Vendor Manual

An electronic or paper copy of this Vendor Manual, as referenced in Wisconsin Administrative Code chapter DHS 149, should be easily accessible to staff at each vendor location.

Your local WIC Agency and Vendor Representative is:

State WIC Vendor and Integrity Unit

Phone 608-266-6912
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DEFINITIONS

“Above-50-percent vendor” means a vendor that derives more than 50 percent of annual food sales revenue from WIC. It includes vendor applicants applying for initial authorization that estimate they will derive more than 50 percent of annual food sales revenue from WIC.

“Agreement” or “Vendor Agreement” means the document or electronic record entered into by a vendor and the department that contains the terms and conditions under which a vendor or direct distribution center is authorized to provide approved food.

“Approved food” means food identified by the department as an authorized food in accordance with 7 CFR 246.10 as acceptable for use under the federal special supplemental nutrition program for women, infants, and children under 42 USC 1786.

“Approved product list” (APL) means an electronic file identifying approved foods used by the EBT system to validate items for purchase with eWIC benefits.

“Authorized Infant Formula Supplier list” means the publication listing wholesalers, distributors, retailers, and manufacturers approved by the department to provide approved infant formula to vendors and direct distribution centers.

“Balance inquiry” means a type of transaction initiated by the cardholder in the checkout lane or at a stand-beside device to check the household’s available balance, including a description of the food category/subcategory, available benefits, unit of measure, and the last date to use the benefits.

“Cardholder” means a person in possession of an eWIC card and personal identification number.

“Cash value benefits” (CVB) means a fixed-dollar amount of fruit and vegetable benefits.

“Change of ownership” means the transfer of the right to control the assets or management of a vendor or direct distribution center, or any majority changes in ownership interest.

“Conditional authorization” means additional terms and conditions imposed by the department including restrictions due to a relationship with an individual with an unacceptable history with WIC or SNAP, or a family member participant.

“Contract period” means the period of time stated in the agreement that a vendor or direct distribution center is authorized to provide approved food in exchange for an eWIC benefit.

“Customer area” means the part of a grocery store or pharmacy that is normally frequented by customers and does not include storage or other areas that are normally not frequented by customers.

“Department” means the Wisconsin Department of Health Services.
“Direct distribution center” means an entity, other than a vendor, that is under contract with the department or a local agency under Wis. Stat. § 253.06 (3m), to distribute approved food to participants.

“Disqualification” means the act by the department of ending WIC participation of a vendor, direct distribution center, infant formula supplier, or participant because of a program violation.

“Electronic benefit transfer” (EBT) means a method that permits electronic access to Women, Infants, and Children program benefits using a device, approved by the department, with payments made in accordance with ch.410 Stats.

”EBT-capable” means a cash register system or payment device, approved by the department, that can accurately and securely obtain the benefit balance associated with eWIC benefits, maintain the necessary files, such as the approved product list, and successfully complete WIC transactions.

“Enforcement assessment” means the amount added to a forfeiture or recoupment required under Wis. Stat. § 253.06 (5)(c).

“eWIC benefit” means the electronic food benefit issued to a WIC participant available for redemption at authorized vendors.

“eWIC card” means a type of food instrument that performs a series of real-time transactions between the Point-of-Sale device at the vendor location and the EBT card issuer processor to approve the WIC transaction. The eWIC card number and PIN link to an eWIC cardholder account that contains a benefit balance. The eWIC card is issued by a local WIC agency and used by the eWIC cardholder to purchase approved food at the vendor location.

“eWIC contractor” means Fidelity Information Services (FIS) Government Solutions, the WIC EBT contractor that processes eWIC transactions. FIS leases stand-beside equipment through a merchant agreement to vendors without integrated cash register systems.

“Family” means a household or economic unit composed of a person or group of persons, related or unrelated who usually live together and whose production of income and consumption of goods are related. Exceptions include residents of a homeless facility or an institution shall not be considered as members of a single family. A foster child is counted as a separate family unit of one.

“Food and Nutrition Service” (FNS) means the agency within USDA that administers the WIC and SNAP Programs.

“Food instrument” means a voucher, check, eWIC card number and personal identification number, coupon, or other method used by a participant to obtain WIC approved foods.

“Food sales” means the sales of all foods that are eligible items under SNAP.
“Forfeiture” means the sum of money required to be paid to the department as a result of a vendor violation as provided in Wis. Stat. § 253.06 (5)(b)(4).

“Grocery store” means a retail store, or a store authorized by SNAP as a specialty store, that sells a general line of food such as breads, cereals, fruits and vegetables, meats, fish, poultry, and dairy products.

“Initial authorization” means the authorization of a specific business entity to serve as a vendor at a designated location.

“Inventory audit” means the examination of invoices or other proofs of purchase to determine whether a vendor has purchased sufficient quantities of approved foods compared to valid claims for payment.

“Integrated system” means a multi-function point-of-sale system (POS) that has been certified to accept eWIC transactions. Terminals accept WIC in all lanes and require a single scan to verify the item’s WIC eligibility and process the purchase. Integrated vendors support mixed basket transactions that allow different tenders, such as WIC, SNAP, debit, and credit in one transaction.

“Invoice” means a non-negotiable commercial instrument issued by a seller to a buyer. It identifies both the seller and buyer and lists, describes, and quantifies the items sold, shows the date of shipment, prices and discounts (if any), and delivery and payment terms.

“Local agency” means an entity that has a contract with the department to provide WIC services including preauthorization site visits, eligibility determination, eWIC benefit issuance, and nutrition counseling for participants.

“Multi-function equipment” means point-of-sale equipment obtained by a vendor through commercial suppliers; capable of supporting eWIC as well as other types of tender.

“Not-To-Exceed” (NTE) means an FNS-approved cost containment methodology that vendors are subject to price limitations. For approved foods exceeding the NTE, payments to vendors are adjusted (reduced) to ensure the price paid for individual food items may be equal to, but not in excess of the maximum, not-to-exceed price.

“Participant” means a person who is eligible for and receives services under Wis. Stat. § 253.06, including an infant, child under age 5, and a pregnant, breastfeeding, or postpartum woman within six months of delivery.

