

Participant Sanction Schedule

Abuse/Violation	Sanction	Local Agency Action	ITCA Action
Minor Abuse			
Excessive card replacement (2 or more replacements in a calendar year)		<ol style="list-style-type: none"> The WIC Rights and Responsibilities will be reviewed and re-signed each time a card is replaced. Local agencies can require clients to watch the WIC Client Video 	Review monthly reports on card replacements. Investigate for possible fraud.
Major Abuse			
Verbally abusing WIC staff or vendor staff such as using inappropriate language, yelling or name-calling (includes throwing something though it is not directed toward WIC or vendor staff)	<p>1st Violation - 90 day disqualification and barred from any WIC clinic during the disqualification period</p> <p>2nd Violation – 6 month disqualification and barred from any WIC clinic during the disqualification period</p> <p>3rd Violation – 1 year disqualification and barred from any WIC clinic during the disqualification period</p>	<ol style="list-style-type: none"> Document the incident briefly in STARS Document specifics in a separate file. Gather as much information as possible, including: client name, ID #, date of incident, description of incident, witnesses and their statements, actions taken. Provide client with at least 15 calendar days written notice of being disqualified. Client has 60 days from decision to DQ to request a fair hearing (verbally or in writing). If they do so within 15 days of receiving the notice, they can continue to receive benefits until a fair hearing decision is reach or the certification period ends, whichever comes first. Disqualify for appropriate period of time. Email ITCA program integrity coordinator. Include date, client name, ID #, description of abuse, & action taken. 	<p>Document all actions for monitoring and improvement of prevention efforts.</p> <p>Organize a fair hearing (if applicable)</p>
Physical confrontation with clinic or store staff or other clients/customers (clinic staff should report to police)	1st Violation - 1 year disqualification and barred from WIC clinic during the disqualification period		
Verbally threatening clinic/store staff or other client/customer with physical force (includes throwing something in the direction of the clinic or store staff or another client/customer) (clinic staff should report to police)	<p>1st Violation - 6 month disqualification and barred from any WIC clinic during the disqualification period</p> <p>2nd Violation – 1 year disqualification and barred from any WIC clinic during the disqualification period</p>		
Theft of WIC equipment, supplies, eWIC cards or formula OR personal belongings of WIC staff, client or visitor in clinic (clinic staff should report to police)	1 st Violation - 1 year disqualification and barred from any WIC clinic during the disqualification period		
Intentional damage to clinic or store property (clinic staff should report to police)	1st Violation - 1 year disqualification and barred from any WIC clinic during the disqualification period		
Unintentional dual	1st Violation - Warning		

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participation (one month or less of benefits received due to transfer, custody issue, etc.)	letter After first violation of unintentional dual participation, dual participation is considered intentional	situation and referring the client to the Director before issuing more benefits. Director will educate client at next visit on rights & responsibilities. Provide a copy of warning letter to client and have client sign to verify receipt and update contact information (if applicable).	monitoring and improvement of prevention efforts. Contact AZ State WIC to see which program the client would like to be in (if applicable).
Failure to return a loaned multi-user electric breastpump by the date indicated in the letter sent by the local agency WIC Program (exemption made for extenuating circumstances such as a theft or fire with a police report)	No further issuance of multi-user electric breastpump in future OR Full restitution of value of pump within 30 days OR Payment plan set up with local or state agency within 30 days AND regular payments are received as planned AND monthly issuance only until restitution made OR Pump is returned	<ol style="list-style-type: none"> 1. Request the return of the pump in person or via a phone call. 2. If the pump is not returned within 7 days of request, send a copy of the user's agreement and a warning letter (template in Chapter 3 attachments) to the client via certified mail. Make a copy of everything being mailed and staple the certified mail receipt to the copy of the letter and file. If the client does not return the pump within 14 days of receipt of the letter, the client will be sent a second notification letter and a 3rd after the next 14 days. 3. Breastfeeding lead to enter a note into STARS to have the client see them before being given benefits. Lead to review breastpump contract at every visit until the pump is returned. Provide a copy of the letter sent, have client sign to verify receipt and update contact information (if applicable). 4. Email ITCA breastfeeding specialist if you have not heard from client, 30 days after the last letter was sent. 	Document all actions for monitoring and improvement of prevention efforts. Establish a payment plan (if applicable) and inform LA.
Fraud			
Intentional dual participation in WIC (signed R&R Form and received two or more months of benefits)	1 st Violation - 1 year disqualification AND monthly issuance only after the disqualification period OR Full restitution made within	<ol style="list-style-type: none"> 1. Put a note in STARS describing the situation and referring the client to the Director before issuing more benefits. Director will educate client at next visit on rights & 	<ol style="list-style-type: none"> 1. Document and notify local agency director 2. Send 0-3 certified letters in pursuit of restitution based on amount. Follow-up letters should be sent at

