

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

(Please indicate) State Agency: West Virginia for FY 2024

Food delivery and food instrument (FI) (*Food instrument* means a voucher, check, electronic benefits transfer card (EBT), coupon or other document which is used by a participant to obtain supplemental foods) accountability and control involve the production, issuance, redemption, 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.

During a disaster or public health emergency, or supply chain disruption, the State agency may request to implement existing WIC regulatory and programmatic flexibilities or waivers to support the continuation of Program benefits and services. State agencies should consider the overarching authority, i.e., Stafford Act, Access to Baby Formula Act, or provision(s) authorized by Congress, and duration before developing a policy and procedure. The State agency must provide a detailed description of how it plans to operationalize the flexibility or waiver through their procedure manual where applicable. Please note the State Plan Guidance is not intended to capture a description of waivers authorized by Congress with separate reporting requirements.

Executive Order (EO) 13988, "*Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation.*" was issued to all Federal Agencies. The EO set out policies that all persons are entitled to dignity, respect, and equal treatment under the law, no matter their gender identity or sexual orientation. The EO does not usurp section 17 of 42 U.S.C, as amended or applicable regulations, rather it complements the language in the nondiscrimination statement. Following the contents of the EO, State agencies must update their policies and procedures to align with the contents of the EO and the nondiscrimination statement.

Electronic Benefit Transfer (EBT) Implementation and Management

A. [Electronic Benefit Transfer \(EBT\): 246.4\(a\)\(1\), \(a\)\(14\)\(xix\), \(a\)\(14\)\(xx\), \(a\)\(19\), 246.12\(h\)\(3\), \(w\)-\(bb\)](#): describe the policies and procedures the State agency is using to implement and operate EBT

Retail Food Delivery Systems

B. [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 by the State agency in producing, monitoring and accounting for the use of food instruments.

C. [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.

D. [Food Instrument Redemption and 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/stolen/damaged, expired, duplicate, or not matching issuance records.

E. [Manual Food Instruments - 246.4\(a\)\(11\)\(iii\), \(a\)\(14\)\(i\), \(a\)\(14\)\(vi\) and \(a\)\(14\)\(ix\)](#): describe the procedures for issuing and accounting for manual food instruments, including the procedures for documentation and disposition.

F. [Special Food Instrument Issuance Accommodations, 246.4\(a\)\(11\)\(iii\), \(a\)\(14\)\(i\), \(a\)\(14\)\(vi\), \(a\)\(14\)\(ix\), \(a\)\(14\)\(xiv\), and \(a\)\(21\)](#) mail or electronic issuance) and how the integrity of program services and fiscal accountability is ensured.

G. [Vendor Cost Containment System Certification - 246.4\(a\)\(14\)\(xv\), 246.12\(g\)\(4\)\(vi\)](#): describe the competitive pricing and reimbursement methods that the State agency will implement to ensure that average payments per food instrument to above-50-percent vendors do not exceed average payments per food instrument to comparable regular vendors.

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

Non-Retail Food Delivery Systems

H. Home Food Delivery Systems - 246.4(a)(11)(iii), 246.4(a)(14)(i), (a)(14)(vi), (a)(14)(vii) and (a)(14)(xii): describe how the State agency's home delivery system operates including but not limited to the types of authorized home food delivery contractors, the frequency of deliveries, and the procedures for documenting deliveries and ensuring safe food delivery of WIC foods, if applicable.

I. 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, the verification process, and assurance of food safety, as applicable.

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

A. Electronic Benefit Transfer (EBT)

1. Is EBT implemented statewide?

Yes (Proceed to question 2)

No (Continue to 1.a.)

a. Does the State agency have an active EBT Project as of July 31, 2016?

Yes No

b. Does the State agency follow APD requirements for EBT management and reporting?

Yes No

2. What is the State agency policy for permitting replacement cards and transfer of balances per [7 CFR 246.12\(bb\)\(2\)](#)?