“Participant access” means criteria and procedures established by the department to evaluate the availability of other vendors in the same area and any geographic barriers to these vendors to ensure the lowest practicable food costs while ensuring adequate access.

“Personal Identification Number” (PIN) means a number set by the cardholder to maintain secure access to food benefits via the eWIC card.
“Pharmacy” means an establishment that is licensed to operate as a pharmacy under Wis. Stat. § 450.06.

“Point-of-Sale (POS) Provider” or “Reseller” means the entity that provides maintenance and support for electronic cash register system.

“Point-of-Sale (POS) Terminal” means a computerized replacement for a cash register.

“Primary Account Number” (PAN) means the number that appears on the front of an eWIC card that when combined with the PIN allow access to food benefits.

“Price Look Up” (PLU) means a four- or five-digit number defined by the International Federation for Produce Standards (IFPS) and used to identify products that are typically of variable measure.

“Recoupment” means the amount of excess payments made to the vendor as a result of violations that is requested for repayment to the WIC Program as specified under Wis. Stat. § 253.03(5)(b)5.

“Relative” means a person connected to the vendor by blood or marriage including spouses, parents, children, grandchildren, grandparents, brothers, sisters, aunts, uncles, nieces, nephews, first cousins, in-laws, stepparents, stepchildren, stepbrothers, and stepsisters. The relative may or may not reside in the same household as the vendor.

“SNAP” means the federal Supplemental Nutrition Assistance Program under 7 USC 2011 to 2029 and known in Wisconsin as FoodShare Program.

“Sanction” means a penalty imposed by the local agency or department on a vendor, direct distribution center, infant formula supplier or participant because of a violation of this chapter and includes denial of an application, termination of authorization for a vendor or termination of the contract for a direct distribution center, disqualification, recoupment, forfeiture, enforcement assessments under Wis. Stat. § 253.06 (5)(b), or civil money penalties defined in 7CFR 246.12 (l)(1)(ix) and (x).

“Single-function equipment” means POS equipment such as barcode scanners, card readers, PIN pads, and printers only capable of processing eWIC transactions.

“Stand-beside system” means a non-integrated POS device that is not connected to the store cash register system. This device may be either single-function or multi-function equipment.

“Stock Price Survey” means the department form used to record current vendor non-sale shelf prices for approved foods, which must be submitted with a vendor application when requested by the department.

“USDA” means the United States Department of Agriculture.
“Universal Product Codes” (UPC) means a specific type of barcode used by retailers to identify products sold. Approved food UPC codes are included on the APL file.

“Vendor” means a sole proprietorship, partnership, cooperative association, corporation, or other business entity operating one or more grocery stores or pharmacies authorized by the department to provide approved foods to participants under a retail food delivery system. Each location operated by a business entity constitutes a separate vendor and must be authorized separately from other stores operated by the business entity.

“Vendor authorization” means the determination by the department that assesses, selects, and then enters into an agreement with a grocery store or pharmacy that applies or reapplies to be authorized as a vendor.

“Vendor Manual” refers to this document and means the electronic or printed manual the department publishes that describes the WIC program and program policies related to the provision of approved food to participants, including program policies, periodic updates and amendments, applicable rules, and other requirements.

“Vendor peer group” means a group of two or more vendors determined by the department to have similar characteristics and used to set distinct competitive price criteria and allowable reimbursement levels.

“WIC” or “WIC Program” means the Special Supplemental Nutrition program for women, infants and children established pursuant to 42 USC 1786, 7 CFR 246, and Wis. Stat. § 253.06.

“WIC vendor number” means the unique number assigned by the Department at the time of vendor authorization to identify the business entity.

“WIC Vendor and Integrity Unit” means the office responsible for vendor management and compliance.
SECTION 1 – PROGRAM INFORMATION

Special Supplemental Nutrition Program for Women, Infants, and Children

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) began in 1972. It is funded by the U.S. Department of Agriculture (USDA) and administered by each state. In Wisconsin, WIC is administered by staff at the Department of Health Services (the Department). The Department contracts with WIC agencies throughout the state to provide support for WIC participants and vendors.

The purpose of the WIC program is to provide nutritious food, health care referrals and nutrition education for eligible pregnant, breastfeeding and non-breastfeeding postpartum women, as well as infants and children up to age five.

Research shows enrollment in the WIC program provides many benefits, such as:

- Reduced fetal deaths and infant mortality.
- Reduced low birthweight rates and increased duration of pregnancy.
- Improved growth of nutritionally at-risk infants and children.
- Decreased incidences of iron deficiency anemia in children.
- Improved dietary intake of pregnant and postpartum women and improved weight gain in pregnant women.
- Earlier involvement by pregnant women in receiving prenatal care.
- Increased likeliness of children having a regular source of medical care and up to date immunizations.
- Significantly improved diet in children.
- Improved intellectual development in children getting ready to start school.

WIC differs from other USDA programs, such as The Supplemental Nutrition Assistance Program (SNAP), in several ways:

- WIC participants must be pregnant or breastfeeding women, new mothers, infants, or children up to age five.
- The foods authorized by the WIC program are tailored to meet each participant’s individual nutritional and medical needs.
- WIC is administered by each state, so benefits are issued by and may only be redeemed in the state in which the participant lives.
About WIC Participants

WIC participants include: single parents, military families, foster children, families with unexpected life events such as medical bills or loss of a job, pregnant and post-partum teen moms who are in high school, and individuals seeking higher education. WIC helps these families stay healthy during hard times and avoid having to make hard choices, like paying the rent or buying food.

To learn more about WIC eligibility and other program information, visit the Wisconsin DHS WIC home page.

About WIC Vendors

Vendors are grocery stores and pharmacies authorized to sell WIC foods and formulas to participants in exchange for eWIC payment. Vendors play an important role to ensure participants receive the correct nutritious foods, which reinforces participant nutrition education and helps to support healthy families.

