

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

(Please indicate) State Agency: Missouri

for FY 2023

Food delivery and food instrument (FI) (*Food instrument* means a voucher, check, electronic benefits transfer card (EBT), coupon or other document which is used by a participant to obtain supplemental foods) accountability and control involve the production, issuance, redemption, and monitoring of automated and manual food instruments through retail systems and the delivery of WIC Program foods by non-retail methods, i.e., home delivery and direct distribution.

During a disaster or public health emergency, the State agency may request to implement existing WIC regulatory and programmatic flexibilities to support the continuation of Program benefits and services. State agencies should consider the overarching authority, i.e., Stafford Act or provision(s) authorized by Congress, before developing a policy and procedure. The State agency must provide a detailed description of how it plans to operationalize the flexibility through their procedure manual where applicable. Please note the State Plan Guidance is not intended to capture a description of waivers authorized by Congress with separate reporting requirements, i.e., the Families First Coronavirus Response Act (PL 116-127).

More recently, Executive Order (EO) 13988, “*Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*.” was issued to all Federal Agencies. The EO set out policies that all persons are entitled to dignity, respect, and equal treatment under the law, no matter their gender identity or sexual orientation. The EO does not usurp section 17 of 42 U.S.C, as amended or applicable regulations. However, where appropriate, State agencies may update their policies and procedures to align with the contents of the EO.

### Electronic Benefit Transfer (EBT) Implementation and Management

A. Electronic Benefit Transfer (EBT): 246.4(a)(1), (a)(14)(xix), (a)(14)(xx), (a)(19), 246.12(h)(3), (w)-(bb): describe the policies and procedures the State agency is using to implement and operate EBT

### Retail Food Delivery Systems

B. Food Instrument Control Overview - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), and (a)(14)(xii): describe the policies and procedures used by the State agency in producing, monitoring and accounting for the use of food instruments.

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

D. Food Instrument Redemption and Disposition - 246.4(a)(14)(vi): describe the procedures used to reconcile food instruments as either issued or voided, and as either redeemed or unredeemed, and redeemed food instruments as either validly issued, lost/stolen/damaged, expired, duplicate, or not matching issuance records.

E. Manual Food Instruments - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi) and (a)(14)(ix): describe the procedures for issuing and accounting for manual food instruments, including the procedures for documentation and disposition.

F. Special Food Instrument Issuance Accommodations - 246.4(a)(11)(iii), (a)(14)(i), (a)(14)(vi), (a)(14)(ix), (a)(14)(xiv) and (a)(21): describe alternatives to participant food instrument pick-up for issuance (e.g., mail or electronic issuance) and how the integrity of program services and fiscal accountability is ensured.

G. Vendor Cost Containment System Certification - 246.4(a)(14)(xv), 246.12(g)(4)(vi): describe the competitive pricing and reimbursement methods that the State agency will implement to ensure that average payments per food instrument to above-50-percent vendors do not exceed average payments per food instrument to comparable regular vendors.

### Non-Retail Food Delivery Systems

H. Home Food Delivery Systems - 246.4(a)(11)(iii), 246.4(a)(14)(i), (a)(14)(vi), (a)(14)(vii) and (a)(14)(xii): describe how the State agency's home delivery system operates including but not limited to the types of authorized home food delivery contractors, the frequency of deliveries, and the procedures for documenting deliveries and ensuring safe food delivery of WIC foods, if applicable.

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*I. Direct Distribution Food Delivery Systems - 246.4(a)(11)(iii), (a)(14)(i), and (a)(14)(vi), (a)(14)(vii), and (a)(14)(xii):*  
describe the methodology and procedures used in the direct distribution of supplemental foods, including types of foods distributed, warehouse and distribution centers, the verification process, and assurance of food safety, as applicable.

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### A. Electronic Benefit Transfer (EBT)

1. Is EBT implemented statewide?

☒ Yes (*Proceed to question 2*)

☐ No (*Continue to 1.a.*)

a. Does the State agency have an active EBT Project as of July 31, 2016?

