



INTER TRIBAL COUNCIL OF ARIZONA, INC.



ITCA WIC Annual Vendor Training Newsletter

FALL 2022

Gratitude

Thank all of you for your commitment and perseverance during ongoing supply chain issues and the formula recall crisis. Grocery stores have adapted and remain reliable during these rapidly changing circumstances. The Inter Tribal Council of Arizona, Inc. (ITCA) WIC Program thanks you for your partnership to provide nutritious foods for WIC families in your community!

Annual Training for Federal Fiscal Year 2023

This newsletter serves as the ITCA annual training for federal fiscal year 2023 (October 1, 2022–September 30, 2023). Authorized ITCA WIC stores are required to attend annual training to keep store management and staff informed about the ITCA WIC vendor policies and procedures. Annual training helps reduce errors and promotes a successful WIC shopping experience.

TRAINING CONTENTS

This newsletter and the handouts include important information for vendors, including:

- *WIC Program Purpose*
- *Incentive Items*
- *Vendor Manual*
- *Reporting Changes*
- *Authorized Foods*
- *Record Keeping Requirements*
- *Infant Formula Suppliers*
- *Complaint Process*
- *Authorized Product List (APL)*
- *Program Integrity*
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WIC

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a public health nutrition program that provides nutritious foods, breastfeeding support, education about healthy eating habits, and healthcare referrals. The WIC program protects the health of moderate to low income people who are at nutritional risk and helps to ensure healthy growth and development. WIC serves people who are pregnant or have recently given birth, infants, and children up to age five. As the third largest food and nutrition assistance program, WIC served 6.2 million participants per month in fiscal year 2020, which includes almost half of all infants born in the United States.

WIC HEALTH OUTCOMES

Numerous studies show that WIC is effective and helps:

- Reduce premature births
- Reduce low & very low birth weight babies
- Reduce fetal and infant deaths
- Reduce the incidence of low iron anemia
- Increase access to prenatal care earlier in pregnancy
- Increase pregnant person's consumption of key nutrients such as iron, protein, calcium, and Vitamins A and C
- Increase immunization rates
- Improve diet quality
- Increase access to regular health care

TRAIN THE TRAINER

Individuals who are trained are responsible for providing this training information to all store employees involved with stocking WIC foods and conducting WIC transactions. Place copies of the Annual Training Newsletter in areas with easy access to store employees. Ensure store employees are provided with the contents of this Newsletter. The vendor business entity is accountable for its owners, officers, managers, agents, and employees who commit vendor violations.

WIC Approved Foods

WIC approved foods are carefully selected to ensure they meet the nutrition needs of WIC clients.

All approved foods can be found in the Food List: itcaonline.com/itca-wic-authorized-foods. Please refer to the Arizona WIC Programs Food List to make sure you are familiar with the types and brands of WIC foods. **If you would like hard copies of the Food List they can be requested at WICVendor@itcaonline.com.**



UPCOMING!

A new Food List, effective October 1, 2023, will be released next year.

AUTHORIZED PRODUCT LIST (APL)

The Approved Product List (APL) is a consolidated list of products that are WIC approved. Each product is uniquely identified by a Universal Product Code (UPC) or Price Look Up code (PLU) for WIC Electronic Benefit Transfer (EBT). The Point of Sale (POS) system uses the ITCA APL during a WIC transaction to ensure only WIC eligible products can be purchased with WIC benefits.

The APL is owned and maintained by the ITCA WIC Program and made available for vendors to download to their POS systems. The APL file plays a vital role in the eWIC transaction process and must be downloaded to the vendor's POS every 24 hours or every day the vendor is open for business. If you are unsure if you're POS is downloading the APL on a daily basis, contact your POS provider. Vendors utilizing stand beside device equipment can contact FIS merchant services at 1-877-291-0433 for questions about the APL.



VENDORS CAN REPORT WIC FOODS THAT NEED TO BE ADDED TO THE APL.

