



Commonwealth of Virginia  
**Department of Health**

August 11, 2006

Ms. Patricia Cumiskey-Czeto  
Regional Director  
Supplemental Food Programs  
United States Department of Agriculture  
300 Corporate Blvd.  
Robbinsville, NJ 08691-1598

Re: Fiscal Year 2007 Virginia WIC Program State Plan

Dear Ms. Cumiskey-Czeto:

In response to SFP 06-074, please find attached the Virginia WIC Program's FFY2007 State Plan. As approved by Les Martin, the Virginia State WIC Office will submit an electronic version of the 2007 State Plan thru email and signed hard copies of the required FNS-339 and lobbying documents via regular mail.

Thank you again for your technical assistance, and please feel free to contact Ron Clark, Operations Liaison, at (804) 864-7838 or [Ron.Clark@vdh.virginia.gov](mailto:Ron.Clark@vdh.virginia.gov) with any questions.

Sincerely,

Donna T. Seward, CHE  
Director, Division of WIC & Community Nutrition Services

Enclosure

**Division of WIC & Community Nutrition Services**  
*FFY 2006 State Plan Goals & Objectives*

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## I. Vendor Management

- A. Goal 1 – Strengthen and evaluate participating retailers’ products and point of service delivery to ensure high quality services are rendered to all eligible Virginia WIC participants.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Continue strategies that improve the customer service outcome experienced by WIC participants at retail stores, i.e., Pilot with a corporate retailer a modified VIP customer service feedback strategy.	N/A	Vendor	<i>On Hold: Waiting for Farm Fresh</i>

B. Goal 2 – Ensure participating retailers’ products and services comply with State, Federal, and regulatory requirements/guidelines.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Implement a more systematic approach for identifying potential high risk stores using redemption data. Flag these stores for compliance investigations.	09/30/06	Vendor	<i>Identified approach being used by 10 other state WIC Programs. Will examine data available once converted to new back- end services contractor.</i>
Publish <i>Working with WIC</i> annual retailer training bulletin.	01/15/06	Vendor	<i>Completed 2/15/06</i>
Implement Trainer soft self instructional computer based training curriculum targeted at retail stores – meet annual training requirement.	12/01/05	Vendor, Operations	<i>Completed</i>
Offer ongoing networking and refresher training opportunities for corporate trainers responsible for training corporate sponsored stores.	02/28/06	Vendor	<i>Training session offered May 18, 2006. Additional training opportunities scheduled for September 2006.</i>
Distribute new training resources to replace the 4-part cashier training video package.	12/15/05	Vendor	<i>Completed</i>
Enhance WICNet System to accommodate regional authorization requirements.	9/1/06	Vendor, Technology	<i>Release with enhanced capabilities scheduled for July 2006</i>
Enhance the Retail Store Management System (RSMS) application to accommodate regional authorization requirements.	9/1/06	Vendor, Technology	<i>Release with enhanced capabilities scheduled for July 2006</i>

Implement a regional reauthorization process for ½ of planning districts.	09/30/06	Vendor	<i>Delayed; implemented system structure to support change Sept 1 2006</i>
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- C. Goal 3 – Strengthen and ensure that the foods provided by participating retailers are reasonably priced and accurately reimbursed.

Objectives	Target Date	Responsible Team(s)	Progress
Complete pricing evaluation of authorized stores at least twice during the federal fiscal year to ensure price competitiveness.	04/30/06	Vendor	<i>Surpassed stated objective; Completed 10/1/05, 1/1/06, 5/1/06; 7/1/06</i>
Implement post-payment edit system and re-coup overcharges.	04/30/06	Vendor, Technology	<i>Begun sending monthly written “warnings” to stores for redeeming Food Instrments without pricing data on file, as of August 2006 – redemptions. Will implement Vendor Claims and repayment process as of July 2006 redemptions.</i>
Implement a method to monitor price and reimbursement levels of all stores flagged as “50%” Vendors.	09/30/06	Vendor	<i>Completed</i>

