



Vendor Handbook for Grocery Stores

July 1, 2023

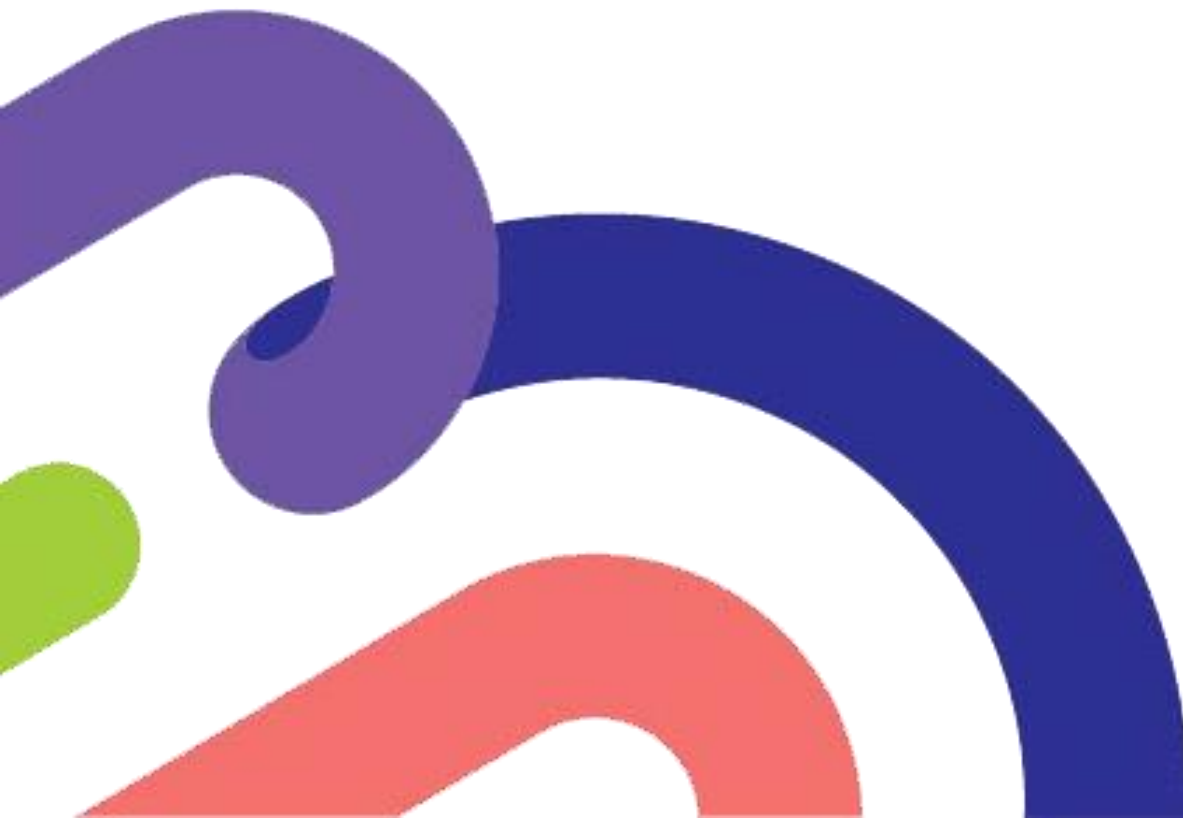


Table of Contents

Introduction	3
Definitions	3
What is WIC?	4
WIC-Eligible Foods	5
WIC Food Benefits	5
WIC Approved Product List	6
Minimum Inventory	7
eWIC Transactions	7
Integrated ECR Transactions	7
Notes for Integrated ECR	8
Produce Mapping	9
Stand Beside Device Transactions	9
Notes for Stand Beside Device	10
Transaction Notes for All Register Systems	11
Additional Information	11
Settlement	11
Selection and Limiting Criteria	12
Infant Formula	12
Peer Groups	12
Maximum Allowable Reimbursement (MARs)	13
Training	13
Reauthorization	14
Complaint Process/Fraud or Abuse Reporting	14
Store Information & Communication	14
Confidentiality of Vendor Information	15
Additional Program Rules & Requirements	15
Signage	16
WICShopper	16
Monitoring Activities	16
Educational Buys	17
Routine Monitoring	17
Unannounced Visits	17
Inventory Audits	17
Cost Competitive Analysis	17
Sanction Schedule	18
Sanction Vocabulary	18
Mandatory Federal Violations	18
State Agency Violations	19
Notification of Vendor Violations	20
Notice of Adverse Action	20
Civil Money Penalty (CMP)	20
Calculating Civil Money Penalty	21
Administrative Appeal Procedures	22
Non-Discrimination Statement	24

INTRODUCTION

The Alaska WIC Program (referred to as “the Program” throughout) created this handbook as a resource for our authorized vendors. The information contained within will provide your staff with the necessary tools to assist WIC participants. This handbook also functions as an extension of the WIC Vendor Agreement. Authorized vendors are contractually obligated to abide by the terms of both the Vendor Agreement and this Vendor Handbook.

The Program could not fully aid our participants without your partnership. We appreciate your commitment to providing the best service possible to your customers and our participants. We look forward to a positive and productive affiliation.

DEFINITIONS

Approved Product List (APL)—The full list of all foods that the Program authorizes for purchase with WIC food benefits. The most up-to-date version of this file is downloaded to your registers or stand beside device.

Balance Inquiry (BI)—A transaction at a register or stand beside device that will allow a participant to see their current list of available WIC food benefits.

Custom Data Processing (CDP)—The Company contracted with the Program that manages and maintains our eWIC systems.

Electronic Cash Register (ECR)—The Point of sale (POS) system used to process purchases and other transaction types at a store.

eWIC Card—A plastic magnetic stripe card that participants use at the point of purchase to buy their WIC foods. This card functions similarly to a debit card. Benefits are loaded to an account and participants access those benefits with this card and their PIN.

Fidelity Information Services (FIS)—The financial institution contracted with the Program to process WIC payments and provide stand beside devices for those vendors whose register systems cannot process WIC transactions.

Fiscal Year (FY)—The Program’s FY runs from October 1 to September 30.

Food Instrument (FI)—The payment method participants use to purchase WIC-eligible foods. In Alaska, the Program issues eWIC cards to our participants so that they may purchase their WIC foods.

Integrated ECR—A register system that is fully capable of processing all transaction types including eWIC transactions.

Local Agency WIC Vendor Manger (LAVM)—Individual working for the Program who will function as the primary contact between a vendor and the Program.

Maximum Allowable Reimbursement (also known as Not To Exceed Amount)—The maximum reimbursement that the Program will provide for the exchange of WIC benefits for a particular WIC-eligible food.

Participant—Individual who receives WIC food benefits and may use an eWIC card to shop at an authorized vendor and purchase WIC-eligible foods.

Personal Identification Number (PIN)—A four-digit number that is set by a participant to use their eWIC card.

PIN Pad—An electronic device connected to an ECR where customers make a payment via an electronic card (debit, credit, SNAP, WIC, etc...)

Point of Sale (POS) Provider— Reseller from where vendor purchased their ECR or POS system.