The SA or LAs replace EBT cards and transfer card balances as requested when cards are lost/stolen, at the time of the request. If a request happens outside of business hours, there is an 800 number on the back of the EBT card and it is also listed in the WIC Approved Shopping Guide that each participant receives. Participants can call the 800 number to have their EBT card deactivated. They would then have to go into clinic to get a replacement card during regular clinic hours. Policy and Procedure 3.07 - Lost, Stolen, and Damaged eWIC Benefit Cards

3. What are the State agency procedures for providing customer service during non-business hours for EBT cards per [7 CFR 246.12\(bb\)\(3\)](#)?

There is an 800 number on the back of the EBT card for after-hours customer service which is available 24/7 in both English and Spanish.

4. Does the State agency use the formula for EBT terminal minimum lane coverage in [7 CFR 246.12\(z\)](#)?

Yes No

a. If no, please provide the date of the approval of the approved alternative installation formula as required per 7 CFR [246.12\(z\)\(2\)](#).

B. Food Delivery and Food Instrument Control Overview

1. Food Instruments (i.e., vouchers, checks, EBT cards, coupons or related documents) - General

a. The State agency uses the following types of FIs (check all that apply):

EBT cards

Paper food instruments

Automated-point of certification

Manual-individual prescription

Pre-printed manual-standard prescription

Automated-central generation

Mobile Payment

Other (specify): [Click or tap here to enter text.](#)

b. The State agency conducts FI inventories (Place an S=[State agency] or L=[Local agency] under the appropriate column to designate primary responsibility):

Automated - EBT Cards

Daily/perpetually

X Other (Specify): Local Agency

Physical - Paper FIs

Daily

Weekly

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

Monthly

Other (specify): [Click or tap here to enter text.](#)

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

c. **The FI contains/allows for the following information (check all that apply):**

- | | |
|---|--|
| <input checked="" type="checkbox"/> Not applicable | <input type="checkbox"/> Local agency identifier |
| <input type="checkbox"/> Participant WIC ID number | <input type="checkbox"/> Vendor/farmer endorsement |
| <input type="checkbox"/> Countersignature for participant/proxy | |
| <input type="checkbox"/> Authorized supplemental foods | |
| <input type="checkbox"/> First date of use | <input type="checkbox"/> Last date of use |
| <input type="checkbox"/> Redemption period | <input type="checkbox"/> Serial number |
| <input type="checkbox"/> Purchase price | <input type="checkbox"/> Signature space |

Provide a facsimile of FI in Appendix or cite Procedure Manual: [Click or tap here to enter text.](#)

d. **The EBT system allows for the following (check all that apply):**

- A unique and sequential number benefit issuance identifier
- Each EBT purchase is matched to an authorized vendor, farmer, or farmers' market prior to authorizing payment per [7 CFR 246.12\(x\)\(3\)](#)
- System contains authorized supplemental foods
- System contains first and last dates of use for electronic benefits

e. **The State agency provides a toll-free number for participant/vendor/farmer inquiries on:**

- Paper Food Instrument Cash-value voucher EBT Card/Sleeve None

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

2. Food Instrument Accountability

a. **FIs are delivered to local agencies by:**

- | | |
|--|---|
| <input type="checkbox"/> State agency staff | <input type="checkbox"/> Local agency staff |
| <input type="checkbox"/> US Postal Service | |
| <input type="checkbox"/> On-demand printing | |
| <input checked="" type="checkbox"/> Contracted service (e.g., UPS, Purolator, etc.) | |
| <input type="checkbox"/> Other (specify): Click or tap here to enter text. | |

b. **FIs (blank stock and preprinted ready for issuance) are delivered to the local agency (check all that apply):**

Blank

- Not applicable
- Weekly
- Twice a month
- Once a month
- Once every two months
- Other (specify):

Preprinted

- Not applicable
- Weekly
- Twice a month
- Once a month
- Once every two months
- Other (specify):

Blank Specify: [Click or tap here to enter text.](#)

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

Preprinted Specify:

c. **The State agency uses the following procedures to ensure that unclaimed paper FIs are not being used fraudulently (check all that apply):**

- Not Applicable
- Signatures on the documentation of receipt are compared for similarities in writing style implying one person signed for multiple participants
- Local agencies conduct an initial review to void food instruments for participants known to have been terminated from the Program
- Inventories of food instruments are not conducted by the same local agency staff responsible for issuing/voiding food instruments
- Procedures are in place to ensure the proper disposal of unused/duplicate/voided FIs
- Other (specify): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