☐ Yes

☐ No

b. Does the State agency follow APD requirements for EBT management and reporting?

☐ Yes

☐ No

2. What is the State agency policy for permitting replacement cards and transfer of balances per [7 CFR 246.12\(bb\)\(2\)](#)?

**9.1.030 – Food Instrument Replacement**

3. What are the State agency procedures for providing customer service during non-business hours for EBT cards per [7 CFR 246.12\(bb\)\(3\)](#)?

The MOWINS Help Desk toll free number is printed on the back of the eWIC card. Participants may call that number during non-business hours and leave a voicemail message. The state agency will respond within one business day to any reports of lost, damaged or stolen cards.

4. Does the State agency use the formula for EBT terminal minimum lane coverage in [7 CFR 246.12\(z\)](#)?

☒ Yes

☐ No

a. If no, please provide the date of the approval of the approved alternative installation formula as required per 7 CFR [246.12\(z\)\(2\)](#).

### B. Food Delivery and Food Instrument Control Overview

1. Food Instruments (i.e., vouchers, checks, EBT cards, coupons or related documents) - General

a. The State agency uses the following types of FIs (check all that apply):

☒ EBT cards

☐ Paper food instruments

☐ Automated-point of certification

☐ Manual-individual prescription

☐ Pre-printed manual-standard prescription

☐ Automated-central generation

☐ Mobile Payment

☐ Other (specify):

b. The State agency conducts FI inventories (Place an S=[State agency] or L=[Local agency] under the appropriate column to designate primary responsibility):

**Automated - EBT Cards**

L Daily/perpetually

Other (Specify):

**Physical - Paper FIs**

Daily

Weekly

Monthly

Other (specify):

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

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

**Provide a facsimile of FI in Appendix or cite Procedure Manual: Appendix A – Missouri eWIC Card**

**d. The EBT system allows for the following (check all that apply):**

- ☒ A unique and sequential number benefit issuance identifier
- ☒ Each EBT purchase is matched to an authorized vendor, farmer, or farmers' market prior to authorizing payment per [7 CFR 246.12\(x\)\(3\)](#)
- ☒ System contains authorized supplemental foods
- ☒ System contains first and last dates of use for electronic benefits

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

- ☐ Paper Food Instrument ☐ Cash-value voucher ☒ EBT Card/Sleeve ☐ None

**ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): 9.1.040 Food Instrument Inventory Management; 9.1.010 Food Instrument Accountability and Liability**

### 2. Food Instrument Accountability

**a. FIs are delivered to local agencies by:**

- |   |   |
|---|---|
| <input type="checkbox"/> State agency staff   | <input type="checkbox"/> Local agency staff |
| <input type="checkbox"/> US Postal Service  |   |
| <input type="checkbox"/> On-demand printing   |   |
| <input checked="" type="checkbox"/> Contracted service (e.g., UPS, Purolator, etc.) |   |
| <input type="checkbox"/> Other (specify):   |   |

**b. FIs (blank stock and preprinted ready for issuance) are delivered to the local agency (check all that apply):**

**Blank**

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

Blank Specify:

**Preprinted**

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

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Preprinted Specify:

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

- ☒ Not Applicable
- ☐ Signatures on the documentation of receipt are compared for similarities in writing style implying one person signed for multiple participants
- ☐ Local agencies conduct an initial review to void food instruments for participants known to have been terminated from the Program
- ☐ Inventories of food instruments are not conducted by the same local agency staff responsible for issuing/voiding food instruments
- ☐ Procedures are in place to ensure the proper disposal of unused/duplicate/voided FIs
- ☐ Other (specify):

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

**3. The State agency has established food delivery procedures in cases of natural disaster and emergencies for the following (check all that apply):**

- ☐ Manual issuance
- ☐ Automated issuance
- ☒ Mailing
- ☐ Home food delivery
- ☐ Direct distribution
- ☒ Remote issuance
- ☐ Other (specify):

**ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): 4.1.060 Emergency and Disaster Preparedness for Local Agencies**

