

## CLIENT VIOLATIONS & SANCTIONS

TYPE ONE VIOLATIONS: EDUCATE		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
<b>C</b> - Signing a WIC check before presenting it to the vendor for purchase of WIC foods.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Educate</b></li> </ul>	
<b>D</b> - Failure to sign a WIC check.		
<b>A</b> - Using check before the first date to use or after the last date to use.		

TYPE TWO VIOLATIONS: SANCTION -- 5 Points		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
<b>F</b> - Redeeming a WIC check at a non-authorized WIC store or redeeming a WIC check for food or primary contract infant formula at a special purchase store.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Evaluate</b></li> <li>✓ <b>Educate</b></li> <li>✓ <b>Assess</b> 5 sanction points, if warranted, for 12 months duration</li> </ul>	<ul style="list-style-type: none"> <li>✓ Monitoring, Enforcement &amp; Support of Local Staff</li> </ul>
<b>T</b> - Accepting foods or formula purchased with WIC checks from a person other than the WIC program.		
<b>E</b> - Purchasing WIC approved foods or formula in amounts greater than that listed on the WIC check.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Evaluate</b></li> <li>✓ <b>Educate</b></li> <li>✓ <b>Assess</b> 5 sanction points, if warranted for 12 months</li> </ul>	<ul style="list-style-type: none"> <li>✓ Monitoring, Enforcement &amp; Support of Local Staff</li> <li>✓ Information forwarded to State for assessment of claims</li> </ul>
<b>G</b> - Exchanging WIC formula at the store without approval by WIC staff.		
<b>H</b> - Purchasing foods or formula in a WIC category not specified on the WIC check.		

TYPE TWO VIOLATIONS: SANCTION -- 10 Points		
CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
<b>R</b> - Giving away WIC clients' WIC food or formula to someone else outside the immediate family for the second party's personal use, exchange or sale.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Evaluate</b></li> <li>✓ <b>Educate</b></li> <li>✓ <b>Assess</b> 10 Sanction points, if warranted, for 12 months duration</li> </ul>	<ul style="list-style-type: none"> <li>✓ Monitoring, Enforcement &amp; Support of Local Staff</li> </ul>

**TYPE TWO VIOLATIONS: SANCTION ( Continued) -- 10 Points**

CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
<b>I</b> - Verbal abuse or threat of physical abuse to any of the following: 1) WIC Local Agency Staff 2) Other WIC clients 3) Responsible parties, 4) Alternate Shoppers or Proxies, 5) Vendor employees.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Evaluate</b></li> </ul>	<ul style="list-style-type: none"> <li>✓ Monitoring, Enforcement, and Support of Local Staff</li> </ul>
<b>J</b> - Changing any information on the front of the check and /or redeeming a WIC check that has been altered.	<ul style="list-style-type: none"> <li>✓ <b>Educate</b></li> </ul>	<ul style="list-style-type: none"> <li>✓ Information forwarded to State for possible assessment of claim</li> </ul>
<b>K</b> - Redeeming a WIC check reported as lost or stolen.	<ul style="list-style-type: none"> <li>✓ <b>Assess</b> 10 Sanction points, if warranted, for 12 months duration</li> </ul>	
<b>S</b> - Purchasing a non-WIC category food or a non-food item with a WIC check.		
<b>V</b> - Purchasing formula in a type or form (ie powdered, concentrate, RTF), not specified on the WIC check		

**TYPE THREE VIOLATIONS: STATE MANDATED SANCTION – 20 Points**

**20 POINTS = WIC PROGRAM DISQUALIFICATION**

CLIENT VIOLATION	LOCAL AGENCY ACTION	STATE AGENCY ACTION
<b>L</b> - Sale or exchange of WIC food, formula or checks for cash or credit.	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Forward</b> documentation to State</li> </ul>	<ul style="list-style-type: none"> <li>✓ <b>Evaluate</b></li> </ul>
<b>M</b> - Receiving Program benefits from 2 or more local WIC agencies or from both WIC and CSFP.		<ul style="list-style-type: none"> <li>✓ <b>Assess</b> claim if warranted</li> </ul>
<b>N</b> - Misrepresenting information, concealing or withholding facts, or making false or misleading statements to receive more WIC foods than eligible to receive or to become eligible for the Program.		<ul style="list-style-type: none"> <li>✓ <b>Track</b> follow-up</li> </ul>
<b>P</b> - Using WIC checks to purchase alcohol or tobacco.		<ul style="list-style-type: none"> <li>✓ <b>Evaluate</b></li> </ul>
<b>Q</b> -Intentional receipt of cash or credit for WIC checks from a WIC vendor or unauthorized party (selling WIC checks)		<ul style="list-style-type: none"> <li>✓ <b>Assess</b> 20 sanction points, if warranted for 12 months duration</li> </ul>
<b>R</b> - Using WIC checks to purchase alcohol or tobacco.		<ul style="list-style-type: none"> <li>✓ <b>Disqualify</b> for 12 months</li> </ul>
<b>O</b> - Physical abuse to any of the following: 1) WIC staff; 2) Other WIC clients, proxies, responsible parties; 3) Vendor’s employees	<ul style="list-style-type: none"> <li>✓ <b>Document</b> client follow-up on Client Integrity Follow-up Form</li> <li>✓ <b>Forward</b> documentation to State</li> </ul>	<ul style="list-style-type: none"> <li>✓ <b>Information</b> forwarded to State for possible assessment of claim</li> </ul>
<b>U</b> -Buying WIC foods or formula from another person outside the immediate family.		<ul style="list-style-type: none"> <li>✓ <b>Evaluate</b></li> <li>✓ <b>Assess</b> 20 sanction points, if warranted for 12 months duration</li> </ul>
		<ul style="list-style-type: none"> <li>✓ <b>Disqualify</b> for 12 months</li> </ul>

A total of: **5, 10 or 15 points** → Notification Letter of Sanction Points Being Assessed; sent by Local Agency WIC Staff  
**20 or more Points:** → Notification Letter of Disqualification; sent By State Agency WIC Staff