Purpose

To outline appropriate actions to be taken by the local WIC agency when participant abuse is alleged or suspected. Local agency WIC staff shall provide follow-up to correct participant abuse and to ensure Program integrity.

Initial Assessment

If a clinic services integrity issue, please refer to Volume I, Section P.

If a vendor integrity issue, please refer to Volume IV, Section J.

If a discrimination complaint, please refer to Volume I, Section K.

If a participant integrity issue, follow the procedure outlined below.

Timeline

Local agency staff should begin immediately filling out the Participant Integrity Follow-up Form after the incident is reported.

Local agency staff has up to 15 days from initial report to make a determination of sanctions. Contact the State WIC Office if guidance is needed in a specific incident. When sanctions are warranted, staff will send a letter to the responsible party:

1. to inform them of the incident,
2. to assign sanction points, and
3. to provide education

In the case of a potential participant suspension, local agencies will send information to the State WIC office for consideration.

Within 15 days from the time state staff receive the completed information from the local agency, a decision will be made whether the assignment of sanction points, disqualification, or other action is warranted.

Gather Information

The local agency may be notified of the incident by State WIC staff, other clients, a vendor, local agency WIC staff, or other party. In the case of verbal notification, a Nebraska WIC Integrity Screening Form may be started. If written documentation is received the screening form is not necessary. Retain the written documentation.

Refer to the Nebraska WIC Program Participant Violations and Sanction Points Table, in Section P, Volume I for information on specific sanctions.

Begin completion of the Participant Integrity Follow-up Form, with as much information as possible for accurate follow-up.

Step	Action
1.	Review documentation on screening form. Gather additional information if needed.
2.	Review check(s) if applicable. A copy of the specific check(s) may be obtained from the State WIC office.
3.	List the main points to be shared with the responsible party.
4.	Contact the State WIC office to discuss the specific situation and reported incident if further guidance is needed.

Follow-up

Education is an essential component of the Nebraska WIC program sanction system.

- WIC staff should provide to the responsible party the correct procedures related to the incident.
- Review the "Abuse of the Program" section on the WIC ID folder and point out the bottom section on the WIC Certification Signature Form, signed by the WIC client or responsible party, regarding providing correct information.
- Staff should sign and date the Participant Integrity Follow-up Form documenting that education/review of correct procedures was completed with the responsible party.

If additional information is identified from the responsible party's voluntary statement, follow-up should be completed by staff. Attach any additional documentation information obtained through follow-up to the Participant Integrity Follow-up Form.

If the Reported Incident…	Then
Can be substantiated	Refer to the Participant Violations and Sanction table, pages 2b – 2e to choose the appropriate corrective action.
	Is substantiated but does not warrant suspension, local agency staff completes the following steps: 1. Review the sanction record for previous active sanction points. 2. Add any previous sanction points to determine if suspension is warranted.
	Warrants suspension, local agency staff contacts the State WIC office. Refer to the State Responsibility Sanction policy, in this section for additional information. Issue monthly benefits until a decision is reached by the State WIC office.
Cannot be substantiated	Provide education for the correct procedure of the reported incident.

Documentation

When the local agency assigns points:

Step	Action
1.	Give or mail the appropriate sanction form letter, examples on pages 3d– 3e, to the responsible party.
2.	Notify the responsible party of the sanctionable points assessed and provide the appropriate educational follow-up as outlined in the form letter and in the Participant Violations and Sanction Table.
3.	Copy the sanction form letter and attach it to the Participant Integrity Follow-up Form plus any copies of checks involved in the incident, if applicable.

Involved WIC staff should sign the Participant Integrity Follow-up Form as verification that assessment, determination of sanctions, and appropriate follow-up have been completed regarding the reported incident.

The Participant Integrity Follow-up Form should be retained in the participant'(s) file.

If the reported incident is determined to be sanctionable, record the sanction points in the participant'(s) file in the computer.

(Date)

Dear (Name of Responsible Party):

This letter is to let you know that 5 sanction points have been assigned to you. These points will be in your record from (date of this letter) until (date 12 months later). These sanction points are assigned for the following reason:

_____Exchanging WIC formula at the store without approval by WIC staff.

_____Redeeming a WIC check at a non-authorized WIC store or redeeming a WIC check for food (not formula) at a pharmacy.

____ Purchasing foods (wrong food) in a WIC category that are not specified on a WIC check. This is not a WIC approved food.

____Purchasing infant formula not specified on the WIC check.

____Purchasing WIC approved foods in amounts greater than that listed on the WIC check.

A WIC category includes formula, juice, cereal, milk, eggs, peanut butter, beans, cheese, tuna, and carrots.

Remember it is your responsibility to carefully read your WIC check and get only the foods and the amounts that are specified on the check. Be sure to separate your foods at the check out and tell the cashier that you will be using a WIC check. When you sign the WIC check, look at the total price, because you will also be held responsible for any wrong foods or amounts that exceed the correct amount. If you need help understanding the foods or WIC check cashing procedures, please ask your clinic staff and they will be glad to give you additional help.

You have now a total of (Identify #) sanction points in your record. Remember a total of 20 sanction points may result in removal from the Nebraska WIC Program.

If you have any questions or comments about this incident, please contact me at (phone).

