOOD DELIVERY/FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL

Food delivery/food instrument accountability and control involves the production, issuance and monitoring of automated and manual food instruments through retail systems and the delivery of WIC Program foods by non-retail methods i.e., home delivery and direct distribution.

(Retail)

- A. Food Delivery and Food Instrument Control Overview 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), and (a)(14)(xii): describe the policies and procedures used in producing, monitoring and accounting for the production of food instruments.
- **B.** Food Instrument Pick-up and Transaction 246.4(a)(11)(iii) and (a)(14)(vi): describe the State agency's procedures for issuing food instruments to participants, including procedures for verification, prorating food packages, training and proxy policies.
- C. Food Instrument Disposition 246.4(a)(14)(vi): describe the procedures used to reconcile food instruments as either issued or voided, and as either redeemed or unredeemed, and redeemed food instruments as either validly issued, lost or stolen, expired, duplicate, or not matching issuance records.
- D. Manual Food Instruments 246.4(a)(6), (a)(11)(iii), (a)(14)(i), (a)(14)(vi) and (a)(14)(ix): describe the procedures for issuing and accounting for manual food instruments, including the procedures for documentation and disposition.
- E. Special Food Instrument Issuance Accommodations 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), and (a)(21): describe alternatives to participant food instrument pick-up for issuance (e.g., mail or electronic issuance) and how integrity of program services and fiscal accountability are ensured.

(Non-Retail)

- F. Home Food Delivery Systems 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), (a)(14)(vii) and (a)(14)(xii): describe how the State agency's home delivery system operates including the types of authorized home food delivery contractors, the frequency of deliveries, and the procedures for documenting deliveries.
- G. Direct Distribution Food Delivery Systems 246.4(a)(11)(iii), (a)(14)(i), and (a)(14)(vi), (a)(14)(vii), and (a)(14)(xii): describe the methodology and procedures used in the direct distribution of supplemental foods, including types of foods distributed, warehouse and distribution centers, and the verification process.

	FOOD DELIVERY/FOOD INSTRUMENT AC Food Delivery and Food Instrument Control Ov	
1.	Food Instruments/General	
a.	The State agency uses the following types of fo	ood instruments (check all that apply):
	 □ Automated - point of certification □ Manual - individual prescription □ Pre-printed manual - standard prescription 	☐ Automated -central generation☐ EBT☐ Other (specify):
b	The State agency conducts food instrument in or L=[Local agency] under the appropriate coresponsibility):	•
	Automated Daily L Weekly Monthly Yearly Other (specify):	Manual Daily Weekly Monthly Yearly Other (specify):
c.	The automated food instrument contains/allow (check all that apply):	vs for the following information
	 Not applicable ✓ Participant WIC ID number ✓ Countersignature for participant/proxy 	☑ Local agency identifier☑ Vendor endorsement
	Provide a facsimile or FI in Appendix or cite I WIC Information Network (WIN) Reference I Sample food instrument may be found in the S	Manual Quick Guide for Clinics.
d.	The State agency provides a toll-free number participant/vendor inquiries:	on the food instrument for
	☐ Yes	
print groce manu	ITIONAL DETAIL: Food Delivery Appendix Ted on their food voucher folder envelope and their toll-free number is printed on the Manager, Cals. Or Procedure Manual (citation):	e tyvek sleeve for their EBT card. The
2.	Food Instrument Accountability	
a.	Food instruments are delivered to local agenci	es by:

IX. A.	FOOD DELIVERY/FOOD INSTRUMENT Food Delivery and FI Control Overview	ACCOUNTABILITY AND CONTROL
	 State agency staff US Postal Service Contracted service (i.e., UPS, Purolator, of Other (specify): 	Local agency staff On-demand printing etc.)
b.	Food instruments (blank stock and prepri are delivered to the local agency (check all	•
	Blank ☐ Not applicable ☐ Weekly ☐ Twice a month ☐ Once a month ☐ Once every two months ☐ Other (specify):	Preprinted Not applicable Weekly Twice a month Once a month Once every two months Other (specify):
c.	The State agency uses the following proced not fraudulently using unclaimed food ins	_ ,
	☐ Signatures on the documentation of food similarities in writing style implying one ☐ Local agencies conduct an initial review for participants known to have been term ☐ Local agency staff responsible for issuing the food instrument inventory by themsel ☐ Other (specify):	person signed for multiple participants of food instruments to void food instruments inated from the Program voiding food instruments do not conduct
	OITIONAL DETAIL: Food Delivery Append for Procedure Manual (citation): Policies FD:	
3.	The State agency has established food deli disaster and emergencies for the following	• •
	☐ Issuing manual food instruments ☐ Mailing food instruments ☐ Direct distribution	☐ Issuing automated food instruments ☐ Home food delivery ☐ Other (specify):
ADI	DITIONAL DETAIL: Food Delivery Append	ix

