CLIENT VIOLATIONS & SANCTIONS CHART

<table>
<tr><th colspan="3">TYPE ONE VIOLATIONS & SANCTIONS – 5 Points</th></tr>
<tr><th>CLIENT VIOLATION</th><th>LOCAL AGENCY ACTION</th><th>STATE AGENCY ACTION</th></tr>
<tr><td>Using WIC card at a non-authorized WIC store or purchasing food or primary contract infant formula at a special purchase store using a WIC card.</td><td rowspan="3"><u>Local Agency staff will:</u>

- Document client follow-up on appropriate investigation form
- Educate on correct actions/WIC rules
- Assess 5 sanction points for 12 months duration
- Send sanction letter & scan into client’s Journey record
- Enter sanction information into the Sanction & Disqualification Tracking Smartsheet</td><td rowspan="3">Monitor and Support of Local Agency Staff</td></tr>
<tr><td>Accepting foods or formula purchased with WIC from a person other than the WIC program.</td></tr>
<tr><td>Exchanging WIC formula at the store. without approval by WIC staff.</td></tr>
<tr><td>Posting or advertising WIC items with a value of $1,000.00 or less for sale or exchange but not completing the sale of the items.</td><td></td><td></td></tr>
<tr><td>Not returning multi-user breast pump by agreed upon date.</td><td><u>Local Agency staff will:</u>

- Document client follow-up on appropriate investigation form
- Assess 5 sanction points for 12 months duration
- Send a warning letter with sanctions assigned & scan into client’s Journey record
- Enter sanction information into the Sanction & Disqualification Tracking Smartsheet
- Forward information to State Breastfeeding Coordinator for monitoring</td><td>Monitor and Support of Local Agency Staff</td></tr>
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Nebraska WIC
10.28.26

TYPE TWO VIOLATIONS: SANCTION -- 10 Points		
CLIENT VIOLATION	**LOCAL AGENCY ACTION**	**STATE AGENCY ACTION**
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. Verbal abuse, harassment, or threat of physical abuse to any of the following: 1) WIC Local Agency Staff; 2) Other WIC clients; 3) Authorized Representatives; 4) Proxies; 5) Vendor employees/customer; 6) Others in clinics or at store. Includes in-person, on social media or over the phone. Swearing at, calling names, racial inferences, throwing items. Creating a public nuisance or disrupting normal activities at a WIC clinic or store. Using a eWIC card reported as lost or stolen.	***Local Agency staff will:*** - **Document** client follow-up on appropriate investigation form - **Educate** on correct actions/WIC rules - **Assess** 10 Sanction points for 12 months duration - **Send** sanction letter & scan into client's Journey record - **Enter** sanction information into the Sanction & Disqualification Tracking Smartsheet	Monitor and Support Local Agency Staff
Multi-user breast pump is not returned 30 days after initial warning/sanction letter was sent. (If arrangements were made to return after the 30 days do not assign points, unless they do not return upon the agreed upon date.)	***Local Agency staff will:*** - **Document** client follow-up on investigation form created initially for this incident - **Send** warning letter, including sanctions assigned and scan letter in client's Journey record - **Assess** 10 sanction points for 12 months duration - **Enter** sanction information into the Sanction & Disqualification Tracking Smartsheet - **Notify** State Breastfeeding Coordinator	Monitor and Support Local Agency Staff

TYPE THREE VIOLATIONS: SANCTION -- 15 Points		
CLIENT VIOLATION	**LOCAL AGENCY ACTION**	**STATE AGENCY ACTION**
Return WIC foods to vendor for unapproved food items, non-food items, credit or cash (attempted or actual). **	***Local Agency staff will:*** - **Document** client follow-up on appropriate investigation form. - **Contact State Vendor & Clinic Services Coordinators** to discuss situation - **Educate** on correct actions/WIC rules - **Assess** 15 Sanction points for 12 months duration - **Send** sanction letter & scan into client's Journey record - **Enter** sanction information into the Sanction & Disqualification Tracking Smartsheet - **Forward** investigation form and documentation to State	**Work** with Local Agency Staff on response to client action **Investigate** vendor actions and take action as needed **Determine** if a claim is warranted **Notify** participant of claim if needed **Track** & collect claim

