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)(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.

- A. Food Delivery and Food Instrument Control Overview
- 1. Food Instruments/General
- a. The State agency uses the following types of food instruments (check all that apply):
 - Automated point of certificationAutomated -central generationManual individual prescriptionEBTPre-printed manual standard prescriptionOther (specify):
 - b. The State agency conducts food instrument inventories: (Place an S=[State agency] or L=[Local agency] under the appropriate column to designate primary responsibility):

Auto	omated	Manual
L	Daily	Daily
S	Weekly	Weekly
	Monthly	Monthly
	Yearly	Yearly
	Other (specify):	Other (specify):

c. The automated food instrument contains/allows for the following information (check all that apply):

Not applicable	Local agency identifier
Participant WIC ID number	Vendor endorsement
Countersignature for participant/proxy	

Provide a facsimile or FI in Appendix or cite Procedure Manual

d. The State agency provides a toll-free number on the food instrument for participant/vendor inquiries:

🖂 No

- 2. Food Instrument Accountability
- a. Food instruments are delivered to local agencies by:

State agency staff	Local agency staff
US Postal Service	On-demand printing
Contracted service (i.e., UPS, Purolator, etc.)	
Other (specify):	

- **Food Delivery and FI Control Overview** A.
- Food instruments (blank stock and preprinted food instruments ready for issuance) b. are delivered to the local agency (check all that apply):

Blank	Preprinted	
Not applicable	🛛 Not applicable	
Weekly	Weekly	
Twice a month	Twice a month	
Once a month	Once a month	
Once every two months	Once every two months	
Other (specify): Upon Request	Other (specify):	

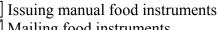
The State agency uses the following procedures to ensure that local agency staff are c. not fraudulently using unclaimed food instruments (check all that apply):

Signatures on the documentation of food instrument receipt are compared for similarities in writing style implying one person signed for multiple participants Local agencies conduct an initial review of food instruments to void food instruments for participants known to have been terminated from the Program

- Local agency staff responsible for issuing/voiding food instruments do not conduct the food instrument inventory by themselves
- Other (specify): Inventory is rotated among staff. FI's are not printed in advance. They are prined once the participant arrives at the clinic.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): P&P 3.03 & 3.05

3. The State agency has established food delivery procedures in cases of natural disaster and emergencies for the following (check all that apply):



Mailing food instruments

Direct distribution

Issuing automated food instruments Home food delivery Other (specify):

B. Food Instrument Pick-up

b.

c.

d.

e.

- 1. Food Instrument Pick-Up Policy and Procedures
- a. Food instruments are issued by (check all that apply):

•	cy nutritionist cy paraprofessional	All Locals	Most Locals	Some Locals
The State a	agency utilizes a par	rticipant identifi	cation card:	
🛛 Yes	Yes, with pho	oto	No	
If yes, issu	ance is controlled n	umerically and o	each card is account	ted for:
Yes	🔀 No			
The State a food instru		following proof	of receipt when issu	ing automated
Carbon Local ag Date of	copy of food instrun gency staff initials food instrument pick th participant signatu	k-up	block on food instrum	nent register
The State a	egency has a policy	to prorate food	packages for the fol	lowing:
	od instrument pick-up onth certification	p Certifica Other (s	ation due to expire w specify):	rithin 30 days
	agency requires loca proxy with training) provide each new j at apply):	participant/parent/
⊠ FI trans ⊠ Use of p	zed vendors action procedures proxy pecify): Rights & Re	⊠ Signatu ☐ Reportin	ng WIC-approved foo re on FIs ng problems/requesti payee	

B. Food Instrument Pick-up

f. The State agency requires local agency staff to provide participants with a list of authorized vendors:

🛛 Yes	🗌 No
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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):

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): P&P 3.12

- 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):

- C. Food Instrument Redemption/Disposition
- 1. Food Instrument Disposition Procedures
- a. The State agency system assures 100% disposition of all issued food instruments

🛛 Yes 🗌 No

If no, specify the circumstances that prevent 100% disposition:

b. The State agency monitors each local agency's:

