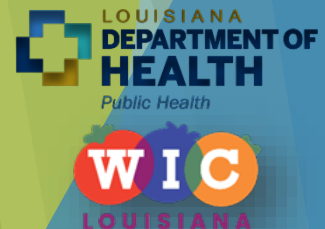


LA WIC ANNUAL VENDOR TRAINING 2024

Annual Vendor Training is a requirement for all Authorized WIC Vendors



Housekeeping

- ▶ Throughout this Annual Vendor Training:
 - Callers should utilize the “Q & A” feature to ask questions
 - All callers will be placed on mute. If you would like to ask a question outside of the Q & A feature, please utilize the “Raise Hand” feature, and LA WIC will take you off mute so you can ask your question.
 - There will also be time at the end of the presentation to ask questions, both in English and in Spanish. Se reservará tiempo al final de la presentación para hacer preguntas en Ingles y Español.
 - Attendance will be recorded using the Annual Training Attendee Form. LA WIC will drop the form link into the chat a various points throughout the call. Each person present should complete this form in order to receive credit for attending.
 - If you are calling in by phone, please email LAWICVendor@la.gov, and LA WIC will respond with the attendance link. Also, use this email to send any questions you may have during the presentation.
- The PowerPoint slides will be sent out after the presentation.

Disclosure

The Louisiana Department of Health Office of Public Health -
Bureau of Nutrition Services employees, contractors, affiliates,
etc. have no actual or potential conflict of interest in relation
to this program / presentation.



Public Health

***Bureau of Nutrition Services
Leadership***

Tonya Joiner

Interim Assistant Secretary,
Office of Public Health (OPH)

Elizabeth Adkins

Deputy Assistant Secretary,
Center for Community and Preventive Health (CCPH)

Jennifer Nicklas

Director,
Bureau of Nutrition Services (BONS)

Timothy Messa

Vendor Operations Manager,
Bureau of Nutrition Services (BONS)

Vacant

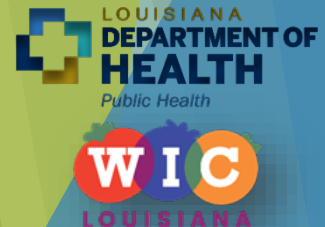
Program Manager 2,
Bureau of Nutrition Services (BONS)

Lavonselle Longmyle

Program Manager 2,
Bureau of Nutrition Services (BONS)

Joetta Ferrell

Program Manager 1B,
Bureau of Nutrition Services (BONS)



Purpose of WIC Vendor Training

Enhance the Bureau of Nutrition Services relationship with Authorized WIC Vendors by providing:

- An overview of WIC and to convey important information relative to Vendor Operations,
- Information to prevent program errors and noncompliance and improve program service, and
- Specific and clear information about State and Federal policies that affect Authorized WIC Vendor Operations.

Learning Objectives

- This session serves as training in each area of WIC Vendor responsibilities.
- Vendors will have the opportunity to increase their knowledge and understanding of the purpose and requirements of the WIC program.
- Vendors will use the learned knowledge to provide excellent customer service to WIC Participants.
- Participation in this training will count toward the mandatory annual WIC Vendor training requirement.

Annual Training Overview

- ▶ Purpose and Mission of WIC
- ▶ Changes in Program Requirements
- ▶ Rules and Regulations Governing LA WIC
- ▶ Authorization
- ▶ Vendor Selection Criteria
- ▶ Cost Containment
- ▶ In-Store Policies
- ▶ Complaints
- ▶ Investigations and Monitoring
- ▶ Sanctions
- ▶ Participant Access
- ▶ Termination
- ▶ Disqualification
- ▶ Civil Money Penalties
- ▶ Administrative Hearings /Appeals
- ▶ Transaction Procedures
- ▶ WIC Transactions at Self-Checkout
- ▶ POS System and Claim Process
- ▶ Additional Vendor Information
- ▶ Vendor Education and Resources
- ▶ Final Steps for Completion



Purpose and Mission of WIC

About WIC

- WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children.
- Funded by the United States Department of Agriculture.
- Administered in Louisiana by the Department of Health (LDH), Office of Public Health (OPH) - Bureau of Nutrition Services (BONS).
- Provides WIC Approved Food Items, promotes good health and nutrition during critical times of growth and development.
- WIC Applicants must meet certain income guidelines.

Our WIC Participants are:

Women

- Pregnant
- Post-partum
- Breastfeeding

Infants

- Up to one year old

Children

- One to five years old



Mission of BONS & LA WIC

The mission of the Bureau of Nutrition Services is to improve health outcomes, reduce disparities, and support nutrition security in Louisiana by providing healthy foods, nutrition education, breastfeeding support, and referrals to support services all through coordinated efforts across the landscape of stakeholders.



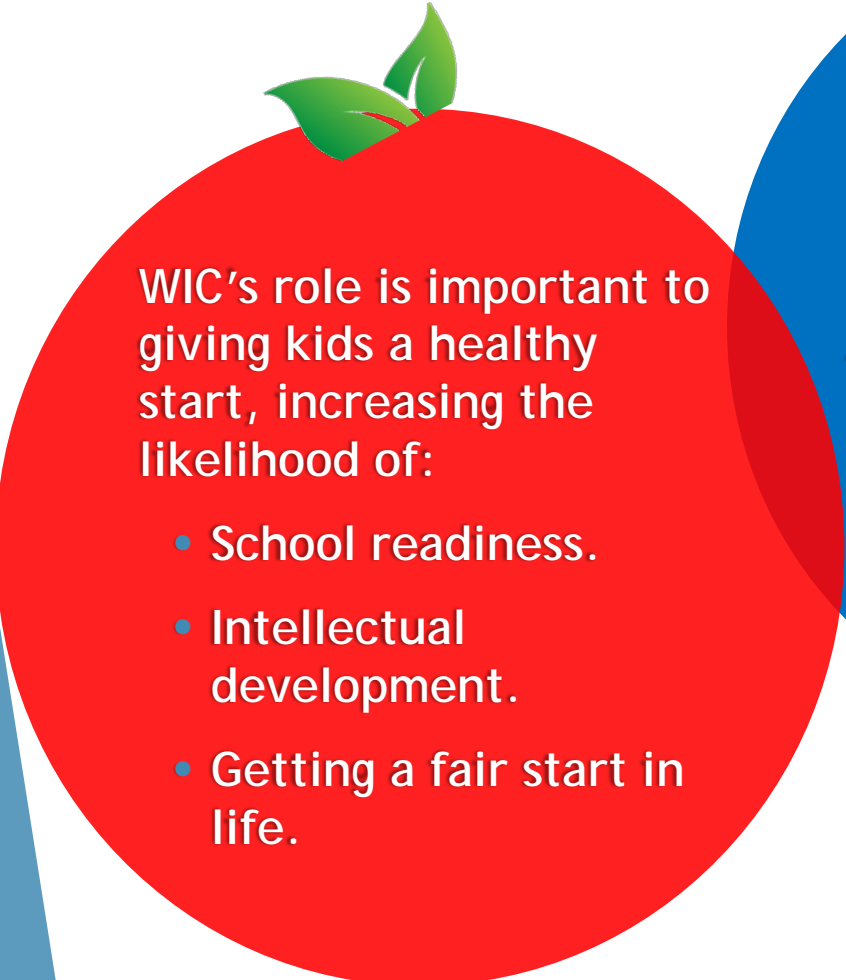
Purpose of WIC

WIC provides its Participants with:

- Breastfeeding Support,
- Nutritional Assessments,
- Nutrition Education,
- Referrals to Other Health Services, and
- EBT Cards to buy nutritious, approved foods through Authorized WIC Vendors.

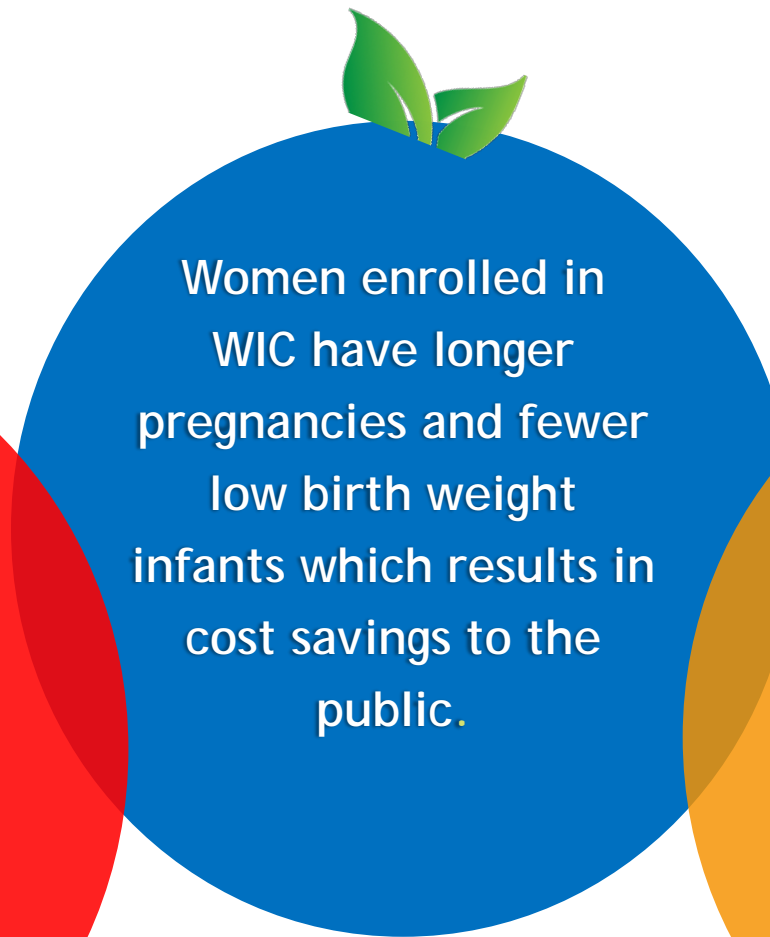


Benefits of WIC

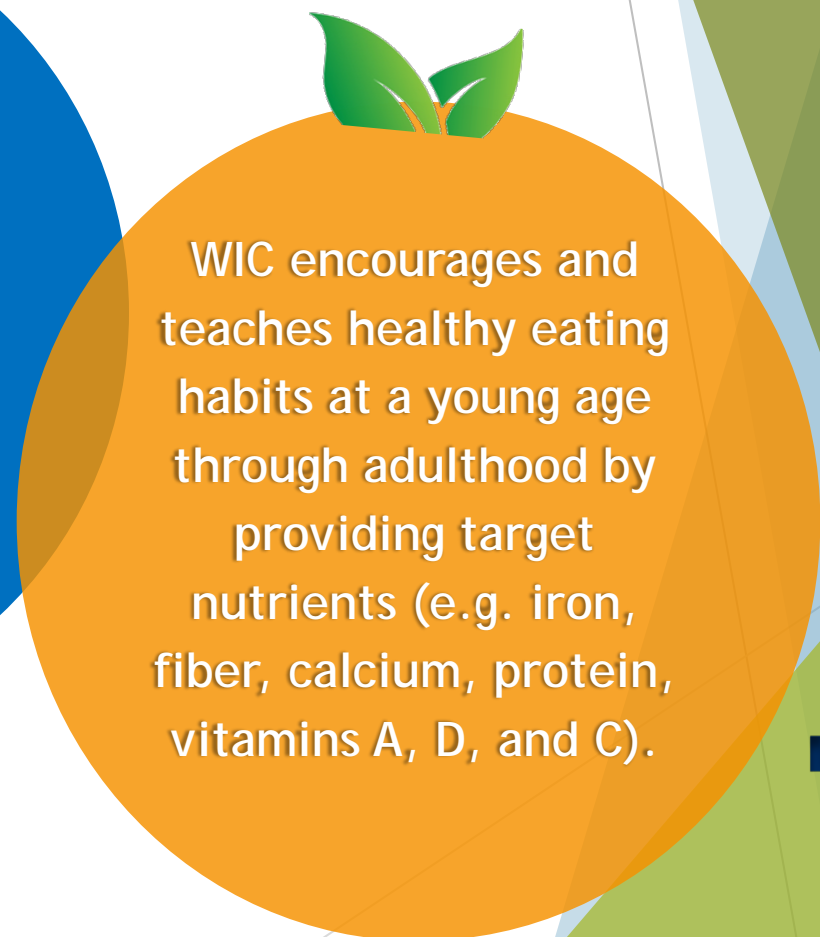
A large red circle with a green leaf on top, representing an apple. It contains text about the importance of WIC for children's health.

WIC's role is important to giving kids a healthy start, increasing the likelihood of:

- School readiness.
- Intellectual development.
- Getting a fair start in life.

A large blue circle with a green leaf on top, representing an apple. It contains text about pregnancy and birth weight.

Women enrolled in WIC have longer pregnancies and fewer low birth weight infants which results in cost savings to the public.

A large orange circle with a green leaf on top, representing an apple. It contains text about healthy eating habits.

WIC encourages and teaches healthy eating habits at a young age through adulthood by providing target nutrients (e.g. iron, fiber, calcium, protein, vitamins A, D, and C).

Our Authorized WIC Vendors



Play an important role
in the health of their
community and
especially to our
WIC Participants!



Annually account for
over \$70 million in
nutritious food
delivered to nearly
95,000 WIC
Participants.



Help with cost
containment through
competitive pricing
on all WIC Approved
Food Items!