## II. Nutrition Services

### A. Goal 1 – Improve the delivery and quality of nutrition education.

Objectives	Target Date	Responsible Team(s)	Progress
Revise nutrition policies that most impact the delivery and quality of nutrition services using the USDA/WIC State Plan, Bright Futures and other nationally recognized sources as guidance.	Ongoing	Nutrition	<i>New USDA guidelines(exit counseling)</i>
Research and develop educational tools and materials to qualify and quantify portion sizes.	09/30/06	Nutrition	<i>OA grant submission to fund project not approved</i>
Provide trainings for nutrition staff on nutrition-related topics to update knowledge and skills.	09/30/06	Nutrition, Operations	<i>Ross Formula Transition Polycom conducted on 4/12/06, Breastfeeding Polycom conducted on 5/2/06, Anthropometric Polycom conducted on 5/19/06.</i>
Implement changes to nutrition education policy and procedures based upon evaluation of 3 methods of nutrition education (multimedia, web-based modules and interactive displays).	09/30/06	Nutrition	<i>Many faces of Nutrition education projects completed. See one above.</i>

Goal 1 (continued)

Objectives	Target Date	Responsible Team(s)	Progress
Conduct annual WIC participant feedback process to ensure measurement of behavior changes and client preferences for nutrition services.	09/30/06	Operations	<i>Focus groups done in lieu of survey</i>
Provide ongoing support to WICNET system maintenance and to district staff related to nutrition-related functionality and reports in the WICNET system.	09/30/06	Nutrition, Technology	<i>Ongoing</i>
Evaluate the effectiveness of the matrix of nutritional food packages.	09/30/06	Nutrition, Vendor, technology Operations,	<i>Implementation Delayed Evaluation</i>

- B. Goal 2 – Increase the percentage of pregnant women who initiate breastfeeding to 48% and continue to breastfeed for 6 months to 20%.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Implement an effective state-wide breastfeeding peer counselor program.	09/30/06	Nutrition	<i>Completed January 2006</i>
Establish a statewide Breastfeeding Advisory Committee.	06/30/06	Nutrition	<i>First meeting scheduled for September 2006</i>
Begin development of tracking system to collect breastfeeding data.	09/30/06	Nutrition	<i>Completed</i>

C. Goal 3 – Improve the community-based response to obesity.

Objectives	Target Date	Responsible Team(s)	Progress
Evaluate effective community interventions that may be deemed best practices and used as models for replication.	09/30/06	Nutrition	<i>Delayed</i>
Hold statewide response meetings regarding CHAMPION solutions.	09/30/06	Nutrition, Operations	<i>Delayed; Report to be released August 2006</i>
Carry out recommendations made by Advisory Committee/published in state plan.	Ongoing	Nutrition	<i>Delayed; Plan to follow published report</i>

### III. Technology Management

- A. Goal 1 – Improve the effectiveness and efficiency of program operations through the utilization of an automated data processing system (WICNET) and services.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Continue WICNET maintenance and program refinements.	Ongoing	Technology	<i>Ongoing Formula, bank, vendor regulations</i>
Submit and implement new WICNET equipment replacement plan (assumes funding availability).	09/30/06	Technology	<i>Contractor secured; plans written and in review</i>
Implement automated system for tracking assistance request calls.	09/30/06	ALL	<i>Help Desk—WIC Net calls</i>

- B. Goal 2 – Develop training and technical assistance programs that enhance the use of WICNET.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Update state and local staff on how to effectively utilize data from the WICNET system.	Ongoing	Nutrition, Vendor, Operations	<i>Ongoing</i>

#### IV. Organization & Management

- A. Goal 1 – Improve the ability of state and local WIC staff to provide efficient quality services to WIC and MCH/non-WIC participants.

Objectives	Target Date	Responsible Team(s)	Progress
Offer staff development through annual WIC training conference.	10/30/05	ALL	<i>Completed</i>
Implement comprehensive training plan for state and local staff.	09/30/06	ALL	<i>Pending; training supervisor hired May 2006</i>
Evaluate State WIC Office Grant Review Process.	09/30/06	Operations	<i>Completed</i>
Maximize the number of WIC and non-WIC professionals served at trainings.	09/30/06	ALL	<i>Ongoing</i>

- B. Goal 2 – Identify optimal organizational staff utilization.

