

XI. CIVIL RIGHTS

(Please indicate) State Agency: Arkansas for FY 2016

The Civil Rights section of the State Plan should cover the training of State and local staff on issues, rules and regulations related to civil rights, public notification of nondiscrimination requirements, the monitoring of local agencies and clinics for compliance with civil rights regulations and rules, the collection of relevant racial/ethnic information and procedures for handling civil rights complaints.

A. Administration - 246.4(a)(17): describe the procedures the State will use to comply with the civil rights requirements described in 246.8, including the processing of discrimination complaints.

B. Public Notification Requirements and Nondiscrimination Notification - 246.8(a)(1): describe the policies and procedures used to ensure that public notification regarding nondiscrimination in the WIC Program reaches all participants and potential participants in an appropriate language (246.8(c)) through WIC Program materials.

C. Compliance Review and Monitoring Activity - 246.8(a)(2): describe the policies and procedures used to monitor and review local agencies to verify that they are in compliance with civil rights laws and regulations.

D. Data Collection and Reporting - 246.8(a)(3): describe the methods used to collect and monitor racial/ethnic data in compliance with title VI of the Civil Rights Act of 1964.

E. Complaint Handling - 246.4(a)(17): describe the policies and practices used to ensure civil rights complaints are handled properly at the State and local level.

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A. Administration

1. The State agency designates an individual to coordinate, implement, conduct training and enforce civil rights efforts.

Yes No

a. The following methods are used to inform and update State and local agency staff of their obligations under civil rights rules, regulations and instructions:

	State Agency	Local Agency
Briefing for new employees	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Handouts for new employees	<input type="checkbox"/>	<input type="checkbox"/>
Memos and updates	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Presentations by civil rights coordinator	<input type="checkbox"/>	<input type="checkbox"/>
Presentations by staff other than WIC Program	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If other, specify: Online Module completed by all Staff using A-Train website

b. Civil rights training is provided annually.

State agency staff Yes No

Local agency staff Yes No

c. Civil rights training includes the following:

	State Agency	Local Agency
Collection and use of racial/ethnic data	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Effective public notification systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Complaint procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Compliance review techniques	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Resolution of noncompliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Requirements for reasonable accommodation of persons with disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Requirements for language assistance	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Conflict resolution	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Customer Service	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If other, specify: _____

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

Civil Rights Appendix I; WIC 109-113

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A. Administration

2. The State agency has copies of the following materials on file:

- FNS Instruction, 113-1
- Title VI (1964), 7 CFR 15
- Title IX, Education Amendments, 7 CFR 15a (sex discrimination)
- Section 504, Rehabilitation Act of 1973, 7 CFR 15b
- Racial/Ethnic data collection policy and reporting requirements
- Age Discrimination Act of 1975, 45 CFR Part 91 (draft)
- Americans with Disabilities Act, 28 CFR Part 35
- Civil Rights Restoration Act of 1987

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

3. The State agency's policy for reasonable accommodation for the disabled includes the most up-to-date special provisions for the disabled.

- Yes No

(Refer to FNS Instruction 113-1, Civil Rights Compliance and Enforcement–Nutrition Programs and Activities)

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

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B. Public Notification Requirements and Nondiscrimination

1. Public Notification

a. The State agency requires its local agencies to include the nondiscrimination policy statement and civil rights complaint procedure on the following (check all that apply):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Outreach letters to the general public | <input checked="" type="checkbox"/> Radio announcements |
| <input checked="" type="checkbox"/> Program information letters | <input checked="" type="checkbox"/> Publications |
| <input checked="" type="checkbox"/> Program information brochures | <input checked="" type="checkbox"/> Posters |
| <input checked="" type="checkbox"/> Program information bulletins | <input checked="" type="checkbox"/> Newsletters |
| <input checked="" type="checkbox"/> Newspaper announcements | <input checked="" type="checkbox"/> Referral material |
| <input checked="" type="checkbox"/> Internet | <input checked="" type="checkbox"/> Television announcements |
| <input checked="" type="checkbox"/> Letters of invitation in the public hearing process | <input type="checkbox"/> Application forms (including computer-based forms) |
| <input checked="" type="checkbox"/> Certification forms to be signed by participants | <input type="checkbox"/> Other (specify): _____ |

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B. Public Notification Requirements and Nondiscrimination

b. The State agency requires that the USDA nondiscrimination poster, "And Justice For All," or an FNS-approved substitute be displayed in the following places frequented by applicants and participants:

- Clinic waiting rooms
- Food instrument issuance offices
- Group/individual nutrition education areas
- Test kitchens
- Warehouse distribution centers
- Other (specify): _____

c. Check the group categories that the State agency and its local agencies publicly inform of the following information (check all that apply; see key below):

- | 1 | 2 | 3 | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Availability of program benefits |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Eligibility criteria for participation |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Location of LA/clinics operating WIC Program and (800) telephone numbers |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Hours of service of LA/clinics operating WIC Program |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Rights and responsibilities |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Nondiscrimination policy |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Civil rights complaint procedure |

1 = general public

2 = grassroots/community organizations that deal with potentially eligible minorities

3 = potential eligibles/applicants/participants

d. The State agency ensures that advocacy/minority organizations and the general public are informed of the benefits/policies listed above (please provide the appropriate Procedure Manual citation of materials used):

- Annually More frequently

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

Appendix II, Appendix III WIC 109-113

2. Nondiscrimination Notification

a. The State agency or local agency:

- Provides applicants/participant with key information, such as applications and materials describing eligibility criteria and procedures for delivery of benefits, in appropriate languages other than English in areas where a significant proportion of people with limited English proficiency (LEP) reside.
- Appropriate bilingual staff, volunteers, or other translation resources are available to serve applicants and participants in areas where a significant proportion of people with limited English proficiency (LEP) reside.
- All rights and responsibilities listed on the certification form are read to or by the applicants and participants in the appropriate language, or if the participant is sight or hearing impaired and requires assistance.

