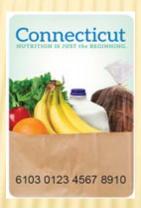


# State of Connecticut Department of Public Health



# The Special Supplemental Nutrition Program for Women, Infants, and Children-WIC Program Pharmacy Training



# Purpose of our program

To serve nutritionally at-risk women, infants, and children up to age 5.

To show participants that good nutrition leads to better health.

To provide nutrition education and specific supplemental foods for good health and nutrition during critical times of growth and development.

To provide referrals for health care and other services.

# **Purpose for training**

To improve vendors' understanding of Program rules and requirements to enhance compliance and prevent errors.

### **CIVIL RIGHTS**

Post in your work areas so all staff are aware of this WIC Civil Rights protection information. All WIC authorized vendors must ensure that they are in compliance at all times with the State of Connecticut, Department of Public Health, WIC State Plan Policy 104-03 Civil Rights Discrimination Complaints procedure

### **Discrimination/Civil Rights Notice**

Complaints from WIC participants about authorized stores may be written or oral and filed anonymously.

Understanding program requirements will help you stay in compliance with the terms of your signed WIC Vendor Agreement in which the store agrees to:

- Comply with all the procedures for WIC transacting WIC benefits
- Comply with all procedures for pricing and payment requirements
- Provide regular review of WIC policies and procedures with all persons involved in WIC transactions
- •Comply with WIC customer confidentiality and treat a person using WIC benefits courteously.
- •Comply with nondiscrimination provisions of USDA regulations (7 CFR Parts 15, 15a and 15b of this title) including but not limited to;

# WIC PARTICIPANTS BEING UNFAIRLY DENIED SERVICES, DELAYED FROM RECEIVING SERVICES, OR TREATED DIFFERENTLY FROM OTHERS, AS THEY MAY HAVE A CLAIM OF DISCRIMINATION

Please make sure that employees are not violating the civil rights of customers receiving federal financial assistance by refusing to serve them and providing inferior customer service. This includes, but is not limited to, not accepting valid WIC benefits from participants/customers, infant formula not being made available within 48 hours of the request and customers paying with WIC being identified and discriminated against due to their payment type.

Cashiers should be polite and treat WIC customers with respect.

# FOOD RESOURCE AND VENDOR MANAGEMENT UNIT (FRVM)

### Mission

The Food Resource and Vendor Management Unit is committed to ensuring participants' access to specific nutritious foods provided by the Connecticut WIC Program by authorizing retail stores and assuring program integrity and compliance through effective management, oversight and review of its authorized vendors.

### **Purpose**

Strengthen the quality of vendor services to the community through;

- Training
- Monitoring/Evaluation
- Recruitment
- Ensuring Business Integrity
- Quality Customer Service

Through these efforts improving adequate participant access to support the shopping experience of our WIC participants.

# Changes to Program Requirements in the last 3 years

- Implemented online portal for applications
- Revisions to WIC Vendor Agreement in March and December 2017
- Standard Formula switch from Enfamil to Similac
- Roll-out of eWIC benefits, new Food Guide implemented for eWIC
- All Special Formulas now obtained at pharmacies
- eWIC planning (APL, checks to eWIC cards)
- No longer authorized Above 50% vendors

# **Vendor's Responsibility for Training**

- You are responsible for training your store employees and cashiers before they handle WIC benefits
- Inform and provide annual and regular training to existing store employees
- Provide documentation of employee WIC training upon request
- Owners are accountable for the actions of staff who handle WIC transactions
- Owners, managers, and staff will be required to sign off on bulletins that contain vendor information. Do you receive these?
- Cashiers must be trained on transactions and customer service managers must be trained on minimum inventory requirements

# **Appendix A-Selection Criteria**

- Authorized vendors must meet the selection criteria at all times throughout the authorization period.
- We may reassess you at any time during your agreement period using the vendor section criteria in effect at the time of the reassessment
- The WIC program will terminate the authorization of vendors who fail to meet the criteria.

# **Posting Prices Requirement**

Prices must be posted on the store shelf in front of the item or on the product itself.



When prices increase or decrease, prices must be changed in all places:

- ✓ Price signs near the product
- ✓ Price stickers on the items
- √ Store shelf tags

This includes but is not limited to, sale prices, new product with higher prices, and replacing the previous prices on older product.

# **Appendix B-Minimum Inventory Requirements**

- At all times, you must maintain the following WIC infant formula in the quantities stated with future expiration dates on the shelves or on the store premises.
- To ensure constant availability of WIC approved foods to our WIC customers, you
  may have to stock this food item in larger quantities than is required.

