Chapter 8
Food Benefit Issuance

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The North Carolina WIC Program provides WIC approved foods through a retail purchase system. This chapter discusses policies and procedures for issuing food benefits to WIC participants. It describes the North Carolina WIC Electronic Benefit Transfer (EBT) system, the steps involved in initial and subsequent issuance, special issuance situations, and various issues related to storage and security of eWIC cards.

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Electronic Benefit Transfer and North Carolina eWIC

Electronic Benefit Transfer (EBT) is a food benefit delivery system that permits electronic access to WIC food benefits using a plastic card with a magnetic stripe. In North Carolina (NC), the WIC EBT system is called eWIC. Each eWIC card has a 16-digit Primary Account Number (PAN) that is linked to the family's Electronic Benefit Account (EBA). The card becomes active when food benefits are issued to the EBA. The card can be used to purchase food benefits after the cardholder self-selects a four-digit Personal Identification Number (PIN). Both the eWIC card and the PIN are required at point of purchase. The PIN is a numeric password used to authenticate the individual to the eWIC system. The PIN acts as an electronic signature at the point of purchase.

Local agency staff initiate the EBT process through the Crossroads Management Information System (MIS). Each family is assigned a PAN and an eWIC card is issued. Aggregated food benefits for the family are issued to the EBA and the food benefits are transacted by the cardholder at WIC-authorized vendors and pharmacies. All food benefits, including supplemental foods prescribed to each participant and/or a fixed-dollar amount to purchase fruits and vegetables (Cash Value Benefit or CVB) are listed on a family shopping list called Shopping List Remaining Benefits. Only the prescribed foods on the Shopping List may be purchased using the eWIC card.

Sample NC eWIC Card





- **Issue a North Carolina eWIC Card**
  Only a WIC participant, Parent/Guardian 1, Parent/Guardian 2, or Caretaker (Participant/PG1/2/Caretaker) can be issued an NC eWIC card (initial or replacement). When an eWIC card is issued or replaced at the local agency, staff must verify proof of identity of corresponding Participant/PG1/2/Caretaker. An eWIC card may not be issued to a proxy. Refer to Chapter 6A for information on representatives for infants and children.

  - **Issuance of an initial eWIC card.**
    The local agency staff member issuing the initial NC eWIC card must verify proof of identity of corresponding Participant/PG1/2/Caretaker.
    - *In hand at the local agency*. The issuance of an initial eWIC card in hand at the local agency is the default issuance method and is sufficiently documented in the Crossroads journal of transactions.
    - *By mail***.** If a family is being served remotely and requests issuance of an initial eWIC card by mail, the local agency staff must:
      - verify identity of Participant/PG1/2/Caretaker being issued the eWIC card and verify mailing address in Crossroads;
      - explain that mailing the initial eWIC card will not change the amount of food benefits in the family EBA; however, the family will not have immediate access to the active food benefits until the eWIC card is received by the family; and
      - create a Family alert in Crossroads to document: Participant/PG1/2/Caretaker request for issuance of initial eWIC card by mail, Participant/PG1/2/Caretaker understanding and consent to a delay in access to food benefits, and date the local agency staff mailed the eWIC card.

  - **Issuance of a replacement eWIC card.**
    - *In hand at the local agency*. The issuance of a replacement eWIC card in hand at the local agency is sufficiently documented in the Crossroads journal of transactions.
    - *By mail.* The eWIC card can be replaced by mail after the cardholder calls the eWIC Customer Service system (also known as the Interactive Voice Response [IVR] system). Mailed cards may take up to 7 days to be received. Local clinic staff may not mail replacement cards.
      - The eWIC card will be mailed to the family address as in the Crossroads record. The eWIC Customer Service representative cannot make changes to the family address and will refer the cardholder to their local agency to make any address changes.

- **Explain How to Use the NC eWIC Card**
  Local agency staff must provide written information on using electronic food benefits.