Changes to Program Requirements and Upcoming Improvements

Changes to LA WIC Policy

Changes that occurred since last Annual Vendor Training (01.2023)

- Louisiana Administrative Code (LAC)
Updated in November 2023
- Minimum Stock Requirements (MSR)
 - Temporary MSR expired 09/30/23
 - LA WIC has returned to the MSR effective 12/07/22
- Initial Authorization
- Change in Availability or Location
- Processing EBT Transactions
- Payment Plan Agreements – New Policy





Rules and Regulations Governing LA WIC

Vendor Rules and Regulations



- [Code of Federal Regulations \(CFR\)](#)
- [Louisiana Administrative Code \(LAC\)](#)
- [LA WIC Policy Manual](#)
- [LA WIC Vendor Guide](#)
- [LA WIC Vendor Agreement](#)

Essential Documents and Forms can be found on the [LA WIC Authorized Vendor Hub](#)



Authorization

Initial Authorization

- ▶ Stores interested in transacting WIC Benefits must apply for WIC Authorization.
- ▶ Stores who are approved for initial authorization enter into an agreement with LA WIC for a length of time that corresponds to their location.
 - Each Vendor's term or length of authorization is identified in their Vendor Agreement.
- ▶ NEW: Initial Authorization applications are now accepted year round.
 - If the vendor applicant's Vendor Agreement would be in effect for less than four months, LA WIC will process the application but will postpone authorization until the next scheduled authorization cycle



Maintaining WIC Authorization

- ▶ In order to maintain WIC Authorization, Vendors shall continue to meet all LA WIC Vendor Rules and Regulations, and any changes thereto, at all times.
- ▶ LA WIC Vendor Rules and Regulations include:
 - The CFR,
 - The LAC,
 - LA WIC Vendor Guide,
 - LA WIC Vendor Agreement,
 - LA WIC Policy Manual, and
 - LA WIC Memos, policies, procedures, formal instructions, and terms of participation
- ▶ A Vendor found to be out of compliance at any time during the agreement period is subject to sanction.

Reauthorization

- ▶ Vendors whose Vendor Agreements expire in the current calendar year must undergo Reauthorization to maintain WIC Authorization.
 - Notification will be sent out on July 1, 2024 to advise Vendors in Trade Area 2 (Regions 6, 7, and 8) to submit reauthorization documentation.
 - Vendors in Regions 6, 7, and 8 who submit a complete application and who are in compliance, will be notified of their eligibility status prior to October 1, 2024.
 - Submission of false or incomplete information will result in a delay or denial of reauthorization (or sanction if the false or incomplete information is discovered after authorization).
- ▶ All Vendor Agreements in Trade Area 2 will expire on September 30, 2024. In order to continue to transact WIC Benefits after September 30, Vendors in Trade Area 2 must apply for Reauthorization in July.



Vendor Selection Criteria

Vendor Selection Criteria

- ▶ Federal Regulations mandate that LA WIC develop and implement vendor selection criteria to *select only qualified Vendors* to provide WIC Approved Food Items to WIC Participants.
 - After authorization, all Vendors shall continue to meet vendor selection criteria and any changes thereto, at all times. A Vendor found to be out of compliance with LA WIC Vendor Rules and Regulations, at any time during the authorization period, may be subject to sanction.
 - LA WIC may reassess any Vendor at any time during the Vendor's agreement period using the vendor selection criteria in effect at the time of the reassessment and may sanction Vendors that fail to meet them.

Vendor Selection Criteria

- Complete Vendor Application
- SNAP Authorization
- Grocery Class Permit
- Store Condition
- Hours of Operation
- Competitive Prices
- Shelf Prices
- Minimum Stock Requirements
- Infant Formula Supplier
- Denial or Termination
- Business Integrity: USDA Program Disqualification
- Business Integrity: Felony
- Business Integrity: Taxes
- Business Integrity: Conviction or Civil Judgement
- Good Standing
- Truthful and Accurate
- Technology Access
- Cash Register System
- WIC Transactions
- A50: Prohibited
- A50: Reimbursement Agreement
- A50: Incentives
- Full-Line Grocery



Selection Criteria - Minimum Stock Requirements (MSR)

- ▶ Vendors must maintain specific WIC Approved Food Items in the store at all times.
 - These WIC Approved Food Items can be on the store shelves or in storage areas within the physical structure of the store.
 - Not all WIC Approved Food Items have a MSR.
 - MSR can be found in the [LA WIC Minimum Stock Requirements](#) (WIC-23) and the [LA WIC Vendor Guide](#).
 - Additional information regarding authorized brands, flavors, varieties and sizes for WIC Approved Food Items can be found in the [LA WIC Program Guide](#), found on the [LA WIC Authorized Vendor Hub](#).

WIC Food List Updates

- ▶ A revised [LA WIC Program Guide](#) became effective February 1st, 2024
- ▶ Important Changes
 - ▶ A variety of new brands and types have been added in several categories
 - ▶ The beans/peas category of the shopping list will now include peanut butter
 - ▶ WIC participants will now have the added option of choosing peanut butter when shopping for beans/peas
 - ▶ Eggs are now allowed in any size; white or brown
 - ▶ Several new types of cheese are now allowed
- ▶ We are accepting [UPC addition requests](#) for new brands and types
- ▶ Review [Vendor Memo](#) from January 24
- ▶ The new Program Guide will be mailed to Vendors in the coming weeks

How to buy beans and peanut butter. One item equals:


1 package of dry beans,
lentils or peas

or


4 cans
of beans

or


1 jar of
peanut butter

Cheese

8 or 16 oz.

- American, mild cheddar, medium cheddar, natural cheddar, mozzarella (part skim or whole), Swiss, pasteurized Processed American, colby, monterey jack, muenster, provolone



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Selection Criteria - Minimum Stock Requirements (MSR)

- ▶ Vendors are required to have the [LA WIC Minimum Stock Requirements \(WIC-23\)](#) available for review in each store.
 - ▶ Additional information regarding authorized brands, flavors, varieties and sizes for WIC Approved Food Items can be found in the [Program Guide](#), found on the [LA WIC Authorized Vendor Hub](#). This Program Guide shall also be made available for review in each store.

LA WIC Minimum Stock Requirements (WIC-23):

- ▶ LA WIC Temporary Minimum Stock Requirements expired 09/30/2023
- ▶ Vendors are now required to stock all MSR items listed on the WIC-23 effective 12/07/2022







Louisiana WIC Program Minimum Stock Requirements (WIC-23) Effective December 7, 2022



All Vendors must meet LA WIC's Full-Line Grocery Requirements and maintain minimum stock of the WIC Approved Food Item(s) listed below. Please reference the [LA WIC Program Guide](#) for information on authorized brands, flavors, varieties and sizes. All Vendors shall regularly review the Authorized Product List (APL), found on the [LA WIC Authorized Vendor Hub](#), and the [WICshopper App](#).

Minimum Stock Requirements (MSR)					
Food Category	Size	Min Stock	Food Category	Size	Min Stock
Cold Breakfast Cereal	12oz., 18oz., 24oz. and/or 36oz. boxes	15 boxes (any combination of approved sizes, 1 must be approved whole grain cereal)	Whole Grains (rice, bread, tortillas, pasta)	16oz. package	10 - 16oz. packages, at least 5 must be Whole Wheat Bread
Infant Cereal	8oz. container	5 containers	Peanut Butter	16 - 18oz. jar	5 jars
Infant Fruits and/or Infant Vegetables	4oz. container	32 containers, 2 varieties	Beans/Lentils/Peas (dried and canned)	16oz. bag and 15-16 oz. can	6 bags, any variety 6 cans, any variety
Fresh Vegetables	N/A	20 units, 4 varieties	Fresh Fruit	N/A	20 units, 4 varieties
Single Strength Juice	64oz. container	6 containers, 2 flavors	Whole Milk	Gallon Half-Gallon Quart	5 gallons total (any combination of whole milk in any approved size)
Single Strength Juice	48oz. container and/or 11.5-12oz. frozen concentrate	6 containers, 2 flavors	Low Fat Milk: Low Fat (1%) Milk and/or Skim Milk	Gallon Half-Gallon Quart	10 gallons total (any combination of approved low-fat milk and/or skim milk in any approved size)
Whole Milk Yogurt	32oz. container	64oz. total (any combination of approved whole milk yogurt in any approved size)	Low Fat and/or Skim Yogurt	32oz. container	64oz. total (any combination of approved low-fat and/or skim milk yogurt in any approved size)
Eggs	Dozen - lg, white	5 dozen	Cheese	8oz. package 16oz. package	5 lbs total (any combination of approved cheese in any approved size)
Infant Formula	12.4 - 12.6oz. can	See page 2			

Infant Formula Minimum Stock Requirements (MSR)			
Infant Formula	Size	MSR	
Similac Advance Powder	12.4oz. can	12 cans	
Similac Soy Isomil Powder	12.4oz. can	6 cans	
Similac Total Comfort Powder	12.6oz. can	6 cans	
Similac Sensitive Powder	12.5oz. can	6 cans	

NEW

LA WIC Minimum Stock Requirements (WIC-23) Change Highlights:

- Change from Temporary Minimum Stock to Current MSR highlights:

Item	MSR as of 10/1/23 (Eff. 12/7/22)			Temp MSR - Expired
Infant Cereal	Infant Cereal	8oz. container	5 containers	N/A
Infant Fruits and Vegetables	Infant Fruits and/or Infant Vegetables	4oz. container	32 containers, 2 varieties	Infant Fruits/Vegetables 4oz. container 16 containers (any combination of approved containers)
Single Strength Juice	Single Strength Juice	64oz. container	6 containers, 2 flavors	N/A
Single Strength Juice	Single Strength Juice	48oz. container and/or 11.5-12oz. frozen concentrate	6 containers, 2 flavors	N/A

LA WIC Minimum Stock Requirements (WIC-23) Change Highlights:

- Change from Temporary Minimum Stock to Current MSR highlights:

Item	MSR as of 10/1/23 (Eff. 12/7/22)			Temp MSR - Expired		
Whole Milk Yogurt	Whole Milk Yogurt	32oz. container	64oz. total (any combination of approved whole milk yogurt in any approved size)	N/A		
Low Fat and/or Skim Yogurt	Low Fat and/or Skim Yogurt	32oz. container	64oz. total (any combination of approved low-fat and/or skim milk yogurt in any approved size)	N/A		
Low Fat Milk	Low Fat Milk: Low Fat (1%) Milk and/or Skim Milk	Gallon Half-Gallon Quart	10 gallons total (any combination of approved low-fat milk and/or skim milk in any approved size)	Low Fat Milk: Low-Fat (1%) Milk and/or Skim Milk	Gallon Half-Gallon Quart	5 gallons total (any combination of approved low-fat milk and/or skim milk in any approved size)
Cheese	Cheese	8oz. package 16oz. package	5 lbs total (any combination of approved cheese in any approved size)	Cheese	8oz. and/or 16oz. package	5 packages (any combination of approved packages)



NEW

LA WIC Minimum Stock Requirements (WIC-23) Change Highlights:

- Change from Temporary Minimum Stock to Current MSR highlights:

Item	MSR as of 10/1/23 (Eff. 12/7/22)			Temp MSR - Expired		
Peanut Butter	Peanut Butter	16 - 18oz. jar	5 jars	N/A		
Beans/ Lentils/ Peas	Beans/Lentils/Peas (dried and canned)	16oz. bag and 15-16 oz. can	6 bags, any variety 6 cans, any variety	Beans/Lentils/Peas (dried and canned)	16oz. bag and/or 15-16 oz. can	5 bags/cans (any combination of approved bags/cans)
Whole Grains	Whole Grains (rice, bread, tortillas, pasta)	16oz. package	10 - 16oz. packages, at least 5 must be Whole Wheat Bread	Whole Grains (rice, bread, tortillas, pasta)	16oz. package	5 - 16oz. packages (any combination of approved whole grains)

LA WIC Minimum Stock Requirements (WIC-23) Change Highlights:

- Change from Temporary Minimum Stock to Current MSR highlights:

Item	MSR as of 10/1/23 (Eff. 12/7/22)	Temp MSR - Expired
Similac Advance Powder	12 Cans	N/A
Similac Soy Isomil Powder	6 Cans	N/A
Similac Total Comfort Powder	6 Cans	N/A
Similac Sensitive Powder	6 Cans	N/A



Selection Criteria - Above 50 Vendors (A50)

- ▶ An A50 Vendor is a Vendor who derives more than 50 percent (50%) of their annual food sales revenue from WIC Transactions.
- ▶ A50 Vendors will only be authorized if the store is needed for participant access.
- ▶ If Authorized, A50 Vendors must agree to:
 - Be placed in their own peer group, and
 - Not use incentives to entice WIC Participants to shop at their store.
 - ▶ A complete list of prohibited incentive items can be found in the [LA WIC Policy Manual](#). Please see Policy 7.11- In Store Promotions.

Selection Criteria - Infant Formula

- ▶ Vendors must purchase infant formula from a source that appears on the LA WIC Infant Formula Supplier List ("Supplier List") and must keep approved invoices to document their purchases.
- ▶ The following Information can be found on the [LA WIC Authorized Vendor Hub](#):
 - The [Supplier List](#),
 - A list of [invoice requirements](#), and
 - [Infant Formula Supplier Request Form](#).



Infant Formula Supplier List



Authorized WIC Vendors (Vendors) must purchase infant formula only from a source that appears on the LA WIC Infant Formula Supplier List ("Supplier List") below, and must retain [approved invoices](#) to document their purchases. A Vendor found to be out of compliance with this vendor selection criteria, at any time, may be subject to sanction.

Vendors may submit a request to add a supplier to the Supplier List by completing the [Infant Formula Supplier Request Form](#) and returning it to LAWICVendor@la.gov.