Similac Advance (Blue Can)
12.4 ounce powder cans AND/OR
13 ounce concentrate cans

24 units any combination 12.4 ounce powder or 13 ounce concentrate



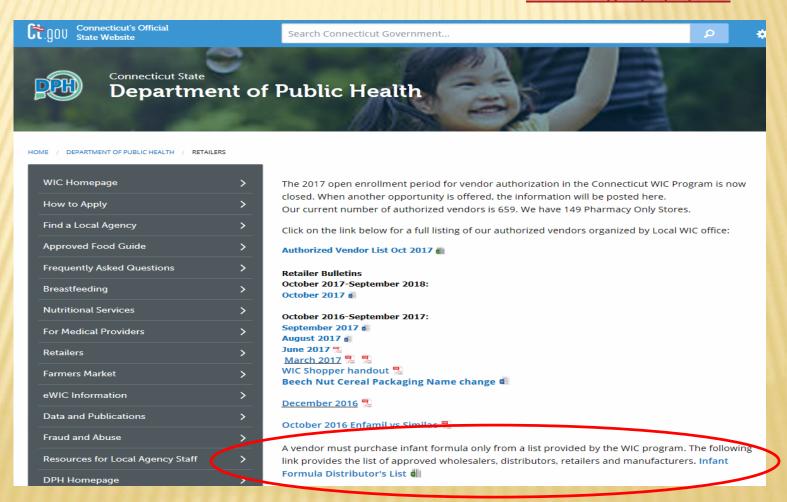
Monthly Redemption:
Similac Advance Powder 12.4 oz: 56000 cans
Similac Advance Concentrate 13 oz: 2600 cans



### **Infant Formula Purchase Requirement**

Authorized vendors MUST purchase all infant formula ONLY from the WIC Program's list of wholesalers, distributors, retailers and manufacturers. This list is provided to authorized vendors on an annual basis.

The list can also be found under Retailers on our website www.ct.gov/dph/wic.



# Other WIC Approved Food

For any requested WIC approved food item that is not a minimum inventory requirement, but on a participant's benefit, an attempt must be made to make the product available to the WIC customer within 48 hours of the request, excluding holidays and weekends.

Other WIC approved Similac Products (Monthly Redemption):

- Similac Sensitive 19 Cal Powder-9500 cans
- Similac Soy Isomil 20 Cal Powder-2900 cans
- Similac Alimentum 12.1 oz Powder-5700 cans

# **Approved Product Listing (APL)**

- The APL is the approved product listing that contains ALL WIC approved products allowed to be purchased.
- List is automatically updated daily to your cash register system.
- New product submissions take 48 hours to be available to purchase.
- The scanner reads the UPC, which checks the APL to identify products.
- The APL List is an Excel file with over 16, 000 items. It can be found on the WIC website: <a href="www.ct.gov/dph/wic">www.ct.gov/dph/wic</a>.
- The WIC Shopper will help you identify WIC Approved products.
- Occasional errors that need to be fixed.

# Product is WIC approved, but not scanning

A WIC customer or manager can contact the State WIC Office.

The following information is needed:

\*The entire UPC number/all of the numbers or a photo of UPC bar code

\*Product Name or photo of the front of the product

\*Size of container

\*Send the information to:

\*Email: ctwic@ct.gov



The product may be WIC approved; however, the UPC number is not listed in the WIC Program's Approved Product Listing.

Once approved, products will appear in the Approved Product Listing within 48 hours.

# Common situations with formula purchases

### Formula will not scan

- The product is not WIC approved.
- The product is not listed in your store's inventory or cash register system.

Complete the sale for the items that do go through. Participants can try another brand or wait to purchase at a later date. If the UPC does not scan, you should refuse to sell the item.

### Food will not come off benefit balance

• The product is not allowed on their benefit. (Participant is issued Boost, and trying to purchase Boost Kids Essential)

If the issue cannot be resolved, WIC customers should call their local WIC office.

### Formula is on back order

Notify the WIC customer on delay of ordering product.

# What are your experiences?

# **Appendix C-Requirements for WIC Transactions**

- Never ask for or enter the cardholder's PIN. The PIN, along with a valid WIC card is the only identification needed.
- Scan the actual item's Universal Product Code (UPC) that is affixed to the item, unless the item is a fresh fruit or vegetable.
- Keep all WIC customer information and payment type confidential, do not confiscate a WIC card.
- All formula that was purchased must be taken at the time of the transaction.
- Do not allow store credit or IOU's in exchange for items not taken at the time of transaction.