Sincerely,

Local Agency WIC Director/Coordinator WIC is an equal opportunity program

(Date)

Estimado(a) (Name of Responsible Party):

Esta carta es para hacerle saber que se le ha asignado 5 puntos de sanción. Estos puntos estarán en su registro desde (date of this letter) hasta (date 12 months later). Se asignan estos puntos de sanción por la siguiente razón:

_____Cambiar la formula de WIC en la tienda sin la aprobación del personal de WIC.

_____Utilizar un cheque de WIC en una tienda no autorizada por WIC o utilizar un cheque de WIC para alimentos (no fórmula) en una farmacia.

____ Comprar alimentos (alimentos equivocados) en una categoría de WIC que no son especificados en un cheque de WIC. Esto no es un alimento aprobado por WIC.

____Comprar fórmula para infantes que no es especificada en el cheque de WIC.

____Comprar alimentos aprobados por WIC en cantidades mayores que se anotan en el cheque de WIC.

Una categoría de WIC incluye fórmula, jugo, cereal, leche, huevos, mantequilla de cacahuete, frijoles, queso, atún y zanahorias.

Recuerde que es su responsabilidad de leer con cuidado su cheque de WIC y solamente obtener los alimentos y cantidades que se especifican en el cheque. Asegúrese que usted separe sus alimentos en la caja registradora y que le diga al cajero que estará usando un cheque de WIC. Cuando firme el cheque de WIC, mire el precio total porque también será responsable de cualquier alimento equivocado o cantidad que excede la cantidad correcta. Si necesita ayuda con entender los alimentos o los procedimientos para cobrar el cheque de WIC, haga favor de preguntarle al personal de su clínica y ellos estarán dispuestos a ayudarle a usted más.

Ahora usted tiene un total de (Identify #) puntos de sanción en su registro. Recuerde que un total de 20 puntos de sanción podría resultar en que se retire a usted del programa de WIC de Nebraska.

Si tiene cualquier pregunta o comentario sobre este incidente, haga favor de comunicarse al (phone).

Atentamente,

Director/Coordinador de la agencia local de WIC
WIC es un programa de igualdad de oportunidad

(Date)

Dear (Name of Responsible Party):

This letter is to let you know that 10 sanction points have been assigned to you. These points will be in your record from (date of this letter) until (date 12 months later). These sanction points are assigned for the following reason:

____**Verbal abuse or threat of physical abuse to**:

____**Changing any information on the front of the WIC check and/or redeeming a WIC check that has been altered.**

____**Redeeming a WIC check reported as lost or stolen.**

___ **Purchasing foods in a non-WIC category or non-food items that are not specified on a WIC check**.

A WIC category includes formula, juice, cereal, milk, eggs, peanut butter, beans, cheese, tuna, and carrots.

Remember it is your responsibility to carefully read your WIC check and get only the foods and the amounts that are specified on the check. Be sure to separate your foods at the check out and tell the cashier that you will be using a WIC check. When you sign the WIC check, look at the total price, because you will also be held responsible for any wrong foods or amounts that exceed the correct amount. If you need help understanding the foods or WIC check cashing procedures, please ask your clinic staff and they will be glad to give you additional help.

You have now a total of (Identify #) sanction points in your record. Remember a total of 20 sanction points may result in removal from the Nebraska WIC Program.

If you have any questions or comments about this incident, please contact me at (phone).

Sincerely,

Local Agency WIC Director/Coordinator

WIC is an equal opportunity program

(Date)

Estimado(a) (Name of Responsible Party):

Esta carta es para hacerle saber que se le han asignado 10 puntos de sanción. Estos puntos estarán en su registo desde el (date of this letter) hasta el (date 12 months later). Se asignan estos puntos de sanción por la siguiente razón:

_____Abuso verbal o amenaza de abuso físico a:

_____Cambiar cualquier información en la parte frontal del cheque de WIC y/o utilizar un cheque de WIC que ha sido alterado.

____ Utilizar un cheque de WIC que ha sido reportado como perdido o robado.

____Comprar alimentos en una categoría que no es de WIC o comprar artículos que no son alimentos que no se especifican en un cheque de WIC.

Una categoría de WIC incluye fórmula, jugo, cereal, leche, huevos, mantequilla de cacahuete, frijoles, queso, atún y zanahorias.

Recuerde que es su responsabilidad de leer con cuidado su cheque de WIC y solamente obtener los alimentos y cantidades que se especifican en el cheque. Asegúrese que usted separe sus alimentos en la caja registradora y que le diga al cajero que estará usando un cheque de WIC. Cuando firme el cheque de WIC, mire el precio total porque también será responsable de cualquier alimento equivocado o cantidad que excede la cantidad correcta. Si necesita ayuda con entender los alimentos o los procedimientos para cobrar el cheque de WIC, haga favor de preguntarle al personal de su clínica y ellos estarán dispuestos a ayudarle a usted más.

Ahora usted tiene un total de (Identify #) puntos de sanción en su historial. Recuerde que un total de 20 puntos de sanción podría resultar en que se retire a usted del programa de WIC de Nebraska.

Si tiene cualquier pregunta o comentario sobre este incidente, haga favor de comunicarse al (phone).

Atentamente,

Director/Coordinador de la agencia local de WIC
WIC es un programa de igualdad de oportunidad