

Renewal Training for Currently Authorized WIC Program Vendors 2025



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Training Overview and Goals

- · Review how to maintain vendor status
 - ✓ Selection criteria
 - ✓ Competitive pricing and limits
- WIC Approved Foods List
- Minimum Variety and Inventory
- Transactions
- eWIC procedures
- Preventing Fraud and Program Compliance
 - Monitoring, Inventory Audits, Violations & Sanctions, Claims, Handling Customer Service Issues
- · Completing required forms

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What is WIC?

- * The Special Supplemental Nutrition Program for $\boldsymbol{W}omen$, Infants and Children
- Federally funded by the United States Department of Agriculture (USDA)
- State-administered by the NC Department of Health and Human Services
- WIC clinical services provided by contracted public health agencies
- NC WIC-authorized vendors are contracted with the NC Department of Health and Human Services and Local WIC Agencies

What is eWIC?

- eWIC is the term used for EBT (Electronic Benefit Transfer) by the North Carolina WIC Program
- EBT is a method that permits access to WIC food benefits using a plastic card

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- In NC, every WIC dollar spent on a pregnant woman saves multiple dollars in newborn health care costs
- Children on WIC have better diets; particularly for vitamin C, thiamin, protein, niacin and vitamin B₆



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Maintaining Vendor Status

- Meet all current selection criteria
- Follow all Program policies
- Meet competitive pricing and price limits
- · Attend annual vendor training
- Train all staff to properly transact eWIC benefits
- Complete vendor-related forms
 - ✓ NC WIC Vendor Information Update
 - $\checkmark \, \mathsf{eWIC} \, \mathsf{Update} \, \mathsf{for} \, \mathsf{Non\text{-}Corporate} \, \mathsf{Vendors}$
 - ✓ Verification of Attendance

Selection Criteria

• Established by U.S. Department of Agriculture and NC WIC Program

✓20 items

• Listed in the Vendor Manual

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 NC Peer Group System							
	VENDOR PEER GROUPS						
# STORE TYPE LOCATION DESCRIPTION							
5	Pharmacy	Statewide	Free-standing pharmacy that sells a limited variety of foods				
6	Convenience Store	Statewide	Retailer with a limited assortment of grocery items				
7	Mass Merchandiser and Commissary	Statewide	Retailer that sells a wide variety of merchandise but also carries groceries and has store locations in most or all states Grocery store operated by US Defense Commissary on a military base				
8	Independent Grocery	Urban	Retailer that primarily sells groceries with fewer than 11 store locations				
9	Independent Grocery	Non-urban	Retailer that primarily sells groceries with fewer than 11 store locations				
10	Regional Grocery Chain	Urban	Retailer that primarily sells groceries with at least 11 store locations and operates in 2 or more states				
11	Regional Grocery Chain	Non-urban	Retailer that primarily sells groceries with at least 11 store locations and operates in 2 or more states				

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Competitive Pricing and Price Limitations

- Peer group structure
 - Peer groups have NTEs for WIC supplemental foods and contract formula
 - ✓ No longer published by the State WIC Agency



Minimum Redemption

- Except for Free-standing pharmacies, a vendor must redeem at least \$2,000 annually in WIC supplemental food sales
 - ✓ If not, the Vendor Agreement will be terminated
 - √The store must wait 180 days to reapply

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Purchasing and Providing Infant Formula from a State-approved Source

- Vendors must purchase all infant formula, exempt infant formula and WIC-eligible nutritionals only from the sources on the State WIC Agency's list of approved sources
- Vendors must provide only such infant formula, exempt infant formula and WIC-eligible nutritionals to WIC customers
- Authorized vendors will have their WIC Vendor Agreement terminated for failure to comply with this requirement
- A list of State-approved sources can be obtained from your Local WIC Agency or found at https://www.ncdhhs.gov/wicvendorsconnection

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Not-to-Exceed (NTE) Prices

- NTEs are set at 2 standard deviations above the average price for supplemental foods within a vendor peer group.
 - ✓ Calculated for each UPC for each WIC supplemental food
 - \checkmark Based on redemption of all vendors in the peer group
 - \checkmark Obtained from the eWIC system
 - Different NTEs for different sizes of the same food even if it is the same brand
- Foods and Contract Formula



NTEs vs. Current Shelf Price

- Vendors **must** charge current shelf price
- Vendors **DO NOT** have to charge the NTE
- Charges for WIC transactions must be less than or equal to charges to regular customers
- Vendors cannot set their prices at the NTE and charge other customers less
 - This is a federal violation for which a vendor can be disqualified

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WIC Approved Foods With No NTE