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

- Manual issuance Automated issuance
- Mailing Home food delivery
- Direct distribution Remote issuance
- Other (specify): Load one month of benefits onto the EBT card if certification is active.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

C. Food Instrument Pick-up and Transaction

1. **Food Instrument Pick-Up Policy and Procedures**

a. **Food instruments are issued by (check all that apply):**

	All Locals	Most Locals	Some Locals
Local agency director			
<input checked="" type="checkbox"/>			
<input type="checkbox"/>			
<input type="checkbox"/>			
Local agency nutritionist			
<input checked="" type="checkbox"/>			
<input type="checkbox"/>			
<input type="checkbox"/>			
Local agency paraprofessional	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clerical staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Other (specify):

[Click or tap here to enter text.](#)

b. The State agency utilizes a participant identification card:

Yes Yes, with photo No

If yes, issuance is controlled numerically, and each card is accounted for:

Yes No

c. The State agency requires the following proof of receipt when issuing paper food instruments or EBT cards:

- Participant/parent/caretaker/proxy signature on register confirming receipt
- Local agency staff initials
- Date of food instrument pick-up
- Stub with participant signature or initials
- Other (specify): Electronic signature by participant, parent/guardian, caretaker, proxy, or WIC staff

d. The State agency has a policy to prorate food packages for the following:

- Late FI pick-up Certification due to expire within 30 days
- Mid-month certification Other (specify): Adding an additional family member

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

- Authorized vendors/farmers Selecting WIC-approved foods
- Transaction procedures Use of proxy
- Reporting problems/requesting assistance
- Participant violations (i.e., selling or offering to sell WIC benefits)
- Other (specify): Rights and Responsibilities

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

Yes No

g. The State agency permits a participant to transact food instruments with any authorized vendor or farmer/farmers' market in the State:

Yes No

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

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 FIs for all homeless WIC participants in a facility
- Limits proxy to a specified number of FI pick-ups
- Limits proxy to a minimum age
- Limits proxy assignment to local WIC staff
- Other (specify): Limits the number of proxies

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

D. Food Instrument Redemption and Disposition

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

1. Food Instrument Disposition Procedures for paper FI issuance

a. The State agency system assures 100% disposition of all issued FIs

- Yes No

If no, specify the circumstances that prevent 100% disposition: [Click or tap here to enter text.](#)

b. Local agencies are supplied with a report on the final disposition of its FIs:

- Yes (specify period):[Click or tap here to enter text.](#) No

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

- Number of manual FIs utilized
 Number of unclaimed FIs
 Number of voided FIs
 Number of redeemed FIs with no issuance record

2. Unclaimed, Voided, Prorated FIs

a. The State agency requires local agencies to return "unclaimed/not picked up" paper FIs or EBT cards:

- Not applicable Daily Weekly Monthly

Other (specify): [Click or tap here to enter text.](#)

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

- Not applicable Daily Weekly Monthly

Other (specify): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

3. Lost/Stolen/Damaged Food Instruments

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

- State agency Police department State agency's banking institution
 EBT Coordinator
 Other (specify): 1-800 number for EBT support

b. Replacement/duplicate FIs Issuance

(1) Replacement/duplicate FIs are issued when FIs are reported lost:

- No
 Depends on the circumstances
 Yes (If FIs are reissued, it is done):
 Immediately
 Following notification of State agency/bank agency
 After a [Click or tap here to enter text.](#) day waiting period (specify number of days)

(2) Replacement/duplicate FIs are issued when FIs are reported stolen:

- No
 Depends on the circumstances

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

Yes (If FIs are reissued, it is done):

Immediately

Following notification of State agency/bank agency

After a [Click or tap here to enter text.](#) day waiting period (specify number of days)

(3) Replacement/duplicate FIs are issued when FIs are reported damaged:

No

Depends on the circumstances

Yes (If FIs are reissued, it is done):

Immediately

Following notification of State agency/bank agency

After a [Click or tap here to enter text.](#) day waiting period (specify number of days)