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): Policy FD: 10.0 - Mailing Food Instruments

IX. FOOD DELIVERY/FOOD INSTRUMENT ACCOUNTABILITY AND CONTROL B. **Food Instrument Pick-up** Food Instrument Pick-Up Policy and Procedures 1. Food instruments are issued by (check all that apply): a. All Locals **Most Locals Some Locals** Local agency director Local agency nutritionist Local agency paraprofessional Clerical staff Other (specify): The State agency utilizes a participant identification card: b. X Yes Yes, with photo No If yes, issuance is controlled numerically and each card is accounted for: X Yes No The State agency requires the following proof of receipt when issuing automated c. food instruments: Participant/parent/caretaker/proxy signature block on food instrument register Carbon copy of food instrument Local agency staff initials Date of food instrument pick-up Stub with participant signature or initials Other (specify): Recipients sign each voucher acknowledging receipt. This signature is visible on the carbon copy. With EBT, the recipients sign the EBT shopping list generated at the clinic acknowledging benefits have been loaded to the card. d. The State agency has a policy to prorate food packages for the following: Certification due to expire within 30 days Late food instrument pick-up Mid-month certification Other (specify): EBT system prorates food packages.

e. The State agency requires local agency staff to provide each new participant/parent/caretaker/proxy with training in (check all that apply):

X Authorized vendors	Selecting WIC-approved foods
☐ FI transaction procedures	Signature on FIs
Use of proxy	Reporting problems/requesting assistance
Other (specify):	

f.	The State agency requires local agency staff to provide participants with a list of authorized vendors:
	☐ Yes No
g.	The State agency permits a participant to transact food instruments with any authorized vendor in the State agency:
	⊠ Yes □ No
	If "no," the State agency will eliminate its vendor-specific system on (date):
	ITIONAL DETAIL: Food Delivery Appendix or Procedure Manual (citation):
2.	The State agency's proxy policy includes the following:
	Limits the number of participants a single proxy may sign for, except that a proxy may pick up food instruments for all homeless WIC participants in a facility Limits proxy to a specified number of food instrument pick-ups Limits proxy to a minimum age Limits proxy assignment to local WIC staff Other (specify): single issuance only; written note from participant/parent/caretaker is required each time; identification
and/o	ITIONAL DETAIL: Food Delivery Appendix or Procedure Manual (citation): Policy FD: 03.0 - Designated Recipients of Food utments

IX. FOOD DELIVERY/FOOD INSTRUMENT ACCOUNTABILITY AND CONTROL

B. Food Instrument Pick-up

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C.	Food Instrument Redemption	Disposition	1	
1.	Food Instrument Disposition	Procedure	es	
a.	The State agency system assu	ures 100%	disposition of all issu	ued food instruments
	⊠ Yes □ No			
	If no, specify the circumstan	ces that pro	event 100% disposit	ion:
b.	The State agency monitors e	ach local a	gency's:	
	 Number of manual food in Number of unclaimed food Number of voided food ins Number of redeemed food 	l instrument struments	S	ord
c.	Local agencies are supplied instruments:	with a repo	rt on the final dispo	sition of its food
	Yes (specify period):		⊠ No	
	DITIONAL DETAIL: Food Deli d/or Procedure Manual (citation)		ndix	
2.	Unclaimed, Voided, Prorated	d Food Inst	ruments	
a.	The State agency requires lo instruments:	cal agencie	s to return ''unclain	ned/not picked up'' food
	Not applicable☐ Other (specify):	Daily	Weekly	Monthly
b.	The State agency requires lo	cal agencie	s to return "voided"	' food instruments:
	☑ Not applicable☑ Other (specify): Voided El	Daily BT cards are	Weekly e returned to the State	Monthly
	DITIONAL DETAIL: Food Deli d/or Procedure Manual (citation)			of "Voided" and