# **Appendix D-Requirements For Pricing and Payment**

- The State WIC Office collects prices through vendor redemptions.
- Charge prices that are fair and competitive for your store type.
- All vendor prices must meet the WIC Program's price limitations.
- Never charge the WIC Program any commercial transaction processing costs and fees imposed by a third-party processor that the vendor elects to use to connect to the EBT processor's host system.
- Never charge WIC customers more for WIC products than non-WIC customers.
- Never collect sales tax on WIC products purchased.

# **Coupons, Sales and Promotions**

### Vendors must allow:

- Manufacturer's Coupons
- Store Promotions
- Savings Cards
- Buy One, Get One Free offers, AND/OR
- Any other types of sales

from WIC customers if offered to non-WIC customers.

The savings must be deducted before completing the WIC transaction.



# Do's

- Use Shelf labels to help WIC customers identify WIC approved items.
- Rotate stock to avoid selling expired WIC products.
- Call the State office 1-800-741-2142 with any issues with ordering any special formula

# Don'ts

- Don't ask to see benefit balance before transaction.
- Don't have a checkout lane designated only for WIC transactions.
- Don't offer, or intend to offer, incentive items solely to WIC customers. Vendors
  cannot offer free food or merchandise to entice WIC customers to use their benefits at
  the store.
- Don't identify WIC customers by calling out a WIC transaction.
- Don't process WIC transactions if communication lines are down.

# **Appendix F-Disqualifications, Civil Money Penalties and Fines**

Violations are determined by investigation, which includes on-site monitoring, transaction audits, inventory audits and undercover compliance buys.

Sanctions are imposed in order to protect the integrity and the nutritional goals of the WIC Program.

Federal Mandatory Sanctions are as follows:



# **Permanent Disqualification**

### **One Occurrence**

Judicial conviction of trafficking in WIC benefits or selling firearms, ammunition, explosives or controlled substances in exchange for WIC benefits.

# **Disqualification 6 Years**

### **One Occurrence**

Administrative finding of buying or selling WIC benefits for cash (trafficking) or selling firearms, ammunition, explosives or controlled substances in exchange for WIC benefits.

# **Disqualification 3 Years**

### **One Occurrence**

Sale of alcohol or alcoholic beverages or tobacco products in exchange for WIC benefits.

### Disqualification 3 Years-If a pattern of three or more occurrences

- Claiming reimbursement for the sale of an amount of a specific WIC food that
  exceeds the store's documented inventory of that WIC food for a specific
  period of time. Example: Have to provide receipts to show that all foods
  sold were purchased for the store
- Overcharging on WIC Benefits. Example: Changing prices in systems
- Receiving, transacting and/or redeeming WIC benefits outside of authorized channels, including the use of an unauthorized vendor and/or unauthorized person. Example: Cannot move devices to another location
- Charging for WIC food not received by the WIC customer. Example: Scanning other products
- Providing credit or non-food items, other than alcohol, alcoholic beverages, tobacco products, cash, firearms, ammunition, explosives or controlled substances in exchange for WIC benefits. Example: Selling paper goods

### Disqualification One Year-If a pattern of three or more occurrences

Providing unauthorized food items in exchange for WIC benefits, including charging for WIC food provided in excess of those listed on the WIC benefits.

**Example: Selling an Non WIC approved formula** 

# **State Agency Established Sanctions**

### Disqualification One Year-If a pattern of two or more occurrences

- Substitution of a WIC food item for another WIC food item not listed on the WIC benefit
   Example: Selling juice instead of milk
- Allowing a refund or exchange for WIC or non-WIC food items. Example: WIC purchase completed, but then allows a return
- Scanning any UPC as a substitute, replacement or otherwise not actually affixed to the
  actual item being purchases. Example: Scanning a UPC codebook or reference sheet.
- Not allowing the WIC customer to enter their own PIN on the PIN pad. Example: Cashier asks for PIN and inputs it for the WIC customer

### \$500.00 fine-If a pattern of two or more occurrences

- Limiting WIC customers in their choice of WIC products. Example: Forcing a WIC customer to buy only the most expensive items, or only allowing the least expensive or store brands
- Offering store credit or IOU to a WIC customer. Example: Performing a transaction, but the customer comes back later for the item