Other (specify): [Click or tap here to enter text.](#)

c. **Is a police report required before replacement benefits are issued when reported stolen?**

Yes

No

d. **The State agency or its banking institution takes the following action after it is notified by the local agency of lost/stolen/damaged FIs (check all that apply):**

Stops payment on the lost/stolen/damaged FIs

Notifies vendor or farmer

Other (specify): Deactivate EBT card and reissue a new card

Please provide a copy/citation of the State agency's policy and procedures that ensure that lost/stolen FIs cannot be redeemed OR lost/stolen/damaged EBT cards will be replaced and associated benefits transferred [\(7 CFR 246.4\(a\)\(14\)\(xix\)\).](#)

Policy and Procedure 3.07 - Lost, Stolen, and Damaged eWIC Benefit Cards

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

Yes

No

f. **If it is established that lost/stolen/damaged FIs are transacted by the participant who reported them lost/stolen/damaged, the following actions are taken:**

A claim for cash repayment is issued to participant

Participant is disqualified; specify the period of time: [Click or tap here to enter text.](#)

Participant receives a warning

Other (specify): No action is necessary since the old EBT card has been deactivated

g. **If lost/stolen/damaged FIs are transacted by someone other than the participant, the following actions are taken, check all that apply:**

Reported to police for investigation

State agency or local agency does an investigation

State agency or local agency notifies the participant

Other (specify): No action is necessary since the old EBT card has been deactivated

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

h. **The State agency monitors the level of reported lost/stolen/damaged FIs by local agency:**

Yes

No

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

4. Benefit Redemption Review [\(7 CFR 246.12\(k\)\(1\)\)](#)

- a. Describe in detail how the State agency sets maximum allowable reimbursement levels for payment for supplemental foods (including whether the State agency uses vendors' shelf prices to set maximum reimbursement levels and how reimbursement levels are linked to competitive price criteria). If the State agency sets maximum allowable reimbursement levels differently for above-50-percent vendors and regular vendors, please explain the different methods used.

The Crossroads State Agency Model gathers cost by requested redemption at UPC level for every product purchased with EBT benefits. As a result, a maximum allowable reimbursement level (MARL) is applied to each authorized item based on two (2) standard deviations of the average cost by peer group over the last 30 days of redemptions. If price is over 25% of the average, then approval has to be manual, and the price is not included in MARL calculation. Competitive cost selection criteria utilized the shelf price survey for applicants and current vendors (as collected at reauthorization and updated at monitoring). A food basket analysis is conducted using the most common WIC food packages (fully formula fed infant, pregnant woman, 12 – 23 month child, and 2 – 5 yr. child) plus a 15% inflation factor. The prices reported on the applicant Vendor Price Survey will be the determinant as to whether the applicant's prices are within 15% of the average reported prices within the individual vendor class. West Virginia does not authorize above 50%-vendors.

(1) The State agency establishes maximum allowable reimbursement levels for:

- | | | |
|---|---|-----------------------------|
| (a) Each peer group | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| (b) Each food instrument or food category | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| (c) Other (please specify): | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

At subcategory or UPC depending on volume

(2) The State agency establishes maximum allowable reimbursement levels using:

- (a) Standard deviations Yes No

If yes, specify the standard deviation number and explain how the State agency determined the standard deviation it used is appropriate: 2 standard deviations – this is what is recommended within the Crossroads system. The 2nd standard deviation against actual redemptions to the peer group and UPC level if enough volume, which is 10 individual purchases.

- (b) A percentage above the average redemption amount Yes No

If yes, specify the percentage and explain how the State agency determined that this percentage is appropriate.

[Click or tap here to enter text.](#)

- (c) Other (please specify): Yes No

Redemption prices developed by vendor class, category, subcategory, and UPC.