"Destroyed" Food Instruments

IX. C.	FOOD DELIVERY Food Instrument Redemption/Disposition
3.	Lost/Stolen Food Instruments
a.	The State agency requires local agencies to report lost/stolen food instruments to (check all that apply):
	
b.	Replacement/duplicate food instruments are issued when food instruments are reported <u>lost</u> :
	□ No □ Depends on the circumstances □ Yes (If food instruments are reissued, it is done): □ Immediately □ Following notification of State agency/bank agency □ After day waiting period (specify number of days)
c.	Replacement/duplicate food instruments are issued when they are reported stolen:
	 No Depends on the circumstances Yes (If food instruments are reissued, it is done): ☐ Immediately ☐ Following notification of State agency/bank agency ☐ After day waiting period (specify # days)
d.	The State agency or its banking institution takes the following action after it is notified by the local agency of lost/stolen food instruments (check all that apply):
	Stops payment on the lost/stolen food instruments Notifies vendor Other (specify): Lost or stolen food instruments are not routinely replaced except er special circumstances such as house fire. EBT cards reported lost/stolen are replaced after working days after the card was reported lost/stolen to the State.
	Please provide a copy/citation for State agency's policy procedures that ensure that lost/stolen food instruments cannot be redeemed.Policy FD:07.0: Action to be Taker When issued Instruments are Reported Lost/Stolen by Participant
e.	The local agency documents in the participant's file that replacement food instruments were issued:
	⊠ Yes □ No

IX. FOOD DELIVERYC. Food Instrument Redemption/Disposition

f.	The State ag agency:	ency monitor	s the level of	reported lost/stolen food instruments by local
	X Yes		Ю	
g.				instruments are transacted by the participant owing actions are taken:
invest	Participar Participar Other (spe	nt is disqualifient receives a w	arning	to participant er to the Office of Inspector General to
h.		food instrum g actions are t		sacted by someone other than the participant,
	State ager	•	ency does an i	investigation s enough information, investigators might be
	ITIONAL DE' or Procedure N			endix
4.	Food Instru	ment Redemp	otion Screenin	ag (7 CFR 246.12(k)(1))
a.	_	•		ents through a pre-edit (before payment) or tect the following:
	Not Applicable	Pre-Edit Screen	Post-Edit Screen	
				Purchase price exceeds price limitations Purchase price missing Altered purchase price Vendor identification missing Invalid/counterfeit vendor identification Transacted before specified period Transacted after specified period Redeemed after specified period Altered dates

IX. C.	FOOD DELI Food Instrun		ion/Disposition		
				Missing signature Mismatched signature Altered signature Other (specify): Redeemed prio	or to specified
b.	Where pre- include:	edit screens a	re used, the pro	portion of food instruments re	viewed
		instruments	☐ Pe	rcentage of food instruments (%)
c.		stem(s) that so ments based o		mitations and vendor overcha	rges reject
	Pre-edit	Post-edit			
			Percentage al	ed or Maximum Prices bove average (%) re average (\$) ry):	
d.	The followi	_	used to control	against unauthorized stores re	edeeming
	☐ Conduct☐ ☐ State age submitted food ins	compliance by ency or its ban ed for redempti truments subm Il participants	y to verify if unking institution of on against the autited for redempt	no longer authorized authorized store redeems food in hecks vendor ID numbers on foo thorized vendor list before paying ion he unauthorized store	od instruments
			Delivery Appen ion): Policy WV		
5.	Price Lists				
a.	Price list in	formation is 1	outinely collect	ed from vendors:	
	Yes		No (go to questic	n 6)	
b.	Price list da	nta are collect	ed:		
	Monthly				

IX. C.	FOOD DELIVERY Food Instrument Redemption/Disposition
	☐ Quarterly ☐ Semiannually ☐ Annually ☐ Other (specify):
c.	Price data are collected by:
	☐ State agency staff ☐ Local agency staff ☐ Reports are submitted by vendors ☐ Other (specify):
d.	The data collected has food prices for:
	☐ All brands and sizes of supplemental foods ☐ Highest price supplemental food items within food categories ☐ Other (specify):
e.	The \square State agency/ \square local agency verifies price data provided by vendors:
	 □ During routine monitoring visits □ Does not verify on a routine basis □ If the vendor is identified as a high-risk vendor □ Other (explain):
f.	The State agency/ local agency analyzes price data:
	 ☐ Manually on a routine or as needed basis ☐ On an ADP system and uses it to: ☐ Generate estimated food instrument values ☐ Help inform WIC staff on vendor selection decisions ☐ Develop vendor peer groups ☐ Flag individual food instruments that appear to be overcharges ☐ Other (specify):
6.	System to Detect Suspected Overcharges
a.	Does the State agency screen for suspected overcharges:
	Yes, vendor claims are issued for overcharges. No, the State agency makes price adjustments to food instruments submitted for redemption at amounts above edit limits No Other (specify): The State Agency reduces overpriced food instruments submitted to
	Other (specify): The State Agency reduces overpriced food instruments submitted to the food item maximum price printed on the food instrument for that food item