Infant Formula Manufacturers Registered with the FDA				
Name	Address	City	State	Zip
Abbott Laboratories (Abbott Nutrition)	300 Stelzer Road	Columbus	OH	43219
ByHeart	131 Varick Street, 11th Floor	New York	NY	10013
Mead Johnson (Mead Johnson Nutritionals)	2400 West Lloyd Expressway	Evansville	IN	47721
Nestle, USA (Nestle Infant Nutrition)	1812 North Moore Street	Arlington	VA	22209
Nutricia North America	77 Upper Rock Circle, Suite 303	Rockville	MD	20850
PBM Nutritionals, LLC	652 Peter Jefferson Pkwy, Ste. 300	Charlottesville	VA	22911
Prolacta Bioscience	757 Baldwin Park Blvd	City of Industry	CA	91746

Infant Formula Suppliers Approved by LA WIC*				
Name	Address	City	State	Zip
Associated Grocers, Inc.	8600 Anselmo Ln	Baton Rouge	LA	70810
	9393 Perkins Rd	Baton Rouge	LA	70810
Associated Wholesale Grocers	63331 Old Military Rd	Pearl River	LA	70452
	2929 State Line Rd	Southaven	MS	38671



Selection Criteria - Full-Line Grocery Requirements

Full-Line Grocery Requirements	
Food Category	Full-Line Grocery Requirement
Cold Breakfast Cereal	Min - 5 Units of each Variety; 5 Varieties
Bread or Tortillas	Min - 5 Units of each Variety; 3 Varieties
Rice	Min - 6 Units of each Variety; 2 Varieties
Fresh Fruits	Min - 5 Units of each Variety; 4 Varieties
Fresh Vegetables	Min- 5 Units of each Variety; 4 Varieties
Fresh or Frozen Meat, Poultry, or Fish	Min - 5 Units of each Variety; 4 Varieties

Selection Criteria - Shelf Prices

- ▶ Vendors must display shelf prices on WIC Approved Food Items or on the shelves/display area in immediate proximity to the WIC Approved Food Items.
- ▶ A Vendor with concerns about infant formula theft:
 - May keep infant formula in a secure area (behind the customer service counter, for example).
 - Must post notice of the location and prices of infant formula in the area where shoppers would expect to find infant formula (on the baby food aisle, for example).
- ▶ Vendors may charge WIC Participants prices that are lower than the shelf prices for WIC Approved Food Items.
- ▶ Vendors may **NOT** charge WIC Participants prices that are higher than the shelf prices for WIC Approved Food Items (this would be considered a Vendor Overcharge, which is a Federal Mandatory Vendor Sanction Violation).



Cost Containment

Federal Regulations at 7 C.F.R. Section 246.12(h)(3)(viii) require LA WIC to establish and apply limits on the amount of reimbursement allowed for WIC Approved Food Items based on a Vendor's peer group, LA WIC's competitive price criteria (CPC) and Maximum Allowable Reimbursement Levels (MARLs).



Vendor Peer Groups

Peer Group	Business Model	Description
1	Independent or Local Grocery	Vendor that operates only within Louisiana and primarily purchases from 3rd party suppliers.
2	Regional Grocery	Vendor that operates within Louisiana and one or more additional states and primarily purchases from 3rd party suppliers. Includes military commissaries.
3	National Grocery	Vendor that operates within Louisiana and one or more additional states, primarily sells groceries, and primarily purchases from its own corporate supplier.
4	Mass Merchandiser	Vendor that operates within Louisiana and most or all states, sells a wide variety of merchandise in addition to groceries, and primarily purchases from its own corporate supplier.
5		Reserved
6	A50	Vendor that derives more than fifty percent (50%) of their annual food sales revenue from WIC Transactions and new vendor applicants expected to meet this criterion under guidelines approved by FNS

- ▶ LA WIC utilizes Business Model to assign Vendors to appropriate Peer Groups
- ▶ LA WIC has published policy guidelines for Peer Groups and they can be found in the [LA WIC Policy Manual](#). Please see Policy 7.31- Peer Groups.

Competitive Price Criteria (CPC) and Maximum Allowable Reimbursement Levels (MARLs)

► What is CPC?

- The prices a Vendor or vendor applicant charges for a selection of WIC Approved Food Items as compared to the prices charged by other Vendors within the vendor peer group.
- All Vendors are subject to CPC at all times in order to ensure cost containment.

► What is a MARL?

- A MARL is the reimbursement amount above which LA WIC will make price adjustments on WIC Transactions at the subcategory level to ensure no WIC Approved Food Item is paid above a reasonable level.



In-Store Policies

- ▶ Shelf Talkers
- ▶ Equitable Treatment and Courtesies
- ▶ In-Store Promotions

Shelf Talkers

- ▶ Vendors may use shelf talkers to help WIC Participants identify WIC Approved Food Items.
- ▶ Shelf Talkers are especially helpful for identifying problem items such as yogurt, breakfast cereal, and whole wheat bread.
- ▶ The use of shelf talkers is optional.
 - If a Vendor elects to use shelf talkers, the Vendor must use only the shelf talker image(s) provided by LA WIC.
 - The approved LA WIC shelf talker images can be found on the [LA WIC Authorized Vendor Hub](#).
- ▶ NOTE: The WIC logo and acronym are not permitted to be attached or affixed to any products, including those placed in the store by a distributor.
- ▶ NOTE: Vendors may indicate an item is WIC Approved (with or without the shelf talker image(s) provided by LA WIC) on the Vendor's own printed shelf price label.



Equitable Treatment

- ▶ Vendors must treat WIC Participants and non-WIC customers the same.
- ▶ Vendors may not treat WIC Participants differently from other customers by:
 - Excluding WIC Participants from in-store promotions - this includes not allowing WIC Participants to use coupons or other store discounts that are allowed in non-WIC transactions, and/or
 - Offering WIC Participants incentive items, Vendor discounts, coupons or other promotions that are not offered to other customers.



Courtesies

- ▶ Vendors must offer WIC Participants the same courtesies that are offered to other (non-WIC) customers with respect to:
 - WIC Approved Food Item prices, and
 - Services.
- ▶ Vendors must treat WIC Participants and non-WIC customers the same by:
 - Helping the customer to obtain an item from a shelf or from behind a counter,
 - Bagging food for the customer, and/or
 - Assisting the customer with loading the food into a vehicle
- ▶ Vendors may NOT treat WIC Participants differently from other customers by:
 - Conducting the WIC Transaction indiscreetly (i.e., yelling or loudly announcing “WIC”),
 - Commenting negatively or offering opinions relative to the WIC Participants use of WIC Benefits, and/or
 - Engaging in verbal abuse of any kind.

In-Store Promotions

- ▶ Vendors must adhere to the handling of in-store promotions following LA WIC Vendor Rules and Regulations.
- ▶ Allowable discounts by type for all Vendors include:
 - Buy One, Get One Free (BOGO),
 - Buy One, Get One at a Reduced Price,
 - Bonus Size Items (Free Ounces Added to Food Item by Manufacturer),
 - Transaction Discounts,
 - Store Loyalty or Rewards Cards, and
 - Manufacturer's Cents-off Coupons.
- ▶ No Cash back. All discounts must be applied to the Transaction.





Complaints

Complaints

- ▶ Types of Complaints:
 1. Vendor Complaints
 2. Participant Complaints
 3. Civil Rights Complaints



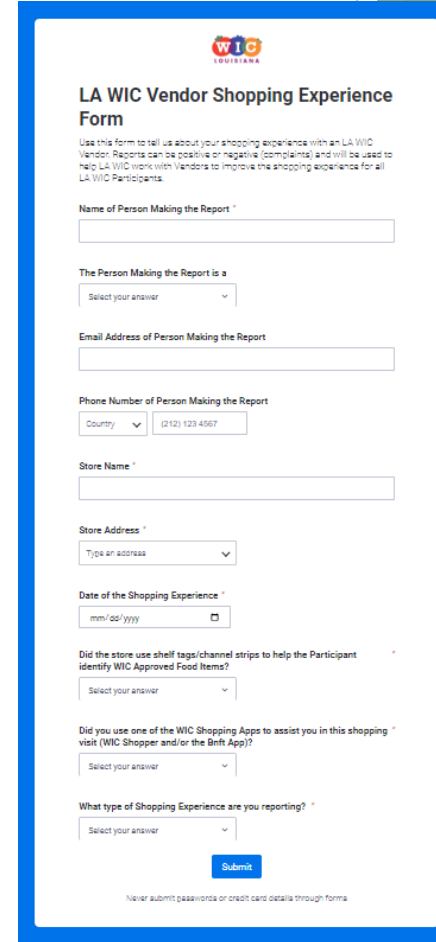
Complaints

- ▶ **Non-Discrimination:** The United States Department of Agriculture (USDA) its agencies, offices, employees, and institutions participating in or administering USDA Programs are prohibited from acting in a discriminatory manner. (See CFR §246.8(a)). The USDA is an equal opportunity provider.
- ▶ **Louisiana WIC Non-Discrimination:** LA WIC must ensure that no persons be excluded from participation, denied benefits, or be otherwise subjected to discrimination under the Program based on race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity in any Program or activity conducted or funded by the USDA.
- ▶ **Unfair Treatment:** LA WIC also discourages intentional or unintentional acts of unfair treatment towards Authorized WIC Vendors (Vendors), vendor applicants, WIC Participants and participant applicants.



Complaints

- ▶ **Vendor Complaints** (Complaints about Vendors) include:
 - Negative treatment of a WIC Participant by a Vendor's owner, manager or employee,
 - Charging more to WIC Participants than other customers,
 - Providing expired or spoiled food items,
 - Refusal to accept manufacturers' coupons, or other store discounts,
 - Inadequate variety and/or quantity of WIC Approved Food Item(s), and
 - Failure to distribute WIC Approved Food Item(s) to intended WIC Participants.
- ▶ The [LA WIC Shopping Experience Form](#) can be found on the [LA WIC Authorized Vendor Hub](#).

A screenshot of the 'LA WIC Vendor Shopping Experience Form'. The form is titled 'LA WIC Vendor Shopping Experience Form' and includes a WIC Louisiana logo. It contains several fields for user input: 'Name of Person Making the Report', 'The Person Making the Report is a' (with a dropdown menu), 'Email Address of Person Making the Report', 'Phone Number of Person Making the Report' (with a country dropdown and a text field for the number), 'Store Name', 'Store Address' (with a dropdown menu), 'Date of the Shopping Experience' (with a date picker), 'Did the store use shelf tags/channel strips to help the Participant identify WIC Approved Food Items?' (with a dropdown menu), 'Did you use one of the WIC Shopping Apps to assist you in this shopping visit (WIC Shopper and/or the Bnft App)?' (with a dropdown menu), and 'What type of Shopping Experience are you reporting?' (with a dropdown menu). A 'Submit' button is at the bottom right. A small disclaimer at the bottom states 'Never submit passwords or credit card details through forms'.

Complaints

- ▶ **Participant Complaints** (Complaints about WIC Participants) include:
 - Negative treatment of a Vendor's owner, manager or employees,
 - Deliberate attempts to purchase unauthorized foods items, and
 - Deliberate attempts to purchase larger quantities of WIC Approved Food Item(s) than what is prescribed on a WIC Participant's EBT Card.
- ▶ The WIC Participant Complaint Form is located on the [LA WIC Authorized Vendor Hub](#) and can be completed [online](#), or a [hard copy](#) can be submitted to your local WIC Clinic.

Online WIC Participant Complaint Form



Louisiana WIC Complaint Form

Use this form to tell us about your concerns with WIC Staff/Clinic, WIC Participant, or to report suspected WIC fraud.

NOTE: the identity of an individual reporting suspected WIC fraud is never disclosed to the person suspected of committing fraud.

Date Submitted*

Enter today's date

mm/dd/yyyy

WIC Participant Complaint Form

Louisiana WIC Complaint Form

Date of Report:

Complaint Against: ☐ Vendor ☐ Participant ☐ Clinic

Instructions: Fully complete as much of this form with as much specific information as possible to assist with the complaint investigation.

SECTION I - General Complaint Information

Staff Taking Report (Name):	Phone Number:	
WIC Clinic:	Clinic City/Parish:	
Person Reporting the Complaint:	Phone Number:	
<input type="checkbox"/> Caregiver <input type="checkbox"/> Proxy <input type="checkbox"/> Family Member <input type="checkbox"/> Staff Member <input type="checkbox"/> Vendor <input type="checkbox"/> Other: _____		
Participant Name:	Participant DOB:	
Family ID:	PAN:	
Date of Incident:	Time of Incident:	Previous Complaint? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown

SECTION II - Complaint Against Vendor
Complete this section to report a complaint against a WIC vendor. Include copies of receipts, if applicable.
These complaints should be forwarded to [LaWICVendorHub.com](#).

Vendor Name:	Vendor Number:
Nature of Complaint:	

Complaints

- ▶ **Civil Rights Complaints** are complaints submitted by an individual who believes and indicates they were treated differently based on their race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity in any Program or activity conducted or funded by the USDA.
 - Complaints should be submitted via mail to the U.S. Department of Agriculture - Office of the Assistant Secretary for Civil Rights at 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or via email at program.intake@usda.gov.
 - Individuals who are hearing impaired or have speech disabilities may contact the USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (Spanish).
- ▶ Civil Rights Complaints can be submitted to USDA using the form found [here](#).