- **Explain How to Select a Personal Identification Number (PIN)**
  To use the NC eWIC card, a PIN must be assigned. Only the Participant/PG1/2/Caretaker can select the PIN. Staff should provide instructions on PIN self-selection.

- **Provide Information on NC eWIC Card Replacement**

  When a replacement NC eWIC card is requested, the local agency staff must document in the family record the reported reason for eWIC card replacement (self-reported or verified by a third party). Reported seasons for an eWIC card replacement can be the original card was destroyed, damaged, stolen or lost. The eWIC card may be replaced in hand at the local agency staff or by mail after the cardholder calls the eWIC Customer Service. The eWIC card should be replaced when the card does not swipe at the vendor and the vendor has to key in the eWIC card number.

  An eWIC card may be replaced as many times as needed; however, families who need their card replaced more than three times should be encouraged but are not required to use the eWIC Customer Service system for a mailed replacement. It is recommended that local staff review the reasons for multiple (excessive) replacements and discuss ways to reduce card replacement with the cardholder as needed.

  Replacing the NC eWIC card does not change the amount of food benefits in the family EBA. The PIN for the card remains the same as the previous card. Any current food benefits reported as missing or stolen from an eWIC card cannot be reissued. Refer to Section 3 for the replacement of redeemed food benefits reported as destroyed or damaged due to personal misfortune.

  Note: In times of natural disasters such as a hurricane, the State WIC Program will provide guidance on handling replacement of destroyed NC eWIC cards.

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Food Benefit Issuance

Supplemental food benefits shall be made available to participants throughout their certification period. Food benefits must not be withheld, delayed or denied to participants who refuse or fail to participate in nutrition education.

- **Food Benefit Access**
  The NC eWIC card is the instrument by which food benefits are made available to participants. The participant's food benefits are issued to a family Electronic Benefits Account (EBA) and the corresponding eWIC card and Personal Identification Number (PIN) are required to securely access and transact food benefits at authorized vendors or pharmacies.

- **Food Benefit Issuance to a Proxy**
  The participant/parent/guardian/caretaker must be offered the option of appointing up to two proxies. A proxy is any individual appointed by a participant/parent/guardian or caretaker of an infant or child. A proxy must be 18 years of age and is authorized to use the NC eWIC card on behalf of the family. A proxy is not authorized to act as the parent/guardian/caretaker of an infant or child at certification or mid-certification assessments. When a local agency staff person who is authorized to provide food benefit issuance also serves as a proxy, then issuance must be performed by a different staff person.

  A proxy must read or have read to them in their language of preference, the WIC Program rights and responsibilities (refer to Chapter 6D). By signing the signature pad, the proxy is indicating understanding of the rights and responsibilities as related to the WIC Program and for food benefit issuance.

- **Food Benefit Issuance Requirements**
  Local agency staff may issue up to three months of food benefits to a participant. At the time of food benefit issuance, there are local agency requirements for documentation, review, and notification. Flexibilities for food benefit issuance allow for in-person or remote issuance along with issuance to individual families or to a group of participants (automated food benefit issuance).

  - **Signature**.
    If the participant/PG1/Caretaker/Proxy is present at food benefit issuance, obtain signature using the electronic signature pad.
    - If the individual cannot write his/her name, instruct the individual to make his/her "mark" on the electronic signature pad. If the individual does not have a usual "mark" staff must have the individual make an "X." Staff then must print the person's name on the signature pad, initial and date this entry.

    Using the American Rescue Plan Act (ARPA) flexibilities referenced in Chapter 6, the local agency may issue food benefits remotely. If the participant/PG1/Caretaker/Proxy is not present at food benefit issuance, the local staff may select the radio button corresponding to their own name on the "Food Benefits Issuance Signature

Confirmation" screen in crossroads, document ARPA on the signature pad and select save.

- **MIS Documentation.**
  When food benefit issuance through Crossroads is scheduled for a group of participants, there is no signature requirement. At the time of issuance, the MIS creates an entry in the participant journal of transactions documenting the time, date, and name of staff member issuing the food benefits.

