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APPENDICES

- Samples of Guam WIC Program Food benefits (eWIC card)
- Disaster Planning Procedures (from Az. WIC dated December 2021)
- WIC Food Instrument and ID/VOC Card Incident Report
- Guam WIC Perpetual Log for WIC Food benefits
(Revised 6/29/2018)
- Listing of Authorized Retail Food Vendors under the Guam WIC Program (for WIC Vendor Participation period, October 1, 2021 – September 30, 2024, revised September 7, 2021)
- Guam WIC Approved Food List (Revised 3/24/2022)



IX. FOOD DELIVERY/ FOOD BENEFITS ACCOUNTABILITY AND CONTROL

A. FOOD DELIVERY and FOOD BENEFITS CONTROL OVERVIEW

1. Food benefits /General

The state agency uses a retail purchase system whereby supplemental foods are provided to certified participants. WIC Food benefits are then redeemed at approved retailers after issuance by the WIC clinic staff.

- a. The state agency utilizes the following formats for Food benefits distribution:

With the deployment of the Guam Health And Nutrition Delivery System (HANDS) formerly Guam AIM computer system on February 2, 2009 and the advent of EBT rollout on March 27, 2018 there are no longer pre-printed or manual FIs.

- b. Automated inventory of food benefits are documented daily for each WIC participant when the Food benefits are issued.

Inventory of issued food benefits is documented by use of a signature receipt. The participant's authorized representative signs a signature receipt indicating that the food benefits were received. The clinic person responsible for the clinic reception area issues the food benefits to clients after verifying the client ID (name and WIC number), the signature of the authorized representative, and the food benefits numbers on the signature receipt with the actual food benefits numbers. Signature receipts are kept in a central location at the local clinic site for audit purposes.

- c. The state agency is accountable for the receipt and issuance of all blank eWIC card-stock and ensures storage of unissued stock. Food benefits perpetual logs are maintained by the WIC Administrative Office to record the receipt and issuance of all blank food benefit stock.

- d. Food Benefits will now be accessible through the eWIC ID card and contains the following:

- * The front side of the card shows the Guam WIC logo and cardholder number;
- * Combined family benefits (one card per household)
- * Only current month benefits are accessible. Benefits expire at 11:59 p.m. on the last day.
- * Available Food Subcategories and quantities.



- * Cash value benefits for fruits and vegetables listed in dollar amounts.

The back side of the eWIC card cites ways to obtain the benefit balance; report a card is lost / stolen; how to reset a PIN number.

- * Cites WIC Clinic sites, addresses, and telephone numbers;
- * Interactive Voice Response (IVR) (toll free);
- * Participant web Portal (www.ebtedge.com) – You need your EBT card no. and PIN – (together with IVR on card))

WIC clients can also download the * EzWIC App (24-7, 7 days/week assistance) to obtain a benefit balance; WIC approved foods list; Scan food items if they are WIC approved;

- * WIC clients can also request a balance summary at WIC stores (at no charge);

2. Food Benefits Accountability

The assigned state agency staff will maintain an accounting of all blank FOOD BENEFITS stock ordered and received from Arizona WIC, as well as the security, storage, and distribution of such stock. The procedures are as follows.

- a) Orders of blank FOOD BENEFITS stock are faxed or requested via email to Arizona WIC, and received by the Guam WIC Program via priority mail. State agency staff verifies shipping receipt against the blank FOOD BENEFITS stock received. When blank FOOD BENEFITS stock order shipments are delivered to the state agency, the contents of the shipment, addressee, and mailing address are compared to the attached order/packing slip.
- b) Blank FOOD BENEFITS stock shipment information along with the following documented data, are recorded in the *Guam WIC Perpetual Log for WIC Food* form, and maintained by the state agency.
 - Date blank FOOD BENEFITS stock shipments were received by the WIC Program.
 - The quantity of blank FOOD BENEFITS stock in each shipment.
 - The carton number of each blank stock box (including those issued to each local clinic site.
 - The date of issuance to the clinic site



- The initials of the state agency person issuing the blank FOOD BENEFITS stock.
- The initials of the clinic person receiving the box(es) of blank FOOD BENEFITS stock (“Received by”)

Any discrepancies found, the state agency will notify the Arizona WIC by telephone, email, or fax, and inform them of the discrepancy. Follow-ups are performed until resolved and notated in the same section.