U.S. Department of Agriculture
USDA Program Discrimination Complaint Form

Complainant Information		
First name	Middle Initial	Last Name
Mailing Address		
Primary Phone Number	Alternate Phone Number	Email
Best way to reach you: <input type="checkbox"/> Mail <input type="checkbox"/> Phone <input type="checkbox"/> Email <input type="checkbox"/> Other		
Representative Information		
Do you have a representative? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Do you have written authorization from representative? If so, please attach. <input type="checkbox"/> Yes <input type="checkbox"/> No		
First name	Last Name	
Mailing address		
Phone	Email	



Investigations & Monitoring

- ▶ Routine Monitoring Reviews (RM)
- ▶ Compliance Investigations- Inventory Audits (IA)
- ▶ Compliance Investigations- Compliance Buys (CB)

Investigations & Monitoring

What Vendors are selected for Investigation or Monitoring?

- ▶ **Compliance Investigation: Compliance Buys & Inventory Audits**
 - At least 5% of Vendors
- ▶ **Routine Monitoring Reviews**
 - At least 5% of Vendors
- ▶ **Any Vendor, any Time!**
 - LA WIC may complete a Routine Monitoring Review and/or a Compliance Investigation on any Vendor at any time.



Routine Monitoring

Routine Monitoring Review: What is it?

- ▶ A Routine Monitoring Review is an overt on-site Monitoring Review, during which LA WIC program representatives identify themselves to Vendor personnel, that examines compliance with LA WIC Vendor Rules and Regulations.



Routine Monitoring

Routine Monitoring Review: How To?

- ▶ A Routine Monitoring Review will examine vendor selection criteria and other LA WIC Vendor Rules and Regulations to determine compliance via:
[Vendor Monitoring Form \(7.15_VF or RM WIC-9\)](#)
 - Documents the Vendors inventory for WIC Approved Food Items, including Infant Formula, against Minimum Stock Requirements (MSR), and
 - Documents additional vendor selection criteria and other Program requirements.
- ▶ The most common violation continues to be failing to meet Minimum Stock Requirements



Routine Monitoring

► Preventative Actions Include:

1. Maintain Minimum Stock Requirements found on the [WIC-23](#) at all times.
2. Ensure correct prices for WIC Approved Food Items are displayed on the foods or on the shelves/display area in immediate proximity to the foods.
3. Maintain a copy of the most recent [WIC-23](#), [WIC-33](#), and [Program Guide](#) in the store.
4. If shelf talkers are utilized, ensure that they only use the images provided by LA WIC.
5. Vendors should use the [Vendor Self Assessment Form](#) to self-assess compliance with certain LA WIC rules and regulations.
6. Vendors are required to comply with all LA WIC Rules and Regulations at all times, only some of which are reflected in this presentation.

Inventory Audit

Inventory Audit: What is it?

- ▶ LA WIC examines food invoices to determine if a Vendor has claimed reimbursement for the sale of an amount of a WIC Approved Food Item(s), at the category level, that exceeds the store's documented inventory of that WIC Approved Food Item(s) for a specific period of time.



Inventory Audit

Inventory Audit: How To?

- ▶ LA WIC is essentially looking to see “did the Vendor have the items to sell at the time the sale occurred?”
- ▶ Inventory Audits examine three key components:
 1. The Inventory Monitoring Review Form (Beginning inventory count),
 2. Invoices from Vendor (Additional inventory count), and
 3. EBT Redemption Data (Inventory Sold)



Inventory Audit

Inventory Audit: Invoices

- ▶ LA WIC will review invoices received during an Inventory Audit to determine that the dates of the invoices are within the period requested, the invoices are for the Vendor being investigated and the invoices are from an inventory record showing all WIC purchases from permitted wholesalers, that contains the following information:
 1. The Vendor's name,
 2. The date of purchase,
 3. The wholesaler's name,
 4. Invoice number, and
 5. The WIC item size, quantity and brand of each specific WIC Approved Food purchased.
- ▶ In addition to #1 - #5 above, invoices for infant formula must only be from an LA WIC approved Supplier who appears on the [Infant Formula Supplier List](#).

Inventory Audit

Inventory Audit: Invoices, Cont'd

- ▶ Any invoices submitted by the Vendor not meeting these criteria shall be excluded from the audit calculation and could lead to required recoupment from the Vendor and/or sanction. LA WIC may refer Vendors that submit invoices from improper Suppliers without an LDH permit to operate, to Sanitarian Services.
- ▶ In its sole discretion, LA WIC may accept invoice spreadsheets sent to LA WIC directly from wholesalers
- ▶ If the Vendor fails to produce the requested invoices within the required timeframe, LA WIC shall exclude the initial inventory count from the audit calculation, and will consider the Vendor deficient for all items selected for audit for each thirty (30) day audit sub-period. The Vendor may be subject to sanction.

Acceptable Purchase Invoices

1. The Vendor being investigated
2. The date of purchase
3. The wholesaler's name,
4. Invoice Number
5. For each specific WIC Approved Food Item
 - a. Size
 - b. Quantity
 - c. Brand

KEY:
Acceptable = Red Boxes

3. Fresh Wholesale Grocers

Deliver to: 6 Bill to: 6

1. Vendor

2. DATE 03/15/2020 **3.** SLIP # 2 **4.** INVOICE # 101112

ORD# FCB

COD / CHECK O.K. ROUTE STOP NOET 6

SPECIAL INSTRUCTIONS

CHECK US OUT ONLINE GO TO WWW.GOGMG.COM 24 / 7 USE OUR LINK TO ACCESS W.I.C

LINE #	QTY	ORD #	SHR #	UPC #	PACK SIZE	DESCRIPTION	ITEM #	SRP	PRICE	AMOUNT
01	1	1	1	15662	6 45 OZ	SUNNYLAND MARGARINE - TUB	F 114207	2.85	12.13	12.13
02	2	2	2	2108	12 16 OZ	GREAT LAKE SLICED AMERICAN CHEESE	F 149849	3.79	32.50	65.00
03	1	1	1	28328	12 8 OZ.	PARADE SHREDDED CHEDDAR CHEESE	F 120584	2.25	19.32	19.32
04	15	15	15	6 5#	INTERSTATE	STRAIGHT CUT FRENCH-FRIES	F 169250	4.35	18.59	218.85
05	5	5	5	36502	6 12.50	ENFAMIL PREMIUM INFANT POWDER	130518	22.35	95.85	479.25
06	1	1	1	00002	24 6 OZ.	CRYSTAL HOT SAUCE	113076	1.05	17.45	17.45
07	1	1	1	00005	12 17 OZ	TONY CHACH CREOLE SEASONING	183954	3.45	29.49	29.49
08	1	1	1	01169	12 1 OZ.	ZATARAINS PARSLEY FLAKE - PLASTIC	141267	1.95	16.44	16.44
09	1	1	1	00091	12 8.5 O	VIGO OLIVE OIL	112532	3.35	28.35	28.35
10	1	1	1	01573	12 16 OZ	ZATARAINS CRAB BOIL - PRESEASONED - BAG	192203	2.05	17.48	17.48
11	1	1	1	25162	9 32 OZ	CRISCO VEGETABLE OIL	271841	4.85	31.27	31.27
12	2	2	2	07657	8 2 PK	GERBER 2ND FOODS APPLESAUCE	113845	1.65	9.59	19.18
13	2	2	2	07640	8 2 PK	GERBER 2ND FOODS PEACHES	113779	1.65	9.59	19.18
14	2	2	2	07334	8 2 PK	GERBER 2ND FOODS PEARS	113753	1.65	9.59	19.18
15	2	2	2	07650	8 2 PK	GERBER 2ND FOODS CARROTS	113811	1.65	9.59	19.18
16	2	2	2	07654	8 2 PK	GERBER 2ND FOODS SWEET POTATO	113803	1.65	9.59	19.18
17	2	2	2	07655	8 2 PK	GERBER 2ND FOODS BANANAS	113787	1.65	9.59	19.18
18	10	10	10	22135	1 5 GAL	CLEAR FRY OIL	307546	24.99	17.85	178.50
19	1	1	1	39108	16 12.5	KELLOGG CORN POPS CEREAL	111732	5.65	82.99	43.90
20	1	1	1	17634	12 18 OZ	GENERAL MI DORA EXPLORER	103440	4.95	42.56	42.56
21	5	5	5	69353	6 12.4	ENFAMIL GENTLEUSE POWDER	139790	23.35	100.05	500.25
22	1	1	1	89108	12 15 OZ	PROGRESSO BREAD CRUMB - PLAIN	162180	2.55	21.68	21.68

Taxable by State: Food/ Non Food \$.00 / \$.00 @ .02 / .02

Taxable by City: Food/ Non Food \$.00 / \$.00 @ .02 / .02

F/CHG- 3.20

CHECK GOODS CAREFULLY BEFORE SIGNING. NOT RESPONSIBLE AFTER [No Title] BY.

CUSTOMER SIGNATURE

A FINANCE CHARGE OF 1 1/2% per month will be added to all balances due over 30 days.

PLEASE PAY FROM THIS ORIGINAL INVOICE - CUSTOMER COPY

TOTALS:

OSHP 60

WGT 1079.10

CUB

SUB TOTAL 1,840.25

TAX

INVOICE TOTAL 1,840.25

DRIVER CASH CHECK AMOUNT

WILLIAM ARMST

3. Big Easy Food Sales Distributors

3. Big Easy

Food Sales Distributors

2 ORDER DATE
01/10/2018

1. Vendor

SLM. #
6

PAGE
1

4. 56789

TERMS
C.O.D. CHECK OK

TELEPHONE

SPECIAL INSTRUCTIONS

TRIP STOP
5 2
MEMO- 00

REMIT TO
CHECK PRODUCT BEFORE
TRUCK LEAVES/NO
CREDITS WILL BE GIVE
N AFTER! - THANK YOU

5b
5c
5a

ITEM #	ORDERED	SHIPPED	UNIT	DESCRIPTION	PACK	SIZE	ST	WEIGHT	COST	AMOUNT
10138	2	2		EGGS, LARGE CARTON AA GRADE	15	Dozen	T	30.00	.9500	28.50
11208	10	10		CHICKEN WINGS, SMILE 60/60 NO BONE	1	40 LB	T	400.00	1.4900	596.00
13049	2	2		CHEESE 120 SLICED AMERICAN CF GRT LAKES	5	LB	T	40.00	2.2900	91.60
14121	1	1		BACON, FIELDSTONE SLAB BACON	1	10 LB	T	65.90	2.1900	144.32
				PRODUCT OF USA, CANADA, MEXICO						
				65.90						
14641	1	1		PORK LOINS FROZEN COV	1	80 LB	T	89.80	1.2900	115.84
				PRODUCT OF USA, CANADA, MEXICO						
				89.80						
15066	1	1		HAMS, CHISESI VIP HAMS 5/13 LB	5	12 LB	T	51.52	3.6900	190.11
				51.52						
15099	1	1		HAM MORRELL 01982 DELI	2	13 LB	T	26.00	1.7900	46.54
15270	1	1		SAUSAGE, SMOKED D.D.	8	3 LB	T	24.00	3.0900	74.16
15408	2	2		SAUSAGE, SMOKED - D.D. PKG MILD	10	1 LB	T	20.00	3.0900	61.80
17248	2	2		SHRIMP 70/90 PEELED USA	1	50 LB	T	100.00	3.2500	325.00
19148	5	5		PATTIES HOT SAUSAGE PATTON 4 OZ	1	10 lb	T	50.00	2.2900	114.50
19200	1	1		ROAST BEEF DRY BARRON BEEF INTERNATIONAL	2	9 LB	T	15.35	3.7900	58.18
				15.35						
22034	1	1		BEEF CHUCK SEMI-BNLS COV SEL	1	50 LB	T	60.70	2.4900	151.14
				PRODUCT OF USA, CANADA, MEXICO						
				60.70						
22441	1	1		BEEF GROUND, FINE 73/27 IBP	8	10 LB	T	80.80	1.8900	152.71

DRIVER	CASH	CHECK	AMOUNT

YOU MUST CHECK YOUR MERCHANDISE BEFORE SIGNING

CUSTOMER SIGNATURE

A FINANCE CHARGE OF 1.5% per month will be added to all Accounts 30 days old, which is an ANNUAL PERCENTAGE RATE of 18% applied to the PREVIOUS BALANCE.

ST = STATUS CODE
O = OUT
S = SUB
P = PARTIAL

SUBTOTAL
TAX
INVOICE TOTAL

CONTINUE

Unacceptable Purchase Invoices

Missing:

1. The Vendor being investigated
2. The Date of purchase
3. The wholesaler's name
4. Invoice Number
5. For each **specific WIC Approved Food Item**
 - a. Size
 - b. Quantity
 - c. Brand

KEY:

Eggs - Don't indicate they are "white" or have a brand
Cheese - Doesn't have a size indication of ounces

3. Big Easy

INVOICE#	Bakery Distribution
Closed to Cash Purchase	
DATE/TIME:	8/31/2015 1:41:11 PM
CASHIER:	Donna
STATION:	01
5b.	5c.
10 FS BUNNY 16" SAND 2*	\$9.90
6 FS ROMAN MEAL 100% *	\$5.94
15 FS BUNNY RTOP 24 OZ*	\$14.85
Subtotal	\$30.69
Tax	\$1.53
GRAND TOTAL	\$32.22
Cash	\$32.22
Amt Tendered	\$40.00
Change	\$7.78

Unacceptable Purchase Invoices

Missing:

1. The Vendor being investigated
2. The Date of purchase
3. The wholesaler's name
4. Invoice Number
5. For each specific WIC Approved Food Item
 - a. Size
 - b. Quantity
 - c. Brand

This is also NOT an invoice- this is a Receipt

Inventory Audit

- ▶ If an Inventory Audit reveals Deficiencies, LA WIC shall establish a claim against the Vendor by the end of the Investigation. The claim against the Vendor will be the total amount of all Deficiencies identified over the course of the Investigation.
- ▶ Vendors must maintain, during and after any WIC Authorization, for a period of four (4) full Federal Fiscal years after the date the record was created and upon request provide to LA WIC, paper or electronic records used for State or Federal tax reporting purposes and other WIC Program records.