C. Food Instrument Redemption/Disposition

b.	The following best describes how the vendor is billed for overcharges:
	 ☐ Based on the vendor's reported prices ☐ Based on redemption values of other vendors in the vendor's peer group
	☐ Based on redemption values of all vendors ☐ Other (specify):
с.	To receive payment or appeal a claim for a vendor overcharge, the vendor must:
	☐ Provide an updated price list ☐ Provide written justification for the higher prices ☐ Provide receipts ☐ Other (apocify); submit a written request
d.	✓ Other (specify): submit a written request.The following actions are taken when a vendor has chronic overcharging problems:
	 □ Routine monitoring or remedial vendor training is conducted □ Vendor is designated as high-risk and scheduled for compliance investigation □ Vendor is provided with a written warning of potential sanction for overcharging □ Vendor is terminated for cause □ Vendor is sanctioned □ Other (specify):

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): Policy WV: 01.0

D. Manual Food Instruments

\boxtimes	DOES NOT APPLY (PROCEED TO NEXT SECTION)
1.	Manual Food Instrument Policy
a.	Manual food instruments are utilized for the following reasons:
	New participants Automated food instruments not available Mutilated automated food instruments Wrong food package on automated food instrument Provide for the special needs of the homeless Food package tailoring Routine monitoring visits (i.e., educational buys) of vendors Compliance buys of vendors Special conditions, e.g., disasters Other (specify):
b.	The State agency requires the following for completing the manual food instrument register:
	☐ Participant/proxy signature ☐ Local agency staff initials ☐ Date of food instrument pick-up ☐ other (specify):
c.	Manual food instruments have a "Not to Exceed Value" of:
	☐ Same dollar amount for all manual food instruments \$ ☐ Variable dollar amount depending on type of prescription on manual FI ☐ No limit ☐ Other (specify):
	ITIONAL DETAIL: Food Delivery Appendix or Procedure Manual (citation):
2.	Manual Food Instrument Documentation and Disposition
a.	A report containing the serial numbers of manual food instrument issued by local agencies is sent to the State agency:
	☐ Not applicable ☐ Weekly ☐ Monthly ☐ Other (specify):

IX. D.	FOOD DELIVERY Manual Food Instruments
b.	Local agencies are required to provide documentation to substantiate a valid or invalid certification record for manual food instruments issued and redeemed but for which no participant record currently exists by utilizing:
	☐ Turnaround documents to establish valid certification records ☐ Telephone calls to the State/local agency on irregularities ☐ Other (specify):
c.	If the manual food instrument inventories do not achieve 100% reconciliation of all issued and unissued food instruments, the local agency (check all that apply):
	Reports the food instrument serial numbers to the State agency Provides the food instrument serial numbers to local vendors Other (specify):
	(Provide a copy/citation of the State agency's prescribed procedures if the manual food instrument inventory cannot be reconciled).
	OITIONAL DETAIL: Food Delivery Appendix or Procedure Manual (citation):

- **E.** Special Food Instrument Issuance Accommodations
- 1. Alternative Food Instrument Issuance

a.	The State agency has implemented the following food instrument issuance policy (check all that apply):				
	except in unusual Participants/proxic Food instruments is scheduled for n where Food Stam high mail issuance Benefits are provi	es are required to show identification at food instrument pick up are routinely mailed to participants except (1) when the participant attrition education or a certification appointment and (2) in areas are not mailed, as these areas are known to have experienced			
2.	Mailing Policy/Procedures				
a.		nts are mailed to participants, State agency provides local nes/procedures for mailing food instruments to individual			
	⊠ Yes	□ No			
b.	•	cipants to pick up food instruments whenever certification or nutrition education is scheduled:			
	X Yes	□ No			
c.	The State agency ha instruments (check a	s implemented the following policy regarding mailing food ll that apply):			
	Food instruments Food instruments Food instruments Return receipt is r	are sent first class mail *(first class is considered <i>regular</i> mail) are sent registered mail are sent certified mail are sent restricted mail equested on food instruments sent certified mail s, "Do not forward, return to sender" or "Do not forward, address ed"			