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B. Public Notification Requirements and Nondiscrimination

b. The State agency provides WIC Program materials and translators in the following languages (Check all that apply; M = Materials, VT = Volunteer Translators, PT = Paid Translators, BS = Bilingual Staff):

M	VT	PT	BS	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	English
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Spanish
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	French
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vietnamese
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chinese
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other Asian/Pacific (specify): _____
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tribal (specify): _____
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Braille
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sign Interpreter
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other (specify): <u>Marshallese</u>

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

2a should have all boxes checked but form would only allow one to be checked; WIC 109-113

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C. Compliance Review and Monitoring Activity

1. Compliance Review

a. Civil rights reviews of local agencies are conducted:

Separately

In conjunction with another department, organization or service as part of an overall review

Other (specify): In conjunction with State and Regional Management Evaluation

b. The State agency reviews all of its local agencies for civil rights compliance with the nondiscrimination laws and regulations when it does its reviews.

Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

WIC130-131

2. Monitoring Activity

a. In addition to the local agency reviews, the State agency uses the following means to ensure that local agencies operate in a nondiscriminatory manner:

<input checked="" type="checkbox"/> Review of the racial/ethnic enrollment and/or participation data	<input type="checkbox"/> Review of complaints
<input checked="" type="checkbox"/> Review of denied applications	<input type="checkbox"/> Review of participant surveys
<input type="checkbox"/> Review of waiting lists	<input type="checkbox"/> Participant interviews
	<input type="checkbox"/> Other (specify): _____

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C. Compliance Review and Monitoring Activity

b. The State agency checks for the following in local agency applications:

- The local agency has corrected all past substantiated civil rights problems or noncompliance situations
- The Civil Rights Assurance is included in the State-Local Agency Agreement
- A description of the racial/ethnic makeup of the service area is included in the application
- Appropriate staff, volunteers, or other translation resources are available in areas where a significant proportion of people with limited English proficiency (LEP) reside

c. The State agency checks for the following in its civil rights reviews of its local agencies:

- Case records include racial/ethnic data
- Where applicable, an explanation of why the racial/ethnic WIC participant level is not proportionate to the income eligible racial/ethnic population
- The local agency has conducted civil rights training for its staff
- The project area displays the USDA nondiscrimination poster, "And Justice For All," or an FNS-approved substitute
- Program information has been provided to applicants, participants, and grassroots organizations or similar minority groups
- The nondiscrimination policy statement and civil rights complaint procedure are included on all printed materials such as applications, pamphlets, forms, or any other materials distributed to the public
- Racial/ethnic data are collected by actual count and maintained on file for 3 years
- The local agency has corrected all past substantiated civil rights problems or noncompliance situations
- Civil rights complaints are handled in accordance with the procedures outlined in FNS Instruction 113-1: XV

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

WIC109-113; WIC130-131

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D. Data Collection and Reporting

1. Data Collection

a. The State agency ensures the following when collecting civil rights data:

- All racial/ethnic categories are collected and reported as part of the program participant characteristics report
- Racial/ethnic data definitions are in accordance with current OMB guidance and WIC policy, and clinic procedures are in place to ensure the data is collected accurately
- Data reported on participant characteristics include the number of persons on WIC master lists or persons listed in WIC operating files who are certified to receive WIC benefits
- Collected racial/ethnic data and records are accessible only to authorized personnel

b. The State agency maintains a civil rights file which retains collected racial/ethnic data for three years.

- Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

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D. Data Collection and Reporting

2. The State agency instructs its local agencies to obtain a participant's racial/ethnic category by (check all that apply):

- Allowing self-identification by participant (must be used at participant's request)
- Visual identification/sight assessment by local agency staff
- Local agency staff personally know participant's racial/ethnic category
- Other (specify): _____

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

Appendix I

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E. Complaint Handling

1. The State agency ensures the following:

- WIC Program applicants and participants are informed where and how they may file a complaint of discrimination by directing them to the USDA Office of the Assistant Secretary for Civil Rights website (http://www.ascr.usda.gov/complaint_filing_cust.html) for proper Discrimination Complaint Filing processes.
- WIC Program applicants and participants are informed that they can file their complaints directly with the U.S. Department of Agriculture (who in turn forward them directly to the FNS HQ Civil Rights Division), directly with the FNS HQ Civil Rights Division, their State Agency or their local Agency. However, the local/State Agency must then forward their complaint either directly to the FNS HQ Civil Rights Division or the U.S. Department of Agriculture.
- All local agency staff are trained in discrimination complaint procedures
- All written and verbal complaints alleging discrimination based on race, color, national origin, age, sex, or disability are accepted from applicants and participants by State agency and local agency staff and forwarded to the FNS HQ Civil Rights Division.
- Complaints alleging discrimination based on race, color, national origin, or age are forwarded to the FNS HQ Civil Rights Division through an FNS-established complaint procedure. (Regional Office receives copy of all complaints.)
- Complaints alleging discrimination based on sex or disability are forwarded to the FNS HQ Civil Rights Division (for those State and local agencies without an FNS-approved grievance procedure in place).
- Complaints alleging discrimination based on sex or disability are forwarded to the FNS HQ Civil Rights Division.

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

2. The State agency uses a discrimination complaint form it has developed for acceptance of a complaint.

- Yes No

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

State uses one complaint form for all types of complaints and they must be readily available in all waiting areas.; Appendix IV

3. The State agency establishes and ensures that local agencies implement specific timeframes concerning discrimination complaints:

- An individual has the right to file a complaint within 180 days of the alleged discriminatory action.
- All complaints are processed and closed within 90 days of receipt.

ADDITIONAL DETAIL: Civil Rights Appendix and/or Procedure Manual (citation):

Appendix I; WIC-14

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

(Please indicate) State Agency: Arkansas for FY 2016

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.

Retail Food Delivery Systems

A. 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.

B. Food Instrument Pick-up and Transaction - 246.4(a)(11)(iii) and (a)(14)(vi): describe the State agency's procedures for issuing food instruments to participants, including procedures for verification, prorating food packages, training and proxy policies.

C. Food Instrument 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 or stolen, expired, duplicate, or not matching issuance records.

D. 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.

E. 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): describe alternatives to participant food instrument pick-up for issuance (e.g., mail or electronic issuance) and how the integrity of program services and fiscal accountability is ensured.