Compliance Buy

Compliance Buy: What is it?

- ▶ A Compliance Buy is a covert, on-site Investigation in which a representative of LA WIC poses as a WIC Participant or proxy, conducts one or more WIC Transactions, and does not reveal during the visit that he or she is an LA WIC representative.



Compliance Buy

Compliance Buy: How To?

1. Conduct a covert Compliance Buy at the Authorized WIC Vendor's store and complete the Compliance Buy Report Form
2. Obtain EBT redemption data
3. Determine if there were any violations



Compliance Investigations

FFY23 Compliance Investigations (CI) Results: Overview

FFY23 Investigation Results

Visit Result	#	%
No Violation Found (Clean)	24	62%
Warning (Violations Found, No Pattern)	12	31%
Sanction (Pattern)	2	5%
Other	1	2%

- ▶ Of the 39 Investigations initiated in FFY23, 24 (62%) were “clean” with no violations found, 12 (31%) included violations (but no pattern), 2 (5%) resulted in sanction (pattern).

Compliance Investigations

FFY23 Compliance Investigations (CI) Results: Violations Found

FFY23 Investigation Results

Violation Found	%
Transaction Procedures	33%
Vendor Overcharge (FMS)	24%
Audit Deficiency (FMS)	10%
Other Violations	33%

- ▶ 33% of violations found in FFY23 Compliance Investigations were for failing to meet Transaction Procedures outlined on the WIC-33.
- ▶ 34% were Federal Mandatory Sanction (FMS) violations for overcharging LA WIC and/or an identified audit deficiency
- ▶ 33% were for failing to adhere to any other requirements of the Vendor Agreement or Vendor Guide.

Compliance Investigations

FFY23 Compliance Buy Investigations (CB) Results: Specific Issues Found During CBs

FFY23 Compliance Buy Violations

SA - Transaction	#	%
Receipt(s) Not Provided	7	41%
Failed to Scan Item	2	12%
Shelf Talker	1	6%
SA - Other		
POS System Error	1	6%
Produce Mapping	1	6%
FMS		
Vendor Overcharge	5	29%

- ▶ 41% of all violations found in FFY23 Compliance Buys were for failing to provide one or more required receipt(s).
- ▶ 12% were related to a procedural error made by the cashier.

Compliance Investigations

FFY23 Compliance Investigations (CI) Results: Preventative Actions

► Preventative Actions Include:

1. Ensure all staff who conduct WIC transactions are trained on the [LA WIC Transaction Procedures](#) (WIC-33). In particular, Vendors should ensure staff are trained to:
 - Provide copies of ALL receipts to WIC Participants
 - NOT accept benefits on behalf of WIC Participants
2. Ensure the price charged at the register is equal to or less than the shelf price for that WIC Approved Food Item.
3. Ensure all purchase invoices meet [LA WIC's invoice requirements](#).
4. Vendors are required to comply with all LA WIC Rules and Regulations at all times, only some of which are reflected in this presentation.



Sanctions

Sanctions

- ▶ Vendors must adhere to all LA WIC Vendor Rules and Regulations.
- ▶ LA WIC may pursue adverse action (sanction) against a Vendor that fails to meet vendor selection criteria, commits a Federal Mandatory Vendor Sanction Violation(s) and/or commits a State Agency Vendor Sanction Violation(s).
- ▶ Some Federal Mandatory Vendor Sanctions and all State Agency Vendor Sanctions must be based on a pattern of violations.
- ▶ LA WIC defines a pattern for each violation as indicated in the Sanction Schedule found in the [LA WIC Policy Manual](#). The definition of a pattern of violations may be different for different types of violations (e.g., to account for severity).
- ▶ Unaddressed violations will carry from one agreement period to the next.
- ▶ Any violation identified through any means will count toward the establishment of a pattern for purposes of sanction (for those sanctions that require a pattern of violations) as long as the violation(s) occurs within a twenty-four (24) consecutive month period.

Sanction Types

- ▶ Generally, there are three types of sanctions LA WIC may impose on a Vendor including:
 1. Termination,
 2. Disqualification, and
 3. Issuance of a Civil Money Penalty (CMP).

- ▶ Imposing the appropriate sanction usually depends on facts and circumstances.

When to Impose each Sanction

- ▶ Sanction via **Termination** is generally imposed based on a Vendor's failure to meet vendor selection criteria.
- ▶ Sanction via **Disqualification** is generally imposed based on the Vendor:
 1. Committing a single violation which does not require a pattern, or
 2. Establishing a pattern of violations.
- ▶ Sanction via **Civil Money Penalties (CMPs)** may only be issued when LA WIC has determined:
 1. That a Vendor should be disqualified, and
 2. Imposing Disqualification would result in a participant access issue for WIC Participants.

FY24 Sanction Schedule: At A Glance

Sanction Schedule: Federal Mandatory Vendor Sanction Violation(s)

Federal Mandatory Vendor Sanction Violation (See LAC 48:V.4509.A.-A.4.b)	Pattern of Violations Required?	Number of incidences required to establish a pattern	Federal Sanction - Disqualification Period	SNAP Notification Required?
Conviction of trafficking in Food Instruments (FIs) or Cash-Value Vouchers (CVVs)	No	1	Permanent	Yes
Conviction of selling firearms, ammunition, explosives, or controlled substances (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)) in exchange for FIs or CVVs.	No	1	Permanent	Yes
One incidence of buying or selling a WIC FI or CVV for cash (trafficking).	No	1	6 years	Yes
One incidence of selling firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802, as amended, in exchange for a WIC FI or CVV.	No	1	6 years	Yes
One incidence of the sale of alcohol, alcoholic beverages, or tobacco products in exchange for a WIC FI or CVV.	No	1	3 years	Yes

FY24 Sanction Schedule: At A Glance

Sanction Schedule: State Agency Vendor Sanction Violation(s)

State Agency Vendor Sanction Violation (See LAC 48:V.4509.D)	Pattern of Violations Required?	Number of incidences to establish a pattern	State Agency Sanction - Disqualification Period	SNAP Notification Required?
Providing cash for returned WIC Approved Food Items purchased with WIC FIs/ CVVs.	Yes	3	1 year	No
Failing to comply with FI and CVV processing and redemption procedures, as described in the Vendor Agreement (also outlined in this WIC Vendor Guide).	Yes	3	1 year	No
Stocking or selling WIC Approved Food Items that are expired or otherwise not fresh, as determined by LA WIC.	Yes	3	1 year	No
Failing to participate in and complete training, as scheduled and required by LA WIC.	Yes	2	1 year	No

FY24 Sanction Schedule: At A Glance

Sanction Schedule: Vendor Selection Criteria

Vendor Selection Criteria (See LAC 48:V.4503.B)

- Vendors must meet all Vendor Selection Criteria at all times
- Vendors who fail to meet any Selection Criteria at any time may have their Vendor Agreement with LA WIC terminated
- A pattern of non-compliance is NOT required prior to Sanction (termination)
- Vendors who are terminated for failing to meet Vendor Selection Criteria may not reapply for LA WIC Vendor Authorization for a year
- Each of the following constitutes cause for termination of the Vendor Agreement:

	Failure to be currently authorized and participating in the USDA Supplemental Nutrition Assistance Program (SNAP) and cannot have received a SNAP Civil Money Penalty (CMP) for which the disqualification period, if it had been imposed, would not yet have expired.
	Failure to have a grocery class permit to operate issued for the current state fiscal year (the Louisiana state fiscal year runs from July 1 – June 30).
	Failure to maintain the establishment in a clean, orderly and safe condition and comply with applicable health protection laws and ordinances as defined by Louisiana Department of Health's Office of Public Health, located at http://ldh.louisiana.gov/index.cfm/page/448 .



Participant Access

Participant Access Determination

What is Participant Access?

- ▶ Method used to determine whether the removal of a Vendor from LA WIC would create an issue for Participants to access to WIC Approved Food Items.
- ▶ Inadequate participant access is determined at the sole discretion of LA WIC and is not subject to Administrative Review.



Participant Access Determination

- ▶ LA WIC can recruit a new Vendor in an area to “replace” a Vendor that’s only on the program due to a PA issue.
- ▶ Prior to or after WIC Authorization or Reauthorization, if the Vendor fails to meet all vendor selection criteria, LA WIC can recruit another Vendor in the area.
 - If another Vendor in an area is recruited, the PA issue would then be alleviated.
- ▶ Once reassessed, if the Vendor still fails to meet vendor selection criteria, LA WIC will terminate its Vendor Agreement.



*Look for another
Vendor in the area*



Termination

Reasons for Termination

- ▶ LA WIC may terminate a Vendor Agreement based on any of the following:
 - A Vendor's failure to meet vendor selection criteria,
 - A Vendor's change of ownership,
 - A Vendor's change in availability or location,
 - After identifying a Conflict of Interest,
 - Based on Disqualification of a Vendor,
 - At the Vendor's request to terminate, and/or
 - At LA WIC's discretion.

Termination - Voluntary Withdrawal

- ▶ Voluntary withdrawal of a Vendor and non-renewal of the Vendor Agreement as an alternative to Termination is not allowed.
- ▶ LA WIC will not accept a Vendor request to terminate the Vendor Agreement in lieu of a Disqualification or a Civil Money Penalty (CMP).
- ▶ LA WIC will not administer a Civil Money Penalty (CMP) in lieu of termination.



Termination – Effective Date

- ▶ The termination of a Vendor Agreement will be effective fifteen (15) calendar days after the date of the notice of adverse action, with the exception of termination due to:
 - Permanent disqualification at 7 CFR § 246.12(l)(1)(i), which is effective on the date of receipt of the notice of adverse action,
 - Change in Availability or Location, which is effective as of the date of the change in availability or location,
 - Change of Ownership, which is effective as of the date of the change in ownership, and/or
 - Providing false information, on the date of the notice of adverse action.



Termination

- ▶ A Vendor whose Vendor Agreement is terminated for reasons other than expiration of the Vendor Agreement, change of ownership, store closing or store relocation cannot reapply to become an Authorized WIC Vendor until one (1) year from the date of Termination.
 - A Vendor that has been terminated shall not transact WIC Benefits during the Termination period.
 - WIC Transactions that take place after the effective date of the Termination and that have resulted in payment to the Vendor are subject to recoupment.

Termination- Obligations for Repayments

- ▶ Termination of a Vendor does not relieve the Vendor of obligations to repay money claimed by and owed to LA WIC.
- ▶ Examples include:
 - Inventory Audit Deficiencies,
 - Recoupment amounts based on WIC Transaction for Foods Not Received,
 - Recoupment amounts based on Vendor Overcharge, and/or
 - Recoupment amounts based on the purchase of an Unauthorized Food Item, etc.



Disqualification

Disqualification

- ▶ LA WIC may Disqualify a Vendor that commits a Federal Mandatory Vendor Sanction Violation(s) or State Agency Vendor Sanction Violation(s).
- ▶ If a Vendor is Disqualified, LA WIC will also terminate the Vendor's Agreement.



Disqualification - FMS

- ▶ After all administrative review/appeal rights have been exhausted, LA WIC will notify the appropriate FNS office, including SNAP, with a copy of the notice of adverse action and information on Vendor(s) it has either Disqualified or imposed a CMP in lieu of Disqualification for any Federal Mandatory Vendor Sanction Violation(s).
- ▶ Disqualification from LA WIC for any Federal Mandatory Vendor Sanction violation(s) may result in Disqualification from SNAP. See the Sanction Schedule in the [LA WIC Policy Manual](#).
 - SNAP Disqualification is not subject to administrative or judicial review under SNAP.



Disqualification – Voluntary Withdrawal

- ▶ The voluntary withdrawal of a Vendor from LA WIC or non-renewal of the Vendor Agreement as an alternative to Disqualification is not allowed.



Disqualification- Obligations for Repayments

- ▶ Disqualification of a Vendor does not relieve the Vendor of obligations to repay money claimed by and owed to LA WIC.
- ▶ Examples include:
 - Inventory Audit Deficiencies,
 - Recoupment amounts based on WIC Transaction for Foods Not Received,
 - Recoupment amounts based on Vendor Overcharge, and/or
 - Recoupment amounts based on the purchase of an Unauthorized Food Item, etc.



Civil Money Penalties (CMPs)

Civil Money Penalties (CMPs)

- ▶ If LA WIC determines that Disqualification of a Vendor would result in inadequate participant access, LA WIC will impose a Civil Money Penalty (CMP) in lieu of Disqualification.
- ▶ Exceptions to this general rule occur when Disqualification results from:
 1. A conviction of trafficking in Food Instruments (FIs) or Cash-Value Vouchers (CVVs);
 2. A conviction of selling firearms, ammunition, explosives, or controlled substances in exchange for Food Instruments (FIs) or Cash Value Vouchers (CVVs);
 3. A third or subsequent sanction for Federal Mandatory Vendor Sanction Violation(s);
 4. A SNAP CMP for hardship, and/or
 5. Another WIC State agency's issuance of a CMP in lieu of Disqualification for a Federal Mandatory Vendor Sanction.
- ▶ For each violation subject to sanction, LA WIC will calculate the CMP using EBT redemption data.