If a vendor suspects that a food product is WIC allowable but it does not ring up as WIC allowable, the product needs to be reported to ITCA. If the product is WIC eligible, it gets added to the APL and available for the WIC shopper to purchase within 24-72 hours of being added. **Report the product information to WICUPC@itcaonline.com. Submit the following product information in the email:**

- Full UPC or PLU code
- Brand Name
- Full product description, including size, type, and flavor (if applicable)
- Image of the front of the product and image of the UPC

Vendor Manual

The ITCA WIC Vendor Manual contains WIC program policies and procedures that apply to authorized vendors. The Vendor Manual is the resource for learning WIC policies and procedures. Authorized vendors must know how to access the vendor manual. **The ITCA WIC Vendor Manual can be accessed on the ITCA website itcaonline.com/vendormanual, the flash drive provided by ITCA containing the electronic version of the ITCA WIC Vendor Manual, or on your store's internal employee site.**

ACTION ITEM

- Access the ITCA WIC Vendor Manual

WHAT'S NEW?

- A copy of the Vendor Manual is now available on a flash drive and can be requested by email at WICVendor@itcaonline.com.
- Minimum Stocking Requirements were reduced effective May 16, 2022.
- ITCA does not authorize or continue to authorize stores whose WIC sales make up 50% or more of their total sales. The following policies and procedures have been updated with this change. See each section for these topics and the enclosed documents for details:
 - + ITCA WIC Sanction Schedule
 - + ITCA WIC Selection Criteria
 - + ITCA Administrative Review Instructions for Vendors

Infant Formula Suppliers

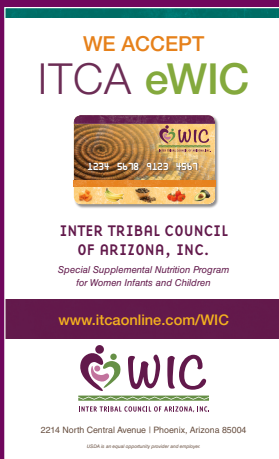
Vendors must only purchase formula from sources that are approved by ITCA WIC. The list of approved infant formula wholesalers, distributors, retailers, and infant formula manufacturers is enclosed.

WIC Signage

WE ACCEPT ITCA WIC WINDOW DECAL

Authorized vendors are required to display the We Accept ITCA eWIC window decal at entrances where they can be clearly seen by the public. The window decal helps ITCA WIC clients find an authorized location to redeem their ITCA WIC benefits.

ITCA WIC window decals can be requested at WICVendor@itcaonline.com.



ACTION ITEMS

- Check the entrances of your store to verify the We Accept ITCA eWIC window decal is present and visible to the public.
- Remove any ITCA WIC decals that do not look like the one in this Newsletter.

Every WIC Program has a different decal. If your store accepts WIC from multiple WIC programs, post the decal for each program.

WIC APPROVED SHELF LABELS

WIC Approved shelf labels are used to help WIC customers identify WIC authorized foods in your store. If a vendor chooses to use the WIC Approved shelf labels, all WIC eligible food items in the same food category must have the WIC Approved label to avoid promoting some products over others.

Example: If you place a WIC Approved shelf label on Langers 64 oz. shelf stable apple juice, you must use the WIC Approved shelf labels to identify all other 64 oz. shelf stable WIC approved juices.

ITCA WIC Approved shelf labels can be requested at WICVendor@itcaonline.com.



ACTION ITEM

- Walk through the aisles and check for WIC approved shelf labels. If they are present, ensure they are used for authorized WIC foods and that all the WIC eligible products in the food category have the shelf label.

WIC Shopper App

The WIC Shopper App is a free app that allows ITCA WIC clients to check their balance in real time and scan foods to determine if they are WIC eligible and available in their benefits. Anyone can use it to scan foods in the store to identify WIC allowable foods, including store staff. The WIC Shopper App also allows any user to view the Food List and submit a request for a product to be added to the authorized product list.