Sanction—An administrative action taken as the result of a violation of the terms of the Vendor Agreement, Vendor Handbook, or Selection Criteria.

Split Tender—The ability for a register (or stand beside device) to allow at least two (2) different payment types to be used during a single transaction.

Stand Beside Device—An electronic device separate of and not connected to a store’s register(s). These devices are used to process card types that your register is not capable of processing.

State Vendor Management Coordinator—Individual who oversees the food delivery system (i.e. authorized vendors) of the Program.

Supplemental Nutrition Assistance Program (SNAP)—A program that provides nutrition benefits to needy families to help them supplement their food budget. Formerly the Food Stamp Program.

Universal Product Code (UPC)—A unique identification number assigned to items for retail sale.

Vendor—Grocery or pharmacy retail merchants authorized to participate with the Program.

Void—For the purposes of the Program and this handbook, a void is a process at a register that cancels a completed transaction and reverses the payment for that transaction. A void of a WIC transaction would return a participant’s benefits to their account.

WIC Food Benefit— Participants are given a set of items (only produce is a straight dollar value) which are purchased with their eWIC card at authorized vendors.

WHAT IS WIC?

WIC stands for the “Special Supplemental Nutrition Program for Women, Infants, and Children”. Congress established the WIC Program in 1972 in recognition of a need for adequate nutrition in pregnancy and early childhood. The United States Department of Agriculture provides funding to each state agency WIC Program. The Alaska Department of Health oversees the management of these funds and the general operation of the Program. Local agencies, operating WIC clinics across the State, contract with DOH to provide WIC services to eligible participants.

WIC strives to prevent health problems before they occur by providing nutrition services to the following categories of individuals: women who are pregnant, postpartum, and/or breastfeeding; infants; and children up until the age of five. The services offered may include:

- Benefits to buy healthy foods and formulas
- Personalized nutrition information and support
- Tips for eating well to improve health
- Breastfeeding education and support

- Referrals to other services which can offer support and aid to the whole family

Participants who would like to participate in the Program must also live in Alaska, meet our Program's income guidelines, and be determined to be at nutritional risk by a WIC dietitian or health care professional. The Alaska WIC program currently provides food benefits to over 8,000 households per month.

WIC-ELIGIBLE FOODS

Participants receive food benefits each month to purchase supplemental foods at stores authorized by the Program. A WIC dietitian or other health care professional determines the nutritional needs of a participant and prescribes certain foods in specific amounts based on those needs. The Program specifically provides foods high in nutrients such as protein, Vitamin C, Vitamin A, Vitamin D, calcium, and iron. WIC participants are frequently found to have diets that lack these nutrients in sufficient quantities. The following table provides a reference for why these nutrients are important:

Calcium - Aids in building strong bones and teeth and improves the function of muscles and nerves.

Fiber - Helps your gastrointestinal system to function properly.

Iron - Aids in preventing anemia as iron is necessary for red blood cell production and function.

Protein - Important for proper growth and development.

Vitamin A - Helps with eye health, promotes a healthy immune system, and needed for cell growth and development.

Vitamin C - Necessary for normal growth/development and promotes a healthy immune system. Aids with iron Absorption.

Vitamin D - Necessary for bone health and aids with calcium absorption.

All supplemental foods provided by the Program have been assessed for their nutritional content. These foods are also assessed to ensure that they meet the regulatory requirements for size, that their cost would not create an undue burden to the Program, and that they are available within our State. The following types of foods may be eligible for purchase to WIC participants:

Milk, eggs, whole wheat bread, juice, yogurt, breakfast cereal, soft corn or whole wheat tortillas, legumes, infant formula and other baby foods, fruits and vegetables, cheese, brown rice, whole wheat pasta, and fish

The current list of the Program's approved, eligible foods is available at request and is posted on our website.

WIC FOOD BENEFITS

Participants purchase WIC foods with their WIC food benefits at an authorized vendor. These benefits determine the types and quantities of WIC-eligible foods that a participant may purchase. Staff members at local clinics issue benefits to a participant's account for specific months, up to three (3) months at a time. WIC food benefits are only accessible within the current benefit cycle and benefits

from one cycle do not roll over to the next or any future months. If a participant does not utilize all of their benefits for a given cycle, they lose those benefits at the start of the next cycle. The foods benefits of members of the same family are aggregated into a single account. Participants access and use these benefits via the Alaska eWIC Card.

WIC foods are placed into specific categories and some categories are further organized into subcategories. Most categories of foods allow the participant to make choices within those categories. For example, the whole grain category has four different subcategories: whole wheat bread, whole wheat pasta, whole grain tortillas, and brown rice. When a clinic issues a whole grain benefit to a participant, the participant may purchase any of the eligible foods that fall into one of those four subcategories.

However, there are some categories where the participant must buy a specific type of food within that category. For example, when a clinic staff member issues a participant benefits for milk, they issue benefits for a specific type of milk, usually based on fat content. A participant with benefits for whole milk cannot use these benefits to purchase 1% or skim milk and vice versa. The participant may choose to purchase any eligible brand of milk, but they must buy the specific type of milk for which they have benefits. The same is true for yogurt and infant formula. In the case of infant formula, a clinic will give a participant benefit for a specific brand and type of formula. Participants may purchase only the exact formula for which that have benefits with their eWIC card.

These food benefits are given as an amount for a specific item and not a cash amount. In the examples above, a participant may be given a whole grain benefit of 1 lb. and a 1% or skim milk benefit of 4 gallons; the participant would not be given the cash value equivalent of those foods. The only exception is produce. Produce benefits are given as a flat dollar amount. When a participant uses their produce benefits (called cash value benefit or CVB), the total dollar amount of the produce item(s) is deducted from their account. Participants may purchase more produce than they have benefits. Produce purchased over their CVB will be left over for the participant to purchase with another form of payment. For example, if a participant has \$2.75 remaining in their benefits and they purchase a \$3.99 container of strawberries, their WIC food benefits will pay for \$2.75 of the \$3.99 and \$1.24 will be left over for the participant to pay for with another form of payment. This is called split tender.

WIC APPROVED PRODUCT LIST

All the nutritious, supplemental foods that the Program authorizes for participants to purchase are in our approved product list (APL). The APL is an electronic file that contains the full UPC—including the leading digit and check digit—of every food approved by the Program. A copy of this list is downloaded to your store's register(s) or stand beside device. When a participant makes a purchase with their eWIC card, the copy of the APL at the register identifies the WIC-eligible foods in the participant's order and allows the participant to purchase those foods using their WIC food benefits.

When the Program adds or removes foods from the APL, a new copy of the APL will be made available for download. A vendor's register(s) or stand beside device should check for an updated APL every night and if a new version is found, that updated version should be downloaded automatically. If this does not occur, the vendor will need to contact their POS provider or IT department (or FIS if using a stand beside device) to ask them to manually download and update the WIC APL. Please note that if the APL version at a register or stand beside device is not up-to-date, errors may occur when trying to process WIC

transactions.

A full copy of the APL is also available on our Program’s website. This copy is updated whenever changes are made.