Civil Money Penalties (CMPs)

- ▶ LA WIC requires the Vendor to provide full payment of the CMP (partial payments may not be accepted).
 - If for any reason the CMP is not paid, LA WIC will impose the full-length of the Disqualification corresponding to the violation for which the CMP was assessed.
 - If the Vendor attempts to voluntarily withdraw or ceases to conduct WIC Transactions, LA WIC will impose the full-length of the Disqualification corresponding to the violation for which the CMP was assessed.
- ▶ For EACH State Agency Vendor Sanction Violation(s), the maximum CMP amount is \$2500.00. For Federal Mandatory Vendor Sanction Violation(s), the maximum CMP amount will not exceed the amount(s) specified in the CFR.

Civil Money Penalties (CMPs)- FMS

- ▶ After all administrative review/appeal rights have been exhausted, LA WIC will notify the appropriate FNS office, including SNAP, with a copy of the notice of adverse action and information on Vendor(s) it has either Disqualified or imposed a CMP in lieu of Disqualification for any Federal Mandatory Vendor Sanction Violation(s).
- ▶ Disqualification from LA WIC for any Federal Mandatory Vendor Sanction violation(s) may result in Disqualification from SNAP. See the Sanction Schedule in the [LA WIC Policy Manual](#).
 - SNAP Disqualification is not subject to administrative or judicial review under SNAP.



Administrative Hearings / Appeals

Administrative Hearings / Appeals

- ▶ Adverse actions taken by LA WIC that affect Vendors or vendor applicants may be subject to administrative review, if appealed.
- ▶ Some adverse actions are appealable, and some are not.
 - See the “Administrative Review of State Agency Adverse Actions” portion of the [LA WIC Vendor Guide](#).
- ▶ Use the [Vendor Request for Appeal Form](#) available on the [LA WIC Authorized Vendor Hub](#).



Louisiana WIC Vendor Request for Appeal
Louisiana Department of Health
Office of Public Health
Bureau of Nutrition Services



Instructions: Fully complete all sections of this form and return to Louisiana WIC using the mailing address below.

SECTION I – Store and Notice Information

Complete all information below. Include a copy of the original notice leading to this appeal with this form.





Transaction Procedures

LA WIC Transaction Procedures (WIC-33)

- ▶ Vendors must allow the sale of any WIC Approved Food Item(s) the Vendor maintains in inventory to WIC Participants, if the item is authorized on the Participant's EBT card regardless of whether the WIC Approved Food Item(s) is a required Minimum Stock item.
 - If there is an instance where a WIC Approved Food Item is on the Participant's EBT card but is not registering as a WIC Approved Food Item at the register, please contact LA WIC.
- ▶ LA WIC requires Vendors to have the WIC-33, effective 10.2023, available for review in each store.

LA WIC Transaction Procedures (WIC-33)

- ▶ Vendors must comply with the following WIC Transaction Processing procedures including but not limited to:
 1. A Benefit Balance receipt must be provided, upon request, prior to the WIC Transaction,
 2. The WIC Participant must enter the EBT Card PIN,
 3. The Cashier must not request any additional form of ID,
 4. The Cashier must scan all items in the Transaction,
 5. The Cashier must deduct coupons and in-store promotions,
 6. The WIC Participant must accept/update WIC Benefits to approve the WIC Transaction,
 7. The Cashier must provide the WIC Participant copies of all receipts printed during the WIC Transaction (receipts may be printed, emailed, and/or texted to the WIC Participant),
 8. The Cashier must provide all items deducted from the WIC Participant's WIC Benefits (EBT card) to the WIC Participant, and
 9. The Cashier must allow other forms of payment.

LA WIC Transaction Procedures (WIC-33)



Louisiana WIC Program Transaction Procedures (WIC-33)



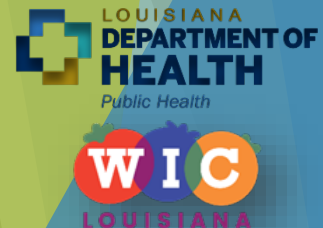
Understanding your EBT System

It is important for cashiers to know how to properly conduct a WIC Transaction using EBT. Each Vendor's POS system is different, so please review any and all training materials provided to you by your POS provider to best understand how your system operates. Once you understand your system, you'll be able to help WIC Participants have a smooth checkout and avoid delays at the register.

Transaction Processing Procedures using an LA WIC EBT Card (EBT Card)

Vendors must comply with WIC Transaction Processing procedures as outlined in the LA WIC Transaction Procedures (WIC-33), the LA WIC Vendor Agreement, and the LA WIC Vendor Guide.

1. **Balance Inquiry.** Vendors must provide WIC Participants with a Benefit Balance (Benefit Inquiry) receipt prior to making a purchase if requested by the WIC Participant. Vendors cannot require a minimum purchase in order to process a balance inquiry and provide the Benefit Balance receipt.
2. **The WIC Participant must enter the EBT Card PIN.** The WIC Participant must enter their PIN to authorize the WIC Transaction. Accept WIC Transactions only from WIC Participants or proxies as indicated by entry of a valid PIN. If the WIC Participant or proxy does not remember their PIN, refer them to their WIC clinic for assistance. Cashiers may NOT enter the PIN for the WIC Participant.
3. **The Cashier must not request any additional form of ID.** The PIN authorizes the WIC Transaction. WIC Participants are not required to produce any additional form of identification to complete the WIC Transaction.



LA WIC Transaction Procedures (WIC-33)

Self-Checkout Terminals

- ▶ WIC Participants may use self-checkout terminals provided the Vendor meets the additional requirements below:
 - **Certified Terminals** - Self-checkout terminals must be certified as WIC-EBT capable by LA WIC prior to use by WIC Participants.
 - NOTE: Self-checkout terminals must be certified in addition to and separately from a Vendor's regular check-out terminals.
 - **Attendants must be Present** - A self-checkout attendant must be present in the self-checkout area during the occurrence of a WIC Transaction.
 - **Recoupment based on Failure to Certify** - LA WIC will recoup the costs of any WIC Transaction(s) conducted at self-checkout terminals if the terminal(s) were not certified by LA WIC prior to the occurrence of the Transaction(s).

LA WIC Transaction Procedures (WIC-33)

Self-Checkout Terminals

- ▶ Vendors interested in accepting WIC at self-checkout terminals may reach out to their [LA WIC Program Monitor](#) or contact the LA WIC Vendor Operations Unit at (225) 342-0725 or LAWICVendor@la.gov
- ▶ Vendors may also complete the [Vendor Point-of-Sale System Certification Request Form](#) located on the [LA WIC Authorized Vendor Hub](#) to request certification of their POS system

LA WIC Transaction Procedures (WIC-33)

LA WIC Transaction Reminders

1. **Accountability for Employee Actions** - LA WIC will hold the Vendor accountable for the actions of its employees in the WIC Transaction and processing of EBT Cards and the provision of WIC Approved Food Items.
 2. **Return any lost EBT Card(s)** - Vendors must return any lost EBT Card(s) found in the store and unclaimed for 24 hours to LA WIC.
- For additional Transaction Reminders, please review the WIC-33 on the [LA WIC Authorized Vendor Hub](#).

LA WIC Transaction Procedures – Voiding Transactions

LA WIC Transaction Tips – Voiding Transactions

- ▶ Cashiers must use caution when voiding WIC purchases.
- ▶ Voiding WIC purchases is a two-step process; the cashier must void the sale in the POS system and reverse benefits to the WIC EBT card.
 - ▶ If a Cashier does not correctly void a WIC sale, the store's POS system will incorrectly indicate that the transaction was cancelled and that the benefits were reversed back to the WIC Participant's WIC EBT card. This could result in the WIC Participant leaving the store without the "voided" items and an incorrect balance on her WIC EBT card. Vendors must provide the WIC Participant *all* items removed from the WIC EBT card during the transaction.
- ▶ Each Vendor's POS system is different, so please review any and all training materials provided to you by your POS provider to best understand how your system operates



POS System and Claim Process

L3 Certification and POS Changes

- ▶ **L3 Certification:** All Vendors' EBT systems must be Level 3 (L3) Certified:
 - Prior to authorization as a WIC Authorized Vendor
 - Prior to allowing WIC Participants to use self-checkout lanes
 - Self-checkout terminals must be certified in addition to and separately from a Vendor's regular checkout terminals prior to Participant use.
 - Upon a change of Vendor location that results in termination of the Vendor Agreement



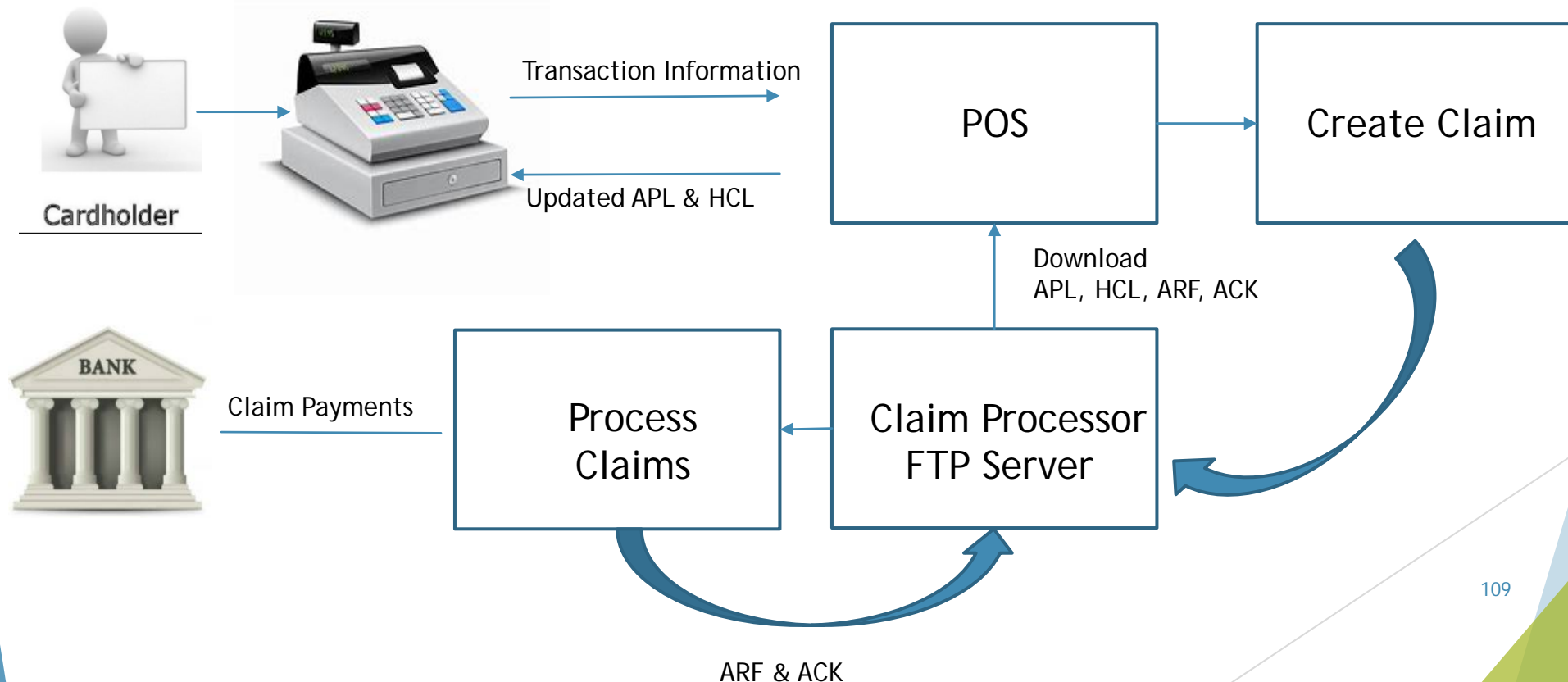
L3 Certification and POS Changes

- ▶ **L3 Certification:** Vendors must ensure their POS systems remain certified as WIC-EBT capable by:
 - Verifying that new POS software versions and/or hardware versions are certified as WIC-EBT capable by LA WIC prior to installation
 - Informing LA WIC of changes to POS systems that may require additional certification, including, but not limited to, software versions and/or hardware updates
 - Obtaining certification from LA WIC if POS system software versions and/or hardware updates have not already been certified as WIC-EBT capable by LA WIC
- ▶ **POS Changes:** Vendors must notify LA WIC of any planned POS system or provider change via email at LAWICVendor@la.gov or LouisianaWICEBT@la.gov. Vendors may also complete the [Vendor Point-of-Sale System Certification Request Form](#) located on the [LA WIC Authorized Vendor Hub](#) to request certification of their POS system



EBT Claims Process – Vendor Payments

- ▶ Vendors must submit WIC Transaction batch files no more often than once every 24 hours nor less frequently than the 15th day of the month following the month in which the WIC Transaction occurred. Vendors must accept financial liability for any WIC Transaction submitted for payment after the 15th day following the month during which the WIC Transaction occurred.
- ▶ This chart demonstrates the flow of the WIC transaction/claim process:



System Download Requirements

- ▶ Vendors must connect their POS system to LA WIC's EBT processor/banking system at least once every 48 hours to download the Approved Product List (APL), the current Invalid Primary Account Number (PAN) Hot Card List file (HCL), Acknowledgement/error (ACK) file, and Auto-Reconciliation/settlement (ARF) file.
- ▶ Vendors must accept financial liability for WIC EBT benefit redemptions resulting from hot card transactions if the Vendor has NOT connected to the Program's EBT System within a contiguous forty-eight (48) hour period of time and updated the Hot Card List file information.

Request to Add a New Universal Product Code (UPC)

- ▶ Verify whether or not UPC is already authorized by LA WIC by checking the [LA WIC Authorized Product List \(APL\)](#).
- ▶ If the UPC is not listed, complete the [LA WIC UPC Addition Request Form](#).
 - For more information regarding how to add a UPC to the APL, please see the [Procedure to Add a UPC to the APL](#).
 - Fill out the [UPC Addition Request Form](#) to request the addition of food items to the Authorized Product List (APL).