### C. Food Instrument Pick-up and Transaction

**1. Food Instrument Pick-Up Policy and Procedures**

**a. Food instruments are issued by (check all that apply):**

|                               | All Locals                          | Most Locals                         | Some Locals              |
|-------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Local agency director         | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| Local agency nutritionist     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Local agency paraprofessional | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Clerical staff                | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other (specify):              | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |

**b. The State agency utilizes a participant identification card:**

- ☐ Yes
- ☐ Yes, with photo
- ☒ No

**If yes, issuance is controlled numerically, and each card is accounted for:**

- ☐ Yes
- ☐ No

**c. The State agency requires the following proof of receipt when issuing paper food instruments or EBT cards:**

- ☐ Participant/parent/caretaker/proxy signature on register confirming receipt

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- ☒ Local agency staff initials
- ☐ Date of food instrument pick-up
- ☐ Stub with participant signature or initials
- ☐ Other (specify):

**d. The State agency has a policy to prorate food packages for the following:**

- ☒ Late FI pick-up
- ☐ Certification due to expire within 30 days
- ☐ Mid-month certification
- ☒ Other (specify): **Appendix B – Additional Responses**

**e. The State agency requires local agency staff to provide each new participant/parent/caretaker/proxy with training in (check all that apply):**

- ☒ Authorized vendors/farmers
- ☒ Selecting WIC-approved foods
- ☒ Transaction procedures
- ☒ Use of proxy
- ☒ Reporting problems/requesting assistance
- ☒ Participant violations (i.e., selling or offering to sell WIC benefits)
- ☒ Other (specify): Keeping PIN for eWIC card safe.

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

- ☐ Yes
- ☒ No

**g. The State agency permits a participant to transact food instruments with any authorized vendor or farmer/farmers' market in the State:**

- ☒ Yes
- ☐ No

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

**2. The State agency's proxy policy includes the following:**

- ☐ Limits the number of participants a single proxy may sign for, except that a proxy may pick up FIs for all homeless WIC participants in a facility
- ☐ Limits proxy to a specified number of FI pick-ups
- ☒ Limits proxy to a minimum age
- ☐ Limits proxy assignment to local WIC staff
- ☒ Other (specify): Appendix B – Additional Responses

**ADDITIONAL DETAIL: Food Delivery Appendix and/or Procedure Manual (citation): 8.1.190 Authorized Representatives and Alternative Representatives**

### D. Food Instrument Redemption and Disposition

**1. Food Instrument Disposition Procedures for paper FI issuance**

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

- ☒ Yes
- ☐ No

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

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

- ☒ Yes (specify period): Monthly
- ☐ No

**c. The State agency monitors each local agency's:**

- ☐ Number of manual FIs utilized
- ☐ Number of unclaimed FIs

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- ☒ Number of voided FIs
- ☒ Number of redeemed FIs with no issuance record

### 2. Unclaimed, Voided, Prorated FIs

#### a. The State agency requires local agencies to return "unclaimed/not picked up" paper FIs or EBT cards:

- ☒ Not applicable      ☐ Daily      ☐ Weekly      ☐ Monthly
- ☐ Other (specify):

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

- ☒ Not applicable      ☐ Daily      ☐ Weekly      ☐ Monthly
- ☐ Other (specify):

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

### 3. Lost/Stolen/Damaged Food Instruments

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

- ☐ State agency      ☐ Police department      ☐ State agency's banking institution
- ☐ EBT Coordinator
- ☒ Other (specify): The local agency staff deactivate any lost or stolen eWIC card.