The APL has the final say as to what foods are approved for purchase by WIC participants. No one can override the APL. If a food is not approved for purchase, then it is either not a WIC-eligible food in our Program’s APL or the participant does not have benefits for that food. If a vendor or a participant believes that a particular food should be approved, but is not, they should contact the Program. When submitting a question regarding a food, please provide as much information as possible including the full name of the food, its size, the full UPC—including the leading digit and the check digit—and pictures (if possible). Food addition requests may be submitted via the WICShopper app. (see WICShopper sections for details) or may be submitted to wic@alaska.gov.

MINIMUM INVENTORY

Vendors must always maintain a minimum inventory of WIC-eligible foods based on the peer group which their store is assigned. Current MSRs can be found on our website located at: <https://health.alaska.gov/dpa/Pages/nutri/wic/vendors/vendor-requirements.aspx>.

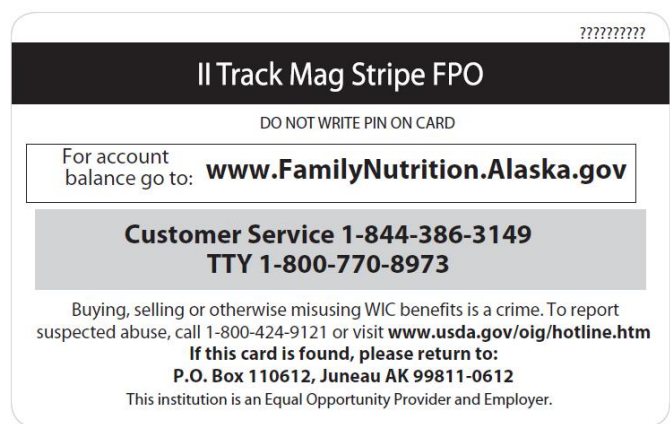
eWIC TRANSACTIONS

The Program issues eWIC cards to our participants. A participant uses this card each time they would like to purchase something with their issued WIC food benefits. Below is an image of the card:

Front Face



Back Face



Vendors will process WIC transactions via either their integrated ECR system or their separate stand beside device. The general flow of a WIC transaction will be described for both processing types.

INTEGRATED ECR TRANSACTIONS

Note: there are many different types of ECRs. The information below regarding how to process WIC transactions for these registers will be general. Individual register systems function differently across

stores. As such, some of the information below may not correspond with the specific ECR that a vendor operates at their store. It is the responsibility of the vendor to train their staff on the proper use of their ECR and to work with their POS provider or IT department should any issues with their system arise. However, the State of Alaska WIC Vendor Management Unit is available to assist with WIC transactions and a vendor may request training sessions for processing WIC transactions.

- The participant will shop at your store and bring their items to the register for purchase.
- The cashier will scan all items.
- The cashier will total the order and the participant may start the payment process if they haven't already done so.
- The participant will swipe their eWIC card at the nearby PIN pad.
 - **The eWIC card must be used first, before any other payment type.**
 - **Under no circumstance should a customer be asked to share their PIN with a store employee.**
- The PIN pad will ask the participant to accept or reject the charges to their WIC food benefits and it will display the total dollar value of the foods that WIC will pay for.
 - At this time, provide the shopper the mid-transaction receipt that will show the participant's available WIC food benefits and which foods WIC will pay for if the participant were to accept the charges.
 - If the participant agrees with the slip, then they will press "Yes" to accept the charges and continue the transaction.
 - If the participant disagrees, then they may press "No" to reopen the transaction and adjust the order as needed.
 - After the participant presses "Yes", the WIC foods that the participant has benefits for will be purchased: their benefits will be deducted from their account and a payment request will generate for the store
- If there are non-WIC items in the order or if the participant is purchasing more produce than they have benefits, then the transaction will remain open and the participant can use another form of payment to pay for those items.
 - **If there are only WIC foods in the order that the participant has benefits for, then after the participant presses "Yes", the transaction will close and be considered final.**
- After all items have been paid for, the transaction will finish and the cashier will hand the receipt to the WIC participant
- No purchase void can occur at an Integrated ECR after a sale is final.

NOTES FOR INTEGRATED ECRs

- Participants may purchase both WIC and non-WIC items in the same transaction.
- The eWIC card must be used as the first form of payment. If a participant uses any other payment type first (e.g, SNAP, debit, credit, or cash), then the WIC-eligible items will be paid for with those other payment types.
- Coupons and other discounts may be applied, however some discounts (usually a discount applied to the total order) have been known to cause issues with WIC transactions. Vendors should speak with their POS provider or IT support if they are having difficulty applying discounts during WIC transactions.
- The participant must approve the utilization of their WIC food benefits by pressing "Yes" on the PIN pad when prompted.

- If the cashier needs to void a WIC transaction and reverse the payment, the void **must** be done prior to the completion of the transaction. After the transaction is closed and the final receipt prints, most ECRs are not capable of voiding and reversing a transaction.
- If a vendor needs some general assistance with WIC transactions, they can contact the State of Alaska WIC Vendor Management Unit for assistance with troubleshooting. However, if a vendor's register system or PIN pad is causing an issue with processing WIC transactions, they will need to contact their POS provider or IT support team to resolve the issue.
- Vendors operating an integrated ECR must map their produce items for them to be purchasable by WIC participants. Please refer to the following Produce Mapping Section for details.

PRODUCE MAPPING

Note: this information regarding producing mapping applies only to vendors who process WIC transactions via an integrated ECR. Vendors using stand beside devices do not need to map produce.

The Program has the UPCs for all WIC-eligible foods in the APL **except** for fresh produce items; UPCs for fresh produce items are not in our APL. However, our APL does contain almost every PLU that is standardized by the International Federation for Produce Standards. Fresh produce items that have UPCs instead of PLUs, need to be mapped or linked to a PLU that is in our APL for those items to be purchasable with WIC food benefits. The specific mapping process will depend on a vendor's POS system. Please contact your POS provider or IT department for information on how to map produce and contact the Program if you need help identifying which produce items need to be mapped.

- When mapping items, please use a PLU that most closely matches the produce item.
- If a package contains multiple types of produce, a vendor may map that product to the PLU of the most abundant produce item within the package.
- We ask that you do **not** use the generic PLU 4469.
- Produce items with PLUs on them do not need to be mapped. You can scan or enter the PLU.
- Vendors will need to map produce items that are produced and packaged at their store. For example, if a store cuts and packages pineapple, they will generate a UPC for that item. That UPC must be mapped to a PLU to be sold to WIC participants.
- If a vendor uses their own store codes for a produce item, that item will need to be added to an order using that item's PLU or the code will need to be mapped to a PLU.
- Please refer to the WIC Food List Booklet for information about which produce items are WIC-eligible.
- Canned and frozen produce items do not need to be mapped.

STAND BESIDE DEVICE TRANSACTIONS

Note: vendors who have cash registers that are not capable of processing WIC transactions may use a stand beside device. FIS, a contractor with the Program, provides these devices. Vendors in need of a stand beside device must complete a separate application with FIS to acquire a device. When a vendor completes an application with the Program, we will work with our contractors and the vendor's POS provider to determine if their current ECR is capable of processing WIC transactions.