WIC is good business. During 2018, Wisconsin WIC participants purchased more than $63 million in approved foods from vendors. On average, participants spend $3 to $4 of their own money for every $1 of foods purchased with eWIC payment.
SECTION 2 – PROGRAM ADMINISTRATION

Vendor Agreement

As part of the vendor application process, all vendors must sign a Vendor Agreement for the current contract period. Once authorized, vendors are responsible for adhering to all conditions of the Agreement. The Agreement between the State of Wisconsin Department of Health Services (Department) and the vendor, as well as the obligations agreed to within it, is binding and contractual. Vendors are encouraged to contact the local WIC agency or the WIC Vendor and Integrity Unit for clarification of program policies and procedures.

The Department informs vendors of changes in program policies and procedures through training, notices, and amendments. Vendors are responsible for employee training and ensuring employees are knowledgeable about current program policies and procedures. Ultimately, vendors are accountable for the actions of all store employees related to the WIC program. Vendors are encouraged to contact the local WIC agency or the WIC Vendor and Integrity Unit for clarification of program policies and procedures.

Conditional Authorizations

In certain circumstances a vendor may be subject to additional terms and conditions in order to become and remain authorized. An example of such conditions are: prohibiting a specific person or persons from being involved in the operation of the store or having a financial interest in the store, and prohibiting relatives from redeeming eWIC benefits at a specific location.

Vendor Contract Period

The current contract period for the Agreement is November 1, 2019 through October 31, 2022. New vendors authorized during the current contract period will have the same contract end date of October 31, 2022.

Vendors must reapply for each three-year contract period to remain authorized. If the vendor does not reapply, the authorization expires at the end of the contract period. Expiration of a vendor’s authorization is not subject to appeal, and vendors must submit a new application to be considered for authorization.

The Department may deny a vendor’s reapplication for authorization for failure to comply with program requirements and may terminate or disqualify a vendor pursuant to 7 CFR 246, Wis. Stat. § 253.06, Wis. Admin. Code ch. DHS 149, and the Agreement.
Minimum Requirements of Authorization

Vendors must meet and maintain minimum requirements of authorization at all times during the contract period. Failure to do so may result in sanctions, up to and including termination of the Agreement. The department may reassess the vendor for minimum requirements, at any time, using the current vendor selection criteria. Specific minimum requirements are available in Wis. Admin. Code §149.05. The minimum requirements include the physical location, licenses, registration, cost containment, business integrity, previous penalties, technology standards, operating standards, and passing the preauthorization site visit. Prior to denying or sanctioning a vendor for program violations the department will review if that location is necessary for participant access.

Reporting Business Changes

Vendors are responsible for notifying the WIC Vendor and Integrity Unit at 608-266-6912 of any changes in the business that may affect authorization.

Changes in Business Name, Status, Corporate Officers, Managers, and Location

Vendors should immediately report to the Department any changes to the retail space (e.g., number of cash registers, cash register system, and store square footage); the business name; status of business entity registered with WI Department of Financial Institutions; and corporate officers or managers by completing and submitting the Retail Vendor Application Amendment form. Changes in location must be submitted at least 15 days prior to the move.

The Department will review the information and determine if a new application is needed. The new application may be waived if the new location is within a five-mile radius of the vendor’s previously authorized location. The vendor must simultaneously close the previous location and open the new location.

Change of Ownership and Permanent or Temporary Closings

If a vendor sells their store to another person or group of persons, or there is a change in majority owner/shareholder, whether by gift, purchase or lease, the vendor must report to the WIC Vendor and Integrity Unit within 15 days of the change. The Department will determine if a new application should be submitted.

Vendors should immediately report a permanent or temporary store closing to the WIC Vendor and Integrity Unit. All WIC business must end at that location on the legal date of the change or closing. Some examples of a change of ownership include: new sole owner, partner, stockholder, or LLC member; asset purchase of a corporation or LLC; new FEI number; new Seller’s Permit or taxpayer’s number; new food dealer’s license; retirement or death of a sole owner, partner, stockholder, or LLC member.
On the date of a change of ownership, the WIC Vendor number and X9 number will be terminated at 11:55 pm Central Time. If any WIC transactions are conducted under the previous ownership after this time, that ownership will be operating without authorization and may be sanctioned.

**Minimum Stock Requirements**

Grocery stores must maintain the minimum stock requirements at all times on the shelves or coolers in the customer area of the store. Stores with infant formula theft problems are encouraged to keep infant formula in a secure area. A notice of the location and prices must be posted in the area where the customer would expect to find the formula. Minimum stock of formula must still be maintained.

Vendors must provide food that is fresh and within its expiration date or sell by date. Expired WIC foods must be removed from the customer area of the store. The sale of infant formula after its expiration date is also prohibited by the Federal Food, Drug, and Cosmetic Act and Wis. Admin. Code § ATCP 75 Appendix.

Pharmacies are not required to maintain minimum stock. However they must provide proof to the Department they can obtain formula in a timely manner and must order special infant formulas and liquid nutritional/medical products within a reasonable time when requested by an eWIC cardholder.

Refer to the WIC Shopping Guide for more detailed information about the approved foods.
SECTION 3 – eWIC TRANSACTIONS

eWIC Benefit Redemption

WIC customers pay for WIC approved foods using their eWIC card. Vendors receive payment for WIC foods electronically. All vendors must have an eWIC capable system, either through their cash register system or by using the contractor stand-beside device.

Accepting eWIC cards

Vendors accept eWIC payment from any person presenting an eWIC card.

WIC cardholders may redeem food benefits over as many or as few transactions as desired until the benefit expiration date. They are not required to use all or most of their benefits at once.

eWIC transactions are processed by either swiping the eWIC card or manually entering the PAN. Vendors may not ask for nor enter the eWIC cardholder’s PIN. The physical eWIC card must be present during the transaction.

The WIC Shopping Guide provides detailed information about WIC Approved Foods. A copy of the WIC Shopping Guide should be kept at each register to assist with any issues or questions that may arise during an eWIC transaction.

Note: Wisconsin eWIC benefits may be redeemed anywhere in Wisconsin as long as they are redeemed at an authorized vendor location.

Processing Transactions

Not all register systems are the same. Processing an eWIC transaction will be different depending on the software developer and maker of the point-of-sale (POS) register system or device.