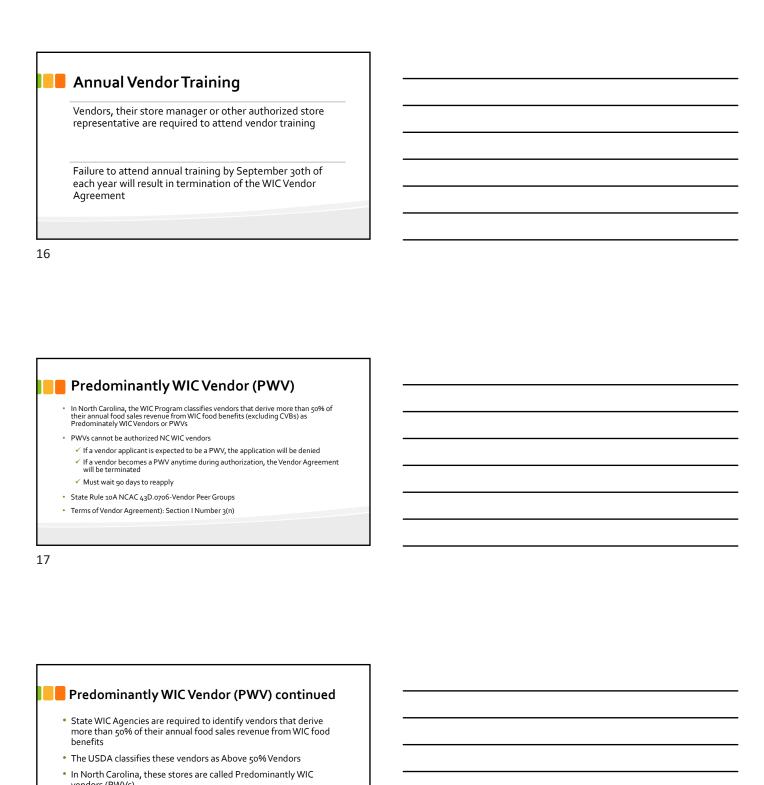
- NTEs do not apply to exempt infant formula or WIC-eligible nutritionals
- Open market system (shelf price)
- Exempt infant formula and WIC-eligible nutritionals can be found at https://www.ncdhhs.gov/wicvendorsconnection
- NTEs do not apply to fruits and vegetables purchasable with cashvalue benefits (CVBs)

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- Identical items only when:
 - Defective
- ✓ spoiled or
- has exceeded its "best if used by" or "sell by" date on the date of purchase



 State WIC Agency collects data to determine total SNAP – eligible food sales as part of the PWV identification process

PWV Identification

PWV Identification is reviewed after six months of authorization as well as annually

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PWV Identification continued

- Request sales records, financial statements, reports, tax documents or other verifiable documentation
- State Agency may require vendor to sign a release of information form from the Department of Revenue to verify SNAP eligible food sales-known as the "GEN-93"
- Very important for vendors to be aware that this information may be requested each year for the previous federal fiscal year

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GEN-93 FORM

- Release of Tax Information Form
- Authorizes the Nutrition Services Vendor Unit to acquire the vendor's E-500 forms directly from Department of Revenue (DOR)
- Must be completed accurately matching what DOR has on file for store
- Must be notarized

SNAP-eligible Food Sales Records

- Vendors must maintain a record of all SNAP-eligible food sales
- SNAP-eligible food sales are sales of those foods that can be purchased with SNAP (Food Stamp) benefits
- Vendors are required to provide the State WIC Agency, upon request, a statement of the total amount of revenue derived from SNAP-eligible food sales and written documentation to support the dollar amount of sales
- Food Sales
 - \checkmark The sale of all foods that could be purchased with SNAP benefits
 - √ Food Sales Fact Sheet

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Appropriate Documentation

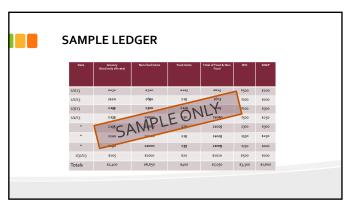
- Each year select vendors are asked to submit SNAP eligible food sales as part of PWV determination
- Request sales records, financial statements, reports, tax documents or other verifiable documentation
- · Keep a monthly copy in files

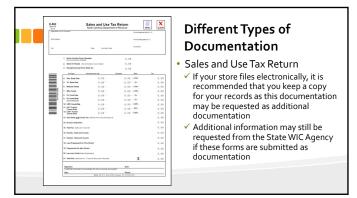
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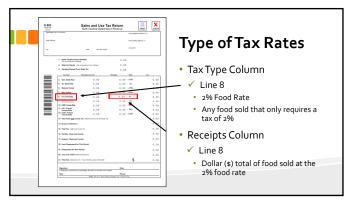


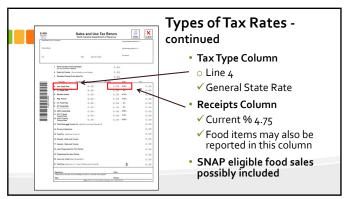
Verifiable Documentation of SNAPeligible Food Sales

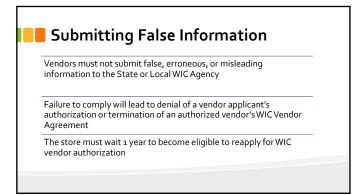
- •Ledger Totals
- Daily, Weekly or Monthly Cash Register Receipts totaled in a ledger (DO NOT send actual cash register receipts)
- $\checkmark\,$ Some registers have the ability to separate out different types of items
- $\checkmark\,$ It is highly recommended that Vendors maintain this type of system. Makes this annual process easier
- Sales and Use Tax returns are not always sufficient for documenting complete SNAP eligible food sales
- These returns may be used along with ledger totals to verify a vendor's documentation of SNAP eligible food sales











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eWIC Payments Through the Banking System

Automated Clearing House (ACH)

- Vendors will receive payment for all eWIC transactions processed in their store through an Automated Clearinghouse (ACH) system in which payments are directly deposited into their bank account
- Each approved food has an NTE
- If a vendor submits an item price that is above the NTE, their payment will be decreased to the NTE amount for the item

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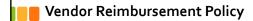
- Vendors (with stand-beside devices because FIS pays them directly) must submit their most current banking information to the eWIC contractor, FIS, (or third-party processor) to ensure payment for eWIC transactions.
- Current vendors (with stand-beside devices because FIS pays them directly) must contact the eWIC contractor with any changes in a vendor's bank account.
- Vendors can contact FIS at 1-800-894-0050 Monday- Friday from 8:00 AM to 5:00 PM CT for account changes or updates