(3) The maximum allowable reimbursement levels include a factor to reflect:

- | | | |
|------------------------------|--|---|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Wholesale price fluctuations; explain: Click or tap here to enter text. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Inflation: explain: Click or tap here to enter text. |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Other (please specify): Click or tap here to enter text. |

- b. The State agency screens redemption requests through a pre-edit (before payment) or post-edit (after payment) process to detect the following:

Not Applicable	Pre-Edit Screen	Post-Edit Screen	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Purchase or requested price exceeds price limitations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Altered purchase price
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vendor/farmer identification missing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Invalid/counterfeit vendor/farmer identification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Transacted before specified period
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Transacted after specified period
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Redeemed after specified period

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

- | | | | |
|-------------------------------------|--------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Altered dates |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Missing signature |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Mismatched signature |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Altered signature |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): Click or tap here to enter text. |

c. **When the payment amount on a food item exceeds the maximum allowable reimbursement amount, what action does the State agency take?**

- Reimburses the vendor for amounts up to the maximum allowable reimbursement amount
- Reimburses the vendor at the peer group average
- Rejects the reimbursement request but allows the vendor to resubmit
- Rejects the reimbursement request without allowing the vendor to resubmit
- Other (please specify): [Click or tap here to enter text.](#)

d. **Where pre-edit screens are used, the proportion of FIs reviewed includes:**

- All FIs Percentage of FI ([Click or tap here to enter text.%](#))
- Other (please specify): [Click or tap here to enter text.](#)

e. **The edit system(s) that use(s) maximum allowable reimbursement levels to screen for vendor overcharges rejects food instruments based on:**

Pre-Edit

Post-Edit

- | | | |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not To Exceed or Maximum Prices |
| <input type="checkbox"/> | <input type="checkbox"/> | Percentage above average (Click or tap here to enter text.%) |
| <input type="checkbox"/> | <input type="checkbox"/> | Amount above average (Click or tap here to enter text.) |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify): Click or tap here to enter text. |

f. **The following actions are used to control against unauthorized stores redeeming FIs:**

- Provide up-to-date list of authorized vendors to participants at certification and/or issuance
- Remove a vendor/farmer/farmers' ability to conduct transactions when it is no longer authorized
- Conduct compliance buy to verify if unauthorized store transacts and redeems FIS
- State agency or its banking institution checks vendor/farmer/farmers' market ID numbers on redemption requests against the authorized vendor/farmer/farmers' market list before paying vendors/ farmers/farmers' markets for FIs submitted for redemption
- Inform all participants who might use the unauthorized store
- Other (specify): EBT Processor has listing of all authorized stores and transactions will not go through for an unauthorized vendor

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

5. **Price Lists**

a. **Shelf Price list information is routinely collected from vendors:**

- Yes No; Explain: (Proceed to item #6) [Click or tap here to enter text.](#)

b. **Shelf Price list data are collected:**

- Real Time or Daily via EBT system Monthly Quarterly Semiannually
- Other (specify): At routine monitoring visit and at reauthorization application.

c. **Shelf Price data are collected by:**

- State agency staff
- Local agency staff

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

Reports are submitted by vendors

EBT system

Other (specify): [Click or tap here to enter text.](#)

d. **The data collected has food prices for (check all that apply):**

All brands and sizes of supplemental foods

Highest price supplemental food items within food categories

Most commonly redeemed food items; please specify: [Click or tap here to enter text.](#)

All authorized vendors

A sample of authorized vendors (please describe the sampling method used): [Click or tap here to enter text.](#)

Other (specify): EBT redemptions

e. **The State agency/local agency verifies price data provided by vendors:**

During routine monitoring visits

Does not verify on a routine basis

Other (explain): At reauthorization

f. **The State agency/local agency analyzes price data:**

Manually on a routine or as needed basis

In an Automatic Data Processing 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 does not identify overcharges and/or issue claims for overcharges. (Proceed to section *D. Manual Food Instruments.*)

Other (specify): EBT automatically adjusts at redemption based on item NTE; but if a mistake occurs, the vendor has 10 days to report, and a manual adjustment / claim procedure is initiated with WIC TPP.

b. **The methods used to identify potential vendor overcharges are:**

Comparison of vendor's redemption prices to charged prices (via receipt).

Other (specify): Comparison of redemption values of vendor with other vendors in the vendor's peer group.