Integrated System

Vendors using an integrated system must contact their POS provider for eWIC transaction instructions.

Stand-Beside System

Vendors using stand-beside terminals must follow the instructions provided with the device or must contact the FIS Retailer Help Desk at 877-227-6347.

Lane Requirements

There must be at least one cash register lane open at all times capable of processing eWIC transactions. Stores must attach the Wisconsin WIC Accepted Here register decal to all
registers capable of processing eWIC payment. Vendors cannot restrict one checkout lane for only WIC purchases.

Transaction Requirements

- Vendors must provide WIC cardholders with a receipt for foods purchased with eWIC benefits. The receipt must include a list with the remaining benefit balance.
- Vendors must process a balance inquiry when requested by a WIC cardholder.
  - Vendors cannot require a minimum purchase in order to process a balance inquiry.
- Vendors, using an integrated system, must allow WIC cardholders to purchase both WIC and non-WIC foods together in one transaction (mixed basket).
  - Vendors must allow WIC customers to use another form of payment (SNAP, cash, or debit/credit card) to pay for anything not covered by WIC.
- Vendors must scan the actual UPC attached to each item presented for sale with eWIC payment.
  - Vendors are not permitted to use the multiple quantity key for WIC transactions.
  - Vendors are not permitted to override or allow any substitutions by scanning a barcode from another authorized product or by scanning a barcode from a pre-printed sheet.
- Vendors cannot provide incentive items dependent upon WIC cardholders redeeming some or all of their benefits at one time.

Approved Product List (APL)

The APL contains UPCs and PLUs for all WIC approved food items. The most current APL is available for download to POS integrated systems and stand-beside devices on a daily basis. APLs should automatically update. However, vendors are ultimately responsible for ensuring the most current version of the APL is available at all registers that process eWIC transactions.

Items presented for purchase with eWIC must be scanned or entered during the transaction. The POS will determine whether items are WIC approved and the WIC cardholder has available benefits. Items not approved by the system should never be processed as part of the eWIC transaction.

If a WIC-eligible food item is not listed in the APL, authorized retailers may submit a New UPC Submission Request form to the State WIC Vendor and Integrity Unit for consideration to be added.
Cash Value Benefits (CVB)

Fruits and vegetables are redeemed as cash value benefits. If the value of the fruit/vegetable purchased in a single transaction exceeds the CVB balance, the WIC cardholder may choose to pay for the remaining balance by using other forms of payment (i.e., SNAP, credit, debit, gift card, or cash), or may choose to remove the item from the purchase. For example, if a WIC Cardholder wants to purchase a bag of apples for $2.99, and there is only $2.00 CVB available, the cardholder must be given the option to pay for the remaining $0.99 with another form of payment, or to remove the bag of apples from the order.

Note: Stand-beside devices do not allow the UPCs for fruit and vegetable items to be scanned. Vendors using a stand-beside device must select the CVB option and enter the dollar value for each item instead of scanning the UPC. This process is for fruits and vegetables only.

Discounts and Coupons

Vendors must honor coupons and discounts the same for WIC and non-WIC customers. Discounts and coupons that provide a greater quantity or lower price for food items must be applied by the vendor when available. The vendor must apply the discounts and/or coupons to the purchase transaction prior to requesting reimbursement through the eWIC card. The dollar amount for the WIC food item must reflect all posted store specials, coupons, discounts, and other reduced prices extended to non-WIC customers. Vendors are not required to accept manufacturer coupons.


Transaction Voids

A vendor may void or cancel the purchase of a single WIC food item, a method of payment, or the entire transaction at the WIC cardholder’s request.

A void must be performed prior to completing the transaction and tendering WIC or for stand-beside devices, prior to the next transaction. When this process is completed, the eWIC cardholder’s benefits will be restored to the card.

Contact your POS system provider if you have any questions regarding the voiding procedure for eWIC transactions.

Exchanges and Refunds

Vendors cannot provide refunds or allow exchanges for authorized WIC foods once a purchase is complete and the WIC cardholder has left the store.
The exception to this rule is if the food is defective, spoiled, or has exceeded its “sell by” or “best if used by” date. Only in these situations may the store replace the food item with the exact same brand and size as the item returned by the WIC cardholder. If the food item was part of a manufacturer safety recall, the vendor may replace the recalled food item with another WIC approved food of the exact same type and size, but different brand. These types of situations are between the customer and vendor and no transaction will occur.

Vendors are prohibited from providing cash or other consideration for a return of items purchased with eWIC.

**eWIC Card Handling**

Vendors must allow WIC cardholders to enter the eWIC card PIN in a manner that prevents viewing by anyone other than the cardholder.

Any eWIC card found in the store or on store property, if left unclaimed for 24 hours, should be returned to the State WIC Vendor and Integrity Unit by mailing the card to:

Wisconsin WIC Vendor and Integrity Unit  
PO Box 2659  
Madison, WI 53701-2659

**Damaged eWIC cards**

If a damaged eWIC card does not work when swiped, the vendor should refer the WIC cardholder to their local WIC Agency for assistance. The vendor may manually key in the eWIC card number only if the card is damaged or unreadable. The physical card must be present at the time of purchase.

**PIN Entry Failure**

If an eWIC card PIN is entered incorrectly four times, the card will be locked. The cardholder should contact the local WIC Agency for assistance in unlocking the eWIC card.

**Confidentiality**

Vendors are not permitted to ask for personal information to transact an eWIC sale or to capture or use the information available from the eWIC transaction for building client files without the WIC cardholder’s knowledge and permission.

However, vendors may use available information contained on the eWIC card, such as the PAN, to file a complaint against a cardholder who does not follow established WIC Program procedures.

Vendors may not ask for a WIC cardholder’s driver’s license, telephone number, address, Social Security Number, or any additional personal identifying information or information as
might be requested with non-WIC transactions. The eWIC card and PIN are the only identifiers necessary to complete the eWIC transaction.

If an issue arises during a transaction requiring manager assistance, cashiers cannot publically identify the transaction as “WIC”.

**Emergency Procedures**

Vendors should inform the WIC Vendor and Integrity Unit as early as possible of any emergency situation that limits store operations. This includes, but is not limited to: equipment, technical, and electrical failures; natural disasters; flooding; public health emergencies; or other adverse condition.