## **State Agency Established Sanctions**

# \$250.00 fine Two or More Occurrences

- Allowing the <u>sale</u> of a WIC food item that is spoiled or is sold to WIC customers after the expiration date, "sell by", "best if used by", "manufacturer suggested, or other date limiting the sale or use of the food item. Example: Selling expired formula
- Allowing the <u>return</u> of any WIC purchases other than for identical WIC food items that are damaged, spoiled, or has exceeded its "sell by", "best if used by", "manufacturer suggested', or other date limiting the sale or use of the food. Example: Customer buys Similac Soy, but vendor allows a return for Similac Isomil

# \$125.00 fine Two or More Occurrences

- Not providing savings to WIC customers through coupons or store offered promotions. Example:
   Giving sale prices to cash customers, but not to WIC customers
- Failure to attempt to provide any requested WIC approved food item within 48 hours that is on the participant's benefits list. **Example: Not trying to order special formula**
- Failure to provide a receipt at the end of the transaction showing the date of the transaction, product(s) purchased, and the remaining balance of available benefits.
- Failure to cooperate with Federal, State, and Local WIC Program personnel during announced and unannounced on-site vendor monitoring. Example: Not allowing entry to the store when it's open or not signing monitoring reports because of the result

# **Appendix E-Monetary Claims**

The Connecticut WIC Program may make monetary claims against vendors that have committed certain types of redemption abuse in addition to any other sanctions applied against such vendors. Those include but are not limited to:

- Inventory Audits when a vendor cannot support all of its redemptions
- Overcharges or errors made on WIC transactions discovered during undercover compliance buys
- Transaction Audits review of a vendor's redemptions to determine if the vendor has overcharged the WIC Program.

All monetary claims must be paid within 15 days of the date of the notice. All remittances must be made with a certified bank check or money order and payable to Treasurer-State of Connecticut, Department of Public Health.

The WIC program may non-select a vendor for failure to pay a monetary claim within the required period of time.

# **Vendor Complaint Process**

Vendors may file a complaint against WIC customers who abuse program rules. Contact the State WIC Office with the last four digits of the card #. Example: Trying to exchange or purchase non-WIC items, is rude or has disruptive behavior.

Notify the State WIC Office if the customer does not know what formula to buy and/or indicates that they do not know how to use the WIC card. Additional training may be needed.

Vendors may file a complaint against other vendors who suspect that WIC program rules are not being followed. **Example: Vendor is giving non-food items or unapproved items.** 

Contact the State WIC FRVM unit:

Email: <a href="mailto:ctwic@ct.gov">ctwic@ct.gov</a>

**Phone**: 860-509-8084 or 800-741-2142 (in Connecticut only)

Mail: State of Connecticut, Department of Public Health, WIC Program

410 Capitol Avenue, MS #11WIC, Hartford, CT 06106

# Requirements for Re-authorization

- Must meet all of the selection criteria in the Vendor Agreement at all times.
- Must meet and maintain the minimum inventory and pricing requirements.
   (Onsite monitors do not have any discretion for excusing missing food items or items not being priced at the time of inspections).
- If monitoring visit is passed, your corporate office will receive an executed agreement for 3 years.
- If monitoring visit is not passed, vendor will have another opportunity.
- Must meet competitive pricing criteria within peer group.
- Unannounced onsite monitoring visits to verify minimum inventory requirements and posted prices of WIC foods, will begin tomorrow.

# **Program Integrity**

The Food Resource and Vendor Management Unit is committed to improving the health of CT's most vulnerable children by ensuring authorized vendors are in compliance with providing healthy foods during the critical stages of early childhood development.

Contact us anytime you feel additional training is needed or have questions regarding policies or procedures.

Refer to the Retailers page on the WIC website <a href="www.ct.gov/dph/wic">www.ct.gov/dph/wic</a> for program materials.

Keep the WIC Vendor Information Folder at the store location at all times. Review the documents with your employees, so they know where to find important Program information.

You play an important role in the health of our participants. We look forward to our continued partnership in providing nutritious food to Connecticut families.

# Completed training certificate-Today is:

Connecticut  With the seginning.	Y	cut Department of Public Health n Program for Women, Infants and Ch	ildren  Connecticut Department of Public Health
Vendor Training Certificate			
This certificate has been awarded to			
Name of Store			
Store Location (#, Street, City)			
Awarded on (Date)			
As the owner or authorized representative of the vendor named above, I have attended training and agree to instruct all store personnel who handle WIC transactions.			
Print name of attendee Signature of attendee Title			