- **Initial Food Benefit Issuance**.
  At initial certification and issuance of initial food benefits, staff must:
  - Explain to the participant/parent/guardian/caretaker that supplemental foods benefits are issued for each eligible participant and aggregated (combined) into the family EBA.
    - Review the aggregated food benefits on the Food Instrument List screen with the participant/parent/guardian/caretaker/proxy prior to issuing food benefits.
  - Instruct the participant/parent/guardian/caretaker and proxies on how to select the food items specified on the "Shopping List Remaining Benefits" including the use of the Cash Value Benefit.
    - If the cost of the approved fruits and vegetables exceeds the available CVB benefit, the participant/parent/guardian/caretaker/proxy is responsible for paying the difference or return item(s). No tax can be charged on payments made with an EBT card; however, tax will be charged on payments made by cash, debit or credit card.
  - Explain and instruct the participant/parent/guardian/caretaker/proxy on how to use the eWIC app, *ebt*EDGE[SM].
  - Explain to the participant/parent/guardian/caretaker/proxy that they are entitled to use coupons (i.e. manufacturer or store coupons), "valued customer" cards, and "in-store" specials for WIC approved foods just as they would use them with any other purchases.
    - The participant/parent/guardian/caretaker/proxy is not responsible for paying tax on the value of the coupon or "in-store special."
  - Provide to the participant/parent/guardian/caretaker/proxy a list of currently authorized eWIC vendors and pharmacies in local service area.
  - Provide a "North Carolina WIC Program Shopping Guide" resource.
  - Instruct the participant/parent/guardian/caretaker/proxy that food benefits are for their use only and that exchanging the eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. Refer to Chapter 6F for further guidance on program abuse by participants.

- **Subsequent Food Benefit Issuance**.
  At any subsequent food benefit issuance and as needed, staff should:
  - Review a participant's food benefit redemption history.
    - Evaluate a participant's food benefit redemption history to identify food benefit categories not being redeemed. Inquire for reasons the benefit is unredeemed, offer the participant/parent/guardian/caretaker/proxy education on possible uses,

and tailor the food package to maximize redemption of all food benefits. (See Chapter 7, Section 4 for additional information about food package tailoring.)

- Review and answer questions pertaining to:
  - selection of food items specified on the "Shopping List Remaining Benefits" including the use of the Cash Value Benefit,
  - use the eWIC app, *ebt*EDGE[SM],
  - use of coupons, valued customer cards or in-store specials
- Provide an updated list of authorized vendors and pharmacies.

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Food Benefit Issuance Variances

There are a variety of situations impacting food benefit issuance. These may include but are not limited to monthly issuance, food package prescription changes, proration, primary caretaker changes, replacement of destroyed or damaged redeemed food benefits due to personal misfortune, and circumstances that prevent or do not require physical presence.

Monthly Issuance

There are times when monthly issuance is either required or preferred.

- **Required Monthly Issuance**. Staff must keep a family on monthly issuance when:
  - A pregnant woman is within two weeks of her expected date of delivery (EDD) or
  - A participant/parent/guardian/caretaker who informs the local agency staff that he/she is moving out-of-state within one month. Staff also should issue a Verification of Certification (VOC) sheet and remind the participant/parent/guardian/caretaker that the North Carolina eWIC card cannot be used outside of North Carolina. See Chapter 6E for information on Transfer of Certification.

- **Preferred Monthly Issuance.** Participant/parent/guardian/caretaker may request monthly or bi-monthly issuance.

Food Package Prescription Change

- **Food Subcategory Change**
  In the current month, food benefits may be replaced when the subcategory of a food item changes (i.e. a change from milk to lactose-reduced milk). The CPA must enter a new food prescription prior to staff replacing the food package.