**WIC Cardholder Responsibilities**

WIC participants receive education from their local WIC agency about the approved foods and how to shop for foods. Participants and cardholders have several responsibilities related to the shopping trip and transaction:

- Treat store personnel with courtesy and respect.
- Ask for a balance inquiry if they unsure of their benefits.
- Inform the cashier they are using eWIC payment prior to swiping their card.
- Use eWIC as the first form of payment.
- For stores with integrated cash register systems, verify the food items on the mid-purchase receipt are correct prior to approving the eWIC payment.

Vendors are encouraged to contact the local WIC Agency or the WIC Vendor and Integrity Unit for guidance if they suspect an eWIC cardholder needs additional education or counseling in using eWIC food benefits such as: understanding which foods are approved, reading their benefit balance and using their eWIC card.
SECTION 4 – STORE VISITS

Store visits may be conducted by USDA FNS, the Department, or the local WIC agency at any time during the contract period. There are several reasons why a store visit may be conducted, including, but not limited to:

- Check-in to see whether vendor has any questions or concerns;
- Training;
- Response to a complaint;
- Inspection to ensure store is meeting WIC minimum requirements;
- Request for inventory records; and
- Investigation to determine whether a store is complying with eWIC processing and redemption procedures.

Pre-Authorization Site Visit

Pre-authorization site visits are conducted as part of the application process for new vendors seeking WIC authorization. Once the Department determines a vendor's application is complete and they are eligible for WIC authorization a pre-authorization inspection of the store is scheduled. This inspection consists of verifying WIC minimum stock requirements are being met, prices are posted, and WIC foods are fresh and within their expiration date. Following a successful inspection, training is provided and the grocery store or pharmacy will become an authorized WIC vendor.

Monitoring Visits

The WIC program periodically conducts unannounced inspections of vendors to ensure continued compliance with WIC program rules. Monitoring visits are conducted to verify minimum stock requirements are being met, prices are posted, and WIC foods are fresh and within their expiration date. Additional information may be requested during a monitoring visit.

There are three main types of monitoring visits: routine monitoring, state requested monitoring, and corrective action plan (CAP) monitoring. As mandated by USDA FNS, routine monitoring visits are conducted of at least 5% of all WIC vendors each federal fiscal year. State requested monitoring is conducted if there are complaints or the Department has other reasons to believe a vendor may not be complying with program rules. CAP monitoring is only conducted as follow-up to a routine or state requested monitoring visit where significant violations were found.
During a monitoring visit the following may also be requested or evaluated:

- Request to review infant formula invoices to ensure the store is purchasing formula from a Wisconsin WIC authorized infant formula supplier.
- Ask about any changes at the store such as changes in ownership, management, store hours, etc.
- Verify WIC Shopping Guides are available at each functioning cash register.
- Verify WIC Accepted Here door and register decals are being used.
- Ask about in-store WIC training of new cashiers.
- Evaluate use of shelf talkers for appropriate placement.
- Evaluate overall cleanliness of the store and whether coolers and freezers containing WIC-approved foods are working properly.

**Compliance Investigations**

As mandated by USDA FNS, the Department must conduct compliance investigations of at least 5% of all vendors each federal fiscal year based on high-risk indicators or by random selection. A compliance investigation involves an unannounced store visit in which an individual posing as a WIC participant completes an eWIC transaction to determine whether the vendor is complying with eWIC processing and redemption procedures. These individuals do not identify themselves to the vendor. Violations documented during these visits may result in sanctions, up to and including disqualification and termination of the WIC authorization.

**Records Request / Inventory Audit**

Vendors are required to provide all information requested by the Department or Department designee in a timely fashion. This includes making available, upon the request of representatives of USDA FNS, the Comptroller General of the United States, the Department, or the local WIC agency all eWIC cards in the vendor’s possession and all required inventory and accounting records for inspection and audit.

Vendor business records must be maintained for a period of three years. This includes all paper or electronic records used for state or federal tax reporting purposes and other WIC program records including: inventory records showing all purchases for WIC foods and formula items, wholesale and retail, in the form of invoices, books of account, shelf price records, and other pertinent records.
All inventory purchase records for WIC foods or formula must contain the following in order to be accepted for audit purposes:

- Name and address of the supplier or wholesaler.
- Name and address of the purchaser (if invoice is supplied by a wholesaler).
- Date of purchase, including: month, day and year.
- List of the items purchased, including: size, stock number (if available), UPC, quantity, and unit price.
- Invoice payment type (e.g.: cash, check, money order, credit or debit card, ACH payment).
- Sales receipts for WIC foods purchased at retail grocer (e.g., Walmart, Woodman’s), for resale by the vendor; they must include the name and address of the retail store, the date of purchase, description (brand, size and variety) of the exact items purchased, the unit price of items, and the total quantity purchased.
SECTION 5 – VENDOR TRAINING

Vendor training is designed to educate vendors on WIC program policies, notify vendors of new policies or changes in policy, and when applicable, provide additional education to vendors in violation of program policies.

Authorization Training

Following a successful pre-authorization site visit, at least one vendor representative must be present to receive in-store training by the Department or local WIC agency representative. Authorization training covers the purpose of the WIC Program, approved foods, minimum stock requirements, requirement to purchase infant formula from the approved list, procedures for transacting and redeeming eWIC benefits, program violations and sanctions, the complaint process, claims procedure, and incentive items policy.

Annual Training

The Department must provide annual training to at least one representative from each vendor. Annual training covers the purpose of the WIC Program, approved foods, minimum stock requirements, requirement to purchase infant formula from the approved list, procedures for transacting and redeeming eWIC benefits, program violations and sanctions, the complaint process, claims procedure, incentive items policy, as well as any program and food changes since the last training. Annual training may be provided in several forms, including: a newsletter, self-paced training manual, and/or interactive training such as a training video, or web-based training.