LA WIC Request to Add UPCs to the LA WIC Authorized Product List

LA WIC Vendors must only sell WIC Approved Food Items include on LA WIC's Authorized Product List (APL). The APL is posted monthly to the LA WIC Vendor Hub. Use this form to request an update or addition of a new food item to the LA WIC APL. Please review the LA WIC Procedure to Add a UPC to the APL prior to submitting this form.

Name of Person Making the Request *

Email Address of Person Making the Request *

Phone Number of Person Making the Request

Vendor/Company Name *

Vendor ID

If applicable



Produce Mapping Requirements

- ▶ All fresh fruits and vegetables must be identified and mapped by a Price Look-Up Code (PLU).
 - Vendors must map fresh fruit/veggies to the PLU.
 - Only fresh fruit and vegetable PLUs listed on the APL are eligible for WIC redemption.
- ▶ For additional [Fresh Fruit and Vegetable Mapping Requirements](#) and examples of items that require mapping, please visit the [LA WIC Authorized Vendor Hub](#).
- ▶ A Vendor who fails to properly map WIC Approved Food Items may be subject to sanction. See the Sanction Schedule within the [LA WIC Policy Manual](#)



Louisiana WIC Vendor Fresh Fruit and Vegetable Mapping Requirement



Requirements for WIC Vendor APL Mapping

Louisiana WIC-eligible foods are listed on the Louisiana WIC Approved Product List (LA WIC APL). All fresh fruit and vegetables must be identified by a PLU (Price Look-Up Code). Only fresh fruit and vegetable PLUs listed on the APL are eligible for WIC redemption. Frozen and canned fruits and vegetables are identified by their UPC and must **not** be mapped. LA WIC will not map fresh fruit and vegetables for vendors and will not process UPC Request Forms for fresh fruit and vegetables.

Definitions

- **UPC** – Universal Product Codes are unique product identification numbers assigned by the manufacturer for tracking trade items.
- **PLU** – Price Look-Up Codes are standardized four or five digit codes assigned by the International Federation for Produce Standards (IFPS) and are used to identify produce.

Background

Mapping refers to matching the WIC Vendor's product identification numbers used in store to those on the WIC State Agency's APL file to identify authorized WIC food items. The [FNS WIC EBT Operating Rules](#) Section 11.3 defines produce mapping requirements.

Examples of Items that Require Mapping

- Produce with a UPC bar code (prepackaged loose fruits such as blueberries or strawberries)
- Produce processed and packaged at your store (cut pineapple or cantaloupe)

****Frozen and canned fruits and vegetables must NOT be mapped.****

Store Responsibilities

- Vendors must map fresh fruit and vegetable UPCs to a PLU on the Louisiana WIC Approved Product List.
 - The LA WIC APL is available on the [LA WIC Vendor Hub](#) website.
 - Please contact your POS provider if you need additional instructions on mapping UPCs to a PLU as POS systems will vary in their instructions for the mapping process.
- If an item contains mixed fruit or vegetables, the item should be mapped to the PLU of the first ingredient listed on the label.
- If an item contains similar (or the same) amounts of mixed fruit or vegetables (ex. a bag of fruit containing 3 apples and 3 oranges), the item can be mapped to the PLU for either fruit or vegetable.
- Vendors must train store personnel on addressing any mapping issues that may occur.

Questions about LA WIC?

The [LA WIC Vendor Hub](#) website includes links to LA WIC Vendor resources such as the [LA WIC Vendor Guide](#) as well as the WIC Food List Brochure, Authorized Vendor Essential Documents and Links, Smart Card Certified System information, APL/UPC information, and LA WIC Authorization Documents. You can also contact us at LAWICVendor@la.gov with any questions.



WIC Transaction Disputes

- ▶ A Vendor may dispute the payment for WIC Transactions (“Dispute”) resulting from late submission of WIC Transaction batch files and/or submission of malformed Transactions.
- ▶ Each Dispute will be evaluated based on its merit. The burden of proof rests with the Vendor and there is no guarantee that the Dispute will be resolved in favor of the Vendor. LA WIC’s assessment and determination of the Dispute are final and not subject to further review.
- ▶ Solely at its discretion, LA WIC reserves the right to consider reimbursements for circumstances other than those identified above, and/or make adjustments to Vendor payments in the Vendor’s favor when it comes to LA WIC’s attention that a Vendor(s) has been underpaid.
- ▶ Vendors can access the [Transaction Dispute Form](#) on the [LA WIC Authorized Vendor Hub](#)

Intent to Change Technology Platforms – Offline to Online

- ▶ LA WIC will be converting from offline SmartCard WIC processing to online eWIC processing
- ▶ The statewide rollout of an online platform is estimated to rollout in 2025
- ▶ Minimal impact is anticipated with this change as most LA WIC POS providers already support online systems in other states
- ▶ LA WIC will continue to communicate information, including updated technical requirements and expectations, to Vendors as we work through this transition

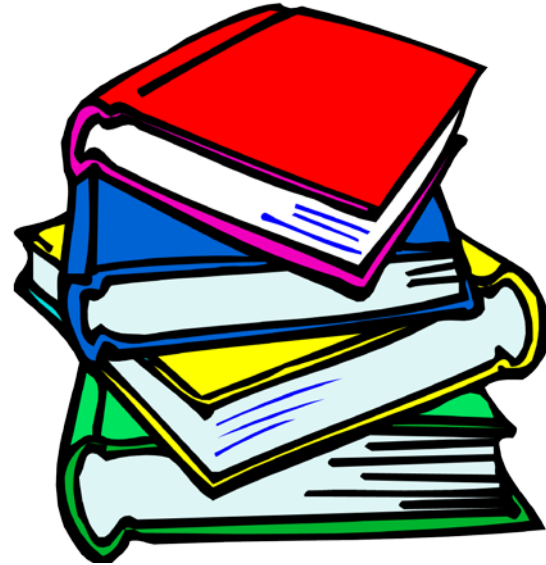




Additional Vendor Information

Vendor Changes

- ▶ Notify LA WIC in writing, at least 15 days prior to or immediately upon knowledge of (whichever comes first):
 - Loss or relinquishment of SNAP Authorization,
 - Cessation of Vendor Operations (WIC Authorized Store Closes),
 - Change of ownership, management, corporate officers or majority stakeholders, merger, acquisition or change in form of business, legal standing, or authority to do business in Louisiana,
 - Change in location, store name (including d/b/a), and/or
 - Change in mailing address, email address, and telephone number.
 - NOTE: A Vendor must verify that their POS system remains certified as WIC-EBT capable by LA WIC prior to transacting WIC at the new location.



Vendor Education and Resources

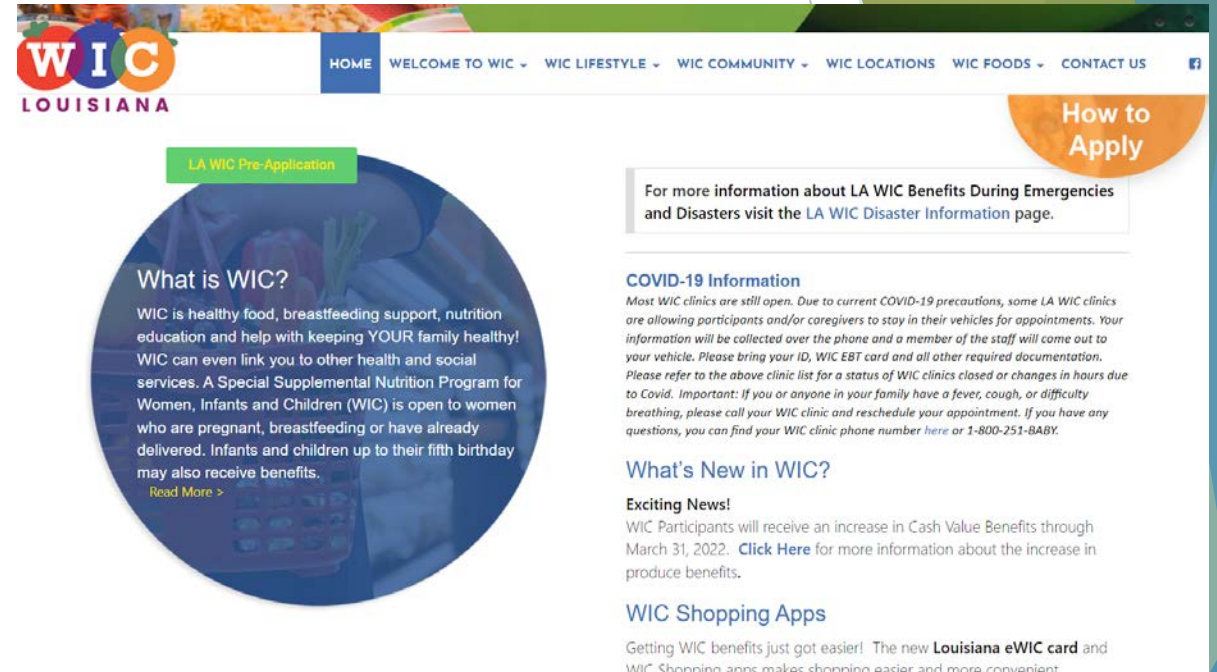
LA WIC Authorized Vendor Hub

- ▶ Official web page of LA WIC Vendor Operations Unit.
- ▶ Found at ldh.la.gov/wicvendor and contains:
 - Official documents and forms,
 - Helpful educational materials and resources,
 - Copies of memos and newsletters, and
 - Contact info.
- ▶ Suggestions?
 - Send an email to LAWICVendor@la.gov



LouisianaWIC.org

- ▶ Official web page for LA WIC Participants to get WIC information.
- ▶ Found at louisianawic.org and contains:
 - Eligibility requirements,
 - Application process,
 - Benefits explanation,
 - Clinic info, and
 - Recipes, breastfeeding support, healthy lifestyle resources.



Vendor Self Assessment Form

- ▶ Allows Vendors to self-assess their compliance with certain LA WIC Vendor Rules and Regulations.
 - Does not include all LA WIC Rules and Regulations
- ▶ The [LA WIC Self Assessment Form](#) can be downloaded from the [LA WIC Authorized Vendor Hub](#).
- ▶ For informal Vendor use only, and does not replace nor supplement LA WIC's formal processes for monitoring and investigations.
- ▶ Not currently available. Vendors will be notified when the 2024 version is finalized.



LA WIC Vendor Temporary Self Assessment Form Effective 2/16/2022 - 9/30/2023



Vendor Name: _____

Date: _____ Person Conducting Assessment: _____

SECTION I – Instructions

Use this form as a resource to self-assess your store's compliance with certain LA WIC rules and regulations. The LA WIC Minimum Stock Requirements (WIC-23) provides additional details regarding Minimum Stock Requirements (MSR). Please note that your store is required to comply with all LA WIC Vendor Rules and Regulations at all times, only some of which are reflected on this form. This form is for informal Vendor use only and does not replace nor supplement LA WIC's formal processes for monitoring and investigations. Visit ldh.la.gov/wicvendor for full program requirement details. This form reflects LA WIC's temporary Minimum Stock Requirements in effect from 2/16/2022 - 9/30/2023.

SECTION II – Documentation and Signage

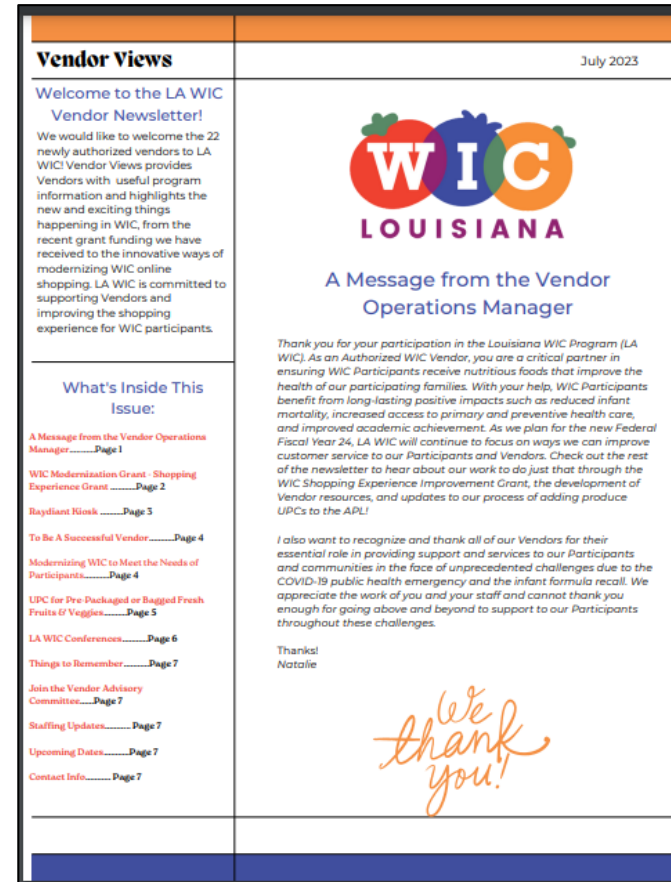
1. Is the store open a minimum of 6 days and 48 hours per week?	Yes ___	No ___
2. Is the "LA WIC Authorized Vendor" window cling prominently displayed?	Yes ___	No ___
3. Is a copy of the LA WIC Minimum Stock Requirements (WIC-23) available in the store?	Yes ___	No ___
4. Is a copy of the LA WIC Food List Brochure (Program Guide) available in the store?	Yes ___	No ___
5. Is a copy of the LA WIC Transaction Procedures (WIC-33) available in the store?	Yes ___	No ___
6. If shelf talkers are used, do you only use the shelf talker image(s) provided by LA WIC?	Yes ___	No ___

SECTION III – Pricing and Temporary Minimum Stock Requirements (MSR)

Food Category	Temporary Minimum Stock Requirement (MSR)	MSR Met?	Prices Posted?	Expired Items?
Infant Fruits/Vegetables 4oz containers	Min - 16 Containers Any combination of approved containers			
Beans/Lentils/Peas 16oz dry and/or 15-16oz cans	Min - 5 bags/cans Any combination of approved bags and/or cans			
Whole Grains 16oz package	Min - 5 packages Any combination of approved whole grains <i>Brown Rice, Whole Wheat Bread, Whole Wheat Pasta, Tortillas (Corn or Whole Wheat)</i>			
Cold Breakfast Cereal 12oz, 18oz, 24oz, and/or 36oz boxes	Min - 15 Boxes Any combination of approved sizes; 1 must be an approved whole grain cereal			
Fresh Fruits	Min - 20 Units; 4 Varieties			
Fresh Vegetables	Min - 20 Units; 4 Varieties			

Vendor Views Newsletter

- ▶ Vendor Operations Unit's email newsletter.
- ▶ These Newsletters generally contain:
 - Updates to policies and procedures,
 - Best practices to avoid common problems, and
 - Upcoming events and trainings
- ▶ Automatically emailed to Vendor emails we have on file, but additional emails can be added to the mailing list by completing the [Join the Mailing List](#) form located on the [LA WIC Authorized Vendor Hub](#).
- ▶ Past issues are archived on the LA [LA WIC Authorized Vendor Hub](#).