Number of manual food instruments utilized

Number of unclaimed food instruments

Number of voided food instruments

Number of redeemed food instruments with no issuance record

c. Local agencies are supplied with a report on the final disposition of its food instruments:

Yes (specify period): Quarterly	🗌 No
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ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):

- 2. Unclaimed, Voided, Prorated Food Instruments
- a. The State agency requires local agencies to return "unclaimed/not picked up" food instruments:

🛛 Not applicable	Daily	Weekly	Monthly
Other (specify):			

b. The State agency requires local agencies to return "voided" food instruments:

Not applicable	Daily	Weekly	Monthly
Other (specify): Void	ded FI's are kept of	n site with daily F	I reconciliation

C. Food Instrument Redemption/Disposition

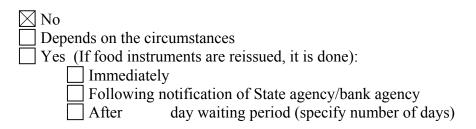
3. Lost/Stolen Food Instruments

a. The State agency requires local agencies to report lost/stolen food instruments to (check all that apply):

State agency State agency's banking institution

Police department Other (specify):

b. Replacement/duplicate food instruments are issued when food instruments are reported <u>lost</u>:



c. Replacement/duplicate food instruments are issued when they are reported <u>stolen</u>:

No	
🗌 Dep	ends 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): SA checks the redemption status of FI's

Please provide a copy/citation for State agency's policy procedures that ensure that lost/stolen food instruments cannot be redeemed.P&P 3.07

e. The local agency documents in the participant's file that replacement food instruments were issued:

🛛 Yes 🗌 No

- C. Food Instrument Redemption/Disposition
- f. The State agency monitors the level of reported lost/stolen food instruments by local agency:

🛛 Yes 🗌 No

g. If it is established that lost/stolen food instruments are transacted by the participant who reported them lost/stolen, the following actions are taken:

 \boxtimes A claim for cash repayment is issued to participant

Participant is disqualified

Participant receives a warning

Other (specify):

h. If lost/stolen food instruments are transacted by someone other than the participant, the following actions are taken:

Reported to police for investigation

 $\overline{\boxtimes}$ State agency or local agency does an investigation

Other (specify)):
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- 4. Food Instrument Redemption Screening (7 CFR 246.12(k)(1))
- a. The State agency screens food instruments through a pre-edit (before payment) or post-edit (after payment) process to detect the following:

Not	Pre-Edit	Post-Edit	
Applicable	Screen	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 Missing signature Mismatched signature Altered signature Other (specify):

C. Food Instrument Redemption/Disposition

b. Where pre-edit screens are used, the proportion of food instruments reviewed include:

All food instruments	Percentage of food instruments (%)
Other:		

c. The edit system(s) that screen for price limitations and vendor overcharges reject food instruments based on:

Pre-edit	Post-edit

Not To Exceed or Maximum PricesPercentage above average (%)Amount above average (\$)Other (specify):

d. The following actions are used to control against unauthorized stores redeeming food instruments:

Recover vendor stamp when vendor is no longer authorized

Conduct compliance buy to verify if unauthorized store redeems food instruments

State agency or its banking institution checks vendor ID numbers on food instruments submitted for redemption against the authorized vendor list before paying vendors for food instruments submitted for redemption

Inform all participants who might use the unauthorized store Other (specify):

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

- 5. Price Lists
- a. Price list information is routinely collected from vendors:

 \boxtimes Yes \square No (go to question 6)

b. Price list data are collected:

Monthly
 Quarterly
 Semiannually
 Annually
 Other (specify): During routine monitoring or site visits.

C. Food Instrument Redemption/Disposition

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): Lowest price milk per gallon

e. The 🖂 State agency/ 🗌 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): At authorized site visits every 2 years

f. The 🖂 State agency/🗌 local agency analyzes price data:

Manually on a routine or as needed basis

 $\overline{\boxtimes}$ On an \overline{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): Drafts above the edits are rejected and returned to vendor.