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FIS Retailer Helpdesk

- FIS Retailer Helpdesk for stand-beside device assistance:
 - ✓ Retailer Helpdesk: 1-844-230-0836 (available 24/7)
 - ✓ Email: merchant.services.support@fisglobal.com



- Vendors may not ask the WIC customer:
 - \checkmark To make up the difference in price for eWIC transactions
- Vendors are responsible for keeping their prices at or below the NTE for their peer group



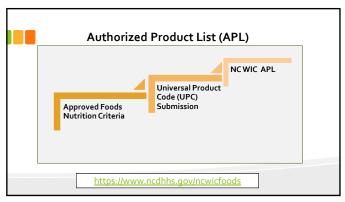
- Customer can pay for an amount that exceeds the CVB maximum
 - ✓ Example: \$10.00 CVB
 - √ Total cost of WIC fruits and vegetables is \$10.25 Customer can pay
 25¢ plus tax on the 25¢ or use other acceptable methods to pay for
 the outstanding balance, e.g SNAP which is not taxable
 - ✓ Vendor submits an eWIC transaction for \$10.00 in CVBs

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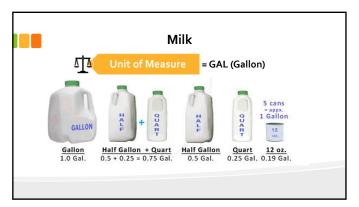


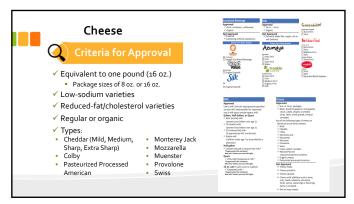


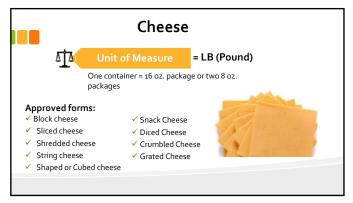
Supplemental	Fully for	mula fed (FF)	Partially (mostly)	breastfed (BF/FF)	Fully bre	astfed (BF
Food Category WIC Formula	Food Packages: I-FF & III-FF A: o - 3 months B: 4 - 5 months A: FNB = 806 fl oz. B: FNB = 884 fl oz.	Food Packages III-FF & IIII-FF 6 - 3.1 months FNB = 624 fl oz.	Food Packages I-BF/FF & III BF/FF (A-0 to 1 month) B: 1-3 months C: 4-5 months A: c1o4 floz. C: FNB = 364 floz. C: FNB = 442 floz.	Food Packages III-BF/FF & III BF/FF 6 - 11 months FNB = 312 floz.	Food Package I-BF o - 5 months	Food Package II-BF 6 - 11 mont
Infant Cereal		24 OZ.		24 OZ.		24 OZ.
Infant food fruits and vegetables		128 oz.		128 02.		256 oz.
Infant food meat						77.5 oz.

Supplemental Foods for Children and Women Food Packages IV, V, VI and VII					
Supplemental Food Category Children Women					
	Food Package IV: 1 - 4 years	Food Package V: Pregnant and Partially Breastfeeding	Food Package VI: Postpartum	Food Package VII: Fully Breastfeeding	
Juice, single strength	128 oz.	144 OZ.	96 oz.	144 OZ.	
Milk, fluid	16 qt.	22 qt.	16 qt.	24 qt.	
Breakfast cereal	36 az.	36 oz.	36 oz.	36 oz.	
Cheese	N/A	N/A	N/A	alb.	
Eggs	1 dozen	1 dozen	1 dozen	2 dozen	
Fresh fruits and vegetables	\$26.00 in cash-value benefits	\$47.00 in cash-value benefits	\$47.00 in cash-value benefits	\$52.00 in cash-value benefits	
Whole wheat or whole grain bread	2 lb.	1 lb.	N/A	alb.	
Fish (canned)	N/A	N/A	N/A	30 oz.	
Mature Legumes and/or p eanut butter	1 lb. dry or 64 oz. canned or 18 oz.	1 lb. dry or 64 oz. canned and 18 oz.	1 lb. dry or 64 oz. canned or 18 oz.	1 lb. dry or 64 oz. canned and 18 oz.	

