

I (A). VENDOR MANAGEMENT

GOAL: To investigate a minimum 5% of the Program’s authorized vendors for compliance with federal regulations during the federal fiscal year.

METHODOLOGY: The compliance liaison, under the direction of the unit supervisor, manually selects vendors for investigation based upon participant and local WIC office complaints and high-risk reports generated from The Integrity Profile (TIP) report, Store Tracking and Redemption System (STARS), and/or Crossroads Management Information System. Investigation priority is determined according to the severity of the possible infractions to the program.

The State Agency (SA) will also develop policy and procedure as well as tools to institute inventory audits as a method of compliance investigations. Technical assistance will be sought from other states as recommended by the regional office through technical assistance site visits and/or review of approved procedures and tools.

The SA will revise the sanction schedule to transition from “sanction points” for state violations to utilization of corrective actions which may include an administrative fine. Throughout revision, the Vendor Advisory Council will be utilized to offer guidance and insight from the retailer perspective.

EVALUATION: Regional office approval of the inventory audit policies, procedures and tools as well as an updated state sanction schedule will be secured to initiate use of inventory audits for compliance investigations.

The number of compliance investigation letters will be recorded to track the most common state violations or customer service issues. This information will inform quarterly newsletter items as well as state standards.

STATUS: During FY 2019, (October 1, 2018 through June 30, 2019), the goal has been attained with the Vendor Management Unit investigating 11.11% of the Program’s authorized vendors for compliance with federal regulations through compliance buy investigations. With 270 authorized vendors during this timeframe, 30 compliance investigations have been completed with 22 investigations occurring with high risk vendors (8.15%) and 8 investigations (as a result of participant complaints) with non-high-risk vendors.

The SA continues to utilize Policy 8.09, as well as the Compliance Buy Investigation Standard Operating Procedures, with revised reporting form and notification template letter. Written notification was mailed following

every investigation regardless of result.

With the enhanced EBT-based audit functionality in XR, and the knowledge of the “process” outlined within the MIS system, the Vendor Manager conducted interviews in FY 2018 with Michigan and Virginia Vendor Management Unit staff, as well as obtained guidelines utilized in those states for conducting inventory audits. The development of inventory audit policy and procedure is ongoing, and has been progressing slowly since it has linked to other necessary operating procedure revisions as well as data clean-up. In addition, the staff member working on this project resigned in July 2018, and the vacancy was not filled until February 2019. The new compliance liaison will resume work on implementing inventory audits October 2019.

In preparation, the compliance liaison utilized a new methodology to identify high risk WIC authorized retailers for the second half of FY 2019. Using three redemption risk indicators – large transaction to WIC redemptions ratio, percent of transactions with a Not To Exceed (NTE) adjustment, and percent of whole dollar transactions – retailers which flagged (two standard deviations above the state average) in one out of three indicators moved to the watch list while retailers which flagged in at least two out of three indicators were designated high risk.

The sanction schedule revision has been ongoing in conjunction with revisions of the Vendor Handbook. The Vendor Advisory Council identified additional state sanction violations; however, the use of sanction points will be a continued practice. The draft will be submitted with FY 2020 State Plan operations.

This goal of developing policies and procedures for implementation of inventory audits is ongoing for FY 2020.

I (B). VENDOR MANAGEMENT

GOAL: To establish an appropriate number and distribution of vendors for each Local Agency to obtain at least a 1:150 vendor to participant ratio in each county.

METHODOLOGY: The West Virginia WIC Vendor Unit will assess active participation and potentially eligible population as well as distribution of population to determine the vendor:participant ratio per county. The West Virginia University Food Link Portal will be utilized to determine areas of low food access, and map Supplemental Nutrition Assistance Program (SNAP) providers already offering fresh fruits and vegetables.

The SA will actively reach out to all SNAP authorized stores currently not participating in the WIC Program to educate about the benefits of being a WIC vendor. In addition, if a vendor inquiry is received personal follow up will occur throughout the application process.