F. 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.

Non-Retail Food Delivery Systems

G. 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.

H. 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. Food Delivery and Food Instrument Control Overview****1. Food Instruments - General****a. The State agency uses the following types of FIs (check all that apply):**

- Automated-point of certification
 Manual-individual prescription
 Pre-printed manual-standard prescription
 Automated-central generation
 EBT
 Other (specify): _____

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 | Physical - Paper FIs |
|----------------------------|---|
| ___ Daily/perpetually | ___ Daily |
| ___ Other (specify): _____ | ___ Weekly |
| | ___ Monthly |
| | <u>X</u> Other (specify): <u>Blank stock; secured</u> |

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

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

Provide a facsimile or FI in Appendix or cite Procedure Manual:

Arkansas WIC Program Cashier and Bookkeeper Guide, p. 5

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

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

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

AR WIC Policy WIC-91

2. Food Instrument Accountability**a. FIs are delivered to local agencies by:**

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

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

A. Food Delivery and Food Instrument Control Overview

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): WIC-34B form; on request

Preprinted

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

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

- 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): On demand printing/no unclaimed.

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

AR WIC Policy WIC-91

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 Other (specify): Specific actions determined by disaster or emergency.

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

AR WIC Policy WIC-92

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

B. Food Instrument Pick-up

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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clerical staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify): <u>All CPA's</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 automated food instruments:

- Participant/parent/caretaker/proxy signature block on register confirming receipt
- Carbon copy of food instrument
- Local agency staff initials
- Date of food instrument pick-up
- Stub with participant signature or initials
- Other (specify): Automated signature pads; MIS records date of issuance.

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): Food package prorated if certified after the 20th of the month.

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
- FI transaction procedures
- Signature on FIs
- Use of proxy
- Reporting problems/requesting assistance
- Other (specify): _____

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

Yes No

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
B. Food Instrument Pick-up

- 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):
AR Policy WIC-97

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): Allow 2 proxies; a proxy cannot be a proxy for more than 2 households.

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):
AR WIC Policy WIC-29

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
C. Food Instrument Redemption and Disposition

1. Food Instrument Disposition Procedures

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

Yes No

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

- b. 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

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

Yes (specify period): _____ No

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):
AR WIC Policy WIC-92

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
C. Food Instrument Redemption and Disposition

2. Unclaimed, Voided, Prorated FIs

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

Not applicable Daily Weekly Monthly

Other (specify): _____

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

Not applicable Daily Weekly Monthly

Other (specify): Retained in LHU; filed by first day to use order

ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation):
AR WIC Policy WIC-92

3. Lost/Stolen Food Instruments

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

State agency Police department State agency's banking institution

Other (specify): _____

b. 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 ____ day waiting period (specify number of days)

c. Replacement/duplicate FIs are issued when FIs are reported stolen:

No

Depends on the circumstances

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

Immediately

Following notification of State agency/bank agency

After a ____ day waiting period (specify number of days)

d. Is a police report required before replacement benefits are issued when reported stolen

Yes

No

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
C. Food Instrument Redemption and Disposition

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

- Stops payment on the lost/stolen FIs
- Notifies vendor or farmer
- Other (specify): LHU enters stolen status in the MIS; state agency monitors monthly through voided/stolen & redeemed rpt.

Please provide a copy/citation for State agency's policy procedures that ensure that lost/stolen FIs cannot be redeemed.

The state agency cannot prevent a FI from being redeemed. Lost/stolen and redeemed are investigated through that MIS report.

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

- Yes No

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

- Yes No

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

- A claim for cash repayment is issued to participant
- Participant is disqualified; specify the period of time: _____
- Participant receives a warning
- Other (specify): _____

i. If lost/stolen 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): _____

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

AR WIC Policy WIC-92 and WIC-114

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

C. Food Instrument Redemption and Disposition

4. Food Instrument Redemption Screening (7 CFR 246.12(k)(1))

a. Describe in detail how the State agency sets maximum allowable reimbursement levels for for payment of food instruments (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.

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

- (a) Each peer group Yes No
- (b) Each food instrument or food category Yes No
- (c) Other (please specify): _____ Yes No

(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:

- (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.

Effective 9/1/15, 110%. The State determined that 10% over the peer group average allows individual vendors with different wholesalers to qualify for the program and still be competitive in their market areas. It also takes into account the range of prices for items in the same food category that can be selected from the Approved Food List.

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

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

- Yes No Wholesale price fluctuations; explain:

- Yes No Inflation; explain:

- Yes No Other (please specify):

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

C. Food Instrument Redemption and Disposition

b. The State agency screens FI 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Purchase price exceeds price limitations (FI only)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Purchase price missing
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Altered purchase price
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vendor/farmer identification missing
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Invalid/counterfeit vendor/farmer identification
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transacted before specified period
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transacted after specified period
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Redeemed after specified period
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Altered dates
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Missing signature
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mismatched signature
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Altered signature
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other (specify): <u>Illegible vendor ID; purchase amt. exceeds CVB face value</u>

c. When the payment amount on a food instrument 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 food instrument, but allow the vendor to resubmit
- Rejects the food instrument without allowing the vendor to resubmit
- Other (please specify): _____

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

- All FIs
- Percentage of FI (_____ %)
- Other (please specify): _____

e. The edit system(s) that screens for price limitations and 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 (_____ %)
<input type="checkbox"/>	<input type="checkbox"/>	Amount above average (\$ _____)
<input type="checkbox"/>	<input type="checkbox"/>	Other (specify): _____

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
C. Food Instrument Redemption and Disposition

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 FI issuance
- Recover vendor/farmer/farmers' market stamp when vendor/farmer/farmers' market is no longer authorized
- Conduct compliance buy to verify if unauthorized store redeems FIs
- State agency or its banking institution checks vendor/farmer/farmers' market ID numbers on food instruments submitted for redemption 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): _____

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

Food Delivery Appendix II. IFDMP XIV. WIC Check and CVB Processing Security

5. Price Lists

a. Price list information is routinely collected from vendors:

- Yes No; Explain: _____ (Proceed to item #6)

b. Price list data are collected:

- Real Time or Daily via EBT system Monthly Quarterly Semiannually
- Other (specify): 3 times per year; ad hoc if needed

c. Price data are collected by:

- State agency staff
- Local agency staff
- Reports are submitted by vendors
- EBT system
- Other (specify): 2 times per year - reported by vendors; 1 time per year collected by WIC staff during monitoring visit

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:

- _____
- All authorized vendors
- A sample of authorized vendors (please describe the sampling method used):

- _____
- Other (specify): _____

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

- During routine monitoring visits
- Does not verify on a routine basis
- If the vendor is identified as a high-risk vendor; please explain the method:
WIC staff member will go on-site to check posted prices

- Other (explain): _____

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
C. Food Instrument Redemption and Disposition

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

- Manually on a routine or as needed basis
- On 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 makes price adjustments to food instruments submitted for redemption at amounts above edit limits
- No
- Other (specify): Bank edits for max.; WIC staff issues claims for overcharges discovered on ck reviews/comp. buys, etc.

b. The following best describes why the vendor is billed for overcharges:

- Vendor's reported prices
- Redemption values of other vendors in the vendor's peer group
- Redemption values of all vendors
- Other (specify): In most cases, a claim is made for the entire redeemed amount of the FI.