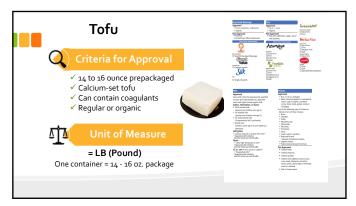


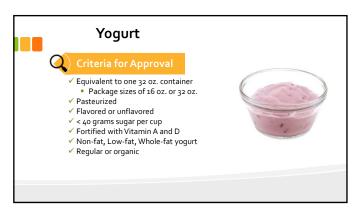


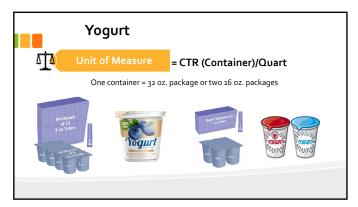


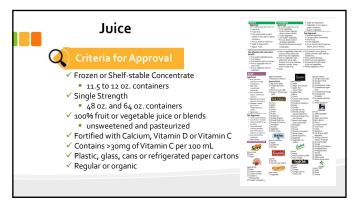


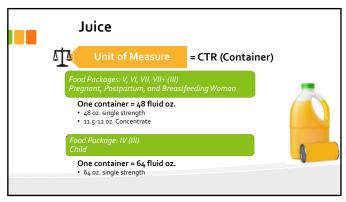


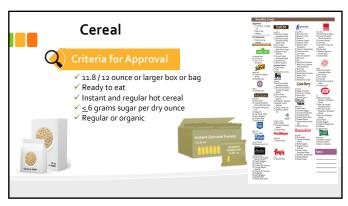


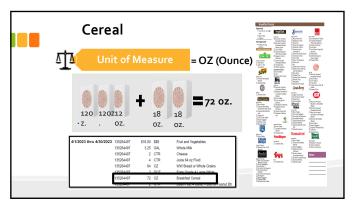


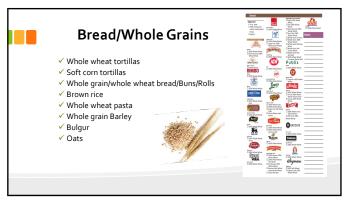












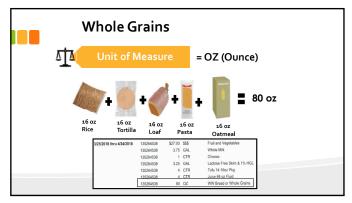






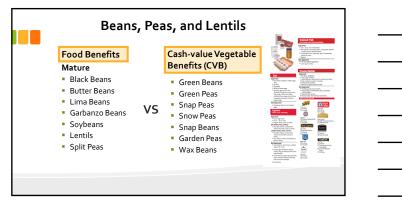




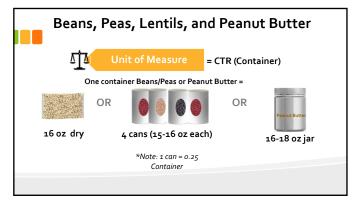








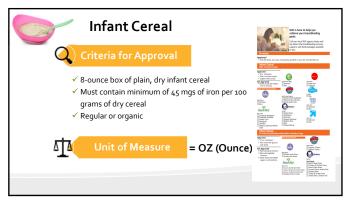




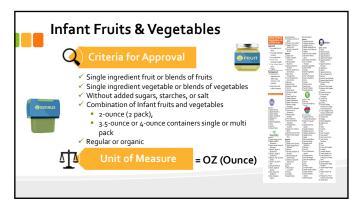




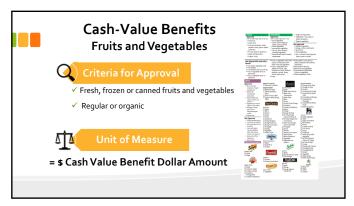


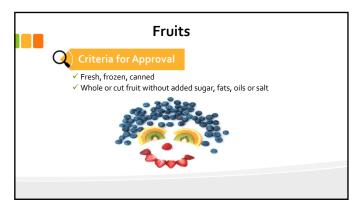


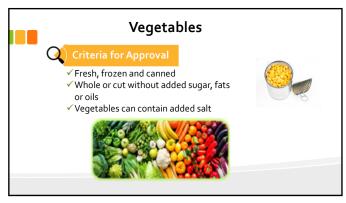




Food Amount Listed Infant Fruits & Vegetables 128 OZ 32 20z. 2-packs or 4-oz containers of infant fruits and vegetables. 18 3.50z. 2-pack containers of infant fruits and vegetables. 16 40z. 2-pack containers of Infant fruits and vegetables. Infant Meats 77.5 OZ 31 2.50z. containers of infant meats.	Shopping for Infant Foods				
Vegetables fruits and vegetables. 18 3.5oz. 2-pack containers of infant fruits and vegetables. 16 4oz. 2-pack containers of Infant fruits and vegetables.	Food		Is Equal To		
and vegetables. 16 4oz. 2-pack containers of Infant fruits and vegetables.		128 OZ			
vegetables.					
Infant Meats 77.5 OZ 31 2.5oz. containers of infant meats.					
	Infant Meats	77.5 OZ	31 2.5oz. containers of infant meats.		









Fruits and Vegetables



NOT Approved

- Dried herbs used for flavoring
- Infant fruits and vegetables*
- Mature legumes (dry or canned beans, peas, lentils)*
 Ornamental or decorative fruits or vegetables
- Catsup or other condiments
- Dried fruits or vegetables
- Salsa
- Sauerkraut

- Pickled vegetables, olives
- Fruit and/or vegetable juices*
- Fruit baskets
- Fruit leathers and fruit roll-ups
- Fruit or vegetable items on party trays
- Fruit or vegetable items on salad bars
 - - * See other approved criteria: 'Infant fruits and vegetables'; 'Beans, Peas, Lentils' and "Juice".

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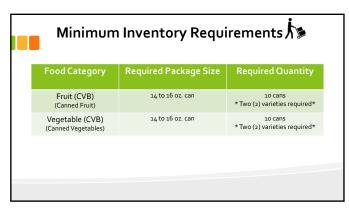
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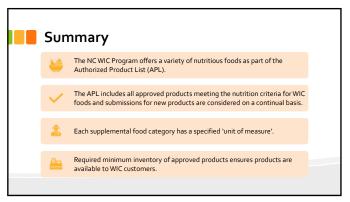
Minimum Inventory Requirements 庵				
Food Category	Required Package Size	Required Quantity		
Milk (Skim/1% Milk <u>AND</u> Whole Milk)	Gallons	Skim/1% milk = six (6) gallons Whole Milk = two (2) gallons *2 types required*		
Cheese	One (1) pound = 16 oz.	Two (2) pounds of one approved type		
Juice (Single Strength*) *concentrated juice does not have inventory requirement	48 oz. container AND 64 oz. container *2 sizes required*	48 oz. container = four (4) containers 64 oz. container = four (4) containers		
Cereal	12+ oz. package	Six (6) packages *required to have 2 types whole grain cereal*		