TYPE FOUR VOLATIONS: STATE MANDATED SANCTION
20 Points – Program Disqualification

<table>
<tr><th>CLIENT VIOLATION</th><th>LOCAL AGENCY ACTION</th><th>STATE AGENCY ACTION</th></tr>
<tr><td>Sale or exchange of WIC food, formula, muti-user breast pump or WIC card for cash or credit. **</td><td rowspan="11">Local Agency staff will:

- Document report on appropriate investigation form.
- Collect supporting documentation.
- Forward documentation to State

Information forwarded to State for possible 1) assessment of claim and 2) notification of State Vendor Coordinator</td><td rowspan="11">Collect additional information needed

Assess 20 sanction points, if warranted for 12 months duration

Disqualify for 12 months

Send sanction letter & scan into client’s Journey record

Enter sanction into Sanction & Disqualification Tracking Smartsheet

Evaluate if claim is needed

Assess claim if warranted

Collect & Track Claim

Notify State Vendor Coordinator as necessary.</td></tr>
<tr><td>Collusion with WIC staff to fraudulently enroll and/or receive benefits.</td></tr>
<tr><td>Receiving Program benefits from 2 or more WIC agencies or clinics at the same time. (Intentional dual participation)</td></tr>
<tr><td>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.</td></tr>
<tr><td>Exchanging items purchased with WIC benefits for non-WIC items at the store.</td></tr>
<tr><td>Posting or Advertising WIC items with a value greater than $1,000.00 for sale or exchange.</td></tr>
<tr><td>Buying WIC foods or formula from another person outside the immediate family.</td></tr>
<tr><td>Failure to return a multi-user breast pump</td></tr>
<tr><td>Redeeming, or attempting to redeem WIC benefits for a participant no longer in the custody of parent/guardian, i.e. a child who has been or is being removed from the home.</td></tr>
<tr><td>Altering Physician Authorization Form (PAF) for the purpose of showing false or misleading information.</td></tr>
<tr><td>Physical abuse to any of the following:
WIC staff; 2) Other WIC clients, proxies, authorized representatives and 2) visitors at clinic or in waiting areas; or 3) Store employees and customers
Includes throwing items toward a person without hitting them with the item.</td><td rowspan="2"><u>Local Agency staff will:</u>

- Document client follow-up on appropriate investigation form

- Collect statements/documents from involved parties

- Forward documentation to State

- Notify proper authorities to include law enforcement, local agency administration and State WIC office when appropriate</td><td rowspan="2">- Evaluate

- Assess 20 sanction points, if warranted for 12 months duration

- Disqualify for 12 months</td></tr>
<tr><td>Damage or destruction of property to include property belonging to clinic, clinic staff, vendor or vendor staff or WIC participants</td></tr>
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TYPE FOUR VOLATIONS: STATE MANDATED SANCTION 20 Points – Program Disqualification		
Trafficking WIC food benefits, WIC card or WIC items and/or collusion with an authorized vendor	***Local Agency staff will:*** - **Document** client follow-up on appropriate investigation form - **Collect** statements/documents from involved parties - **Forward** documentation to State - **Notify** proper authorities to include law enforcement, local agency administration and State WIC office when appropriate	- **Evaluate** - **Assess** 20 sanction points, if warranted for 12 months duration - **Disqualify** for 12 months - **Notify** proper authorities to include law enforcement when necessary. - Notify State Vendor Coordinator.
Receiving tobacco, alcohol, or controlled substances in exchange for WIC card or benefits. **		
Intentional receipt of cash or credit for WIC card from a WIC vendor or unauthorized party (selling WIC cards) **		

A total of:

5, 10 or 15 points = Notification Letter of Sanction Points Being Assessed Sent to Authorized Representative by Local Agency WIC Staff
20 or more points = Notification Letter of Sanction Points Being Assessed Sent to Authorized Representative by State Office.
Disqualification Letter Sent to Authorized Representative by State Agency WIC Staff

** designates violations that need to be shared with local and state agency vendor coordinators to allow them to determine if/when vendor sanctions may need to be applied.

NOTE: All investigation forms and documents will be saved at the local agency for a minimum of three years.