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
- Other (specify): _____

d. What action(s) is/are taken when a vendor overcharge occurs? (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
- Vendor is terminated for cause
- Vendor is sanctioned
- Other (specify): Three-year DQ for three documented incidents within a period of three year.

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

VD Appendix II. IFDMP, Appendix C & E; App III VPA&H, Sept. 1, 2015 to Aug 31, 2018, Section IV., #5 & Handbook Sec. V.

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

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): _____

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

- Same dollar amount for all manual food instruments \$ _____
- Variable dollar amount depending on type of prescription on manual FI
- Variable dollar amount depending on participant category on manual FI
- No limit
- Other (specify): _____

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

2. Manual FI Documentation and Disposition

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): _____

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): _____

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

D. Manual Food Instruments

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): _____

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

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

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

E. 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 cards at the clinic or local agency, except in unusual circumstances
- Participants/proxies are required to show identification at FI card pick up
- FI 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 clinic
- Other (specify): _____

2. Mailing Policy/Procedures

a. The State agency provides local agencies with guidelines/procedures for mailing FIs cards to individual participants:

- Yes No

b. Policy requires participants to pick up FIs whenever certification appointment is due or nutrition education (including breastfeeding promotion and support activities) is scheduled:

- Yes No

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
E. Special FI Issuance Accommodations

c. The State agency has implemented the following policy regarding mailing FIs cards (check all that apply):

- FIs cards are sent first class mail *(first class is considered *regular* mail)
- FIs cards are sent registered mail
- FIs cards are sent certified mail
- FIs cards are sent restricted mail
- Return receipt is requested on FIs cards sent certified mail
- Envelope specifies, "Do not forward, return to sender" or "Do not forward, address correction requested"
- Other (specify): _____

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

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

(if other, specify): _____

e. When mailing FIs cards, documentation of FI card issuance is:

- Signed by the participant at the following FI card 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): Document reason; who requested, address mailed to, date mailed and name of WIC staff that issued.

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

AR WIC Policy WIC-96 & 97

3. Participants who receive FIs cards by mail are sent:

- One month of FIs
- Two months of FIs
- Three months of FIs
- Other (specify): _____

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

AR WIC Policy WIC-97

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

F. Vendor Cost Containment System Certification

If the State agency has authorized or plans to authorize any above-50% 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 G)

1. Calculation of new competitive price levels

Describe how the State agency derived or will derive new competitive price levels for regular vendors, which exclude the prices of above-50-percent vendors.

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

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

b. The State agency plans to exempt 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? _____

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 to food instruments during the food instrument redemption process.

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

3. Describe the State agency's methodology for grouping above-50-percent vendors in its peer group system (i.e., separately or in peer groups with regular vendors) and the criteria the State agency uses to identify comparable vendors for each group of above-50-percent vendors.

4. 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 :

a. 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;

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

F. Vendor Cost Containment System Certification

- b. The reason the non-profit above-50-percent vendors are needed to ensure participant access to supplemental foods;
- c. Does the State agency collect shelf prices from non-profit vendors?
 Yes No
- d. 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; and
- e. How the State agency will establish the level of reimbursement for the non-profit above-50-percent vendors that it has exempted.
5. 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.
6. 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 medical foods to program participants.
7. Does the State agency collect shelf prices from pharmacies that provide only exempt infant formula?
 Yes No
8. Complete the three tables on the following pages 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% vendors do not exceed average payments to regular vendors.
9. Attach a copy of the report(s) that the State agency will use to monitor average payments per food instrument to above-50% 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.

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
F. Vendor Cost Containment System Certification

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 of these regular vendors combined, what was the total amount of WIC redemptions paid in June 30?	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 WIC-only 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 in June?	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: _____

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
F. Vendor Cost Containment System Certification

(Note: If the State agency has completed the peer group table in the Vendor Management section of this Guidance, skip the following table.)

Table 2: Data for WIC Vendor Cost Containment Certification – Peer Group Structure

Please describe all vendor peer groups and identify the regular vendors that are comparable to each group of above-50-percent vendors. The information provided should refer to the peer group system as structured to comply with regulatory vendor cost containment requirements.

Peer Group No. (Col1)	Peer Group			Comparable Vendors Peer Group No. (from Col1) (Col6)
	Description (e.g., supermarkets, chain stores, pharmacies) (Column 2)	Number of Vendors in Peer Group		
		Regular Vendors (Col3)	Above-50% Vendors (Col4)	
1				
2				
3				
4				

Instructions:

Column 1 – Assign a sequential number to each peer group.

Column 2 – Describe the vendors in the peer group.

Column 3 – Insert the number of authorized vendors that are regular vendors.

Column 4 – Insert the number of above-50-percent vendors currently authorized.

Column 5 – Insert the total number of authorized vendors. This number should be the sum of columns 3 and 4, since the State agency must identify each vendor as being either a regular vendor or an above-50-percent vendor.

Column 6 – For each peer group that contains above-50-percent vendors, insert the number of the peer group that contains comparable regular vendors. The comparable vendor peer group is the peer group that the State agency uses to derive the competitive price criteria and maximum reimbursement levels that it applies to the above-50-percent vendors. If above-50-percent vendors are placed in a peer group with regular vendors, then the number in column 1 should be the same as that in column 6. If above-50-percent vendors are in separate peer groups, then the number in column 1 will be different from that in column 6.

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

F. Vendor Cost Containment System Certification

Instructions :

Begin by identifying the above-50-percent vendors to which the data in the chart refer. Insert the peer group number for the above-50-percent vendors and write it on the line at the top of the chart. All data in the chart should pertain only to the above-50-percent vendors in the peer group and the comparable regular vendors. Complete a separate table for each group of above-50-percent vendors and comparable regular vendors identified in the table 2.