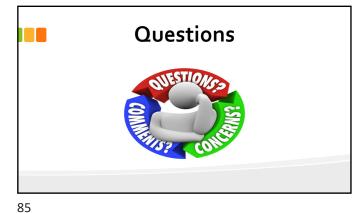
Minimum Inventory Requirements				
Τ	Food Category	Required Package Size	Required Quantity	
	Bread	16 oz. loaf of bread, 16 oz. package of tortillas	Two (2) loaves or packages <u>OR</u> One (1) loaf & one (1) package	
	Brown Rice	14 to 16 oz. package	Two (2) packages	
	Eggs	One (1) dozen	Two (2) packages	
	Beans, Peas, Lentils	One (1) pound dry beans, peas, lentils	Two (2) packages of dry beans, peas, lentils *Only one 1 (one) approved type required*	
	Peanut Butter	16 to 18 oz. containers	Two (2) containers	
	Fish	5 to 6 oz. containers	Six (6) cans	

Minimum I	nventory Requir	ements 庵
Food Category	Required Package Size	Required Quantity
Infant Formula (contract milk-based <u>AND</u> soy-based powder infant formula)	11.0 – 14.0 OZ. Cans	Milk-based Infant Formula = Eight (8) cans Soy-based Infant Formula = Four (4) cans
Infant Cereal	8 oz. container	Six (6) boxes *only one (1) approved type required*
Infant Fruits and Vegetables (Fruit <u>AND</u> vegetable)	3.5 to 4 oz. containers	64 ounces total (or ~16-18 containers) *required to have one (1) type of fruit and one (1) type of vegetable*









eWIC Requirements

- Obtain card readers to support eWIC transactions within their store(s). The vendor must ensure that the card readers they obtain meet all eWIC requirements (Integrated systems)
- Cessation of operations, withdrawal from the WIC Program or disqualification from the WIC Program shall result in termination of the WIC Vendor Agreement by the State WIC Agency

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eWIC Requirements - continued

- Process eWIC transactions accurately, in a timely manner, and in accordance
 with the terms of the North Carolina WIC Vendor Agreement. Maintain
 compliance with the eWIC Processor Vendor Agreement, the FNS EBT
 operating rules, standards and technical requirements, WIC Program Rules, and
 state and federal regulations, and statutes
- Maintain a certified eWIC system that is available for WIC redemption processing during all hours the store is open;
- Request eWIC Processor re-certify the vendor's eWIC system if it is altered or revised in any manner that impacts eWIC redemption



eWIC Requirements - continued

Integrated Vendors:

- There is no need for WIC customers to separate their items when transacting WIC benefits
- Do not make them separate their WIC items from non-WIC items
- ✓ All items can be rung up together; however, the WIC customer must swipe their eWIC card first before any other tender type is applied to ensure that the proper items are deducted from the WIC customer's benefit balance before another tender type is used for purchase

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eWIC Requirements - continued

- Should a vendor that uses stand-beside device(s) to transact eWIC decide to upgrade to an
 - integrated system, the vendor must:

 1. Inform the eWIC processor before making any change, so that it can be determined if the system needs to be certified, and testing can be performed to establish connectivity
 - Inform the State WIC Agency so that Level III certification testing can be performed prior to use of the system in the store
- Testing performed with the eWIC processor for a new system that a vendor chooses to use does not supersede the Level III certification testing that must be performed by the State WIC
- These procedures also apply to vendors who alter the integrated system that they currently use or decide to use a different integrated system altogether

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eWIC Requirements - continued

- The State WIC Agency, not the eWIC processor, must grant final approval before a new system or system that has been altered is used by a vendor
- Vendors must inform the State WIC Agency if their integrated cash register system will be altered or revised in any manner that impacts eWIC redemption. This is a requirement detailed in the Terms of Vendor Agraement Vendor Agreement. Failure to do so may result in the termination of their WIC Vendor Agreement



eWIC Requirements - continued

- It is important to continue to follow policies and procedures to maintain authorization
- Federal regulations provide processes to support program integrity
- Review your Vendor Manual for more detailed information regarding federally and state mandated WIC Vendor policies and

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Business Integrity **Standards**

- May not have any owners, officers or managers who have been convicted of or had a civil judgment entered against them in the last six years for any activity indicating a lack of business integrity
- Includes, but is not limited to fraud, antitrust violations, embezzlement, theft, forgery, bribery, falsification or destruction of records, receiving stolen property, making false claims, and obstruction of justice

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Violations and Sanctions

- A violation is an infraction of WIC Program regulations or other requirements
- A sanction is an administrative action taken as a result of a pattern of violations and may include:
 - ✓ Disqualification or civil money penalty in lieu of disqualification



Violations

 Any intentional or unintentional action of a vendor's owners, officers, managers, agents or employees, with or without knowledge of management, that violates the WIC Vendor Agreement or federal or state statutes, regulations, policies or procedures governing the Program

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Types of Violations

- Federal violations for which vendors are subject to disqualification
 - ✓ Federal violations; carry longest disqualification periods
 - ✓ Found through compliance buys and inventory audits
- $\bullet\,$ State violations for which vendors are subject to disqualification
 - $\checkmark \ \mbox{Usually found during compliance buys and Local WIC Agency monitoring}$

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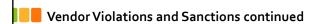
Vendor Violations and Sanctions

- 10A NCAC 43D.0710 includes language for eWIC transactions. The rule states a vendor shall be disqualified from the WIC Program for:
 - ✓ One year for three occurrences within a 12-month period of failure to properly transact WIC food benefits by manually entering the EBT card number or entering the PIN into the POS instead of the WIC customer, scanning the UPC or PLU codes from UPC codebooks or reference sheets when completing a WIC customer's EBT transaction, not entering the correct quantity and item price, or not providing the WIC customer with a receipt that shows the items purchased and the customer's remaining food benefit balance.