Comparison of redemption values of vendor with all vendors. Having the NTE set at the UPC level helps to keep vendors from overcharging on individual items; however, if there is a mistake, the vendor has 10 days to report the transaction for a manual adjustment process.

c. **To receive payment or justify and correct a claim for a price adjustment or vendor overcharge, the vendor must: (Check all that apply)**

Provide an updated price list

Provide written justification for the higher prices

Provide receipts

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

Other (specify): EBTCordinator verifies transaction errors with participant and vendor.

d. **What action(s) is/are taken when a potential vendor overcharge is identified? (Check all that apply)**

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

Other (specify): Click or tap here to enter text.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): Click or tap here to enter text.

E. Manual Food Instruments

DOES NOT APPLY (PROCEED TO NEXT SECTION)

1. **Manual FIs Policy**

a. **Manual FIs are utilized for the following reasons:**

New participants

Automated FIs not available

Mutilated automated FIs

Wrong food package on automated FI

Wrong dollar amount on automated FI

Provide for the special needs of the homeless

Food package tailoring

Routine monitoring visits (i.e., educational buys) of vendors/farmers

Compliance buys of vendors/farmers

Special conditions, e.g., disasters

Other (specify): Click or tap here to enter text.

b. **The State agency requires the following for completing the manual FI register:**

Participant/proxy signature Local agency staff initials

Date of FI pick-up Other (specify): Click or tap here to enter text.

c. **Manual FIs have a "Not to Exceed Value" of:**

Same dollar amount for all manual food instruments \$ Click or tap here to enter text.

Variable dollar amount depending on type of prescription on manual FI

Variable dollar amount depending on participant category on manual FI

No limit

Other (specify): Click or tap here to enter text.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): Click or tap here to enter text.

2. **Manual FI Documentation and Disposition**

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

- a. **A report containing the serial numbers of manual FIs issued by local agencies is sent to the State agency:**
- Not applicable Weekly Monthly
 Other (specify): [Click or tap here to enter text.](#)
- b. **Local agencies are required to provide documentation to substantiate a valid or invalid certification record for manual FIs 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): [Click or tap here to enter text.](#)
- c. **If the manual FI inventories do not achieve 100% reconciliation of all issued and unissued FIs, the local agency (check all that apply):**
- Reports the FI serial numbers to the State agency
 Provides the FI serial numbers to local vendors/farmers
 Other (specify): [Click or tap here to enter text.](#)

(Provide a copy/citation of the State agency's prescribed procedures if the manual FI inventory cannot be reconciled.)

[Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

F. Special FI Issuance Accommodations

1. Alternative FI Issuance

- a. **The State agency has implemented the following FI issuance policy (check all that apply):**
- All participants are required to pick up FIs at the clinic or local agency, except in unusual circumstances
 Participants/proxies are required to show identification at FI card pick up
 FIs cards are routinely mailed to participants except (1) when the participant is scheduled for nutrition education (including breastfeeding promotion and support activities) or a certification appointment and (2) in areas where SNAP benefits 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 FIs at the clinics.
 Other (specify): [Click or tap here to enter text.](#)

2. Mailing Policy/Procedures

- a. **The State agency provides local agencies with guidelines/procedures for mailing paper FIs or EBT cards to individual participants:**
- Yes No
- b. **Policy requires participants to pick up paper FIs or EBT cards whenever certification appointment is due or nutrition education (including breastfeeding promotion and support activities) is scheduled:**
- Yes No
- c. **The State agency has implemented the following policy regarding mailing paper FIs or EBT cards (check all that apply):**
- FIs are sent first class mail *(first class is considered *regular* mail)
 FIs are sent registered mail

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

- FIs are sent certified mail
- FIs are sent restricted mail
- Return receipt is requested on FIs sent certified mail
- Envelope specifies, "Do not forward, return to sender" or "Do not forward, address correction requested"
- Other (specify): [Click or tap here to enter text.](#)

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

	State-Wide	LA with SA Approval	Case by Case
Participant hardship	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Travel-related issues	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Better clinic management	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Participant safety	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Participant convenience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cost effectiveness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Health Emergency	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(if other, specify): WV does not typically mail. However, for reasons indicated above, benefits may be remotely loaded to EBT cards without the client having to come to clinic. Each situation is assessed on a case-by-case basis.

e. **When mailing paper FIs or EBT cards, documentation of FI issuance is:**

- Signed by the participant at the following FI 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): Notated in the participant's record within Crossroads as to the reason and approval of the mailing of the EBT card to the participant.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

3. **Participants who receive paper FIs or EBT cards by mail are provided:**

- One month of benefits
- Two months of benefits
- Three months of benefits
- Other (specify): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

G. Vendor Cost Containment System Certification

If the State agency authorizes or plans to authorize any above-50-percent vendors, FNS must certify the State agency's vendor cost containment system. The State agency that has not yet received FNS certification must submit a request for certification/recertification that contains the following information.