#### b. Replacement/duplicate FIs Issuance

##### (1) Replacement/duplicate FIs are issued when FIs are reported lost:

- ☐ No
- ☐ Depends on the circumstances
- ☒ Yes (If FIs are reissued, it is done):
  - ☐ Immediately
  - ☐ Following notification of State agency/bank agency
  - ☒ After a 5 day waiting period (specify number of days)

##### (2) Replacement/duplicate FIs are issued when FIs are reported stolen:

- ☐ No
- ☐ Depends on the circumstances
- ☒ Yes (If FIs are reissued, it is done):
  - ☐ Immediately
  - ☐ Following notification of State agency/bank agency
  - ☒ After a 5 day waiting period (specify number of days)

##### (3) Replacement/duplicate FIs are issued when FIs are reported damaged:

- ☐ No
- ☐ Depends on the circumstances
- ☒ Yes (If FIs are reissued, it is done):
  - ☐ Immediately
  - ☐ Following notification of State agency/bank agency
  - ☒ After a 5 day waiting period (specify number of days)

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☒ Other (specify): If the card can still be read, then a replacement may be issued immediately.

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

☐ Yes ☒ No

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

- ☐ Stops payment on the lost/stolen/damaged FIs  
☐ Notifies vendor or farmer  
☒ Other (specify): N/A

Please provide a copy/citation of the State agency's policy and procedures that ensure that lost/stolen FIs cannot be redeemed OR lost/stolen/damaged EBT cards will be replaced and associated benefits transferred [\(7 CFR 246.4\(a\)\(14\)\(xix\)\)](#).

9.1.030 Food Instrument Replacement

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

☒ Yes ☐ No

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

- ☒ A claim for cash repayment is issued to participant  
☒ Participant is disqualified; specify the period of time: If no repayment, the participant may be disqualified for one (1) year or until payment is received, whichever occurs first.  
☐ Participant receives a warning  
☐ Other (specify):

g. If lost/stolen/damaged FIs are transacted by someone other than the participant, the following actions are taken, check all that apply:

- ☐ Reported to police for investigation  
☒ State agency or local agency does an investigation  
☐ State agency or local agency notifies the participant  
☐ Other (specify):

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

10.1.020 Participant Violations; 11.1.030 Participant Fair Hearings

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

☒ Yes ☐ No

4. Benefit Redemption Review [\(7 CFR 246.12\(k\)\(1\)\)](#)

a. Describe in detail how the State agency sets maximum allowable reimbursement levels for payment for supplemental foods (including whether the State agency uses vendors' shelf prices to set maximum reimbursement levels and how reimbursement levels are linked to competitive price criteria). If the State agency sets maximum allowable reimbursement levels differently for above-50-percent vendors and regular vendors, please explain the different methods used.

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

- |   |   |  |
|---|---|--|
| (a) Each peer group                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| (b) Each food instrument or food category | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| (c) Other (please specify):               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |

Appendix B – Additional Responses



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### (2) The State agency establishes maximum allowable reimbursement levels using:

(a) Standard deviations ☐ Yes ☒ No

If yes, specify the standard deviation number and explain how the State agency determined the standard deviation it used is appropriate:

(b) A percentage above the average redemption amount ☒ Yes ☐ No

If yes, specify the percentage and explain how the State agency determined that this percentage is appropriate.

Fifteen percent above the average peer group price assures the cost of the WIC food item will most likely be within the not to exceed amount for each pricing peer group. Allowing fifteen percent above the average price prevents the reduction of submitted food item prices by the banking contractor as product costs increase. Biweekly reviews will provide a timely analysis of product costs.

(c) Other (please specify): ☐ Yes ☒ No

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

☒ Yes ☐ No Wholesale price fluctuations; explain: The 15 percent allowance and the biweekly price assessment are used to address these fluctuations.

☒ Yes ☐ No Inflation; explain: The 15 percent allowance is used to address this issue. Peer group prices are evaluated biweekly.

☐ Yes ☒ No Other (please specify):

### b. The State agency screens redemption requests through a pre-edit (before payment) or post-edit (after payment) process to detect the following:

| Not Applicable                      | Pre-Edit Screen          | Post-Edit Screen                    |   |
|-------------------------------------|--------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Purchase or requested price exceeds price limitations |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Altered purchase price                                |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Vendor/farmer identification missing                  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Invalid/counterfeit vendor/farmer identification      |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Transacted before specified period                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Transacted after specified period                     |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Redeemed after specified period                       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Altered dates   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Missing signature                                     |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Mismatched signature                                  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Altered signature                                     |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Other (specify):                                      |

### c. When the payment amount on a food item exceeds the maximum allowable reimbursement amount, what action does the State agency take?