Minimum Stocking Requirements

We want to make sure that WIC clients can purchase WIC foods when they are in your store. ITCA established the minimum inventory of WIC foods a store needs to keep on the shelf at all times. **The required minimum stock and varieties of WIC foods are outlined in the enclosed minimum stocking requirements document.** The foods listed in the minimum stocking requirements must be stocked in levels that are equal to or greater than the quantity and variety listed.

All Vendors are required to maintain minimum stock and variety of all WIC foods prior to submitting an application and throughout the Contract period. Failure to maintain the minimum stock and variety of WIC foods results in administrative sanction. Repeated failure to maintain the required quantity and variety of WIC foods may result in termination of the Vendor Contract.

ACTION ITEM

- Walk the aisles with the enclosed Minimum Stocking Requirements documents to verify the store meets the minimum quantity and variety of WIC foods required.

WHAT'S NEW?

Effective May 16, 2022, the minimum stocking requirements were reduced. See the enclosed Minimum Stock Requirements document to review the types and quantities of WIC foods that are required to be in stock at all times as of May 16, 2022.

HAVING TROUBLE SELLING WIC FOODS?

You may be eligible for a reduction in the types and quantities of WIC foods required to be maintained in inventory. To learn more, see the Request for Reduced Minimum Stock document enclosed.

WIC Transaction Procedures

WIC customers should be treated like non-WIC customers. WIC Shoppers can purchase WIC foods and non-WIC foods in the same transaction. After all the items are scanned, the Point of Sale (POS) system finds:

- Food(s) that are WIC eligible
- AND**
- In the cardholder benefit balance

The WIC payment is applied ONLY to the foods that meet these two criteria. All products that do not meet both of the criteria listed above cause a balance to be due. Products that cause a balance to be due can be paid for with another form of payment or can be removed from the transaction at the request of the WIC shopper. **See the enclosed eWIC Transaction Procedures for more details and examples.**

SOLVE WIC SHOPPING PROBLEMS HANDOUT

Provide the enclosed Solve WIC Shopping Problems document to ITCA WIC shoppers when there is a problem at the register.

BALANCE INQUIRY

If asked, you must help a WIC customer check their benefit balance. WIC shoppers are not required to make a purchase to retrieve their benefit balance. A balance inquiry gives the WIC shopper a list of their current available benefits that can be used as a guide for purchasing WIC foods in the quantities available to them.



Payment Adjustments

Payments made by the ITCA WIC Program to authorized vendors may be adjusted for the following reasons:

Item price is over the Not To Exceed amount

- A Not To Exceed (NTE) amount is the price ITCA WIC calculates to be the competitive price for a specific item or food subcategory. Vendors are reimbursed up to the NTE amount and never paid more than the product or food subcategory NTE, even if the requested price is higher than the NTE amount.

Food removed from the WIC benefits but not received by WIC customer

- Payments may be adjusted for items charged to the WIC Program that were not received by the WIC customer.

Transaction communication and other errors

- If a transaction communication or other error results in over payment to the vendor, the ITCA WIC program will adjust the payment to reflect the accurate dollar amount. If transaction communication errors result in underpayment to an authorized vendor, the vendor must follow the procedures for Transaction Dispute Resolution.

If, for any reason, there is a dispute regarding a payment, the vendor must communicate the dispute to the ITCA WIC Program following the Transaction Dispute Resolution procedures detailed in the Vendor Manual.

Transaction Dispute Resolution

Dispute resolution addresses conditions where one or more parties to a eWIC transaction have or may incur a financial loss. Transactions can be disputed by the WIC cardholder, the WIC Vendor or other parties to the transaction. **For more information on transaction dispute resolution, refer to the Vendor Manual.**

Reporting Changes

Authorized vendors **must provide ITCA at least 30 days advance** notice for changes related to:

- Banking management
- Cash register hardware
- Cash register software
- Software version updates
- Third party processor
- Hours of operation
- Mailing Address

Failure to report banking information, cash register information, or third party processor changes will result in the ITCA WIC Program losing the ability to reimburse a vendor for benefits redeemed.