E. Special Food Instrument Issuance Accommodations

d.	The State agency approves mailing food instruments under the following conditions (check all that apply):				
	(check an that apply).	State-	LA w	ith	Case by
		Wide	SA A	pproval	Case
	Participant hardship Travel-related issues Better clinic management Participant safety Participant convenience Cost effectiveness Other (if other, specify):Local agency can of	decide ba	ased on state and including: audiness; imminespecial health weather; client at satellite cli	agency allowat tomation systement childbirth; care needs; inc nt unable to kee nic is open on	ole reasons in failure; client family with clement ep appointment by at certain
e.	When mailing food instruments, de	j	mmune syste		
	☐ Signed by the participant at the form Noted "mailed" and initialed/date ☐ Signed and dated by local agency ☐ Other (specify):	ed by loc	al agency stat	ff	it
	FIONAL DETAIL: Food Delivery A Procedure Manual (citation): Police			g Food Instrun	nents
3.	Participants who receive food instr	ruments	by mail are	sent:	
	One month of food instruments Three months of food instrument	S	Two mon	ths of food inst ecify):	ruments
	FIONAL DETAIL: Food Delivery Procedure Manual (citation):	Append	ix		

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IX. F.	FOOD DELIVERY Home Food Delivery Systems
	DOES NOT APPLY (PROCEED TO NEXT SECTION)
1.	Home Food Delivery Systems Overview
a.	Home delivery vendors include (check all that apply):
	Dairies Private delivery service doing WIC business only Private delivery service Other (specify):
b.	Participants who receive home food delivery:
	 ☐ Are notified in writing of the types and quantities of foods ☐ Are issued food instruments that they sign and provide to the vendor when the food i delivered ☐ Indicate by authorized signature on a FI, receipt or signature document, the supplemental foods received ☐ Other (specify):
c.	Supplemental foods may be delivered:
	Only to the participant of record To the participant of record or proxy of record To any adult at home during time of delivery To anyone at home at the time of delivery Other (specify):
	DITIONAL DETAIL: Food Delivery Appendix l/or Procedure Manual (citation):
2.	Documentation
a.	The forms verifying delivery are reconciled against vendor invoices:
	 ☐ Weekly ☐ Monthly reconciliation of the signed FI or other signed receipts or signature documents from participant or proxies. ☐ Other (specify):
b.	Signatures of participants, who sign the food receipt document/food instruments, are compared to the signature on file.
	☐ No ☐ Yes, sample ☐ Yes, 100%

FOOD DELIVERY

Home Delivery

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

IX. G.	FOOD DELIVERY Direct Distribution				
	DOES NOT APPLY (PROCEED TO NEXT SECTION)				
1.	Direct Distribution Food Delivery - General				
a.	The State agency uses a direct distribution food delivery system to:				
	☐ Distribute all of its WIC Program foods ☐ Distribute only exempt infant formula and/or medical foods ☐ Distribute (specify):				
b.	The State agency uses:				
	 □ Warehouse not used □ One central warehouse, deliveries directly to local agencies □ One central warehouse from which foods are sent to one or more subsidiary warehouses before delivery to local agencies □ Other (specify): 				
c.	Warehouses are operated by:				
	☐ State agency ☐ Other state or public agency ☐ Other (specify): ☐ Local agency ☐ Under contract with a private business				
d.	Warehouses used for storage of WIC foods are also used to store other FNS program commodities:				
	☐ Yes ☐ No				
	DITIONAL DETAIL: Food Delivery Appendix /or Procedure Manual (citation):				
2.	Food Distribution				
a.	Foods are distributed to participants:				
	☐ Grocery store fashion ☐ Pre-packaged ☐ Other (specify):				
b.	Participants receiving food are required to sign:				
	☐ A register once for all foods received ☐ A register/form for each food item received ☐ Other (specify):				
c.	Foods are distributed to participants:				

IX. G.	FOOD DELIVERY Direct Distribution					
	☐ Monthly ☐ Other (specify):					
d.	Participants with limited access to facilities used for distribution have					
	available to them:			Services provided by:		
	Home delivery Cost-free transportat Other (if other, specify): DITIONAL DETAIL: I	Food Delivery	Appendix	Local Agend	Other Sources	
3.	Warehouse Insuran	nce and Inspec	tors			
a.	Insurance for the w	arehouse cove	rs (check all th	at appl	y):	
	☐ Theft ☐ Other (specify):	Fire	☐ Infestation	l	Spoilage	
b.	Warehouses are ins	pected by a pu	blic authority	respon	sible for enforcing:	
	 Fire safety laws and regulations (specify date and grade of last inspection): Sanitation laws and regulations (specify date and grade of last inspection): Other (specify): 					
ADI	DITIONAL DETAIL: 1	Food Delivery	Appendix:			

and/or Procedure Manual (citation):