Vendor Supplemental Training

- ▶ Available upon request.
- ▶ Customizable to fit your topic of interest, target audience, and format.
 - Can be targeted to management, customer service staff, cashiers or anyone else.
 - Can be for Individual store or a group of stores.
- ▶ Submit a request by filling out the [Vendor Supplemental Training Request Form](#) which can be found on the [LA WIC Authorized Vendor Hub](#).
- ▶ Please note: Supplemental vendor training does not fulfill the requirement to participate in mandatory Annual Vendor Training



LA WIC Vendor Supplemental Training Request Form

Please use this form to request supplemental WIC training in order to help improve your store's compliance with program rules and regulations. Please note that that supplemental vendor training does not replace nor fulfill the requirement to participate in Annual Vendor Training each year.

If you have questions please feel free to contact us at (225) 342-0725 or LAWICVendor@la.gov.

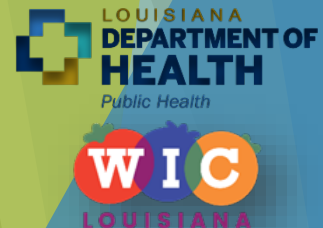
Vendor Name *

LA WIC Vendor ID Number *

Store Physical Address *

Store Physical Parish *

Store Representative's Name *



Vendor Educational Transaction Training (VETT)

- ▶ An on-site visit in which a representative of LA WIC conducts a mock Compliance Buy (CB) to provide education and training to store staff regarding LA WIC Vendor EBT Transaction Procedures and Rules and Regulations.
- ▶ An opportunity for Vendors to receive preventive education related to EBT transaction procedures and Vendor rules and regulations in an attempt to prevent future violations and sanctions.
- ▶ Topics covered in the training include:
 - ▶ Compliance Buy Process
 - ▶ WIC-33 Transaction Procedures
 - ▶ Shelf Pricing
 - ▶ Shelf Talker
 - ▶ WIC-23 Minimum Stock Requirements
 - ▶ LA WIC Program Guide

Vendor Continuing Education Training (CET)

- ▶ An on-site or virtual training in which a representative of LA WIC provides store staff education regarding common compliance issues as well as answers any questions store staff may have
- ▶ An opportunity for Vendors to receive preventative education related to common compliance issues in an attempt to prevent future violations and sanctions.
- ▶ Topics covered in the training include:
 - ▶ Review of prior/ongoing sanctions/violations
 - ▶ Compliance issues
 - ▶ LA WIC supplemental resources
 - ▶ WICShopper App
 - ▶ How to request to add items to the APL
 - ▶ MSR concerns

VETT and CETs

Vendors may request a VETT and/or CET visit by completing the [Vendor Supplemental Training Request Form](#) which can be found on the [LA WIC Authorized Vendor Hub](#)

LA WIC Staff will:

- ▶ Contact the store manager and schedule a date and time to conduct the VETT or CET
- ▶ Conduct a mock Compliance Buy at the Authorized WIC Vendor's store with a store representative's participation (VETT). Conduct an in-store or virtual training with a store representative's participation (CET).
- ▶ Complete the VETT Report Form or the CET Tracking Form.
- ▶ Review the visit with the store representative and answer any questions

WICShopper App

- ▶ The app's barcode scanner can be used by store employees to help identify WIC Approved Food Items in the store.
- ▶ This could be useful when helping a WIC Participant shop for WIC Food Items, conducting minimum stock checks on WIC Food Items, or in a number of other scenarios.
- ▶ Download for free on [Google Play](#) and [Apple App Store](#).
- ▶ Review this [demo video](#) and [flyer](#) for instructions on how to use the WICShopper App.



LA WIC Vendor Operations Contacts

Vendor Operations Unit Main Line

- Phone - (225) 342-0725
- Fax - (225) 376-4674
- LAWICVendor@la.gov

Tim Messa, Program Manager 3

- WIC Vendor Manager
- Timothy.Messa@la.gov

Danielle Hardges Hughes, Vendor Project Manager

- Danielle.Hardges@la.gov

Fraud & Investigation Section

Lavonselle Longmyle, Program Manager 2

- Lavonselle.Longmyle@la.gov

Monique Phillips, Program Manager 1A

- Monique.Phillips@la.gov

Dana Hills, Auditor 2

- Dana.Hills@la.gov

Jillian Gibbs, Compliance Auditor

- Jillian.Gibbs@la.gov

Monitoring & Outreach Section

Vacant, Program Manager 2

Deborah Fortner, Program Monitor (Regions 1, 5, 7)

- Deborah.Fortner@la.gov

Alicia King, Program Monitor (Regions 3, 4, 8)

- Alicia.King@la.gov

Hope McCorkle, Program Monitor (Regions 2, 6, 9)

- Hope.McCorkle@la.gov

Whitney Johnson, Outreach & Education Planner

- Whitney.Johnson@la.gov

Marian Schenck, Policy Planner

- Marian.Schenck@la.gov

EBT Section

Joetta Ferrell, Program Manager 1B

- LouisianaWICEBT@la.gov

Carolina Bailey, Business Analytics Specialist

- LouisianaWICEBT@la.gov

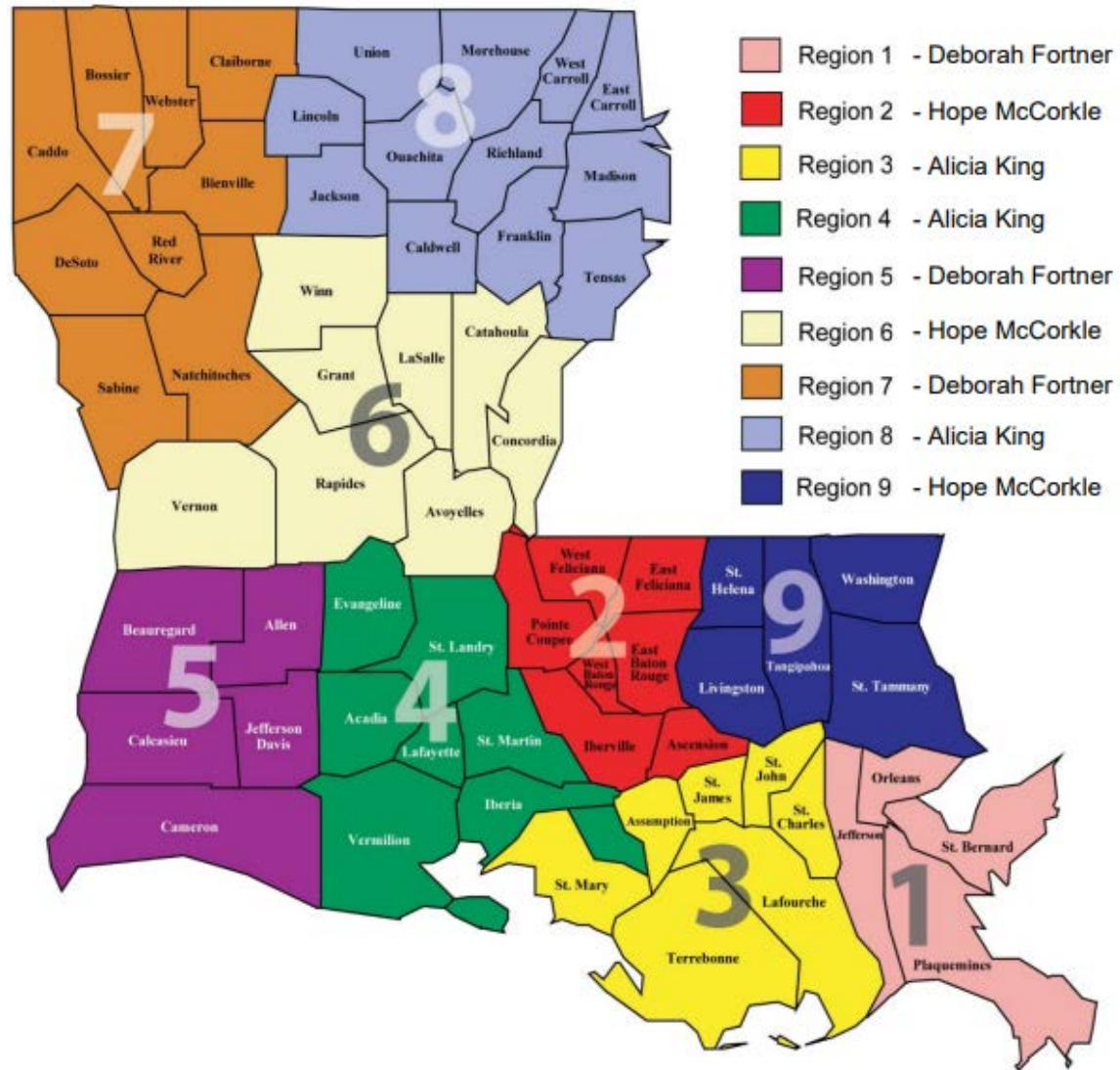
Walt McCall, Data Specialist

- LouisianaWICEBT@la.gov

NEW

LA WIC Vendor Operations

Program Monitors by Region





FINAL STEPS

Final Steps for Completion

Final Steps

1. Disseminate what you have learned today to appropriate staff including but not limited to store owners/operators, managers, cashiers, customer service representatives.
2. Ensure all staff responsible for handling WIC Transactions have read and understand the [LA WIC Transaction Procedures](#) (WIC-33, effective 10.2023) and sign a new [LA WIC Transaction Procedures Training Log](#) (WIC-33L, effective 01.2023).
3. Once LA WIC confirms your attendance, LA WIC will send you an email with a link to the Annual Vendor Training Submission Form. Follow that link and upload an updated copy of your store's signed WIC Transaction Procedures Training Log (WIC-33L), no later than the date indicated within the notice.
 - Your store is required to keep the original WIC-33L in the store.
 - Failure to complete Annual Vendor Training and/or submit the documents by the date indicated in the notice may result in sanction.

Transaction Procedures Training Log (WIC-33L) Requirements

- ▶ Please keep in mind that to be considered acceptable, all Training Logs must:
 - ▶ Utilize the most recent version of the [LA WIC Transaction Procedures Training Log](#) (WIC-33L), effective 01.2023
 - ▶ Clearly list the Vendor's LA WIC ID Number, Name, and Address
 - ▶ Clearly list the Employee Name, Signature, and Date Signed for EACH employee listed on the Training Log
 - ▶ Contain staff signatures dated no earlier than 2/7/2024 (the date of this training)

LA WIC Transaction Procedures Training Log

(WIC-33L)



Louisiana WIC Program
Transactions Procedures Training Log
(WIC-33L)



Page Starting Date (First signature date): _____

Vendor Number: _____ Vendor/Store Name: _____

Vendor Address: _____

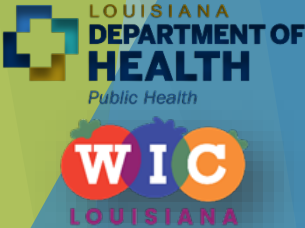
Vendors are fully responsible for violation(s) of LA WIC Vendor Rules and Regulations committed by its owners, officers, managers, employees, agents, representatives or other individuals who directly or indirectly participate in the Vendor's operations.

Vendors are required to ensure that employees who process WIC Transactions, and all other relevant staff who may handle or account for WIC Transactions, are trained in LA WIC requirements, including WIC Transaction Procedures. All existing store personnel and future hires responsible for handling WIC Transactions MUST:

1. Read the [LA WIC Transaction Procedures \(WIC-33\)](#).
2. Sign this LA WIC Transaction Procedures Training Log (WIC-33L).

By signing this document, I acknowledge that I have discussed the contents of the **LA WIC Transaction Procedures (WIC-33)** with my employer and/or their representative, and that I have read and clearly understand the LA WIC Vendor Rules and Regulations therein.

	Name of Employee	Signature of Employee	Date Signed by Employee
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			





Questions? ¿Preguntas?

thank
you!

Thank You!