Column 1 – Insert the food instrument (FI) type or number and list the foods included on the FI. Include no more than two infant formula food instrument types, but complete the chart using the next most frequently redeemed food instrument types.

Column 2 – For each type of FI identified in column 1, insert the number of food instruments redeemed (paid) in June (the calendar month). If the State agency implemented competitive price criteria and allowable reimbursement levels that comply with the new vendor cost containment requirements before June, then select the calendar month before the State agency applied the new competitive price criteria and allowable reimbursement levels.

Columns 3 & 4 – Insert the average food instrument redemption amount and the standard deviation for the above-50-percent vendors and for the regular vendors that the State agency has identified in Table 2 as comparable vendors. As an alternative to providing average payments to comparable regular vendors, the State agency may enter average payments to all regular vendors. If the State agency provides data for all regular vendors rather than average payment to comparable vendors, indicate this on the table or in the accompanying narrative.

Column 5 – Subtract the amount in column 4 from the amount in column 3 and enter the difference here. If the amount in column 3 is less than that in column 4, enter the difference as a negative dollar amount.

Column 6 – Insert the average food instrument redemption amount for above-50-percent vendors *after* the State agency has applied the revised competitive price criteria and allowable reimbursement levels. If the State agency has implemented new competitive price criteria and allowable reimbursement levels before submitting its request for certification to FNS, then the data in column 6 should be actual redemption data for the above-50-percent vendors and comparable regular vendors. Insert the calendar month(s) to which the data pertain. If the State agency does not have actual redemption data, then the State agency must estimate the new average redemption amounts.

Column 7 – Insert the average redemption amounts for the corresponding group of comparable vendors. If the State agency has not yet implemented its revised methodologies, insert the target date to which the estimated average redemption amounts would apply. In the narrative that accompanies this data, discuss in detail the rationale for the State agency's estimated average redemption amounts in columns 6 and 7. The average redemption amount for above-50-percent vendors may not exceed the average redemption amount for comparable vendors.

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
G. Home Food Delivery Systems

DOES NOT APPLY (PROCEED TO NEXT SECTION)

1. Home Food Delivery Systems Overview

a. Home delivery vendors include (check all that apply):

- Dairies
- Private delivery service doing WIC business only
- Private delivery service
- Other (specify): _____

b. Participants who receive home food delivery:

- Are notified in writing of the types and quantities of 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): _____

c. Supplemental foods may be delivered:

- Only to the participant of record
- To the participant of record or proxy of record
- To any adult at home during time of delivery
- To anyone at home at the time of delivery
- Other (specify): _____

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

2. Documentation

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

- Weekly
- Monthly reconciliation of the signed FIs or other signed receipts or signature documents from participant or proxies.
- Other (specify): _____

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):

IX. FOOD DELIVERY and FOOD INSTRUMENT (FI) ACCOUNTABILITY AND CONTROL
H. Direct Distribution Food Delivery Systems

c. Foods are distributed to participants:

- Monthly
- Not to exceed a one-month supply at any one time to any participant
- Other (specify): _____

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 type="checkbox"/>
Cost-free transportation	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

(if other, specify): _____

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

AR WIC Policy WIC-93 - 96

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): _____
- Sanitation laws and regulations (specify date and grade of last inspection): _____
- Other (specify): _____

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

AR WIC Policy WIC-99 - 103

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.).

LHU/WIC Clinic staff is required to maintain formula logs (drop ship and return) daily. Each LHU submits a monthly report of formula received, issued, and destroyed due to damage/expiration to the regional WIC Coordinator for review/action. Formula storage areas/formula inventories are audited by state agency staff four times per year. Staff review formula logs and check formula storage area(s) for proper stock rotation and storage practices. Formula with an expiration date within 3 months is designated for immediate use or transfer to another unit. Formula is issued according to expiration date (closest date issued first). In order to maintain proper control of formula stock, there is a separation of duties within the LHU. These duties must be separated between two or more staff members. For example: Staff 1: Order formula and maintain inventory and submit reports; Staff 2: Sign for/receive formula shipments and log into inventory.

fact sheet



The purpose of the Arkansas WIC Program (Special Supplemental Nutrition Program for **W**omen, **I**nfants and **C**hildren) is to improve the nutrition of eligible pregnant, breastfeeding and postpartum women, infants and young children during periods of critical growth. The Program provides checks for specific foods that participants redeem at local grocery stores, nutrition education and referrals to other services.

Pregnant, breastfeeding and postpartum women, infants and children under age five are eligible for WIC if they:

- **Live in Arkansas.** There is no waiting period to meet the residency requirement.
- **Meet income guidelines.** These guidelines are set at 185% of poverty. Applicants must provide proof of household income. Recipients of Medicaid, ARKids First, TEA and/or SNAP (Food Stamps) are automatically income eligible for WIC.
- **Are nutritionally eligible.** Conditions such as anemia, certain medical disorders, weight (underweight, overweight, pattern of gain or loss, weight in relation to height, etc.), number and frequency of pregnancies, and inappropriate nutrition practices are some of the factors considered in a nutritional assessment. This assessment is performed by a nurse, nutritionist or physician in the Local (County) Health Unit.

Foods provided to children and women may include:

- Milk
- Cheese
- Juice
- Iron-fortified cereal
- Dried or canned beans or peas
- Eggs
- Whole grains
- Fresh or frozen fruits & vegetables
- Peanut butter
- Canned fish

Foods provided to infants include:

- Special food packages for breastfeeding mothers
- AND/OR**
- Iron-fortified infant formula
 - Infant cereals
 - Infant foods



INCOME GUIDELINES (Arkansas WIC Program, effective May 1, 2015)

Family/Household Size	1	2	3	4	5
Annual Gross Income	\$21,775	\$29,471	\$37,167	\$44,863	\$52,559

(Add \$7,696 per year for each additional family member.)

For more information

Call: 1-800-462-0599 | Click: www.healthy.arkansas.gov/wic

WIC is available in every Arkansas county at the Local (County) Health Units.

USDA is an equal opportunity provider and employer.

Hoja de información

El propósito del Programa WIC de Arkansas (Programa especial de nutrición complementaria para mujeres, bebés y niños) es mejorar la nutrición de mujeres embarazadas, lactantes y en posparto, y de infantes y niños durante los períodos cruciales de crecimiento, si reúnen los requisitos necesarios. El Programa proporciona cheques para alimentos específicos que los participantes pueden canjear en los supermercados locales, información sobre la nutrición y referencias a otros servicios.