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	30 days OR Payment plan set up with local or state agency within 30 days AND regular payments are received as planned AND monthly issuance only until restitution made Note: If a payment is not made, benefits for the next benefit months will not be issued until the payment plan is renegotiated and next payment is received	responsibilities. Provide a letter of actions taken to client and have client sign to verify receipt and update contact information (if applicable). 2. Monthly issuance after disqualification period (if applicable)	least 30 days after the previous letter to allow time for response. *0 letters mailed if <\$115 (notified in the clinic only) *1 letter: \$115-214.99 *2 letter: \$215-300 *3 letters if >\$300 * For cases over \$2500, ITCA will pursue legal action in court – otherwise no further action will be taken.
Falsely reporting or intentionally making false or misleading statements or withholding facts to obtain benefits including, but not limited to identity, income, residence, family size, health status, custody, falsification of medical data or pregnancy, date of birth.	1 st Violation - 90 day disqualification (claim <\$100) or 1 year disqualification (claim ≥ \$100) AND monthly issuance only after the disqualification period OR Full restitution within 30 days AND monthly issuance only after the disqualification period		3. Establish a payment plan (if applicable) and inform the LA. 4. Disqualify participant for appropriate period (if applicable) and notify LA.
Falsely reporting, receiving, or using benefits for a client that does not exist, does not reside in the household, is no longer in your custody or is otherwise not ingesting the foods	OR Payment plan set up with local or state agency within 30 days AND regular payments are received as planned AND monthly issuance only until restitution made		
Attempting to receive or actually receiving cash or credit from vendors toward purchase of unauthorized food or other items of value in lieu of authorized foods			
Attempting to redeem or actually redeeming benefits for alcohol or tobacco			
Attempting to sell or exchange or actually selling or exchanging food or formula for cash, credit, goods or services			
Giving away and/or not providing benefits to client including but not limited to		If hearsay: 1. Put a note in STARS describing the situation and referring the client to the Director before issuing more benefits. Director will educate client at next visit on rights & responsibilities. Provide a	If strong proof exists: 5. Document and notify local agency director 6. Send 0-3 certified letters in pursuit of restitution based on amount. Follow-up letters should be sent at least 30 days after the

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not providing formula or other foods received on the program to the infant/child that the formula/foods were issued to.		warning letter to client and have client sign to verify receipt and update contact information (if applicable).	previous letter to allow time for response.
Attempting to traffic or actually trafficking eWIC cards or foods for money		2. Email ITCA program integrity coordinator. Include date, client name, ID #, description of abuse, & action taken.	*0 letters mailed if <\$115 (notified in the clinic only) *1 letter: \$115-214.99 *2 letter: \$215-300 *3 letters if >\$300
Attempting to sell or trade or actually selling or trading a WIC issued breastpump		If strong proof exists (pictures, proof of amount of products sold or exchanged, witnesses)	* For cases over \$2500, ITCA will pursue legal action in court – otherwise no further action will be taken.
Second violation of any of the above fraud violations regardless of dollar amount	1 year disqualification AND monthly issuance only after the disqualification period OR Full restitution within 30 days OR payment plan set up with local or state agency within 30 days AND monthly issuance only until restitution made	1. Provide all documents and witness contact information to ITCA. 2. Monthly issuance after disqualification period (if applicable).	7. Establish a payment plan (if applicable) and inform the LA. 8. Disqualify participant for appropriate period (if applicable) and notify LA.