☒ Reimburses the vendor for amounts up to the maximum allowable reimbursement amount

☒ Reimburses the vendor at the peer group average

☐ Rejects the reimbursement request but allows the vendor to resubmit

☐ Rejects the reimbursement request without allowing the vendor to resubmit

☐ Other (please specify):

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

☐ All FIs ☐ Percentage of FI ( %)

☐ Other (please specify):

### e. The edit system(s) that use(s) maximum allowable reimbursement levels to screen for vendor overcharges

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rejects food instruments based on:

| Pre-Edit                            | Post-Edit                |                                    |
|-------------------------------------|--------------------------|------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not To Exceed or Maximum Prices    |
| <input type="checkbox"/>            | <input type="checkbox"/> | Percentage above average (      %) |
| <input type="checkbox"/>            | <input type="checkbox"/> | Amount above average (\$      )    |
| <input type="checkbox"/>            | <input type="checkbox"/> | Other (specify):                   |

**f. The following actions are used to control against unauthorized stores redeeming FIs:**

- ☒ Provide up-to-date list of authorized vendors to participants at certification and/or issuance
- ☐ Remove a vendor/farmer/farmers' ability to conduct transactions when it is no longer authorized
- ☐ Conduct compliance buy to verify if unauthorized store transacts and redeems FIS
- ☒ State agency or its banking institution checks vendor/farmer/farmers' market ID numbers on redemption requests against the authorized vendor/farmer/farmers' market list before paying vendors/ farmers/farmers' markets for FIs submitted for redemption
- ☐ Inform all participants who might use the unauthorized store
- ☒ Other (specify): Provide access to a map showing authorized stores on the WICNS website and through WICShopper app. Provide door decals to authorized retailers to post on store entrances.

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

### 5. Price Lists

**a. Shelf Price list information is routinely collected from vendors:**

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

**b. Shelf Price list data are collected:**

- ☒ Real Time or Daily via EBT system      ☐ Monthly      ☐ Quarterly      ☐ Semiannually  
☐ Other (specify):

**c. Shelf Price data are collected by:**

- ☐ State agency staff  
☐ Local agency staff  
☐ Reports are submitted by vendors  
☒ EBT system  
☐ Other (specify):

**d. The data collected has food prices for (check all that apply):**

- ☒ All brands and sizes of supplemental foods  
☐ Highest price supplemental food items within food categories  
☐ Most commonly redeemed food items; please specify:  
☒ All authorized vendors  
☐ A sample of authorized vendors (please describe the sampling method used):  
☐ Other (specify):

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

- ☐ During routine monitoring visits  
☐ Does not verify on a routine basis  
☒ Other (explain): Compliance buy reports, pictures of posted prices, and eWIC receipts are compared to claim files.

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

- ☐ Manually on a routine or as needed basis
- ☒ In an Automatic Data Processing system and uses it to:
  - ☒ Generate estimated food instrument values
  - ☐ Help inform WIC staff on vendor selection decisions
  - ☒ Develop vendor peer groups
  - ☐ Flag individual food instruments that appear to be overcharges
  - ☐ Other (specify):

**6. System to Detect Suspected Overcharges**

**a. Does the State agency screen for suspected overcharges?**

- ☒ Yes, vendor claims are issued for overcharges.
- ☐ No, the State agency does not identify overcharges and/or issue claims for overcharges. (Proceed to section *D. Manual Food Instruments*.)
- ☐ Other (specify):

**b. The methods used to identify potential vendor overcharges are:**

- ☐ Comparison of vendor's redemption prices to charged prices (via receipt).
- ☒ Other (specify): Compliance buy reports, pictures of posted prices, and eWIC receipts are compared to claim files.