CHANGE OF OWNERSHIP AND/OR LOCATION

Vendors who change the location of their business or change ownership are terminated. To become authorized to accept ITCA WIC benefits, the new location or new ownership needs to go through the authorization process as a new vendor.

To report changes, the Notice of Change form in the Vendor Manual can be used. The Vendor Manual can be found at itcaonline.com/wic/vendor.

Incentive Items

Any item or service provided by a vendor to attract customers or encourage loyalty is considered an incentive item. WIC vendors may offer incentive items to WIC shoppers, ONLY if they are also offered to non-WIC shoppers. WIC shoppers must be treated the same as non-WIC customers.

Claims Procedure

When a vendor overcharges for WIC products, intentionally or unintentionally, ITCA may establish a monetary claim to recover those funds. ITCA may recover the full amount paid for each item containing an overcharge or only recover the amount overpaid for each item ITCA provides the vendor with an opportunity to justify or correct an overcharge or other error. The vendor must pay any claim assessed by ITCA. In collecting a claim, ITCA may offset the claim against current and subsequent amounts to be paid to the vendor, or adjust the transactions containing an overcharge through the third party processor. In addition to establishing a monetary claim, the vendor may be sanctioned for vendor violations found in the Contract and in the Sanction Schedule. Sanctions may include termination, disqualification, administrative fines, and civil money penalties in lieu of disqualification, or any combination of sanctions.





Record Keeping Requirements

Vendors must maintain program related records for four years from the vendor contract expiration date, and the records must be provided to ITCA upon request. Records that are required to be kept for four years include the following:

- Inventory records showing all wholesale and retail purchases
- Invoices for purchase of WIC foods
- State and federal tax returns
- Other records that are necessary to support the quantity of foods and prices charged
- Records relating to WIC transactions
- Shelf price records
- Financial records
- Supplemental Nutrition Assistance Program (SNAP) sales

Vendor purchase records must reflect the name and address of the supplier, distributor, wholesaler or manufacturer, the date of the purchase, list of the items purchased, size, stock number, quantity and the unit price (handwritten invoices are not acceptable). A vendor's inventory records may be used to audit the vendor to determine if contract violations have occurred. These records may also be used to determine the amount of money owed to ITCA in the event of any improper WIC transactions or other program violations related to inventory. Vendors authorized to accept ITCA WIC benefits are subject to audit by the ITCA WIC program and the US Department of Agriculture (USDA). In the event of an audit, vendors must provide ITCA, or USDA, access to their facility and provide access to records associated with WIC transactions and other documentation needed to verify vendor compliance with program rules and regulations at the time of the audit.

In addition to purchase and receiving records, vendors must keep any and all records related to disputes, litigation, and financial claims imposed upon the vendor for program violations. These records must be kept for four years from the contract expiration date or until the dispute is resolved, whichever is later.

Complaint Process

COMPLAINTS ABOUT WIC SHOPPERS

We welcome your input on ways to improve the WIC program. If you experience an issue or concern with a WIC customer, let us know about it. Individuals who submit a complaint about WIC shoppers will remain anonymous. We follow up with the WIC shopper as needed to address the issue. Resolutions include: providing the WIC client additional shopping education, reminding WIC clients of their rights and responsibilities, and possibly WIC client disqualification or termination from the ITCA WIC program.

COMPLAINTS AND CONCERNS CAN BE SUBMITTED TO ITCA THE FOLLOWING WAYS:

Email: WICVendor@itcaonline.com

Online: itcaonline.com/complaint
Select "File a Complaint"

Phone: 602.258.4822

COMPLAINTS ABOUT VENDORS

WIC clients can submit complaints about vendors to their WIC clinic. ITCA WIC follows up with vendors and WIC clients as necessary to resolve the complaint. Resolutions include: change of store staff behavior, increasing inventory of WIC foods at the store, store staff attending WIC training, imposition of monetary fines and possibly vendor disqualification, imposition of a civil money penalty instead of disqualification, or termination from the ITCA WIC program.