Las mujeres embarazadas, lactantes y en posparto, y los bebés y niños menores de 5 años pueden participar en WIC si:

- **Viven en Arkansas.** No se requiere cumplir con un tiempo de espera para cumplir con el requisito de residencia.
- **Cumplen con los requisitos de ingreso.** Estos requisitos han sido fijados a un 185% de pobreza. Los solicitantes deben proporcionar prueba del ingreso familiar. Los recipientes de Medicaid, ARKids First, TEA y/o SNAP (estampillas de alimentos) son automáticamente elegibles para WIC por su ingreso.
- **Son elegibles nutricionalmente.** Algunos de los factores que se toman en cuenta durante una evaluación nutricional son: anemia, ciertos trastornos médicos, peso (bajo peso, sobrepeso, patrón de aumento o pérdida, peso en relación a la estatura, etc.), cantidad y frecuencia de embarazos, y prácticas inapropiadas de nutrición. Una enfermera, un nutricionista o un médico llevan a cabo estas evaluaciones en la Unidad de Salud Local (condado).

Los alimentos provistos a niños y mujeres pueden incluir:

- Leche
- Queso
- Jugo
- Cereal fortificado con hierro
- Frijoles o guisantes secos o enlatados
- Huevos
- Granos enteros
- Frutas y verduras frescas o congeladas
- Mantequilla de cacahuete (maní)
- Pescado enlatado

Los alimentos provistos a bebés incluyen:

- Paquetes de alimentos especiales para madres lactantes Y/O
- Fórmula fortificada con hierro para bebés
- Fórmula para bebés
- Alimentos para bebés



REQUISITOS DE INGRESO (Programa WIC de Arkansas, vigente desde el 1 de mayo de 2015)

Tamaño de familia/hogar	1	2	3	4	5
Ingreso bruto anual	\$21,775	\$29,471	\$37,167	\$44,863	\$52,559

(Agregue \$7,696 por año por cada miembro adicional de la familia.)

Para obtener más información

Llame al: 1-800-462-0599 | Visite: www.healthy.arkansas.gov/wic

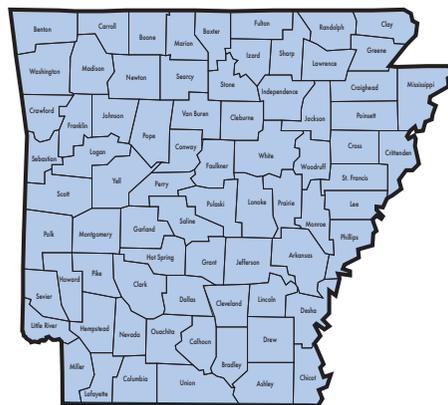
WIC se encuentra disponible en todos los condados de Arkansas en las Unidades de Salud Local (condado).

USDA es un proveedor y empleador que ofrece igualdad de oportunidades.

WHAT DOES WIC PROVIDE?

- Milk
- Cheese
- Eggs
- Cereal
- Whole Grains
- Fresh or Frozen Fruits
- Fresh or Frozen Vegetables
- Fruit/Vegetable Juice
- Dried or Canned Beans/Peas
- Peanut Butter*
- Canned Fish*
- Infant Cereal
- Infant Fruits & Vegetables
- Infant Meats*
- Iron-fortified Infant Formula

*May not be available for all food packages



USDA is an equal opportunity provider
and employer.

Call: 1-800-235-0002

Click: www.healthy.arkansas.gov/wic

June 2014

GOOD FOOD

AND A WHOLE
LOT MORE



WHAT IS WIC?

WIC stands for Women, Infants, and Children. WIC is a nutrition program that provides nutrition and health education, healthy foods, referrals and other services to individuals who qualify.

WIC provides:

- Personalized nutrition counseling
- Nutrition education opportunities covering topics such as healthy eating and maintaining a healthy weight
- Breastfeeding support



- Checks for healthy food
- Referrals for medical and dental care, immunizations, health insurance, childcare, and other services

HOW DO I APPLY FOR WIC?

Call the WIC Program in your community for an appointment (see back) or call 1-800-235-0002.

If you are a parent, grandparent, foster parent or other guardian of a child under five, you can apply for WIC for your child or if you are pregnant, postpartum or breastfeeding you can apply for WIC for yourself.

You can participate in WIC if you:

- Live in Arkansas
- Have a nutritional need (WIC staff will determine this)
- Are an infant, child under 5, or a pregnant, breastfeeding or postpartum woman
- Have a household income equal to or less than WIC guidelines or receive Medicaid, ARKids, SNAP (Food Stamps) or TEA

For more information about WIC, call your local health unit or visit <http://www.healthy.arkansas.gov/programsServices/WIC>.

For information regarding Breastfeeding Services call 1-800-445-6175 or visit <http://www.healthy.arkansas.gov/programsServices/WIC/breastfeeding>.





Arkansas Department of Health WIC Program

Civil Rights Training

Making a Difference for Families

Civil Rights Training

The United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) and the Arkansas WIC Program are committed to assuring that Title VI of the 1964 Civil Rights Act guides the provision of WIC services.

Civil Rights Training

The purpose of this training is to provide information to aid in protection of the Civil Rights of WIC Participants and to provide guidance in the fair administration of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).

Civil Rights Training

Training Timeline Requirements

- Civil Rights Training must be completed at least one time per federal fiscal year for all staff members who have any contact with WIC applicants/families or supervise those who do.
- Annual training for WIC staff is available on A-Train. A certificate of completion should be provided to the supervisor.