DOES NOT APPLY (PROCEED TO SECTION H)

1. **Calculation of competitive price levels**

Describe how the State agency derives (or will derive) competitive price levels for regular vendors that excludes the prices of above-50-percent vendors.

[Click or tap here to enter text.](#)

2. **Maximum allowable reimbursement levels for regular vendors and above-50-percent vendors**

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

- a. **Explain how the State agency ensures that average payments to above-50-percent vendors do not exceed average payments to comparable regular vendors.**

Click or tap here to enter text.

- b. **The State agency exempts above-50-percent vendors from the calculated competitive price criteria and maximum allowable reimbursement levels.**

Yes No If yes, how many vendors will be exempted? Click or tap here to enter text.

Are these vendors needed to ensure participant access to supplemental foods?

Yes No

- c. **The State agency applies peer-group specific maximum allowable reimbursement levels during the benefit redemption process.**

Yes No If yes, describe the procedure or process used:

Click or tap here to enter text.

3. **The State agency plans to exempt *non-profit* above-50-percent vendors from competitive price criteria and maximum allowable reimbursement levels.**

Yes No If yes, provide the following information in detail: Click or tap here to enter text.

- a. **Describe the reason the State agency has decided to exempt such vendors (i.e., the benefits to the program) and the number of non-profit vendors to be exempted.**

Click or tap here to enter text.

- b. **Describe the reason the non-profit above-50-percent vendors are needed to ensure participant access to supplemental foods.**

Click or tap here to enter text.

- c. **Does the State agency collect shelf prices from non-profit vendors?**

Yes No

- d. **Describe how the prices of the non-profit vendors compare to those of other vendors in their geographic area that are subject to competitive price criteria and allowable reimbursement levels.**

Click or tap here to enter text.

- e. **Describe how the State agency establishes the level of reimbursement for the non-profit above-50-percent vendors that it has exempted.**

Click or tap here to enter text.

4. **The State agency has fully implemented the competitive price criteria and maximum allowable reimbursement methodologies described in items 1 and 2 above.**

Yes No

If the State agency has not fully implemented the revised competitive price and maximum allowable reimbursement methodologies, describe the current status of this effort and include the timetable for achieving full implementation.

Click or tap here to enter text.

5. **The State agency plans to exempt *pharmacy* vendors from competitive price criteria and maximum allowable reimbursement levels.**

Yes No

If yes, the State agency has confirmed that these pharmacies provide **only** exempt infant formula and/or WIC-eligible

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

nutritional foods to program participants.

6. Does the State agency collect shelf prices from pharmacies that provide only exempt infant formula?

Yes No

7. Complete the table on the following page to demonstrate that the State agency's procedure for establishing and implementing competitive price criteria and maximum allowable reimbursement levels ensures that average payments per food instrument or food item to above-50-percent vendors do not exceed average payments to regular vendors.

8. Please attach and cite of a copy of the report(s) that the State agency will use to monitor average payments per food instrument to above-50-percent vendors and regular vendors. If the State agency does not have such a report, describe the State agency's plans to develop and implement a report(s) for monitoring purposes, including the report contents or fields.

Click or tap here to enter text.

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

Table 1. Data for WIC Vendor Cost Containment Certification – Overview

Please provide the following information on the regular vendors and the above-50-percent vendors authorized by the State agency as of June 30th. If data are not available through June 30th, the State agency should enter data for the period for which data are available, replacing “June” with the month to which the data are applicable.