Reapplication Training

Prior to the start of a new contract period, at least one representative from each vendor location is required to attend an interactive training session. Reapplication training is conducted by the Department and local WIC agencies. This training covers the purpose of the WIC Program, approved foods, minimum stock requirements, requirement to purchase infant formula from the approved list, procedures for transacting and redeeming eWIC benefits, program violations and sanctions, the complaint process, claims procedure, incentive items policy, and changes to program requirements since the last training. Vendors who fail to attend reauthorization training will not be authorized for the new contract period and will need to reapply for authorization.

eWIC System Training

Integrated Systems

Vendors using integrated cash register systems are responsible for contacting their POS provider to receive training on processing eWIC transactions. Vendors are also responsible for training store employees to use the integrated system.
Stand-Beside Systems

Vendors using stand-beside systems will receive training from the eWIC contractor on POS operations and additional reference materials for processing eWIC transactions. Vendors are also responsible for training store employees to use the stand-beside device system.

Vendor Requested Training

Vendors may request additional training or technical assistance from the Department or local WIC agency staff. Training may take place on-site at the store or in a location designated by the Department or local WIC agency. Vendor requested training is subject to staff availability and is conducted solely at the discretion of Department and local WIC agency staff.
SECTION 6 – TRAINING MATERIALS

Training Managers and Cashiers

Vendors are required to provide training to all managers and cashiers on eWIC transactions, redemption policies, and procedures. Managers should read all sections of this manual carefully, as well as review all applicable federal regulations, state administrative rule and statutes, and Department policies and procedures.

Vendors are encouraged to review the following materials with all managers and cashiers at least twice a year:

- This Vendor Manual, specifically Section 2 and Section 6;
- The WIC Shopping Guide; and
- Store policies and procedures related to eWIC transactions.

WIC Transaction Troubleshooting

If a food item is not ringing up as an eligible food, the store cannot override the cash register system. The following questions can assist in troubleshooting:

1. Is the item an approved food?
   - Check the Shopping Guide to see if the food item is listed as approved. Make sure to verify the brand, variety, and sizes match.

2. Does the WIC cardholder have the correct benefits to purchase that food?
   - Ask the WIC cardholder if you can process a balance inquiry to check what benefits are available on their eWIC card. Verify the WIC cardholder has the correct benefit to purchase the food item.

3. Does the WIC cardholder have available benefits to purchase that food?
   - The WIC cardholder may have already purchased all of the available benefits for that food item, or may not have enough remaining benefits to purchase the food item. For example, participants with cereal benefits receive a total number of ounces, which can be redeemed on any eligible cereal size 12 ounces or larger. This can result in WIC cardholders having less than 12 ounces leftover on their benefits, which would not be enough to purchase another box of cereal.

If the food item is approved and the WIC cardholder has available benefits to purchase that item, the system will not allow you to override it. You should apologize and explain there is an issue preventing you from being able to sell the food item, and ask if they would like to purchase a different eligible food item. After the transaction is complete, a Manager should
submit the food item to the State Vendor and Integrity Unit for consideration to be added to the APL using the New UPC Submission Request form.
Cashier eWIC Quiz

Use the following information to answer the questions below. Answers are on the following page of this manual.

<table>
<thead>
<tr>
<th>Beginning Benefit Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 OZ WIC Cereal</td>
</tr>
<tr>
<td>4 GAL Milk, 1%/Skim, Gallon</td>
</tr>
<tr>
<td>11.00 $$ Fruits and Vegetables</td>
</tr>
<tr>
<td>3 CTR Juice, Frozen or 48 oz.</td>
</tr>
<tr>
<td>1 DOZ Dozen Eggs</td>
</tr>
<tr>
<td>2 GAL Whole Milk, Lactose-Free</td>
</tr>
<tr>
<td>4 CTR 12.7 oz. GS GentlePro- Pwd</td>
</tr>
</tbody>
</table>

Benefits Start: 11/1/16
Benefits End Midnight: 11/30/16

Questions

Why weren’t the following items allowed on an eWIC purchase with the above available benefits?

1. 1 gallon whole milk (red cap)
2. 1 box (14.5 oz.) Honey Bunches of Oats with Almonds
3. 1 container (64 oz.) apple Juicy Juice
4. Two $6.00 watermelons ($12 total)
5. 1 dozen Eggland’s Best eggs
6. 2 containers (12.4 oz.) Good Start Soothe
7. 2 containers (23.2 oz.) Good Start GentlePro
8. 2 half-gallons Lactaid, 2% lactose-free milk
Answer Key

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</tr>
<tr>
<td>Benefits Start: 11/1/16</td>
</tr>
<tr>
<td>Benefits End Midnight: 11/30/16</td>
</tr>
</tbody>
</table>

Why weren’t the following items allowed on an eWIC purchase with the above benefits available?

1. **1 gallon whole milk (red cap)**
   *The food is not in the participant’s benefit balance. Only 1% or skim milk is allowed or lactose-free whole milk.*

2. **1 box (14.5 oz.) Honey Bunches of Oats with Almonds**
   *There is only 12 oz. of cereal available on the participant’s benefit balance.*

3. **1 container (64 oz.) apple Juicy Juice**
   *There are only 48 oz. containers available on the participant’s benefit balance.*

4. **Two $6.00 watermelons ($12 total)**
   *There is only $11 of cash value benefits available. The participant would be responsible for paying the $1 difference with another form of tender.*

5. **1 dozen Eggland’s Best eggs**
   *Eggland’s Best eggs are not an approved WIC food brand.*

6. **2 containers (12.4 oz.) Good Start Soothe**
   *The food is not in the participant’s benefit balance. Only Good Start Gentle is allowed.*

7. **2 containers (23.2 oz.) Good Start GentlePro**
   *There are only 12.7 oz. containers available on the participant’s benefit balance.*

8. **2 half-gallons Lactaid, 2% lactose-free milk**
   *The food is not in the participant’s benefit balance. Only lactose-free whole milk is allowed.*

*Note:* WIC cardholders with lactose-free milk benefits may purchase a combination of three-quart (96 oz.), half-gallon (64 oz.), and/or quart (32 oz.) size containers to equal the total number of gallons listed on the benefit balance.
SECTION 7 – VENDOR RESOURCES

1. To submit an item for consideration to be added to the APL:
   - Complete and submit the UPC Submission Request Form

2. To submit a complaint:
   - Complete and submit the Vendor/Participant Complaint Form.
   - Contact the WIC Vendor and Integrity Unit.