All blank FOOD BENEFITS stock shipments in a secured/locked location. Blank FOOD BENEFITS stock shipments are stored in a secure location at the clinic site in the Administrative Aides’ office in Tiyan, thus making it a controlled and secured area. Only authorized personnel having to do with the administration or enforcement of WIC operations are allowed in such office.

- c) Blank FOOD BENEFITS stock is picked-up by the local clinic site from the state agency on as needed and recorded in the *Guam WIC Perpetual Log for WIC Food* form. At the local clinic blank FOOD BENEFITS stock must be stored in a safe or locked cabinet within a locked room. Only authorized persons can be given access to blank FOOD BENEFITS stock and should not be accessible to participants or other unauthorized persons. WIC clinic staff should not leave the blank FOOD BENEFITS stock unattended. Blank FOOD BENEFITS stock being transported to or from an issuance site must be locked in the authorized person's car trunk. The clinic staff receiving blank FOOD BENEFITS stock from the WIC administrative office shall sign for such receipt in the *Guam WIC Perpetual Log for WIC Food* form.

Unusual discrepancies or problems reported by clinic staff after the FOOD BENEFITS are issued to the participants, must be documented on the *WIC Food FOOD BENEFITS Card Incident Report* forms. All completed forms must be reviewed by clinic supervisor and then submitted to the state agency’s Management Analyst III, Quality Assurance Section, for action.

FOOD BENEFITS should not be issued to the client by the same person that did the certification and/or printed the FIs and CVVs.

This division of Food benefits- processing is normally divided between the local site receptionist and the Nutrition Assistant.

- d) Lost, Stolen, and Damaged Food Benefits–(eWIC cards)

Guam WIC rolled out EBT on March 27, 2019. WIC participants now use a Personal Identification Number (PIN) to access their benefits and approve



the purchase. PIN is used in lieu of a signature and the card does not have to be signed.

The PIN locks after 4 incorrect attempts. The WIC customer should call the clinic for assistance to unlock their PIN for immediate use. After midnight it will automatically unlock. They can call the number on the back of the eWIC card to reset it, but will not be available until after midnight. WIC vendor are instructed to never ask the WIC customer for their PIN. No additional identification is required.

- If card is lost and found, send the card to the address on the back of the card;
- If stolen or damaged, call the WIC clinic or 1-877-216-3082;

Physical Inventory of Unissued Food Benefits

Policy: To ensure full compliance with procedures of food benefits storage and accountability of all food unissued benefits, a physical inventory of unissued food benefits must be conducted at least quarterly.

Procedures: The assigned WIC Administrative staff will conduct a physical inventory count of unissued blank food benefits stock every quarter of the fiscal year.

Clinic staff will conduct a physical inventory count of all unissued food benefits at the end of each Work day.

Physical reconciliation of the state agency's unissued blank food benefits stock are conducted quarterly by two separate WIC Administrative staff each having different roles. One person performs the physical inventory count while the other verifies the information which is recorded on the *Guam WIC Perpetual Log for WIC Food Benefits* form (see Appendix). Procedures are as follows:

One person conducts the physical inventory and fills out the *Guam WIC Perpetual Log for WIC Food Benefits* form. Information collected include the persons and dates the physical inventory is reconciled and verified.

3. State Agency Purchases/Contract Bids

The state agency places the order to purchase Food benefits blank stock annually from Arizona WIC. The Food benefits-blank stock are shipped quarterly and upon



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receipt of the shipment are issued an invoice.

The NASPO (formerly WSCA) lead agent, the State of Oregon (Pam Johnson), has established a NASPO WIC Infant Formula Rebate Agreement with Abbott Nutrition, agreement # 8327, on behalf of the NASPO participating State agencies. The purpose of this agreement is to provide rebates on milk-based and soy-based infant formula for participating WIC programs and is pursuant to local public law 31-212 (Joinder / mutual use of contracts by governmental entities by WIC). The contract meets local procurement requirements and has gone through a competitive procurement process through the State of Oregon (ITB DAS PS 2205-8). It is also in compliance with federal funding requirements. The contract period is from January 29, 2019 through January 28, 2022. The primary user agencies under this agreement include 14 U.S. states, the District of Columbia, three (4) inter-tribal organizations, Pueblo of Isleta, the Virgin Islands, American Samoa, Commonwealth of Northern Mariana Islands and Guam.

Although each participating State agency must enter into a Participating Addendum for the NASPO WIC Infant Formula Rebate Agreement with Abbott Nutrition before January 29, 2019 the Lead Procurement (Pam Johnson) understands Guam's contract routing process (and with the advent of the new elected officials) as long as we can continue to expedite the approval process of this *urgent* matter.