**c. To receive payment or justify and correct a claim for a price adjustment or vendor overcharge, the vendor must: (Check all that apply)**

- ☐ Provide an updated price list
- ☒ Provide written justification for the higher prices
- ☐ Provide receipts
- ☒ Other (specify): Provide an invoice showing the actual wholesale cost or price increase.

**d. What action(s) is/are taken when a potential vendor overcharge is identified? (Check all that apply)**

- ☒ Routine monitoring or remedial vendor training is conducted
- ☒ Vendor is designated as high-risk and scheduled for compliance investigation
- ☐ Vendor is provided with a written warning of potential sanction for overcharging
- ☒ Other (specify): A letter requesting reimbursement for the overcharge is sent to the retailer.

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

### E. Manual Food Instruments

☒ **DOES NOT APPLY (PROCEED TO NEXT SECTION)**

**1. Manual FIs Policy**

**a. Manual FIs are utilized for the following reasons:**

- ☐ New participants
- ☐ Automated FIs not available
- ☐ Mutilated automated FIs

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- ☐ Wrong food package on automated FI
- ☐ Wrong dollar amount on automated FI
- ☐ Provide for the special needs of the homeless
- ☐ Food package tailoring
- ☐ Routine monitoring visits (i.e., educational buys) of vendors/farmers
- ☐ Compliance buys of vendors/farmers
- ☐ Special conditions, e.g., disasters
- ☐ Other (specify):

**b. The State agency requires the following for completing the manual FI register:**

- ☐ Participant/proxy signature                      ☐ Local agency staff initials
- ☐ Date of FI pick-up                                      ☐ Other (specify):

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

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

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

### 2. Manual FI Documentation and Disposition

**a. A report containing the serial numbers of manual FIs issued by local agencies is sent to the State agency:**

- ☐ Not applicable                      ☐ Weekly                      ☐ Monthly
- ☐ Other (specify):

**b. Local agencies are required to provide documentation to substantiate a valid or invalid certification record for manual FIs issued and redeemed but for which no participant record currently exists by utilizing:**

- ☐ Turnaround documents to establish valid certification records
- ☐ Telephone calls to the State/local agency on irregularities
- ☐ Other (specify):

**c. If the manual FI inventories do not achieve 100% reconciliation of all issued and unissued FIs, the local agency (check all that apply):**

- ☐ Reports the FI serial numbers to the State agency
- ☐ Provides the FI serial numbers to local vendors/farmers
- ☐ Other (specify):

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

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

## F. Special FI Issuance Accommodations

### 1. Alternative FI Issuance

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

**a. The State agency has implemented the following FI issuance policy (check all that apply):**

- ☒ All participants are required to pick up FIs at the clinic or local agency, except in unusual circumstances
- ☒ Participants/proxies are required to show identification at FI card pick up
- ☐ FIs cards are routinely mailed to participants except (1) when the participant is scheduled for nutrition education (including breastfeeding promotion and support activities) or a certification appointment and (2) in areas where SNAP benefits are not mailed. , as these areas are known to have experienced high mail issuance losses
- ☐ Benefits are provided electronically to a location (such as a grocery store) under certain conditions; thus, participants may not always pick up FIs at the clinics.
- ☐ Other (specify):

**2. Mailing Policy/Procedures**

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

- ☒ Yes ☐ No

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

- ☒ Yes ☐ No

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

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

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

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

(if other, specify): When the Missouri WIC Information Network System (MOWINS) is down during onsite food instrument issuance, and in situations when the disaster plan is in effect.

**e. When mailing paper FIs or EBT cards, documentation of FI issuance is:**

- ☐ Signed by the participant at the following FI pick-up/visit
- ☒ Noted "mailed" and initialed/dated by local agency staff
- ☐ Signed and dated by local agency staff after return receipt is received

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

☒ Other (specify): eWIC card PIN is mailed separately.

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

**3. Participants who receive paper FIs or EBT cards by mail are provided:**

- ☒ One month of benefits ☒ Two months of benefits  
☒ Three months of benefits ☐ Other (specify):

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

9.1.020 Food Benefit Issuance Cycles

### G. Vendor Cost Containment System Certification

If the State agency authorizes or plans to authorize any above-50-percent vendors, FNS must certify the State agency's vendor cost containment system. The State agency that has not yet received FNS certification must submit a request for certification/recertification that contains the following information.