- The participant will shop at your store and bring their WIC-eligible foods to the register for purchase.
****Non-WIC items will need to be in a separate transaction.****

- The cashier will press F2 to for “WIC Purchase”. The participant or the cashier will swipe the eWIC card at the device then the participant will enter their PIN on the separate PIN pad.
 - ****A customer should never be asked to share their PIN with a store employee.****
- The cashier will use the handheld scanner to scan each food (save produce until the end). If a food is WIC-eligible and the participant has benefits for it, then the device will ask for a price.
- The cashier will manually key in a price for each food as they scan each food.
- After all non-produce foods have been entered, the cashier will press F1 for “Total”.
- The next screen will ask “Enter CVB?”
 - If the participant has produce (fresh, canned, or frozen), the cashier will press F1 for “Yes” (press F2 for “No” if there are no produce items) and they can now add produce items to the order.
 - ****You will never scan produce when using a stand beside device. The cashier will simply enter in the total purchase price for each produce item.****
- Press F1 for “Total” after all produce items are entered.
- Next, the device will ask to enter in any coupons or discounts.
 - Press F1 if there are discounts to enter or F2 if there are no discounts. Enter in discounts as a price like produce items. You will never scan a coupon.
 - Press F1 for “Total” to continue if you entered in discounts
- The device will ask to continue. The cashier can press “Yes” to finalize the transaction or “No” to keep it open and adjust as needed. After “Yes” is pressed, the transaction will be finalized: the participant’s WIC food benefits will be utilized, a payment request will generate for the vendor, and a receipt will print
- The cashier will hand the receipt to the participant.

NOTES FOR STAND BESIDE DEVICES

- Stand beside devices can process only WIC-eligible foods that the participant has benefits for
 - If a food is not a WIC-eligible, then an error message will display that says “Not WIC Approved Invalid WIC Item Press any Key...”
 - If the food is WIC-eligible, but the participant does not have benefits for it, then an error message will display that says “QTY Not Avail to Cardholder Press any key...”
- Cashiers may swipe the participant’s eWIC card at the device, but only the participant may enter their PIN on the separate PIN pad.
 - ****Under no circumstance should a customer be asked to share their PIN with a store employee.****
- The device has a copy of the Program’s APL. This copy should update automatically if any changes are made to the APL. For this update to occur, it is recommended that the device be left powered on and always connected to the Internet.
- While the device knows which foods are WIC-eligible, it does not know the prices that your store charges for those foods. The cashier will need to enter the price for each food as they are scanned.
- If the participant needs the cashier to void and reverse the transaction after it has been finalized and closed, then the cashier must void the transaction immediately after it completes. **If any other action is taken, then the ability to void the transaction will be lost.** Please refer to the device manual or contact the Program for instructions on how to void a transaction.

- Please contact the Program if you need assistance with WIC transactions. If you need assistance with your device, please contact FIS via the 800 number that is located on the front of the device.

TRANSACTION NOTES FOR ALL REGISTER SYSTEMS

The following is a list of considerations that apply to all WIC transactions.

- A participant may ask for a balance inquiry at any authorized vendor at no charge to the participant.
- **The eWIC card must be physically present at the time of purchase.**
- The participant or a cashier may manually input the card number if the card is not readable by a PIN pad (or stand beside device), but again, the card must physically be present. The State of Alaska WIC Program office may consider your store as high risk for fraud if card numbers are manually keyed in often.
- The eWIC card is the most restrictive form of payment and therefore needs to be the first form of payment used. If any other form of payment is used first, then the WIC-eligible foods will be paid for with that form of payment.
- The eWIC card is PIN protected.
- The participant will have four (4) attempts to enter their PIN correctly. If they fail on the fourth attempt, the card will lock and they will need to reset their PIN or wait until the next day for it to unlock.
- Store staff must NEVER ask for the participant's PIN nor should the participant share their PIN with anyone at the store.
- Cashiers cannot override items. If a food is not coming up as WIC-approved, then the food is not a WIC-eligible food or the participant does not have benefits for that food. Please contact the Program if you or a participant feels this is an error and the food should be approved.
- Participants can purchase as few or as many WIC foods as they want (and can) in any transaction, and they may make as many WIC purchases as they want during a month until they utilize all of their benefits.

ADDITIONAL INFORMATION

The information found in the remaining sections of this handbook apply to all authorized grocery vendors. Please review this information carefully and contact the Program if you have any questions.

SETTLEMENT

The eWIC system allows vendors to receive payment soon after a WIC transaction is completed and processed. The settlement cutoff time for WIC purchases is 3:00 pm Alaska Time. Purchases made before that time will settle the next day and purchases made after 3:00 pm will settle the day after the next day. For example, a WIC purchase made at 11am on Monday, will result in a payment to the vendor's bank account the next day (Tuesday). A purchase made at 7pm on Monday, will result in a payment to the vendor's bank account the day after the next day (Wednesday).

Settlement rules follow typical banking practices: purchases made between 3:00 pm on Friday and 3:00 pm on Sunday will settle on Monday and purchases made on holidays will settle the next banking day.

SELECTION AND LIMITING CRITERIA

The Program uses its Selection and Limiting Criteria to determine if applicant and authorized vendors meet the minimum requirements to be authorized with the Program. A vendor must meet these criteria prior to authorization with the Program and they must always meet these criteria during their contract period. Vendors who fail to maintain compliance with these criteria may be subject to sanction and could have their Vendor Agreement terminated. The Program may update or change the Selection and/or Limiting Criteria as needed. Authorized vendors must comply with any updates as well. The Program will communicate via email any changes before implementing those changes. The full Selection and Limiting Criteria is included in this manual.

INFANT FORMULA

The Alaska WIC Program authorizes two categories of infant formula for purchase: standard milk and soy formulas and specialty or medical formulas and nutritional. The Program procures a rebate contract for standard milk and soy-based formulas with one formula manufacturer for a designated period. This is done to provide those infant formulas at a reduced cost to the Program so that the Program can serve more participants. Authorized vendors are required to always carry a minimum stock of certain formulas. The Program currently has a contract with Abbott Laboratories for Similac products. A list of those products has been included with this handbook.

Authorized grocery vendors are not required or expected to always carry specialty formulas. A full list of the specialty/medical formulas is included with this handbook. You may contact the State WIC office for the current specialty formula prices for which the Program will reimburse you.

The Program is required to produce and maintain a list of suppliers from where authorized vendors may procure their infant formulas. Authorized vendors may purchase and subsequently sell infant formulas from **only** the sources included on the Infant Formula Supplier List on our website. Acquiring infant formula from other sources may result in termination of your WIC Vendor Agreement.

PEER GROUPS

The Program places its authorized vendors into peer groups to monitor cost competitiveness. To serve as many WIC-eligible individuals as possible, the Program must be mindful of the prices our vendors are charging for their WIC-eligible foods. Placing vendors into peer groups, allows the Program to monitor these prices effectively.