- **Infant Formula, Exempt Infant Formula or WIC-Eligible Nutritional Change**
  - Type: Food benefits may be replaced when the type of Infant Formula (IF), Exempt Infant Formula (EXF) or WIC Eligible Nutritional (WEN) changes on the participant's food prescription.
    - After staff receive appropriate medical documentation (if required) for the new formula and/or WIC-eligible nutritional, a CPA should update the participant food prescription as appropriate and use the Exchange/Increase Formula feature in Crossroads to update the food benefits.
  - Quantity: When an IF, EXF or WEN is added or quantity changed, the CPA must update the participant food prescription and the food benefits. For an infant participant, staff should review the food packages for the woman and the infant(s).

- **Incorrect Food Package Issuance**
  If an incorrect food package was prescribed and issued, local agency staff may correct the prescribed food package and reissue food benefits as appropriate.

Proration of Food Benefits

The Crossroads system automatically prorates a participant's food package according to the

following principles:

- Some food categories/sub-categories cannot be partially provided and thus the maximum value is always issued each month. No proration for the following food category/sub-categories:
  - Cash Value Benefit (CVB)
  - Bread/whole grains
  - eggs
  - cheese
  - yogurt
  - juice
  - fish
  - legumes
  - infant cereal
  - infant fruits and vegetables

- The remaining food package is prorated as follows:

Number of Days remaining to the last date to spend (inclusive)	Food Package Size
11 – 19	2/3 Package
1 – 10	1/3 Package

Proration rules apply to any situation when the family issuance day is fixed, and the provision of a full food package is not indicated. Examples: a participant receives food benefit issuance with fewer than 19 days before the last date to spend or a newborn is added to the program and given the same family issuance day as the rest of the family and there are 9 days remaining to the last date to spend. The family issuance date should never be changed to avoid proration.

A family issuance date may be changed before issuance occurs if a family re-enrolls after more than three months off the program and has no current food benefits.

■ **Change to Primary Caretaker of Infant or Child**

Each situation should be evaluated individually when the primary caretaker of an infant/child has changed due to abandonment, incarceration, death, a legal change of custody, or a change in foster care and that infant/child's food benefits cannot be retrieved from the person to whom they were issued.

Staff must document the change of primary caretaker, after verifying through written documentation or verbal confirmation from an agency such as the police or sheriff's department, or the Department of Social Services; or by a legal document or a public record such as a newspaper; or by self-report from the new primary caretaker.

Staff should try to retrieve any redeemed IF, EXF or WEN. If the infant or child is in the custody of the Department of Social Services, staff should ask the appropriate social worker for assistance. If the food benefits are not retrievable, staff should deactivate the previous card and issue a new NC eWIC card to the new primary caretaker and replace any unredeemed food benefits. Staff must document the situation for replacement in the

participants record in Crossroads. When an infant requires an EXF or a child requires a WEN, staff should order these products from Community Nutrition Services Section (CNSS).

- **Issuance in the Last Month of Certification or Categorical Eligibility**
  The Crossroads system issues to a participant in the last month of his/her certification period when the family issuance day is prior to the end of the certification period. Crossroads determines whether issuance can occur and how much to issue. If a subsequent certification is not completed, further issuance is not allowed.

  The Crossroads system issues to a participant in his/her last month of categorical eligibility when the family issuance day is prior to the date of the end of the categorical eligibility. Further issuance is not allowed.

- **Issuance When the Certification Period is Extended**
  Issuance of one month of food benefits is allowed if an infant or child's certification period is extended. The Crossroads system will issue one month of food benefits beginning with the family issuance day. No further issuance is permitted. Refer to Chapter 6A, Section 8: Certification Periods.

- **Issuance When the Cardholder is Not Physically Present**
  Local agencies may provide food benefits to cardholders when they are not physically present through remote issuance following program policy (Chapter 8, Section 2.)

  - **Food Package Changes**
    Food package changes that do not require medical documentation or nutrition assessment (for example, food subcategory changes) may be completed without the cardholder's physical presence. Formula exchange or increases may require additional assessment and documentation or require in-hand return/ issuance of products which requires physical presence on a case-by-case basis.