3. To report program fraud/abuse:
   - Complete the Vendor/Participant Complaint form.
   - Vendors should notify the local WIC agency or WIC Vendor and Integrity Unit of instances where participants or cardholders fail to comply with WIC program requirements or are abusive to store personnel.

4. To report transaction issues with an integrated cash register system:
   - Contact your cash register system.

5. To report transaction issues with the stand-beside device:
   - Contact the Retailer Help Desk at 877-227-6347.

6. To request a payment adjustment related to a transaction issue:
   - Contact the WIC Vendor and Integrity Unit at 608-267-6912.

7. To report a change in business name, corporate officers, managers, location, or banking information:
   - Submit the Retail Vendor Application Amendment.
   - Stand-beside device users must also notify Merchant Services at 800-894-0050.

8. To report a change of ownership, temporary or permanent closing:
   - Notify the WIC Vendor and Integrity Unit at 608-266-6912.

Forms, Publications and Links

WIC Program Regulations

- Wisconsin Administrative Code, Chapter DHS 149
- Wisconsin State Statute, Chapter 253.06
Vendor Forms

- **New UPC Submission Request (F-001473)**
- **Retail Vendor Application Amendment (F-40108)**
- **Vendor Agreement (F-40036)**
- **Vendor/Participant Complaint (F-44322)**

Vendor Publications

- **Minimum Stock Requirements (P-00371)**
- **WIC Shopping Guide (P-44578)**
- **Wisconsin Authorized Infant Formula Suppliers (P-40146)**

Vendor Supply Order Request

- **WIC Vendor Forms/Publications Request (F-44444)**

WIC supplies are available to vendors free of charge to promote the WIC program. It is recommended for vendors to maintain an adequate supply of “WIC Shopping Guide” (English and Spanish, if applicable), “WIC Approved Food” shelf talkers, “WIC Approved Fruit/Vegetable” shelf talkers, “WIC Accepted Here” register decals, and “WIC Accepted Here” door decals.

Local WIC Agency Directory

- **Local WIC Agencies Directory**

Contact information for Wisconsin WIC agencies, listed by county.

Vendor Websites

1. **Wisconsin WIC Vendor Assistant**

   Click on the link, Email Sign-Up, in the left column. It is not necessary to have a user name and password. Vendors receive an email when a new message or urgent bulletin is posted.
2. Wisconsin Department of Health Services – WIC Program

Information for participants and vendors

3. Wisconsin Department of Health Services – WIC Vendor

Information for vendors and vendor applicants

Vendor Contacts

- **WIC Vendor and Integrity Unit**
  *Phone:* 608-266-6912
  *Email:* DHSWICVendor@dhs.wisconsin.gov

- **WIC Fraud Hotline**
  *Voicemail:* 866-260-1727

- **eWIC Contractor – FIS Merchant Services**
  For stand-beside device settlement/billing questions
  *Phone:* 800-894-0050

- **eWIC Contractor – FIS Retailer Help Desk**
  For stand-beside device hardware questions/issues
  *Phone:* 877-227-6347
SECTION 8 – VENDOR RIGHTS AND RESPONSIBILITIES

Nondiscrimination Statement

The Vendor shall comply with the requirements of title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., Executive Order 13166 and guidance found at 65 Fed. Reg. 50123 (Aug. 16, 2000)), title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 701 et seq.), title II of the Americans with Disabilities Act of 1990 (42 U.S.C. § 12131 et seq. and implementing regulations found at 28 C.F.R. part 35, title II, subtitle A), the Age Discrimination Act of 1975 (42 U.S.C. § 6101 et seq. and implementing regulations found at 45 C.F.R. part 91), and Department of Agriculture regulations on nondiscrimination (7 C.F.R. parts 15, 15a and 15b), and Food and Nutrition Service (FNS) instructions (FNS Instruction Number 113-1 Nov. 8, 2005)) to ensure that no person shall, on the grounds of race, color, national origin, age, sex or disability, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the WIC Program.

The Department shall review and monitor the Vendor’s activity to ensure compliance with these nondiscrimination provisions and the Vendor shall cooperate with the Department in any complaint investigations, monitoring or enforcement related to civil rights compliance of Vendor under this Agreement.

The Vendor, as a sub-recipient of USDA funds, shall comply with the FNS nondiscrimination statement, provided herein as Section 9 of this manual.

Customer Service

Like any other customer, WIC cardholders can be very loyal to a vendor if the shopping experience is positive. Some strategies to achieve the positive experience are to use the shelf talkers to identify WIC approved items and to create a section with just WIC items.

Vendor Responsibilities

During an eWIC transaction, vendors are expected to:

- Scan or enter the UPC/PLU for each WIC food item, using quantity key is not recommended;
- Ask the WIC cardholder to review and approve the transaction.
- Inform the cardholder if the purchase exceeds the benefit balance or includes non-WIC items, notify them of the amount owed and allow them to remove the items from the transaction or use another form of tender to complete the purchase.
- Provide the WIC cardholder with a detailed receipt of the eWIC transaction.
• Apply WIC changes or updates.

• Expect to be respected. Report a complaint if you experience verbal or physical abuse by a WIC cardholder.

**Participant Civil Rights**

Vendors and all their employees must offer WIC cardholders the same courtesies as offered to other customers in accordance with equal opportunity guidelines under Title 7 CFR Part 15.

Vendors should not contact participants outside of the store for any reason. Contact the local WIC Agency with participant-related questions or issues.

To comply with participant civil rights laws, vendors should:

• Recognize cultural differences and treat people with respect. Be aware of language limitations or differences in interactions.

• Prevent misunderstandings or legal challenges by avoiding physical contact, making sexual comments or inappropriate jokes when dealing with employees or customers.

• Make sure the store is accessible to people with disabilities, whether they are applicants for employment, employees, or customers.

**Cost Containment**

Vendors are required to:

• Provide the Stock Price Survey to the Department upon request.