• As a Reminder:

- 10A NCAC 43D.0708 (20)(j) states that the vendor must:
 - Scan or manually enter Universal Product Codes (UPC) only from approved supplemental foods being purchased by the WIC customer in the types, sizes, and quantities available on the WIC customer's EBT account. The vendor shall not scan codes from UPC codebooks or reference sheets;
- This requirement is also listed in the current Terms of Vendor Agreement
- 10A NCAC 43D.0710 has two state violations relating to the eWIC system
- Vendors may be disqualified from the WIC Program if they commit either of these state-established violations

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- The two violations for which a vendor can be disqualified are failure to make EBT point of sale equipment accessible to WIC customers and failure to comply with minimum lane coverage criteria. The pattern of occurrences and respective disqualification periods are:
- 180 days for three occurrences within a 12-month period of failure to make EBT point of sale equipment accessible to WIC customers to ensure that EBT transactions are completed in accordance with 10A NCAC 43D .0708(20)
- 90 days for three occurrences within a 12-month period of failure to comply with minimum lane coverage criteria required by 7 CFR 246.12(2)(2) and 10A NCAC 43D .0708(20)(c)

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- The nature of the violation and the number of violations determine the sanction imposed
- Sanctions remain on a vendor's record for 12 months or until a vendor is disqualified
- A pattern of occurrences for the same violation may result in disqualification
- The number of occurrences needed to establish a pattern depends on the violation

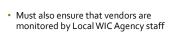
Examples of Patterns of Violations

- Three occurrences within a 12-month period of failure to stock minimum inventory
- Three occurrences within a 12-month period of stocking WIC supplemental foods outside of the manufacturer's expiration date
- Three occurrences within a 12-month period of failure to mark the current shelf prices of all WIC supplemental foods
- Three occurrences within a 12-month period of failure to make EBT point of sale equipment accessible to WIC customers

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Preventing Fraud and Ensuring Compliance

- State WIC Agency must investigate at least 5% of vendors annually using:
 - ✓ compliance (undercover) buys
 - ✓ inventory audits





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Compliance Buys and Audits

- State WIC Programs are required to identify and investigate highrisk vendors
- NC sometimes works with the U.S. Office of Inspector General for investigations

Compliance Buys

- Undercover purchases by a compliance investigator
- May make multiple visits over one year
- Vendors may receive a letter from the State WIC Agency if problems are noted



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Vendor Overcharging

- Intentionally or unintentionally charging more for supplemental food provided to a WIC customer than a non-WIC customer or charging more than the current shelf price for supplemental food provided to a WIC customer
- Overcharging is a serious federal violation that can lead to vendor disqualification
- This violation is uncovered during compliance buys
- Vendor overcharging is **NOT** the same as charging over the NTE

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Overcharging?

- A vendor looks at the NTE to determine what they could charge the WIC customer for a gallon of whole milk. The current shelf price is \$2.79. They charge the WIC customer \$3.69 for the gallon of whole milk because that is the current NTE for the month. Is this vendor overcharging?
- A vendor charges a WIC customer \$6.50 for WIC approved cheese.
 The current shelf price is \$6.50. The NTE is \$6.29. Is this vendor overcharging?

Food Substitution

- Per the Vendor Agreement:

 √ Vendors must provide to the WIC customer only the approved supplemental foods, fruit, and vegetables contained in the authorized product list (APL) after it has been determined that the WIC customer has an available balance for the item on the date of the transaction
- Vendors must properly transact the WIC supplemental foods that are listed on the participant's food benefit balance
- Vendors cannot substitute one food subcategory for another
 - o Federal violation that carries 1-year disqualification
 - Example: Substituting 1% Milk/Skim Milk for 2% Milk or Whole Milk

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Use of Scanning Sheets Prohibited

- · Vendors cannot use a collection of UPC barcodes on Scanning Sheets, cash registers, computers, tablets, cell phones or any other similar electronic devices to transact eWIC
- · Failure to comply with this policy could result in termination of their WIC Vendor Agreement





Inventory Audits

- A vendor must make available at any reasonable time and place
 - ✓ Program-related records: invoices, purchase orders, various tax and business records
- **MUST** be retained 3 years or until audit pertaining to these records is resolved, whichever is later

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Purchase Documentation Requirement

- Specific requirements for purchase documentation of WIC supplemental foods
- Invoices, receipts, purchase orders, and any other proofs of purchase for WIC supplemental foods must include the following:
- The name of the seller and be prepared entirely by the seller or on the seller's business letterhead;
- The date of purchase and the date the authorized vendor received the WIC supplemental food at the store if this date is different;
- A description of each WIC supplemental food item purchased, including brand name, unit size, type or form, and quantity $\,$

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Violations Detected During Inventory Audit

- 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 six or more days within the 6o-day period
 - o The six or more days do not have to be consecutive
- Inability to provide records or providing false records is also a violation

Vendor Claims

- Overpayment to a vendor as determined by an inventory audit or compliance buy investigation requires repayment to the WIC Program
- The State WIC Agency assesses a claim against the vendor in the amount of the overpayment
- Vendors can request a conference to review the claim, but this action cannot be appealed

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Claims Assessed for Vendor Violations

- If a vendor is assessed a claim, the vendor must reimburse the State WIC Agency in full or agree to a repayment plan within 30 days of written notification of the claim
 - ✓ Failure to do so will lead to termination of the Vendor Agreement
- A vendor applicant cannot be authorized if any of the vendor applicant's owners, officers or managers currently have or previously had a financial interest in a WIC Vendor that was assessed a claim by the WIC Program and the claim has not been paid in full