Infant Formula Rebates are a federal cost containment requirement (7 CFR 246.16.) for the WIC Program where an infant formula manufacturer rebates back to the program a set portion of the wholesale price per can of contracted formula. The advantage of participating in the NASPO agreement is that a small WIC agency, such as Guam, receives the same rebate amount per can as a larger state WIC agency receives, which in turn provides more disposable funding to serve more WIC clients on Guam. Guam has participated in successive WSCA/NASPO multi-state contracts since 1995, up to the present. Our most recent contract began on October 1, 2012 through September 30, 2015, received three one-year extensions and is now set to end on January 28, 2019.

The new contract begins January 29, 2019 through January 28, 2022. As a direct result of Guam's participation in our NASPO agreement, our island has realized more than \$1 million per year in additional rebate dollars infused back into our economy via the retail food market.

The NASPO agreement was signed by newly elected Governor, Lourdes A. Leon Guerrero on February, 15, 2019. An amendment was made for an extension and thus the The Master Agreement term is now extended to January 28, 2025.



B. FOOD BENEFITS- PICK UP/REDEMPTION

1. Food benefits- Pick-Up Policy and Procedures

On the day a person is certified for WIC participation, the Nutrition Assistant will issue the food benefits. The food package selected is a standard food package for the WIC client category. Modifications in milk container size may be adjusted according to the WIC participants' needs and preference. Other modifications in the food package need the Nutritionist's approval.

Food benefits- pick-ups are scheduled every three (3) months depending on the WIC participant's need for nutrition education contacts which may require a shorter interval between FI pick-ups.

- a. The procedure for issuing the food benefits to clients is divided between two clinic staff. Nutrition Assistants print the the food benefits and the Community Program Aide (Receptionist) issues the the food benefits to the WIC authorized representative. In the event that no Community Program Aide is present, two clinic nutrition staff will divide the issuance process between themselves.
- b. A Guam eWIC Card is issued by a Competent Professional Authority (CPA) Clinic Nutrition staff. Only one (1) Guam eWIC ID/VOC Card will be issued per family. The eWIC ID/VOC Card Serial Control Number will be recorded when it is issued in the Guam eWIC ID/VOC Issuance Log. In families where there are more than one (1) WIC participant, participants' names and certification data will be placed on the same card.
- c. The state agency requires the following proof of receipt entered on the FI and CVV register when issuing on-demand FIs and CVVs.
 - Participant/parent/caretaker signature.
 - Local agency staff initials.
 - Date of food benefits pick-up.
 - Food benefits numbers.
- d. Local clinic sites should prorate food packages for the following reasons:
 - Late food benefits- pick-up. Prorated to a minimum of one (1) week left in the month.
 - A partial month issue of food benefits- to synchronize pick-up dates within a family.
 - No retroactive food benefits- will be issued for a late food benefits pick-up or any other situation whereby food benefits- have not been



issued regardless of the cause of the error in issuance.

- e. The state agency requires local clinic staff to provide each new participant/parent/caretaker/proxy with training in the following:
 - * Approved vendors
 - * FI Redemption Procedures
 - * Selecting WIC approved food
 - * Reporting problems/requesting assistance
 - * Use of Proxies
 - * Participant Violations
- f. The state agency requires local clinic staff to provide participants with a list of authorized vendors and foods. A list of WIC approved vendors and a list of WIC approved foods is given to each WIC family at each certification as part of general client orientation to the WIC Program (See Appendix Listing of Authorized Retail Food Vendors under the Guam WIC Program and WIC Approved Food List). General orientation to the WIC Program for each participant is documented in the basic care plan and the authorized food list is documented on the list of handouts, which is kept in the client's file.

2. State Agency Proxy Policy

Policy: The Guam WIC program allows the WIC Authorized Representative to designate a proxy (or proxies) who can act in behalf of the authorized representative if needed.

Procedures:

- 1. At the certification appointment, the WIC Authorized Representative is offered the option to designate a proxy (or proxies if needed). The proxy(s) must meet the following criteria.
 - a) Must be 18 years old or older.
 - b) Must accept the training on WIC program requirements regarding use of WIC food benefits-and the purchase of WIC authorized foods.
 - c) May receive education for participant(s) and ensure that the education benefits the participant directly.
 - d) Must ensure that the food benefits are used for the intended benefit of the WIC participant. The proxy may do the shopping for approved WIC foods or deliver the food benefits to the authorized representative to use.
 - e) Must be able to provide a picture ID for verification of the Proxy ID signature during WIC transactions.