Civil Rights Training Topics

This Civil Rights Training Will Address the Following Topics:

- ✓ Nondiscrimination Statement
- ✓ Compliance Review
- ✓ Public Notification and Outreach
- ✓ Reasonable Accommodations for Persons with Disabilities
- ✓ Language Assistance
- ✓ Data Collection
- ✓ Conflict Resolution
- ✓ Customer Service
- ✓ Civil Rights Complaint Procedure
- ✓ Resolution of Noncompliance
- ✓ Fair Hearing Procedure

Definitions

Civil Rights

The rights of individuals to receive equal treatment based on certain legally protected classes

Discrimination

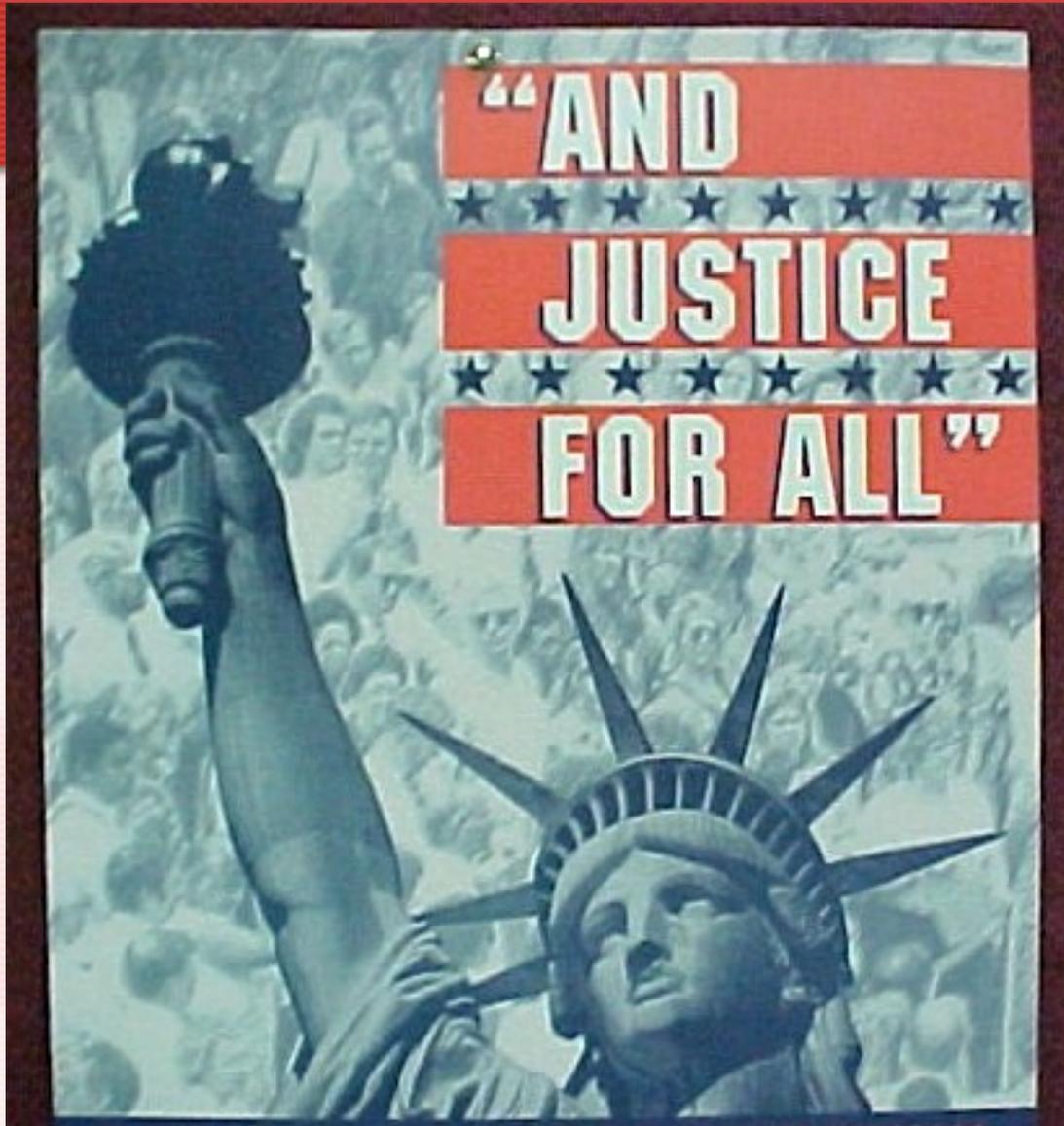
Discrimination simply means to treat people differently and less favorably based on their protected classes

WIC Program Protected Classes:

- Race
- Color
- National Origin
- Sex
- Age
- Disability

“And Justice for All” Poster:

- Every WIC clinic should have this poster placed in a readily visible location accessible to all participants to read.
- Local Health Units should contact the WIC State Office if new posters are needed.



“AND

JUSTICE

FOR ALL”

Examples of Discrimination

- Treating people disrespectfully based on a protected class
- Providing a different level of benefits based on a protected class
- Requesting extra verification of documentation based on a protected class
- Segregated seating in waiting rooms or in accommodations such as restrooms
- Differences in waiting times based on a protected class

Customer Service

- Preventing complaints is the best course of action.
- Providing excellent customer service is the best way to prevent complaints.
- The Rights and Responsibilities must be reviewed with each WIC family at the time of certification (located in *WIC Online Policies and Procedures online-APP-2*).

Providing WIC Services To Individuals with Disabilities

- Clinics must work to eliminate barriers to providing WIC services to families who have members with special needs.
- Look at each family individually.
- Find ways to provide accommodations that are reasonable and appropriate.
- Document in the record what was done to eliminate barriers in serving the family.

Providing WIC Services To Individuals with Limited English Proficiency (LEP)

- Clinics must take reasonable steps to ensure “meaningful” access to program information and services is available.
- WIC Staff should identify participants needing language assistance (hearing, written or spoken) and make appropriate arrangements in advance.
- Provide interpreters and utilize bilingual staff.
- Give printed materials in appropriate language.

Voter Registration

- It is a federal requirement to offer adults applying for WIC an opportunity to register to vote (National Voter Registration Act 964 of 1995).
- Voter registration packet applications should be provided to applicable WIC participants with each certification visit or any visit where demographic changes are made in SPIRIT (change of address, phone number and name changes should be verified).
- ADH policy should be followed (GEN-169 Administration General).

Conflict Resolution

- Conflicts can happen...be prepared.
- Try to remain calm and not mirror negative behavior of the participant.
- Be patient, listen, avoid sarcasm, smile, apologize where appropriate, be open to valuing the other person's opinion, treat everyone the same.
- Call supervisor to help resolve the situation.
- Report participant abuse of staff to WIC State Office.

Public Notification and Outreach

All forms of public notification and outreach materials must inform participants and applicants, particularly minorities, of their program rights and responsibilities, their protection against discrimination, and the procedure for filing a complaint.