The Program has created six (6) peer groups. These peer groups are designed to compare vendors fairly by placing vendors with similar characteristics into the same group. The characteristics the Program considers are the total number of front-end registers, store size and type, freight delivery method, and location. We compare the prices from each vendor within a peer group to the average prices for that group. A percentile is added above these averages to create the maximum allowable reimbursements (MARs) for each WIC-eligible food in each peer group.

MAXIMUM ALLOWABLE REIMBURSEMENT LEVELS (also known as MARs)

Each unique UPC in the WIC APL has a maximum allowable reimbursement level (MAR) and the MARs for each food are different across each peer group. These MARs are the maximum amount that the Program will pay a vendor for a particular food purchased by a WIC participant. MARs are the primary way that the Program enforces cost containment. When a new food is added to the APL, a MAR is applied. After this initial calculation, all MARs are updated automatically based on actual WIC redemptions at our authorized vendors; the MARs will increase or decrease as the actual prices at our authorized vendors increase or decrease.

TRAINING

The Program must provide authorized vendors with training every year. The Program will provide such annual training in various formats including electronic documents sent via email, teleconferences, webinars, and faxes. Training details the following important information about the Program:

- the purpose of the Program
- the supplemental foods authorized by the Program.
- the minimum inventory for those foods
- a list of the approved formula manufactures/distributors from which vendors can purchase infant formula.
- general information on processing WIC transactions
- the Program's penalty and sanctions
- how to file a complaint with the Program
- the Program's claims procedures
- the Program's policy on incentive items
- any changes since the last required training

The Program must also provide interactive training at the time of authorization of a new vendor and at least once every three (3) years. This training has much of the same content as the annual training, but it allows the vendors an opportunity to ask questions or make comments and receive immediate feedback. The Program provides this training during reauthorization years in place of the annual training.

Note: Authorized vendors are required to attend the interactive training sessions at least once every three (3) years and vendors must review the yearly annual training. Vendors are also required to train their staff on WIC procedures. When a vendor trains staff, they must document that training and the Program must be allowed to view this documentation if requested. Documentation forms are available on our website. Vendors may request training at any time from the State of Alaska WIC Vendor Management Unit. See below.

Other training options are available to vendors as needed:

- Vendors are encouraged to request training sessions for their staff at any time during their agreement period. The State of Alaska WIC Vendor Management Unit may be available via phone to assist cashiers to run live transactions for training purposes only.
- Vendors may be required to accept additional training if required by the penalty and

sanction schedule listed in their WIC Vendor Agreement.

- Self-training materials may be made available on our Program's website.

REAUTHORIZATION

Per federal regulations, vendors may not be authorized with any State WIC Program for longer than three (3) years. Every three (3) years, the Program sends out new applications for its authorized vendors to complete. Vendors who want to remain authorized with the Program must complete a new application. The Program also requires that vendors attend an interactive training session during reauthorization years. Authorization cycles begin on October 1st and end the following September 30th.

COMPLAINT PROCESS AND FRAUD OR ABUSE REPORTING

Vendors may file a complaint against a participant or the Program. The vendor should contact the State of Alaska WIC Program office which will take information regarding the complaint. Complaints will be reviewed, and the appropriate action will be taken.

If a vendor suspects fraud or abuse of the Program (whether actual or attempted), the vendor may use the same process to inform the Program. Under no circumstance should a vendor contact or confront a participant regarding the suspicion of fraud or abuse.

STORE INFORMATION AND COMMUNICATION

Vendors are encouraged to communicate regularly with their respective Local WIC Agency Coordinator or State of Alaska WIC Vendor Management Unit if they have any questions or concerns. The Program wants to assist our vendors in providing the best possible shopping experience for our participants. We also want to get ahead of any potential issues.

The Program asks that vendors please provide any updated information about your store to the Program promptly. This includes a change in contact information such as a new phone number, email address, or in-store contact. The Program asks that each vendor designate a specific person as the point of contact for the Program. Please email any of the above changes to the State of Alaska WIC Vendor Management Unit.

If the store changes its name or its address, then a more formal notice is required. Please notify the State of Alaska WIC Vendor Management Unit of a name or address change in at least 30 days advance. The State of Alaska WIC Vendor Manager will review the change and determine if the new vendor application process is needed. If not, an addendum to the vendor's signed agreement with the new information will be created and sent it to the vendor for their signature. Vendors who change store location will need to have an on-site monitoring visit conducted by a representative of the Program prior to accepting WIC benefits.

If the vendor goes through an ownership change, then the agreement must be terminated and the new owner will need to apply for authorization. The Program will send out a termination letter for the current owner which will confirm the date of the agreement's termination. In addition, an owner may voluntarily withdrawal from their partnership with the Program and terminate their agreement at any

The Program does require 30-days' notice of voluntarily termination to allow time for all affected WIC households to be notified.

CONFIDENTIALITY OF VENDOR INFORMATION

Confidential vendor information is information about a vendor that individually identifies the vendor, except for the vendor's name, address, telephone number, website, email address, store type, and authorization status. The WIC Program limits the disclosure of confidential information to the following:

- Persons directly connected with the administration or enforcement of the WIC Program or the Supplemental Nutrition Assistance Program (SNAP)
- Persons directly connected with the administration or enforcement of any Federal or State law
- A vendor that is subject to an adverse action and the confidential information concerns the vendor subject to the adverse action and is related to the adverse action

ADDITIONAL PROGRAM RULES AND REQUIREMENTS

- A cashier or attendant must be present or available for all WIC transactions. This includes transactions at self-checkout registers.
- Self-Checkout (SCO) registers may or may not be able to process WIC transactions. SCO registers must be certified separately from a vendor's primary front-end registers.
- Vendors must not charge a tax of any kind on any WIC-eligible food.
- Vendors may not provide rain checks for items not currently in stock. If a participant would like to purchase an item that is not in stock, then the vendor can tell them when the food will be available so that they may return and purchase it at that time.
- No substitutions. Vendors should provide WIC-eligible foods to participants only if those foods are approved at the register. If a food is not approved at the register, that food is either not a WIC-eligible food or the participant does not have benefits for it.
- If you believe an error occurred in the cash register system and that the participant should be able to purchase a food with WIC food benefits, do not provide that food to the participant. Instead, please contact your head cashier, store manager, or the State Vendor Management Unit to research the issue. *If a food is WIC-eligible and provided for a participant without the participant exchanging their WIC food benefits, then a vendor may not be at risk of being disqualified, but there is no guarantee that the Program will be able to reimburse the vendor for those items.*
- Do not scan another WIC-eligible item or UPC to trick the system into approving the non- WIC food. If a vendor provides non-WIC foods to a participant in exchange for their WIC food benefits, then that vendor may be at risk of being disqualified for substituting items.
- Do not provide refunds for purchased WIC foods.
- Exchanges for WIC purchased foods are permitted only if the purchased food(s) is defective in some way such as it is damaged, spoiled, past its expiration date, or recalled. When exchanging, provide the participant with the exact food item (UPC, type, brand, size, ect...) as the one they are requesting an exchange for and do not do anything with the participant's eWIC card. The benefits were already used to purchase the defective food. You are providing the participant with the same non-defective product.
- Vendors must not offer incentive items exclusively to WIC shoppers.