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Disqualification

- Ranges from 60 days to permanent
- WIC status may impact status with SNAP (formerly the Food Stamp Program)
- Vendor has right to appeal



E Disqualification continued

- Upon disqualification or termination, vendors are required to return their stand-beside equipment to FIS within 10 business days
 - ✓ Including all cords, cables, scanners and pin pads (if applicable)
 - ✓ FIS will send a shipping label
- Failure to return all stand-beside equipment to FIS will result in the initiation of an ACH debit from the vendor's account
- If a vendor's bank account has been closed, Local Agency staff will be asked to retrieve all equipment from the vendor location

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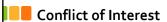


General

MISSION:

- Perform audits and investigations of the Department's programs and operations;
- Work with the Department's management team in activities that promote economy, efficiency, and effectiveness or that prevent and detect fraud and abuse in programs and operations, both within USDA and in non-Federal entities that receive USDA assistance;
- OIG web site: https://usdaoig.oversight.gov/

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- A vendor shall not have any owner(s), officer(s) or manager(s) who are employed, or who have a spouse, child, or parent employed by the State WIC Agency or the Local WIC Agency serving the county in which the vendor conducts business.
- A vendor shall not have an employee who handles or transacts food benefits
 or cash-value benefits who is employed or has a spouse, child or parent who
 is employed by the State WIC Agency or the Local WIC Agency serving the
 county in which the vendor conducts business
- Ask your staff if they have a spouse, child or parent who works for the WIC program
 - \checkmark If they do, report it to your vendor contact at your Local WIC Agency

Routine Monitoring

- Includes, but is not limited to:
 - ✓ Review of formula invoices and receipts
 - ✓ Price checks
 - ✓ Treatment of WIC Program participants and customers
 - ✓ Inventory of WIC-approved foods subject to minimum inventory requirement
 - ✓ Ensure equipment for use in transacting eWIC is accessible
- · Visits are documented and if violations found:
 - ✓ An occurrence assessed
 - ✓ The vendor must take steps to correct them
 - ✓ Will be monitored again within 21 days

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Equitable Treatment

- Section 246.12(h)(3)iii of the Federal WIC Regulations requires WIC-authorized vendors to offer WIC customers the same courtesies that are offered to other (non-WIC) customers
 - ✓ WIC customers cannot be excluded from in-store promotions
- Failure to provide the same courtesies to WIC customers is a violation of Federal WIC Regulations, thereby constituting a vendor violation
 - ✓ Discrimination on the basis of WIC participation
 - ✓ May result in disqualification

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Definitions

- Incentive item-an item or service provided by a vendor to attract customers or encourage customer loyalty
- Vendor discount-an in-store promotion that reduces the price or increase the quantity of a given product; a vendor discount could also result from the use of a coupon
- In-store promotion-a sales promotion in which a vendor may offer incentive items, vendor discounts or coupons in order to increase sales of certain items or to encourage customer loyalty to the vendor

Incentive Items

- Incentive items must be approved by the North Carolina WIC Program prior to providing them to WIC customers
- The North Carolina WIC Program may approve incentive itemsincluding food, merchandise or services-that a vendor obtained at no cost or that cost a vendor less than \$2.00. Vendors may also provide food sales or specials (vendor discounts) that involve no cost or cost the vendor less than \$2.00

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Approval for Incentive Items

- To obtain approval to provide incentive items to WIC customers, a vendor must submit a written request directly to the North Carolina State WIC Agency
- WIC vendors **cannot** offer incentive items to WIC customers without approval from the State WIC Agency

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Approval for Incentive Items continued

- Following is a list of prohibited incentive items:
 - ✓ Assistance applying for WIC benefits
 - ✓ Transportation for WIC customer to and/or from vendor premises
 - $\checkmark \ \mathsf{Delivery} \ \mathsf{of} \ \mathsf{WIC} \ \mathsf{supplemental} \ \mathsf{foods}$
 - ✓ Lottery tickets
 - ✓ Cash gifts
 - Any other service that results in a conflict of interest, any item that incurs a liability to the WIC Program or violates any Federal, State or Local law or regulation

In-Store Promotions and Coupons

- Allowing WIC customers to use vendor discounts in WIC purchases reinforces wise food purchasing practices
- Vendor staff/cashiers should be well-informed about the use of different types of in-store promotions and coupons
 - \checkmark Understand the temporary nature of some offers in order to reduce confusion at the point of sale
 - Know how to properly transact eWIC using in-store promotions and coupons

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Types of In-Store Promotions and Coupons

- Buy One, Get One Free (BOGO)
- Buy One, Get One at a Reduced Price
- Free Ounces Added to Food Item by Manufacturer (Bonus Size Items)
- Transaction Discounts
- Store Loyalty/Rewards Cards
- Manufacturers' Cents Off Coupons

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In-Store Promotions: BOGOs and eWIC

Per the USDA WIC EBT Operating Rules:

- In a true BOGO, the free item cannot be deducted from the WIC customer's benefit balance or reported to the State Agency.
- If a food item is advertised as "Buy one, get one free" with the disclosure that each item is sold for half the advertised price, both food items shall be redeemed using WIC benefits and shall reflect an item price of half the advertised price in the transaction.
 - ✓ Quantity discount
 - ✓ If using this methodology for BOGOs, vendors must put this disclosure in store advertising



Sales Tax & Cash Back

- Sales Tax on Manufacturers' Coupons
 - Not permitted to tax WIC items, so cannot charge WIC customers tax on manufacturer's coupons
- Cash Back
 - ✓ Not permitted as a result of vendor discount in any WIC transaction