2. At a time other than the certification appointment, the WIC authorized representative can designate a proxy(s).
 - The proxy must meet the same criteria as described for a proxy designated during the certification.
 - If the authorized representative is not present to designate the proxy, the proxy should bring the eWIC card and a note signed by the authorized representative to the WIC site requesting the new proxy. The note must state that the proxy has permission to obtain and use the food benefits .

C. FOOD BENEFITS DISPOSITION

1. Food benefits- Disposition Procedures

- a. State agency procedures assure 100% disposition of all issued

2. Lost/Stolen/Damaged FIs and CVVs

Guam WIC rolled out EBT on March 27, 2019. WIC participants now use

- a. Personal Identification Number (PIN) to access their benefits and approve the purchase. PIN is used in lieu of a signature and the card does not have to be signed.

The PIN locks after 4 incorrect attempts. The WIC client ~~customer~~ should call the clinic for assistance to unlock their PIN for immediate use. After midnight it will automatically unlock. They can call the number on the back of the eWIC card to reset it, but will not be available until after midnight. WIC vendor are instructed to never ask the WIC customer for their PIN. No additional identification is required.

- If card is lost and found, send the card to the address on the back of the card;
- If stolen or damaged, call the WIC clinic or 1-877-216-3082;
- Replacements for lost / stolen / damaged cards will depend on the circumstances;

3. Food benefits- Redemption Screening

With the advent of EBT since March 27, 2019, redemption screening can



be viewed from the WIC Direct website. Discrepancies such as overcharges can be adjusted and submitted to Customs Data Processing, Inc.'s Helpdesk via email for resolution. Adjustments can be made but must be address before the WIC client's benefit expiration date.

4. Price Lists

- a. Guam WIC Program routinely collects price list information from all of the authorized vendors.
- b. The price list information is collected at the time of initial authorization and re-authorization of vendors, semi-annually, and or upon request throughout the fiscal year.
- c. Prior to the start of each semi-annual month [(October (October to March) and April (April to September) food price list form is provided to all authorized WIC vendors by the Vendor Management section staff. The form must be completed and submitted to the WIC Program to report vendor's food price data by the due date specified. Vendors are required to update the WIC Program in writing on any price increase of WIC foods before the price change may take effect. Notification must be made within ten (10) calendar days prior to the effective date of the change.
- d. The data collected has food prices for all brands and sizes of authorized foods including special infant and other formulas authorized.
- e. The state agency verifies price data provided by vendors during routine monitoring visits
- f. The state agency analyzes price data manually on an as needed basis.

5. System to Detect Suspected Overcharges

With the advent of EBT since March 27, 2018, Guam WIC can now review transactions from the WIC Direct website. Discrepancies such as overcharges can be adjusted and submitted to Customs Data Processing, Inc.'s Helpdesk via email for resolution. Adjustments can be made but must be address before the WIC client's benefit expiration date.

D. HOME FOOD DELIVERY SYSTEMS

Does not apply to the Guam WIC program.

E. DIRECT DISTRIBUTION FOOD DELIVERY SYSTEMS

Does not apply to the Guam WIC program

F. DEFINITIONS – 7CFR 246.2



Compliance Buy means a covert, on-site investigation in which a representative of the Program poses as a participant, parent or caretaker of an infant or child participant, or proxy, transacts food benefits, and does not reveal during the visit that he or she is a program representative.

Farmer means an individual authorized by the state agency to sell eligible fruits and vegetables to participants at a farmers' market or roadside stands. Individuals who exclusively sell produce grown by someone else, such as wholesale distributors, cannot be authorized.

Employee Fraud and Abuse means the intentional conduct of a State, local agency or clinic employee which violates program regulations, policies, or procedures, including, but not limited to, misappropriating or altering FIs or CVVs, entering false or misleading information in case records, or creating case records for fictitious participants.

Participants means pregnant women, breastfeeding women, postpartum women, infants and children who are receiving food benefits under the program, and the breastfed infants of participant breastfeeding women.

Participant Violation means any intentional action of a participant, parent or caretaker of an infant or child participant, or proxy that violates Federal or State statutes, regulations, policies, or procedures governing the Program. Participant violations include intentionally making false or misleading statements or intentionally misrepresenting, concealing, or withholding facts to obtain benefits; exchanging food benefits for cash, credit, non-food items, or unauthorized food items, including supplemental foods in excess of those listed on the participant's FI; threatening to harm or physically harming clinic, **farmer** or vendor staff; and dual participation.