- Vendors may not store a participant’s card, card number, or PIN. Vendors may not perform WIC transactions with participants remotely. Participants must use their eWIC card at the vendor’s location and at a certified register or stand beside device. (*Transactions over the phone are authorized when done so with the supervision of State of Alaska WIC representatives. This may be requested to assist with troubleshooting WIC transaction issues.*)
- If a vendor should find a lost eWIC card, please return it to the State of Alaska WIC Program Office. The address is PO Box 110612, Juneau, AK 99811.
- Vendors should never contact participants to seek reimbursement for a WIC transaction. If you have concerns regarding a transaction, please contact your State Vendor Manager.
- Vendors should not confiscate a WIC shopper’s eWIC card or confront a participant on the suspicion of fraud. If you believe a participant is committing or attempting to commit fraud, please provide the State Vendor Management Unit as much information as possible including the name of the shopper, as many numbers from the eWIC card used, images of the shopper, and items attempted to be purchased.
- If a vendor believes they were not properly reimbursed for a WIC transaction, they may submit a claim to the State Vendor Management Unit. The vendor should provide documentation such as transaction records (receipts, ECR journal entries, or other). Reimbursements are not guaranteed and will be done at the discretion of the Program.

SIGNAGE

The Program may provide authorized vendors with WIC Shelf Labels and Door Decals. If used, the labels must be posted on the shelf next to the appropriate price sticker to assist participants in identifying WIC- eligible foods. The door decal(s) must be posted at every primary store entrance to identify the store as capable of transacting WIC food benefits. The Program may provide signage for store use to identify WIC capable cash register lanes.

WICShopper APP

The Program offers participants use of a free phone app called “WICShopper”. This application allows participants to view their most current food benefit balance, a list of authorized vendors near their location, the full Approved Product List, and much more. The application is also capable of scanning barcodes on items. When a participant goes shopping, they can scan the barcode on a food package and the application will tell them if they food is WIC-eligible, and it can tell them if they have benefits for that particular food if they have their eWIC card number registered with the app. We encourage our participants to use this application. Our vendors’ staff members, at the vendor’s discretion, may use the application as well. It is free and it can assist with helping WIC participants have a better shopping experience.

MONITORING ACTIVITIES

Authorized vendors agree to have their activities monitored for compliance with the Program’s rules and regulations as listed in the Vendor Agreement and this Vendor Handbook. There are different types of monitoring visits that can be conducted by a representative of the Program. The Program may also

conduct an audit of a vendor's inventory records. The different types of monitoring activities are described below.

EDUCATIONAL BUYS

The Program wants to assist our vendors in providing the best possible shopping experience for WIC participants. The primary purpose of an educational buy is to assess your cashiers' ability to process WIC transactions and the produce mapping (if applicable) at your store. These visits are a proactive approach to assist our vendors with any training or mapping deficiencies and help to identify any compliance issues before they become violations. They also give vendors an opportunity to discuss any issues or concerns directly with a Program representative. Educational Buys are conducted by Program and/or Local WIC Agency staff.

ROUTINE MONITORING

A routine monitoring visit is a full on-site visit of an authorized vendor. It will be conducted by Program and/or Local WIC Agency staff. During the visit, the representative will assess the vendor to ensure that they are meeting all terms of the Agreement, Handbook, and Selection and Limiting Criteria. The representative will check minimum inventory levels, store cleanliness, training documentation, and much more. These visits will be scheduled with a member of the store's ownership or management and the results will be discussed with a representative of the store. If a violation(s) is detected during the visit, the LAVM will give the store a set amount of time to correct the violation(s). If the violation(s) is not corrected within that timeframe, then the vendor may be subject to sanctions. (This applies to violations that require a pattern before administrative action may be taken. (See the sanction section for more details.)

UNANNOUNCED VISITS

The Program may also conduct visits unannounced and in a covert manner. These visits will assess the vendor for many of the same items as a routine monitoring visit, but the vendor will not be aware at the time of the visit. Any compliance issues discovered during these visits will be discussed with the vendor. Results may be communicated via a warning letter or a sanction because of the visit.

INVENTORY AUDITS

The Program may conduct vendor inventory audits to ensure compliance with Program requirements. The Program may request up to 12 months of inventory records in the form of purchase invoices. The vendor will be given at least two (2) weeks to provide the proper records from the date of request. Records must meet requirements as specified in the WIC Vendor Agreement. Failure to produce the records may result in sanctions up to disqualification.

COST COMPETITIVE ANALYSIS

The Program is required by federal regulation to conduct a cost competitiveness analysis on all its

authorized vendors. This must be done at a minimum of twice per federal fiscal year which begins October 1st and ends the following September 30th. The Program uses redemption data to conduct this analysis. If a vendor is no longer cost competitive with other vendors in its peer group, the vendor's agreement may be terminated. The Program does not release cost competitive analysis data to vendors.

SANCTION SCHEDULE

Sanctions are the primary tools used by the Program to enforce administrative action upon a vendor for a violation of the terms of the Vendor Agreement, the Vendor Handbook, or the Selection and Limiting Criteria. There are two types of sanctions: federal and state. Federal sanctions occur as the result of a violation(s) of a WIC Program regulation that applies to all state WIC Programs. State sanctions occur as the result of a violation(s) of a Program rule or regulation specific to the Alaska WIC Program.

SANCTION VOCABULARY

Investigation—A method used by the State WIC office to determine if violations are occurring. Investigations may be overt or covert.

Pattern—Two or more documented incidences of the same violation

Sanction—An administrative action taken because of a violation.

- Mandatory Federal Sanctions are mandated in the federal regulations for the WIC Program and have disqualification periods associated with each violation.
- State Agency Sanctions use a point system. Each violation has a corresponding point value and remain on the vendors record throughout the agreement cycle. Points can accumulate and if a vendor reaches a certain threshold of points, the vendor may be disqualified from the Program.

Vendor Violation—Any action, intentional or unintentional, by a vendor's current owner(s), manager(s), agent(s), officer(s), or employee(s), with or without the knowledge of management, that violates the Vendor Agreement or Federal or State statutes, regulations, policies, or procedures governing the WIC Program.

MANDATORY FEDERAL VIOLATIONS

The following are mandatory federal violations that result in a disqualification from the WIC program.

Permanent Disqualification

- A vendor is convicted of trafficking eWIC benefits or selling firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802 in exchange for eWIC benefits.

Six-Year Disqualification

- One incident of buying or selling eWIC benefits for cash (trafficking); or one instance of selling firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802 in exchange for eWIC

benefits.

Three-Year Disqualification

- A pattern of claiming reimbursement for the sale of an amount of a specific WIC food item which exceeds the store's documented inventory of that WIC food item for a specific period of time.
- One incident of the sale of alcohol or alcoholic beverages or tobacco products in exchange for WIC checks, cash value vouchers, or eWIC benefits.
- A pattern of vendor overcharges.
- A pattern of receiving, transacting, and/or redeeming WIC checks, cash value vouchers, or eWIC benefits outside of authorized channels, including the use of an unauthorized vendor and/or an unauthorized person; or
- A pattern of charging for WIC food items not received by the participants.
- A pattern of providing credit or non-food items, other than alcohol, alcoholic beverages, tobacco products, cash, firearms, ammunition, explosives, or controlled substances as defined in [21 U.S.C. 802](#), in exchange for food instruments or cash-value vouchers.