☒ **DOES NOT APPLY (PROCEED TO SECTION G)**

**1. Calculation of competitive price levels**

Describe how the State agency derives (or will derive) competitive price levels for regular vendors that excludes the prices of above-50-percent vendors.

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

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

**b. The State agency exempts above-50-percent vendors from the calculated competitive price criteria and maximum allowable reimbursement levels.**

☐ Yes ☐ No If yes, how many vendors will be exempted?

**Are these vendors needed to ensure participant access to supplemental foods?**

☐ Yes ☐ No

**c. The State agency applies peer-group specific maximum allowable reimbursement levels during the benefit redemption process.**

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

**3. The State agency plans to exempt *non-profit* above-50-percent vendors from competitive price criteria and maximum allowable reimbursement levels.**

☐ Yes ☐ No If yes, provide the following information in detail:

**a. Describe the reason the State agency has decided to exempt such vendors (i.e., the benefits to the program) and the number of non-profit vendors to be exempted.**

**b. Describe the reason the non-profit above-50-percent vendors are needed to ensure participant access to supplemental foods.**

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

c. Does the State agency collect shelf prices from non-profit vendors?

☐ Yes ☐ No

d. Describe how the prices of the non-profit vendors compare to those of other vendors in their geographic area that are subject to competitive price criteria and allowable reimbursement levels.

e. Describe how the State agency establishes the level of reimbursement for the non-profit above-50-percent vendors that it has exempted.

4. The State agency has fully implemented the competitive price criteria and maximum allowable reimbursement methodologies described in items 1 and 2 above.

☐ Yes ☐ No

If the State agency has not fully implemented the revised competitive price and maximum allowable reimbursement methodologies, describe the current status of this effort and include the timetable for achieving full implementation.

5. The State agency plans to exempt *pharmacy* vendors from competitive price criteria and maximum allowable reimbursement levels.

☐ Yes ☐ No

If yes, the State agency has confirmed that these pharmacies provide **only** exempt infant formula and/or WIC-eligible nutritional foods to program participants.

6. Does the State agency collect shelf prices from pharmacies that provide only exempt infant formula?

☐ Yes ☐ No

7. Complete the table on the following page to demonstrate that the State agency's procedure for establishing and implementing competitive price criteria and maximum allowable reimbursement levels ensures that average payments per food instrument or food item to above-50-percent vendors do not exceed average payments to regular vendors.

8. Please attach and cite of a copy of the report(s) that the State agency will use to monitor average payments per food instrument to above-50-percent vendors and regular vendors. If the State agency does not have such a report, describe the State agency's plans to develop and implement a report(s) for monitoring purposes, including the report contents or fields.

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

Table 1. Data for WIC Vendor Cost Containment Certification – Overview

Please provide the following information on the regular vendors and the above-50-percent vendors authorized by the State agency as of June 30th. If data are not available through June 30th, the State agency should enter data for the period for which data are available, replacing “June” with the month to which the data are applicable.

|   |                                   |
|---|-----------------------------------|
| 1. How many authorized regular vendors did the State agency have as of June 30th? (or month of: )   | 1.                                |
| 2. For all authorized regular vendors, what was the total amount of WIC redemptions paid as of June 30th?   | 2.                                |
| 3. How many above-50-percent vendors did the State agency have as of June 30th?   | 3.                                |
| a. Non-pharmacy above-50-percent vendors  | a.                                |
| ▪ Number of <i>WIC-only</i> stores  | ▪                                 |
| ▪ Number of other types of above-50-percent vendors (excluding pharmacies)  | ▪                                 |
| b. Above-50-percent pharmacy vendors  | b.                                |
| c. Total above-50-percent vendors (sum of a and b)  | c.                                |
| 4. What was the total amount of redemptions paid to these above-50-percent vendors as of June 30th?   | 4.                                |
| a. Non-pharmacy above-50-percent vendors  | a.                                |
| b. Above-50-percent pharmacy vendors  | b.                                |
| c. Total above-50-percent vendors (sum of a and b)  | c.                                |
| 5. How many peer groups of above-50-percent vendors (either separate peer groups or groups with regular vendors) has the State agency identified?   | 5.                                |
| 6. How many above-50-percent vendors and regular vendors has the State agency authorized that do <u>not</u> meet competitive price criteria, but are needed to ensure participant access to supplemental foods? | 6. above-50%:<br>regular vendors: |