Participant Access means the reasonable accessibility of a participant to the available food delivery system utilized by the State Agency in order to receive their supplemental food benefits provided to them under the program. When making participant access determinations, the WIC Program will consider the availability of other authorized vendors in the same area as the violative vendor and any geographic barriers to using such vendors. The following is the Guam WIC Program's participant access determination criteria: (1) Does any participant or authorized parent/caretaker of an infant or child participant have to travel an amount greater than or equal to 15 miles to the next authorized vendor; and (2) Is there any permanent damage to a bridge or main road which prohibits participants or authorized parents/caretakers of infant or child participants from accessing the next WIC authorized vendor in the same region, and if so, is there an alternative road of travel existing on the island for participants to access the next WIC vendor in the same region. Both criteria must be answered in determining inadequate participant access. Further, in the second criteria, if the answer should be that "yes" an alternative road of travel exists to access the next WIC vendor, then inadequate participant access is not met.

Pattern is defined as 2 occurrences of the same violation within a 12-month period.

Proxy means any person designated by a woman participant, or by a parent or caretaker of an infant or child participant, to obtain and transact food benefits on behalf of a participant. The proxy



must be designated consistent with the state agency's procedures established pursuant to § 246.12(r)(1). Parents or caretakers applying on behalf of child and infant participants are not proxies.

"Food instruments and cash value vouchers" is hereby replaced with *"WIC PAPER BENEFITS"* and with the following definition:

WIC FOOD BENEFITS - means a voucher, check, electronic benefits transfer card (EBT), coupon or other document which is used by a participant to obtain supplemental foods.

G. FOOD PACKAGE RULE – CASH VALUE (CV)

1. **Cash Value (CV) - Definition: A cash-value benefit is a fixed-dollar benefit which is used by a WIC participant to obtain authorized fruits and vegetables (fresh, canned and/or frozen). Fixed cash-value benefits are set at \$ 8 (5/5/14), \$11 and \$16.50 (effective 10/1/15) for Breast-Feeding women with multiple infants i.e. twins.**

2. WIC foods Requirements under the Food Package Rule

Minimum Inventory

- At least two varieties of fruits, two varieties of vegetables;
 - At least one whole grain cereal authorized by the Guam WIC Program;
- These are minimum requirement per federal regulations but the Guam WIC Program has more specific requirement. See minimum varieties and quantities of supplemental foods in vendor agreement.
- Additional food inventory requirements sufficient to redeem the standard food instruments for the rest of the new foods (especially the baby foods), will be implemented;
- See listing provided in the Vendor Application packet or vendor agreement on WIC-Approved foods and their minimum variety and stocking requirements.

3. Transaction and redemption requirements of Cash-Value Benefits for fruits and vegetables

- WIC Participants Will:
 - Tell the cashier they are using their eWIC card
 - Swipe* their eWIC card and enter their PIN to access benefits (depending on the POS system, this may occur at the start or end of transaction).
 - Verify the amount and agree to the purchase (verbally or by pressing the 'Yes' button on the card reader).



- The Cashier Will:
 - Scan the WIC food items
 - Scan the UPC barcode on the actual product.
 - If it doesn't scan, it can be manually entered.
 - Review items on their POS system
 - Identify the items that will not be paid for by WIC
 - Tender eWIC transactions from the most restrictive payment to the least restrictive
 - First use eWIC card
 - Then, Guam Quest (SNAP) card (if applicable)
 - Finally, cash, debit or credit
 - Provide the WIC customer with a detailed receipt
 - Receipts must show:
 - Store name and address
 - Transaction date
 - Transaction information that includes products purchased, prices, approved purchase total, balance due
 - Last date to use benefits
 - Remaining benefits
 - The Vendor Shall:
 - Provide WIC customers with a balance inquiry when requested.
 - Manually enter the card number **ONLY** when the magnetic stripe cannot be read (the card and the WIC customer must be present).
 - Allow the WIC customer to pay for any item that is **NOT** allowed on their WIC benefits or if it is over the cash value amount using another method of payment (e.g., SNAP, cash, debit/credit card).
- NOT...
- Require the WIC customer to make a purchase in order to obtain a balance inquiry.
 - Override or allow any substitutions by scanning a barcode from another authorized product (e.g. do not scan an authorized juice and provide the WIC customer with another product).
 - Scan barcodes from code books, clipboards or from a pre-printed sheet.
 - Restrict any lane to WIC customers only.