One-Year Disqualification

- A pattern of providing unauthorized food items in exchange for food instruments including charging for supplemental foods provided more than those listed on the food instrument.

Second Mandatory Federal Sanctions

When a retailer who previously has been assessed a sanction for any of the mandatory federal violations receives another sanction for any of these violations, the Program will double the second sanction. Civil Money Penalties (CMPs) will be double up to the maximum limits.

Third or Subsequent Mandatory Federal Sanctions

When a vendor, who previously has been assessed two or more sanctions for any of the violations listed above, receives another sanction for any of these violations, the State agency must double the third sanction and all subsequent sanctions. The State agency may not impose civil money penalties in lieu of disqualification for third or subsequent sanctions for violations listed above.

Disqualification Based on SNAP Disqualification

A vendor which has been disqualified from SNAP must also be disqualified from WIC. The disqualification must be for the same length of time as SNAP disqualification, may begin at a later date than SNAP disqualification, and is not subject to administrative or judicial review under the WIC Program.

Voluntary Withdrawal of Nonrenewal of WIC Vendor Agreement

For any of the mandatory federal violations, the Program will not accept voluntary withdrawal from the Program as an alternative to disqualification. The Program will enter the disqualification on the vendor's record. In addition, the Program will not use nonrenewal of the WIC Vendor Agreement as an alternative to disqualification.

STATE AGENCY VIOLATIONS

Upon signing a WIC Vendor Agreement, all vendors agree to be accountable and responsible for program

violations committed by owners, officers, managers, agents, and employees. In addition to claims collection, the Vendor may be sanctioned for violations in accordance with Appendix A of their WIC Vendor Agreement. Sanctions may include disqualification or a civil money penalty in lieu of disqualification to ensure participant access to healthy foods.

A Vendor who has embezzled, willfully misapplied, stolen, or fraudulently obtained Program funds, assets, or property is liable for prosecution under applicable federal, state, and/or local laws. The Program will determine any actions to be taken when vendor abuse, fraud, or administrative violations are discovered. If the Program determines that the vendor has violated applicable rules or regulations, the vendor will be disqualified for a period of no more than the maximum allowed under the Code of Federal Regulations, Chapter 7, Part 246.12(h).

Please see Appendix A of the WIC Vendor Agreement for a list of violations and their sanctions. A total of points exceeding 25 will result in a 1-year disqualification.

NOTIFICATION OF VENDOR VIOLATIONS

The State Vendor Management Coordinator will notify a vendor, in writing, of the initial violation when a violation requires a pattern of occurrences to impose a sanction. This will be done prior to the documentation of another violation unless the Program determines that notifying the retailer would compromise an investigation; such determinations will be made on a case-by-case basis. This applies to all state agency sanctions and mandatory federal violations.

When notification of a violation **is not** required:

- Notification is not required for WIC vendor disqualifications or civil money penalties based on SNAP sanctions.
- Notification is not required for violations involving inventory audits. A pattern can be established during a single review of the retailer's redemption records.
- Notification is not required for violations that require only one incidence before a sanction is imposed.
- If the Program determines that notification would compromise an investigation.

NOTICE OF ADVERSE ACTION

If adverse action is taken against a vendor, the Program will send the vendor a notice in writing. The notice will explain the following:

- The reason(s) for the adverse action.
- The effective date of the action.
- The steps to request an administrative review.

CIVIL MONEY PENALTIES (also known as CMP)

A civil money penalty (CMP) may be imposed in lieu of disqualification from the Alaska WIC Program if the disqualification would result in inadequate participant access to WIC foods. A CMP may be imposed for the following:

- cases of permanent disqualification because of conviction of trafficking in WIC food instruments or selling firearms, ammunition, explosives, or controlled substances in exchange for WIC food instruments, or
- cases of disqualification because of other violations as outlined in the WIC Vendor Agreement or its attachments.

A civil money penalty may not be imposed in lieu of disqualification for third or subsequent violations.

If the Program permits a vendor to continue to participate in lieu of disqualification, the Program shall assess the vendor a CMP in an amount determined by the Program and in accordance with federal regulation 3.91. This regulation dictates maximum CMP amounts which may be imposed and is subject to change based on inflation.

CALCULATING A CIVIL MONEY PENALTY

According to federal regulation, 7 CFR 246.12(l)(x), a CMP must be calculated as follows:

- Determine the vendor's average monthly redemptions for at least the 6- month period ending with the month immediately preceding the month during which the notice of adverse action is dated;
- Multiply the average monthly redemptions figure by 10 percent (.10);
- Multiply the product by the number of months for which the store would have been disqualified.

For a violation that warrants permanent disqualification, the amount of the CMP penalty shall be a set dollar amount as based on the current amounts as cited in 7 CFR 3.91.

The Program will notify the United States Department of Agriculture with a copy of the written notification and information on vendors it has disqualified from WIC or imposed a CMP in lieu of disqualification for violations covered under 7 CFR 246.12 (l) of the WIC Program regulations. SNAP authorization may be withdrawn from any vendor which is disqualified from the WIC Program or is assessed a CMP in lieu of disqualification from the WIC Program based in whole or in part on the following categories of violations outlined in 7 CFR 246.12:

(l) of the WIC Program regulations:

- One conviction by a criminal court of trafficking of WIC benefits or selling firearms, ammunition, explosives, or controlled substances in exchange for WIC benefits.
- One WIC administrative finding of buying or selling WIC benefits for cash (trafficking) or selling firearms, ammunition, explosives, or controlled substances in exchange for WIC benefits.
- One incidence of the sale of alcohol or alcoholic beverages or tobacco products in exchange for WIC benefits.
- A pattern of claiming reimbursement for the sale of an amount of a specific supplemental food item that exceeds the store's documented inventory of that supplemental food item

- for a specific period of time.
- A pattern of charging WIC participants more for supplemental food than non-WIC participants or charging WIC participants more than the current shelf or contract price.
 - A pattern of receiving, transacting, and/or redeeming WIC benefits outside of authorized channels, including the use of an unauthorized vendor and/or unauthorized person.
 - A pattern of charging for supplemental food not received by the WIC participant.
 - A pattern of providing credit for non-food items other than alcohol, alcoholic beverages, tobacco products, cash, firearms, ammunition, explosives, or controlled substances in exchange for WIC benefits.
 - A pattern of providing unauthorized food items in exchange for WIC benefits, including charging for supplemental food(s) provided in excess of those listed on a participant's benefit balance.

ADMINISTRATIVE APPEAL PROCEDURE

Authorized WIC vendors have the responsibility to comply with WIC program regulations, policies, and procedures. As indicated in the Vendor Agreement, the State Agency may impose sanctions on vendors for non-compliance. These sanctions range from a warning letter to permanent disqualification from participation in the WIC program. Refer to Section 3.0 of the Vendor Agreement and Chapter 6 of the Vendor Manual for a full description of the sanctions.