1. How many authorized regular vendors did the State agency have as of June 30th? (or month of:)	1.
2. For all authorized regular vendors, what was the total amount of WIC redemptions paid as of June 30th?	2.
3. How many above-50-percent vendors did the State agency have as of June 30th?	3.
a. Non-pharmacy above-50-percent vendors	a.
▪ Number of <i>WIC-only</i> stores	▪
▪ Number of other types of above-50-percent vendors (excluding pharmacies)	▪
b. Above-50-percent pharmacy vendors	b.
c. Total above-50-percent vendors (sum of a and b)	c.
4. What was the total amount of redemptions paid to these above-50-percent vendors as of June 30th?	4.
a. Non-pharmacy above-50-percent vendors	a.
b. Above-50-percent pharmacy vendors	b.
c. Total above-50-percent vendors (sum of a and b)	c.
5. How many peer groups of above-50-percent vendors (either separate peer groups or groups with regular vendors) has the State agency identified?	5.
6. How many above-50-percent vendors and regular vendors has the State agency authorized that do <u>not</u> meet competitive price criteria, but are needed to ensure participant access to supplemental foods?	6. above-50%: regular vendors:

Supplemental WIC State Plan Guidance section IX.I – Vendor Cost Neutrality Assessment will be issued in the spring.

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

H. 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): CAP Formula Warehouse

b. Participants who receive home food delivery:

- Are notified in writing of the types and quantities of foods
- Are issued FIs that they sign and provide to the vendor when the food is delivered
- Are delivered not more than a one-month supply of supplemental foods at any one time
- Indicate by authorized signature on a FI, receipt or signature document, the supplemental foods received
- Other (specify): [Click or tap here to enter text.](#)

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): CAP formula is the only food delivered. No supplemental foods are involved.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

2. Documentation

a. The forms verifying delivery are reconciled against vendor invoices:

- Weekly
- Monthly reconciliation of the signed FIs or other signed receipts or signature documents from participant or proxies.
- Other (specify): Payment files are matched back to issuance. If participant indicates formula is missing, delivery method is researched with CAP Formula Warehouse and future orders must be shipped to the clinic.

b. Signatures of participants who sign the food receipt document/FIs are compared to the signature on file.

- No
- Yes, sample
- Yes 100%

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

I. Direct Distribution Food Delivery Systems

DOES NOT APPLY

1. Direct Distribution Food Delivery - General

a. The State agency uses a direct distribution food delivery system to:

- Distribute all its WIC Program foods
- Distribute only exempt infant formula and/or medical foods

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

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): One central warehouse providing home delivery

c. Warehouses are operated by:

- State agency Local agency
- Other state or public agency Under contract with a private business
- Other (specify): [Click or tap here](#)

d. Warehouses used for storage of WIC foods are also used to store other FNS program commodities (Please specify which commodities):

- Yes No Specify commodities: [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

2. Food Distribution

a. Foods are distributed to participants:

- Grocery store fashion
- Pre-packaged
- Other (specify): [Click or tap here to enter text.](#)

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): Signature may not be that of the participant/parent/guardian

c. Foods are distributed to participants:

- Monthly
- Not to exceed a one-month supply at any one time to any participant
- Other (specify): [Click or tap here to enter text.](#)

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

Services provided by:

	Local Agency	Other Sources
Home delivery	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cost-free transportation	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(if other, specify): Most orders are shipped to the home; however, if there has been an issue with delivery in the past, the participant must pick up formula at the clinic.

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

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation): [Click or tap here to enter text.](#)

3. Warehouse Insurance and Inspections

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

Theft Fire Infestation 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): [Click or tap here to enter text.](#)

Sanitation laws and regulations (specify date and grade of last inspection): [Click or tap here to enter text.](#)

Other (specify): [Click or tap here to enter text.](#)

ADDITIONAL DETAIL: Food Delivery Appendix: and/or Procedure Manual (citation): **Appendix W– CAP Formula Warehouse Contract Agreement**

4. Monitoring and Inventory Control

Please describe the State agency's methods for ensuring WIC supplemental foods are under proper inventory control (separation of duties for intake and inventory; stock rotation; performance of perpetual and physical inventory duties; reconciliation against issuance records; etc.). [Click or tap here to enter text.](#)