• Maintain reasonable prices consistent with prices indicated on the Stock Price Survey and charged by other vendors in the same vendor peer group.

• Display the prices of approved foods either on the foods, on the shelves in proximity to the foods, or in the immediate area where the foods are kept in the customer area of the store. Prices should be printed clearly.

**Not-To-Exceed (NTE) Prices**

Vendors are reimbursed for foods purchased with eWIC payment. A reasonable price is determined based on the food item’s category, subcategory, or UPC.

Vendors whose prices are higher than established NTE prices will only be paid up to NTE reimbursement levels. A request for reconsideration of NTE reimbursement levels must be submitted to the Department for review.

Settlement reimbursements paid to vendors will be for the total dollar amount as approved by the Department at the time of purchase. This amount represents the lesser of either the vendor’s shelf price or the Department’s NTE price.
The NTE maximum does not permit vendors to routinely charge the NTE amount. Vendors must charge competitive prices comparable with the average price charged in their peer group and not exceed the posted prices and the prices charged to other customers.

Vendors may be sanctioned for charging prices that exceed eligibility requirements.

Annual total food sales are compared to WIC approved food sales. Additional records may be requested. If a vendor is determined to be an above 50% vendor, additional NTE limits will be imposed.

**Payment Adjustments**

Payment adjustment requests should be submitted to the WIC Vendor and Integrity Unit as soon as the issue is discovered. Adjustment requests must be submitted within 30 calendar days of the original transaction date.

The request must include an explanation of the error, as well as the corrective action taken to prevent future occurrences.

**Recordkeeping**

Vendors must maintain the original inventory records used for federal tax reporting purposes and other program records the Department may require for a period of three years. Upon request, the vendor must make them available to representatives of the WIC Program, the Department and the Comptroller General of the United States at any reasonable time and place for inspection and audit. Other program records include original inventory records showing all purchases, wholesale and retail, in the form of invoices that identify the quantity and prices of specific WIC foods, books of account, State Tax and Use reporting forms, bank statements and other pertinent records.

Vendors must maintain documentation of the sales of SNAP eligible items and provide to the Department upon request.

**Compliance with Federal, State and Local Regulations**

Vendors must comply with:

- WIC Program requirements specified in the Agreement, the Vendor Manual, Wis. Stat. § 253.06, Wis. Admin. Code ch. DHS 149, and 7 CFR 246; and

- Applicable federal, state, and local health protection laws and ordinances.
Failure to Comply with Program Requirements

WIC vendors agree to abide by program policies and procedures as stated on the Wisconsin WIC Retail Vendor Application form, the Stock Price Survey, the Agreement, this Vendor Manual, Wis. Stat. § 253.06, Wis. Admin. Code ch. DHS 149, 7 CFR246, and other written notices. The obligations agreed to in the signed agreement are binding and contractual. The sanctions for program violations can be found in the Vendor Agreement. WIC sanctions are required to be reported to SNAP which may result in a reciprocal disqualification from SNAP and is not subject to administrative or judicial review.

Summary Suspension

Wis. Admin. Code § DHS 149.17 states in pertinent part,

“If the department finds that public health, safety or welfare imperatively requires emergency action…summary suspension of WIC authorization may be ordered pending proceedings for disqualification or other action. Such proceedings shall be promptly instituted and determined.”

Note: The Department interprets this rule to mean one or more incidents of buying or selling eWIC benefits for cash, or selling alcohol, an alcoholic beverage, or a tobacco product in exchange for WIC benefits constitutes an imminent health, safety, or welfare risk to WIC participants. Such behavior may result in an order summarily suspending WIC authorization. An Order of Summary Suspension would, upon receipt, immediately terminate WIC authorization, and authorization would remain terminated pending any further proceedings such as administrative appeal. Vendors are not allowed to accept WIC during the summary suspension.

Appeal Process

The Department informs vendors of sanctions by providing written notice by certified mail to the address of record with the WIC Program or by personal delivery.

A vendor applicant or authorized vendor seeking to contest the adverse action of forfeiture, recoupment, or enforcement assessment; a denial, suspension, or termination of authorization; or a suspension or termination of eligibility may request a hearing. The request must be made in accordance with Wis. Admin. Code DHS 149.18.

Appeals may be requested by:

Mail
Division of Hearings and Appeals
PO Box 7875
Madison, WI 53707-7875
Hearings are conducted in accordance with Wis. Stat. §§ 227.44 to 227.50. The final hearing decision is subject to judicial review under Wis. Stat. § 227.52.

The hearing site will be designated by the Division of Hearings and Appeals. Hearings are usually held in the vendor’s county.

If the appeal involves the termination of the vendor agreement, the vendor may continue to participate in the WIC Program until the Department issues a final administrative decision. If the final administrative decision upholds the WIC Program allegations, the vendor may not continue to participate in the WIC Program pending judicial review, unless a stay of enforcement is ordered pursuant to Wis. Stat. § 227.54.

### Reporting Complaints and Fraud

Vendors are encouraged to notify the local WIC agency of participants or WIC cardholders who fail to comply with program requirements or are abusive to store personnel.

Examples of participant complaints:

- WIC cardholder is verbally or physically abusive towards staff
- WIC cardholder is attempting to receive non-WIC approved foods, non-food items, cash, tobacco, or alcohol in exchange for eWIC benefits
- Any incident where police are contacted regarding a WIC cardholder’s behavior, including theft or damage of store property

Vendors may not ask WIC cardholders for personally identifying information. Whenever possible, the transaction receipt should be used to obtain the last four digits of the eWIC card number. The complaint should be reported using the Vendor/Participant Complaint form (F-44322) and by attaching any supporting documents (i.e., cash register transaction receipt, description of person complaint is against, and eyewitness reports). The WIC cardholder will receive additional training and may receive program sanctions if found to be abusing the program.

If a vendor suspects an eWIC card is being used improperly, the store should report details to the local WIC agency or State WIC Vendor and Integrity Unit using the Participant/Vendor Complaint form or by calling the Fraud Hotline at 866-260-1727.
SECTION 9 – USDA NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliations for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov

This Vendor is an equal opportunity provider.