Supplemental WIC State Plan Guidance section IX.I – Vendor Cost Neutrality Assessment will be issued in the spring.



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

### H. Home Food Delivery Systems

☒ DOES NOT APPLY (PROCEED TO NEXT SECTION)

#### 1. Home Food Delivery Systems Overview

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

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

##### b. Participants who receive home food delivery:

- ☐ Are notified in writing of the types and quantities of foods
- ☐ Are issued FIs that they sign and provide to the vendor when the food is delivered
- ☐ Are delivered not more than a one-month supply of supplemental foods at any one time
- ☐ Indicate by authorized signature on a FI, receipt or signature document, the supplemental foods received
- ☐ Other (specify):

##### c. Supplemental foods may be delivered:

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

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

#### 2. Documentation

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

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

##### b. Signatures of participants who sign the food receipt document/FIs are compared to the signature on file.

- ☐ No      ☐ Yes, sample      ☐ Yes 100%

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

### I. Direct Distribution Food Delivery Systems

☒ DOES NOT APPLY

#### 1. Direct Distribution Food Delivery - General

##### a. The State agency uses a direct distribution food delivery system to:

- ☐ Distribute all its WIC Program foods
- ☐ Distribute only exempt infant formula and/or medical foods
- ☐ Distribute (specify):

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

### b. The State agency uses:

- ☐ Warehouse not used
- ☐ One central warehouse, deliveries directly to local agencies
- ☐ One central warehouse from which foods are sent to one or more subsidiary warehouses before delivery to local agencies
- ☐ Other (specify):

### c. Warehouses are operated by:

- ☐ State agency
- ☐ Local agency
- ☐ Other state or public agency
- ☐ Under contract with a private business
- ☐ Other (specify):

### d. Warehouses used for storage of WIC foods are also used to store other FNS program commodities (Please specify which commodities):

- ☐ Yes
- ☐ No Specify commodities:

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

## 2. Food Distribution

### a. Foods are distributed to participants:

- ☐ Grocery store fashion
- ☐ Pre-packaged
- ☐ Other (specify):

### b. Participants receiving food are required to sign:

- ☐ A register once for all foods received
- ☐ A register/form for each food item received
- ☐ Other (specify):

### c. Foods are distributed to participants:

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

### d. Participants with limited access to facilities used for distribution have available to them:

#### Services provided by:

|                          | Local Agency             | Other Sources            |
|--------------------------|--------------------------|--------------------------|
| Home delivery            | <input type="checkbox"/> | <input type="checkbox"/> |
| Cost-free transportation | <input type="checkbox"/> | <input type="checkbox"/> |
| Other                    | <input type="checkbox"/> | <input type="checkbox"/> |
| (if other, specify):     |                          |                          |

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

## 3. Warehouse Insurance and Inspections

### a. Insurance for the warehouse covers (check all that apply):

- ☐ Theft
- ☐ Fire
- ☐ Infestation
- ☐ Spoilage

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

☐ Other (specify):

**b. Warehouses are inspected by a public authority responsible for enforcing:**

☐ Fire safety laws and regulations (specify date and grade of last inspection):

☐ Sanitation laws and regulations (specify date and grade of last inspection):

☐ Other (specify):

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

**4. Monitoring and Inventory Control**

**Please describe the State agency's methods for ensuring WIC supplemental foods are under proper inventory control (separation of duties for intake and inventory; stock rotation; performance of perpetual and physical inventory duties; reconciliation against issuance records; etc.).**