Vendor Appeals and Administrative Reviews

The ITCA WIC program must impose sanctions on vendors for non-compliance with program rules, regulations, policies, and procedures. Vendors may appeal decisions that result in adverse action to be applied to the vendor by requesting an administrative review. Instructions for requesting and administrative review are enclosed with this newsletter.



Program Integrity

You can protect the integrity of the WIC Program by reporting WIC customer and vendor fraud. Buying, selling or otherwise misusing WIC benefits is a crime. Suspected program abuse by anyone should be reported to the ITCA WIC Program Vendor Manager: call **602.258.4822** or visit www.usda.gov/oig/hotline.

How We Monitor You

The ITCA WIC Program ensures all WIC vendors follow the program rules and regulations outlined in the Vendor Manual through monitoring. Vendors are monitored in several different ways, including:

- Vendor Site Reviews
- Inventory Audits
- Customer Complaint Reporting
- Compliance Investigations
- Transaction Receipt Review
- Review of WIC Redemption Activity

WHEN PROBLEMS ARE DETECTED

If a store is not following the WIC rules, it may result in written warning, training, monetary fine, termination, or disqualification, depending on the severity of the violation. Violations that result in federally mandated sanctions result in termination of the vendor contract and disqualification. Depending on the violation, the store can be disqualified for a minimum of one year to permanent disqualification. See the enclosed Sanction Schedule for more information on violations and penalties

Sanction Schedule

Authorized Vendors shall comply with the ITCA WIC Program rules, regulations, policies and procedures. If violations are uncovered during store monitoring, ITCA may take certain measures to assist the vendor in complying with the rules and regulations of the WIC Program, impose sanctions on the vendor, or may disqualify the vendor for a period of time. **See the enclosed Sanction Schedule for a list of violations and their corresponding sanctions.** The Sanction Schedule does not encompass all contract terms and potential violations.

WHAT'S NEW?

The new Sanction Schedule is effective October 1, 2022. A copy is enclosed with this newsletter.

- The maximum civil money penalty dollar amount was revised to reflect the latest maximum value per federal regulation
- Violation B7 was removed. This violation was related to vendors who receive 50% or more of their sales from WIC redemptions (A50 store) was removed because ITCA WIC does not authorize A50 stores.

WIC & SNAP JOINT DISQUALIFICATION AND TERMINATION

Being disqualified and/or terminated from SNAP results in disqualification and/or termination from the WIC program. The vendor will be disqualified from WIC for the same length of time imposed by SNAP, but the disqualification and/or termination start date may be different. If the vendor is needed for WIC client access, a civil money penalty will be imposed by WIC instead of disqualification.

Violations that result in disqualification and/or termination from the WIC program are communicated to SNAP. SNAP may disqualify and/or terminate a vendor for WIC program violations.





Technical Assistance

Vendors may request technical assistance from the ITCA WIC program. Technical assistance is available for vendors who need support with WIC related problems and efforts to improve the WIC shopping process. Some examples of technical assistance include:

- Working together to develop in-store training materials
- Identifying WIC eligible products
- Addressing concerns about WIC rules and procedures
- Providing additional training
- Collaborating to make it easier for shoppers to identify WIC foods
- Efforts to improve the WIC shopping process
- Providing WIC redemption data to guide the quantity of WIC foods needed to meet the demand

**Contact ITCA WIC to request technical assistance,
(602) 258-4822 or WICVendor@itcaonline.com.**

Summer EBT for Children Program Thank You

ITCA is pleased to announce that our Summer EBT for Children (SEBTC) program is successfully completing its third year! We would like to thank all of our Vendors for your hard work and dedication to improving the lives of our SEBTC families. Your support and efforts, especially when faced with a myriad of challenges during COVID-19, was vital to our success. We look forward to working with you all and expanding our program for the summer of 2023!



INTER TRIBAL COUNCIL OF ARIZONA INC. WIC PROGRAM

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itcaonline.com/WIC

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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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**; or
2. Fax: **(833) 256-1665 or (202) 690-7442**; or
3. Email: **program.intake@usda.gov**

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