- **Replacement of Redeemed Food Benefits Destroyed or Damaged Due to Personal Misfortune**
  WIC food benefits that have been exchanged by the WIC -participant for foods, IF, EXF, or WEN, between the first date to spend and before the last date to spend are called redeemed food benefits. Redeemed food benefits are not replaceable except for those destroyed or damaged due to an isolated personal misfortune or as indicated by the State WIC in response to a disaster. A personal misfortune exists when one or a few households are affected by a destructive incident such as a gas line explosion, water main break, or house fire. This exception does not apply to mass disasters where emergency feeding services are typically available.

  As indicated in Chapter 1, Section 6 in addition to requirements for the personal misfortune exception for replacing redeemed food benefits include:

  - Verification of Personal Misfortune.
    The personal misfortune must be verified with documentation from the fire department, the police department, or other community agency. A record of this documentation should be indicated within Crossroads.

- Only the redeemed food benefits damaged or destroyed because of the documented personal misfortune may be replaced.
- Replacement does not result in the replacement of prior month benefits.
- Quantity of replacement food benefits reflects the portion of food benefits for which the participant would still be eligible.
- Participant/parent/guardian/caretaker signs the 'Affidavit Attesting to WIC Food Benefit Loss' (Chapter 1, Attachment 3).
- The local agency notifies CNSS Customer Service Desk to assist with replacement.

■ **Exchange of WIC Food Benefits**
At all issuances, staff must remind the participant/parent/guardian/caretaker/proxy that exchanging the NC eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. If an eWIC card does not work when swiped or the vendor has had to manually key in the card number at point of transaction, the eWIC card should be replaced. Refer to Chapter 6F for further guidance on program abuse by participants.

■ **Issuance during Fair Hearings**
Refer to Chapter 14 Administrative Appeals for guidance on food benefits issuance when an applicant/participant/parent/guardian/caretaker has requested a fair hearing.

eWIC Card Orders, Storage and Security

To maintain security and accountability of NC eWIC cards, local agencies must follow procedures for storage and security of eWIC cards.

- **Initial eWIC Card Order**
  The Community Nutrition Services Section (CNSS) will initiate and coordinate eWIC card orders for each local WIC agency. Initial card order and replenishment threshold amounts will be determined by CNSS. The number of initial cards ordered is determined by the number of WIC families each agency supports, with additional amounts ordered to cover up to three (3) months of new WIC families and card replacements.

- **Card Shipment and Verification of Receipt**
  eWIC cards will be shipped directly from the vendor to the local WIC agency main site physical address. Cards will not be shipped to satellite sites. When the eWIC card order is shipped, the CNSS Customer Service Desk will alert the local WIC agency with an email to the agency contact. The email will provide the number of boxes ordered and shipping address for the delivery. CNSS Customer Service Desk will follow up with a second email to request confirmation of receipt of the eWIC cards.

  When the local agency receives a shipment of eWIC cards, send card receipt verification to the CNSS Customer Service Desk by either capturing a snapshot of the label affixed to each box and signing it or by signing the Card Order Manifest. Card receipt verification of the label or manifest must be emailed to CNS.CustomerService@dhhs.nc.gov or sent by fax to (984)-236-8263.

- **eWIC Card Storage and Security**
  eWIC cards should be stored in a secure locked location (cabinet, closet or desk drawer) inaccessible to anyone other than WIC staff.

- **Additional eWIC Card Information**

  - The magnetic stripe on the card contains the 16-digit card number.
  - There is no participant data on the card itself.
  - Until the card is issued, it is not usable.
  - Even when the card is issued, all data resides within the eWIC processing system rather than on the card.

- **Records Retention**
  The local agency must retain the shipping manifest sent with eWIC Card shipments in accordance with the NCDHHS Office of the Controller's Records Retention and Disposition Schedule Spreadsheet (see: https://www.ncdhhs.gov/about/administrative-offices/office-

controller/records-retention.) Refer to Chapter 13 Records Retention and Disposition Schedule for additional information.