The Vendor Handbook will be revised to develop minimum stocking requirements by vendor peer group, offer exemption application for minimum stocking requirements, and/or outline expectations of providing WIC Approved food items upon participant request when minimum stock is not available.

EVALUATION: The vendor:participant ratio will be calculated and assessed quarterly. The number of new vendor applications will be tracked as well as results of outreach to potential vendors. The development, approval and printing of a revised Vendor Handbook will result in a stakeholder friendly tool which can be utilized for vendor outreach and education.

STATUS: West Virginia started FY 2019 with 249 vendors; the same as FY 2018. There are currently 253 vendors statewide.

The statewide vendor to participant ratio is 1:126. There are 14 counties which still experience a service ratio above 1:150, but this decreased from 18 in FY 2018. Plus, in FY 2018, each Local Agency had at least one location experiencing an access issue, but now two Local Agencies do not have WIC retailer access issues for their current caseload.

Revisions for the Vendor Handbook have been initiated, and the draft will be submitted with FY 2020 State Plan operations. The Vendor Advisory Council convened in March 2019. Meeting attendees finalized drafts of a retailer outreach brochure, Cashier Training Manual, and Vendor Handbook.

This goal has been accomplished.

I (C). VENDOR MANAGEMENT

GOAL: To develop in-store tools and a cashier handbook to assist retailers with training store personnel with the overall goal of a positive WIC shopping experience for cashiers and WIC customers.

METHODOLOGY: The Vendor Management Unit will work collaboratively with the Vendor Advisory Council, Local Agency Vendor Liaisons, and Food List Committee to develop a cashier handbook and other helpful in store tools necessary to support implementation of the revised WIC Approved Food List effective October 1, 2018.

In-store tools of food category aisle signs, and approved shopping guide lane hangers will be piloted in twenty (20) Wal-Mart stores throughout the state. The pilot will kick-off with a store manager and corporate phone conference discussing project timeline, store placement, and evaluation.

The Vendor training program will be amended to reflect the additional foods available to WIC participants by identifying areas of current issues as well as needs for new approved food list; development and design of a cashier handbook; revising, approving, printing and distributing training materials; and scheduling/conducting regional vendor training sessions (estimate 16 to be conducted in 8 regions January 2018-August 2018).

Authorized vendors will receive updated information regarding new state options, and stocking requirements including, but not limited to, a letter outlining the changes, a dedicated edition of the WIC'r Basket, and information updates on the website.

EVALUATION: A survey of Wal-Mart corporate, management and associate personnel will be conducted to assess store materials pilot prior to final design and statewide implementation.

The development, approval and printing of a Cashier Handbook will result in a stakeholder friendly tool which can be utilized for vendor education.

STATUS: The Vendor Advisory Council convened March 20, 2019. Meeting attendees finalized drafts of a retailer outreach brochure, Cashier Training Manual, and Vendor Handbook.

This goal has been accomplished.

I (D). VENDOR MANAGEMENT

GOAL: To develop policy and procedures for the authorization of farmers, farmers markets, and/or co-op organizations to transact Cash Value Benefits (CVBs)

METHODOLOGY: The Vendor Management Unit will work collaboratively with the West Virginia Food and Farm Coalition and West Virginia University Extension Service SNAP-Ed to identify at least five (5) locations to pilot WIC CVB redemption. In conjunction with the successful SNAP Stretch Program, these farmers/farm markets are already EBT capable utilizing the Point of Sale (POS) devices provided by FIS.

The State Agency will utilize technical assistance from other states utilizing eWIC with farmers and farm markets through site visits, phone conferences

and/or review of approved procedures and tools. Also, through the collaborative relationship, policy and procedures will be refined through the pilot process.

EVALUATION: Redemption rates, number of participants served, and farmer surveys will be gathered at the mid-point and end of the pilot.

STATUS: **This is a new goal for FY 2020.**