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

 \bigcirc Other (specify): have not yet developed methodology.

C. Food Instrument Redemption/Disposition

c. To receive payment or appeal a claim for a vendor overcharge, the vendor must:

Provide an updated price list

 \boxtimes Provide written justification for the higher prices

Provide receipts

Other (specify):

d. 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):

D. Manual Food Instruments

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
 Date of food instrument pick-up
 Date of food instrument pick-up

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):

- 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):		

D. **Manual Food Instruments**

Local agencies are required to provide documentation to substantiate a valid or b. 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):

If the manual food instrument inventories do not achieve 100% reconciliation of all c. 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).

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):

- All participants are required to pick up food instruments at the clinic or local agency, except in unusual circumstances
- Participants/proxies are required to show identification at food instrument pick up
- Food instruments are routinely mailed to participants except (1) when the participant is scheduled for nutrition education or a certification appointment and (2) in areas where Food Stamps are not mailed, as these areas are known to have experienced high mail issuance losses
- Benefits are provided electronically to a location such as a grocery store under certain conditions; thus participants may not always pick up food instruments at the clinic
- Other (specify): Participants/Proxies are to present WIC ID folder when picking up FIs

2. Mailing Policy/Procedures

a. When food instruments are mailed to participants, State agency provides local agencies with guidelines/procedures for mailing food instruments to individual participants:

X Yes No

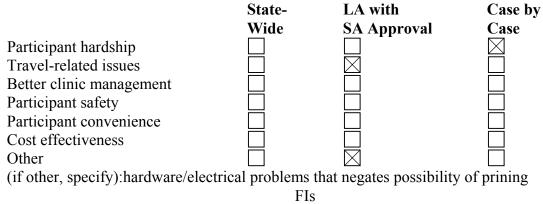
b. Policy requires participants to pick up food instruments whenever certification appointment is due or nutrition education is scheduled:

🛛 Yes	🗌 No
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- c. The State agency has implemented the following policy regarding mailing food instruments (check all that apply):
 - Food instruments are sent first class mail *(first class is considered *regular* mail)
 - Food instruments are sent registered mail
 - Food instruments are sent certified mail
 - Food instruments are sent restricted mail
 - Return receipt is requested on food instruments sent certified mail
 - Envelope specifies, "Do not forward, return to sender" or "Do not forward, address correction requested"
 - Other (specify):

E. Special Food Instrument Issuance Accommodations

d. The State agency approves mailing food instruments under the following conditions (check all that apply):

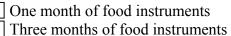


e. When mailing food instruments, documentation of food instrument issuance is:

Signed by the participant at the following food instrument pick-up/visit
 Noted "mailed" and initialed/dated by local agency staff
 Signed and dated by local agency staff after return receipt is received
 Other (specify):

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

3. Participants who receive food instruments by mail are sent:



Two months of food instruments \bigcirc Other (specify): Up to 3 months

depending on the circumstances

F. 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 foc		Are notified	in v	vriting	of the	types	and	quantities	of	foo	ds
--	--	--------------	------	---------	--------	-------	-----	------------	----	-----	----

Are issued food instruments that they sign and provide to the vendor when the food is 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):

ADDITIONAL DETAIL: Food Delivery Appendix and/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

G. 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	Local agency
Other state or public agency	Under contract with a private business
Other (specify):	_

d. Warehouses used for storage of WIC foods are also used to store other FNS program commodities:

Yes

No

ADDITIONAL DETAIL: Food Delivery Appendix and/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:

G. Direct Distribution

Monthly
Other (specify):

d. Participants with limited access to facilities used for distribution have available to them:

Local	Other
Agency	Sources

Services provided by:

Home delivery Cost-free transportation Other (if other, specify):

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

3. Warehouse Insurance and Inspectors

a. Insurance for the warehouse covers (check all that apply):

Theft	Fire	Infestation	Spoilage Spoilage
Other (specify):			

b. Warehouses are inspected by a public authority responsible 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):