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- Vendors should report customer service issues (complaints) to the Local WIC Agency concerning:
 - o WIC customer inappropriate behavior
 - Vendors are not required to tolerate behavior from a WIC customer that they would not tolerate from other customers
 - ✓ May also report complaints about other vendors
- May use form in the Vendor Manual or on website at: https://www.ncdhhs.gov/wicvendorsconnection

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Training

Employees

- Vendor owners/managers are responsible for training all cashiers on WIC as it pertains to the following:
 - ✓ WIC-approved foods
 - ✓ WIC Vendor Transaction Guides
 - ✓ Allowing same courtesies to WIC customers that are provided to non-WIC customers
 - ✓ Completing eWIC transactions
 - ✓ All other NC WIC-vendor related policies and procedures



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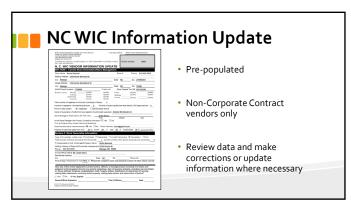


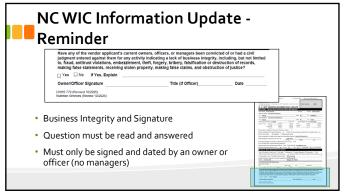
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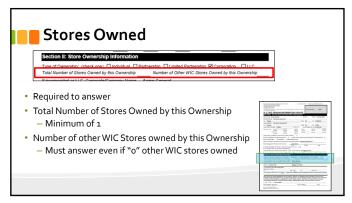
Completing Required Forms

To comply with renewal requirements, these documents must be completed

- Corporate Contract Vendors
 - ✓ The corporate office will:
 - Update the vendor record using the Vendor Portal
 - ✓ <u>Individual corporate contract store</u> managers must complete annual training and submit the <u>Verification of Attendance</u>
- Non-corporate contract vendors
 - 1. Pre-populated NC WIC Information Update
 - ${\bf 2.} \quad {\bf eWIC\,Update\,for\,Non-Corporate\,Vendors}$
 - 3. Verification of Attendance







eWIC Update

- Updated information needed on vendor's cash register system
- · Stand-beside device or integrated system
- If integrated system:
 - Point-of-sale provider
 - Third-party processor
 - Possible plans for upgrade; time frame
- If stand-beside device:
 - Possible plans for upgrading to an integrated system



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continued

- Why Is This Form Needed?
- Comply with the Electronic Benefit Transfer (EBT) provisions in the Terms of Vendor Agreement
 - Section I, Number 18(e)

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Verification of Attendance Form

- Vendors must check off ALL items they receive in their training packets
- Vendor number must be documented on the form
- Signature of the vendor owner/ representative reviewing training ensures the receipt of forms, manual and training materials

Required Forms Reminders!

- All required forms must be completed, dated and returned to the Vendor Coordinator at your Local WIC Agency, by the date the Vendor Coordinator has provided
- Be complete and accurate
- Vendor number, store name must be the same on each form
- Only an owner or officer can sign the Information Update form
 - \checkmark Completed by Non-corporate contract vendors only
 - ✓ If store is Incorporated or an LLC, the store must forward the form to corporate office for signature
- Call your Local WIC Agency, if you have questions

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Tags

- **√** |
- Identify WIC-approved foods in your store
 - ✓ Decreases confusion for WIC customers when selecting food items

WIC Shelf • For vendors that do not have shelf tags that include WIC information already

- Vendors can request shelf tags, if needed, from your Local WIC Agency
- · Highly recommended, but not required

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Questions



Assurance of Civil Rights Compliance

The wender hereby agrees that it will comply with Title VI of the Grill Rights Act of 396, (2 U.S.C. 2000 det 580.) Title IX of the Education Amendments of 397 (20 U.S.C. 385.) et 580.) Section 50.0 of the Rehabilitation Act of 397 (20 U.S.C. 385.) et 580.) Exercise 10.0 of the Rehabilitation Act of 397 (20 U.S.C. 303.) the Age Discrimination Act of 1970 (20 U.S.C. 303.) the Age Discrimination Act of 1970 (20 U.S.C. 303.) the Age Discrimination Act of 1970 (20 U.S.C. 303.) the Age Discrimination Act of 1970 (30 U.S.C. 303.) the Age

This assurance is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants, and loans of Federal funds, reimbursable expenditures, grant, or donation of Federal property and interest in property, the detail of Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration that is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Program applicant by USDA. This includes any Federal agreement, assistance for purposes of resolutions of the public interest of the publi

This assurance is binding on the vendor, its successors, transferees, and assignees as long as it receives assistance or retains possession of any assistance from the Department. The person or persons whose signatures appear below are authorized to sign this assurance on the behalf of the vendor.

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USDA Nondiscrimination Statement

accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retailation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g. Braile, large print, audotape, American Sign Language), should contact the responsible state or local agency that administers the program or USBN's TARGET Center at (202) 72-2000 (vicion and TTV) or contact USBN from pile feeder all Respectives (at (80) 817-8359.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.com/selectedes.effice-stocoursets/SSA-045CRN-2076-Complaint Form-0508-0000-305811-128-17Fee24bb.gdf, from any USDA (rife, by calling (866) 5232902-0, by whiting a letter addressed of USDA file. The letter must continue in the complaintant same, addressed letter bunks and selected form the Adstantal Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 from order must be submitted or USDA by:

- mail: U.S. Department of Agriculture
 Office of the Assistant Secretary for Civil Rights
 1400 Independence Avenue, SW
 Washington, D.C. 20250-9410;
- 2. fax: (833) 256-1665 or (202) 690-7442; or
- email: program.intake@usda.gov

This institution is an equal opportunity provider.