Public Notification and Outreach

Public Notification and Outreach materials include all information sheets, brochures, publications, posters, and public announcements that inform the public about the WIC Program's benefits or eligibility criteria. Any materials that are considered as Public Notification or Outreach must contain the following non-discrimination statement...

Non-Discrimination Statement

The U.S Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

(continued on next page)

Non-Discrimination Statement (cont.)

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Discrimination Complaint Form, found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

(continued on next page)

Non-Discrimination Statement (cont.)

Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800)877-8339: or (800) 845-6136 (Spanish).

USDA is an equal opportunity provider and employer.

Public Notification and Outreach

Mandatory Minimum Statement

If the material is too small to permit the full statement to be included, at minimum include the following statement in print no smaller than the text...

“USDA is an equal opportunity provider and employer”

Data Collection

Policy

We are federally required to collect the racial and ethnic data in accordance with FNS Policy.

This data is collected to determine how effectively the WIC and Farmers Market Program is reaching potential eligible persons and beneficiaries, identify areas where additional outreach is needed, and assist in the selection of locations for compliance reviews.

Data Collection

Obtaining the Ethnic/Racial Data

- All applicants are asked to **identify** their **race** and **ethnicity**.
- The LHU staff receiving the information **must not second guess** or in any other way **change or challenge a self-declaration** made by the applicant as to his or her race or ethnic background.

Data Collection

- If an applicant **refuses** to identify their race and ethnicity, staff member must explain and the participant must understand that the collection of this information is strictly for statistical reporting requirements and has no effect on the determination of their eligibility to participate in the Program.
- If an applicant continues to refuse to disclose the information, **visual identification** by a staff member must be used to determine the person(s) racial and ethnic category. Staff member must **document** in General Notes that Ethnicity/Race was not self-declared.

Data Collection

Ethnic Categories

- **Hispanic or Latino**
 - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term "Spanish Origin" can be used in addition to "Hispanic or Latino."
- **Not Hispanic or Latino**

****Remember only ONE category can be selected.***

Data Collection

Racial Categories

The participant or representative of participant may choose one or more of the following racial categories:

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Pacific Islander
- White

Data Collection

ADH WIC Policy

Refer to the WIC Online Policy and Procedure Manual, Civil Rights Section (WIC-95-WIC-98) for detailed instructions on Data Collection.

Complaint Procedures

- All applicants/participants have a right to file a complaint alleging discrimination based on race, color, national origin, sex, age, or disability.
- Complaints must be made **within 180 days** of the alleged action.

Complaint Procedures

Notification Requirements

- The LHU must permanently display the “**And Justice for All**” poster in the WIC waiting area(s) of the clinic for all WIC applicants/participants to see.
- The LHU must permanently display the “**Fair Hearing**” poster in the WIC waiting area(s) of the clinic for all WIC applicants/participants to see.
- **Complaint Forms** (MCH:WIC-14) must be available in the **waiting area** for all WIC clinics.

Complaint Procedures

Handling Civil Rights Complaints

- All WIC staff are required to accept and process upon receipt, all complaints relating to the WIC Program. Complaints may be made in person, by phone, or in writing.
- All complaints alleging discrimination on the basis of race, color, national origin, age, sex, or disability, either written or verbal, must be submitted to the WIC State Office within 24 hours upon receipt.

Complaint Procedures

Civil Rights complaints may also be forwarded to:

Civil Rights Coordinator
WIC Program
Arkansas Department of Health
5800 West 10th Street, Suite 810
Little Rock, AR 72204

Or call 1-800-462-0599

Fair Hearing

A Fair Hearing is...

A review of disputed WIC Program actions or decisions which affect participation of vendors or participants.

Fair Hearing Procedure

A request for a fair hearing is...

A clear expression by the individual, the parent, guardian, caretaker, or other representative, that an opportunity to present his or her case to a higher authority is desired.

**** All requests for hearings must be made within 60 days after denial or termination of WIC services.**

Compliance Reviews

- The Arkansas WIC Program is evaluated by USDA Food and Nutrition Service (FNS) every 3-5 years through the Management Evaluation Process.
- As a part of this evaluation, the State Office and selected local health units are evaluated by USDA on areas under review which may include compliance with civil rights policies, laws and regulations.
- A written report is provided by USDA and the State Office is required to submit a corrective action plan outlining actions taken to resolve any issues identified as a finding. The State Office must follow up with the local health unit to ensure the issue has been corrected.

Compliance Reviews

- A WIC Civil Rights Compliance Review is a component of WIC Management Evaluations conducted by State and Regional Staff for 20% of local health units each two federal fiscal years.
- Reviews are also conducted on 10% of farmers, farmers' markets, and roadside stands annually and routine monitoring visits are conducted on 5% of the number of WIC vendors authorized each fiscal year.

Compliance Review Examples:

- Are potentially eligible households given an equal opportunity to participate?
- Is the LHU displaying the “And Justice for All” and “Fair Hearing Posters” and in an easily seen location?
- Is the Outreach Plan being followed and is program information made available ?
- Are displays and materials reflective of inclusiveness based on race, color, national origin, age, sex and disability?
- Are civil rights complaints being handled according to WIC policies and procedures?
- Have all WIC staff members completed annual civil rights training?

USDA FNS's Southwest Regional Office will manage all noncompliance findings.

Resolution of Noncompliance

- A finding of noncompliance may be the result of a routine management evaluation, a special review, or an investigation. Noncompliance is a factual finding that any civil rights requirement, as provided by law, regulation, policy, instruction or guidelines, is not being adhered to by a State agency or WIC clinic.
- Steps must be taken immediately to obtain **voluntary** compliance.
- USDA FNS's Southwest Regional Office will manage all noncompliance findings. The effective date of the finding of noncompliance is the date of notice to the State agency, local health unit, or other subrecipient.

Civil Rights Training

Remember...

As employees of the State of Arkansas we are **public servants**. Our duty as public servants is to treat all people with the **highest level of dignity and respect**.

Questions/Comments

Contact:

Mitzi Fritschen

Mitzi.Fritschen@arkansas.gov

(501)661-2508

Regional WIC Coordinators:

Central: Carol Waller (501) 280-4933

Northeast: Tena McCoy (870) 236-7782

Northwest: Gwen Williams (479)770-6232

Southeast: Monica Barnett (870) 270-9737

Southwest: Barbara Claybrook (870)777-2191