Vendor's Right to Administrative Review.

The Local Agency and/or State Agency must provide written notice of any adverse action taken against a vendor. The notice must specify the action being taken, the effective date of the action, the reasons for the actions, and explain the vendor's right to an administrative review and the procedures to follow to obtain an administrative review. Notice must be given prior to an adverse action being taken; except for disqualification due to conviction of trafficking WIC food instruments.

Effective Date of Adverse Actions against Vendor.

The State Agency must make adverse actions effective no earlier than 15 days after the date of the notice of adverse action and no later than 45 days after the date of notice of adverse action or, in the case of an adverse action that is subject to administrative review, no later than the date the vendor receives the review decision.

Decisions rendered under the administrative review procedures are the final state agency action. If a decision is rendered as a result of a hearing and the vendor expressed an interest in pursuing a higher review of the decision, the State Agency shall explain the right to pursue the judicial review of the decision. Alaska statutes allow individuals to file suit against the State of Alaska in State Court.

Requesting an Administrative Review

A vendor wishing to appeal an adverse action must submit a written request for a review of the action. The request must be made within fifteen (15) days of receipt of the notice of adverse action. The request for review must state the reason(s) for the request and include any supporting information or documentation. The requestor should also specify the level of review sought, as described in Section C, Parts 1 and 2, below. Requests for

administrative review should be addressed to: State of Alaska, DOH – DPA – WIC, P.O. Box 110640, Juneau, AK. 99811-0640.

Appealing an action does not relieve the food vendor of responsibility for continued compliance with the terms of any written agreement or contract with the State Agency or Local Agency. Participating vendors who are disqualified from the program must reapply for authorization to participate. Vendor applicants who are denied participation at application may appeal the denial but shall not participate in the program while awaiting decision.

The State Agency shall not deny or dismiss a request for an administrative review unless:

- The request is not received in writing by the State within the time limit of 15 days from receipt of the notice of adverse action.
- The request is withdrawn in writing by the appellant or representative.
- The appellant or a representative fail, without good cause, to appear at any scheduled hearing.
- The request for review is regarding an adverse action that is not subject to administrative review.

When a vendor is disqualified due in whole or in part to violation in 7 CFR 246.12(l) (1), such notification must include the following statement: “This disqualification from WIC may result in disqualification as a retailer in the Supplemental Nutrition Assistance Program (SNAP). Such disqualification is not subject to administrative or judicial review under SNAP.”

Administrative Review Levels

Informal Review by Director, Division of Public Assistance

The vendor submits a written request for an administrative review of the decision. The request should include the requestor’s name, mailing address, telephone number, and email address, if any, and it should also:

- a. Identify the specific decision requested to be reviewed; and
- b. State in clear and concise terms the reason for the request and
- c. The reason(s) why the adverse action should be reversed and include any supporting documentation.
- d. The State Agency replies in writing to the requesting party either denying the review and stating the reason for denial or allowing the administrative review to proceed.

If the requesting party has requested an abbreviated review, the Director of the Division of Public Assistance notifies the requesting party of the schedule for the abbreviated review and when a decision will be made. Written notification of the review decision, including the basis for the decision will be provided to the vendor. The written notification need not amount to a full opinion or contain formal findings of fact and conclusions on law. The written notification should be provided within 90 days from the date of receipt of a vendor’s request for an administrative review. This time frame is only an administrative requirement for the State Agency and does not provide a basis for overturning the State Agency’s adverse action if a decision is not made within the specified time frame.

Administrative Hearing

If the requesting party requests an administrative hearing, the Director notifies the requestor at least 15 days in advance of the time and place of the pre-hearing conference or administrative hearing. The administrative hearing will be conducted according by the Office of Administrative Hearings pursuant to AS 44.64.030 and AS 44.64.060 and regulations adopted to implement those statutes.

As part of the administrative hearing, the State Agency must provide the vendor with the following:

- a) The opportunity to appeal the adverse action within a time period specified by the State Agency in its notification of adverse action;
- b) Adequate advance notice of the time and place of the administrative hearing to provide all parties involved sufficient time to prepare for the hearing;
- c) The opportunity to present its case and at least one opportunity to reschedule the administrative hearing date upon specific request;
- d) The opportunity to cross examine adverse witnesses;
- e) The opportunity to be represented by counsel if desired;
- f) The opportunity to examine, prior to the hearing, the evidence upon which the State Agency's action is based;
- g) An impartial decision-maker whose determination is based solely on whether the State Agency has correctly applied federal and State statutes, regulations, policies, and procedures governing the program, according to the evidence presented at the administrative hearing; and
- h) Written notification of the hearing decision, including the basis for the decision. The written notification need not amount to a full opinion or contain formal findings of fact and conclusions on law. The written notification should be provided within 90 days from the date of receipt of a vendor's request for an administrative review. This time frame is only an administrative requirement for the State Agency and does not provide a basis for overturning the State Agency's adverse action if a decision is not made within the specified time frame.

Adverse Actions Subject to Administrative Review:

Administrative Hearing for:

- The denial of authorization to become a WIC vendor based on: the vendor selection criteria for minimum variety and quantity of authorized supplemental foods;
- the determination that the vendor is attempting to circumvent a sanction
- The termination of a current WIC Vendor contract for cause.
- Disqualification, except as otherwise specified
- The imposition of a fine or CMP in lieu of disqualification, unless as otherwise specified
- The disqualification of a current WIC vendor for cause.

Administrative Review by DPA Director for:

- The denial of authorization to become a WIC vendor based on: the vendor selection criteria for competitive price; the State agency's vendor limiting criteria; a State Agency-established vendor selection criteria if the basis of the denial is a WIC vendor sanction or the Alaska Supplemental Nutrition Assistance Program withdrawal of authorization or disqualification; submission of an application outside the timeframes during which applications are being accepted and processed; a determination based on whether an applicant is currently authorized for SNAP.
- The denial of authorization to become a WIC vendor based on the vendor selection criteria for business integrity or for a current Alaska Supplemental Nutrition Assistance Program disqualification or CMP* for hardship.
- The termination of a current WIC Vendor contract because of a change in ownership or location or cessation of operations.
- The disqualification of a current WIC vendor based on the imposition of a CMP in lieu of disqualification based on a Alaska Supplemental Nutrition Assistance program disqualification.
- The disqualification of a current WIC vendor based on the imposition of a SNAP CMP for hardship.
- The disqualification of a current WIC vendor based on a trafficking conviction.
- Disqualification of or imposition of a CMP in lieu of disqualification based on a mandatory sanction imposed by another WIC State agency
- Application of peer group criteria.

- The imposition of a CMP in lieu of disqualification based on a SNAP penalty.
- Above 50% status determination.

USDA NON-DISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

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

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

QUESTIONS

State of Alaska Department of Health
Division of Public Assistance Family Nutrition Programs
PO Box 110612
Juneau, AK 99811-0612
(907) 465-3100
doh.dpa.wic.vendor@alaska.gov