Objectives	Target Date	Responsible Team(s)	Progress
Evaluate Workflow Analysis Report. Establish guidelines for local agency staffing.	09/30/06	Operations, Nutrition	<i>Data deemed inadequate by 2007 OA grant consultant</i>
Identify performance measures for service delivery activities.	09/30/06	Operations, Nutrition	<i>See above</i>

C. Goal 3 –Evaluate plan to be implemented in the event of a disaster.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Perform test of State WIC Office Disaster Recovery Plan.	09/30/06	ALL	<i>System failure provided test</i>

D. Goal 4 – Ensure skills and competency of nutrition professionals serving WIC participants.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Evaluate VDH Dietetic Internship Program.	03/30/06	Nutrition	<i>completed</i>
Provide statewide training on revised criteria/process for services to high-risk participants.	09/30/06	Nutrition	<i>completed</i>
Continue educational opportunities for Virginia Nutrition Associates & Nutrition Assistants.	Ongoing	Nutrition	<i>ongoing</i>

## V. NSA Expenditures

### A. Goal 1 – Maximize use of USDA funds.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Provide increased funding for serving more pregnant women during the year.	Ongoing	Operations, Business Unit	<i>Funds provided quarterly to LA</i>
Enforce local agency budget management within the 3 categories of NSA funds.	Ongoing	Operations, Business Unit	<i>Fiscal Recovery of 2005 funds from 3 local agencies</i>
Budget, monitor, and track Food and NSA grant funding and expenditures to advise management of the status of funding.	Ongoing	Business Unit	<i>Monthly reports available as of May 2006</i>

B. Goal 2 – Ensure WIC Program meets spending targets.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Assign and track local agency budgets.	Ongoing	Operations, Business Unit	<i>Vacant position; 1(filled); 1(in recruit)</i>
Develop and monitor State WIC Office NSA funds in three separate budgets: Administration, Nutrition Education, and Breastfeeding.	Ongoing	Operations	<i>Completed</i>
Track spending at the team level within the State WIC Office.	09/30/06	ALL	<i>Completed</i>

C. Goal 3 – Allocate funds to local agencies to adequately fund WIC services.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Implement new funding formula for local agencies.	09/30/06	Operations, Business Unit	<i>Formula completed; implementation 2007</i>
Implement mechanism for reallocation of funds based on participation and/or failure to meet categorical spending requirements.	09/30/06	Operations	<i>See Above</i>

## VI. Food Funds Management

- A. Goal 1 – Maximize the use of USDA food funds through various cost containment measures.

Objectives	Target Date	Responsible Team(s)	Progress
Implement new banking contract.	07/30/06	Vendor	<i>Completed 7/1/06</i>
Evaluate allowable foods and update criterion used to select WIC approved cereals.	06/01/06	Vendor, Nutrition	<i>Completed</i>
Implement contract with VA Department of Medical Assistance Services (DMAS) to recoup costs of exempt formulas to Medicaid recipients.	07/01/06	Nutrition, Business Unit	<i>MOA effective October 2006</i>
Publish Infant Formula Bid (IFB) and select IFB Contractor.	03/01/06	ALL	<i>Completed</i>

## VII. Caseload Management

- A. Goal 1 – Improve the management and allocation of food funds to serve the greatest number of eligible women, infants and children.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Monitor food inflation and revise projections of participants served with food grant.	09/30/06	WIC Management	<i>Ongoing</i>

## VIII. Certification & Eligibility

- A. Goal 1 – Improve service delivery to ensure high program retention rates and customer satisfaction.

Objectives	Target Date	Responsible Team(s)	Progress
Review current WIC Policy and Procedure Manual to streamline and enhance program operations and nutrition service delivery and improve customer service practices.	Ongoing	ALL	<i>Ongoing</i>
Utilize research on participation losses to improve client retention.	09/30/06	ALL	<i>Ongoing</i>
Monitor calls and provide routine reports from the toll-free support line “1-888-TELL-WIC”.	10/01/05	Operations Support	<i>Implementation delayed until June 2006</i>
Evaluate need for general client survey.	03/30/06	ALL	<i>Ongoing</i>

- B. Goal 2 – Improve the integrity of program operations by strengthening internal controls to minimize the risk of potential fraud and abuse.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Implement Program Integrity Plan.	09/30/06	Operations	<i>Operations Manager position in recruit 7/1/06</i>
Complete evaluation of need for separation of duties among central office staff and make appropriate changes.	09/30/06	ALL	<i>Ongoing</i>

## IX. Monitoring / Audits

A. Goal 1 – Complete nutrition, operations, and fiscal monitoring plan.

Objectives	Target Date	Responsible Team(s)	Progress
Schedule and perform monitoring site visits and follow-up reviews according to Local Agency Management Evaluation (LAME) schedule.	09/30/06	Operations, Nutrition	<i>Completed &amp; Ongoing per federal regulations</i>

B. Goal 2 – Revise Program Operations/Nutrition Services monitoring tool.

Objectives	Target Date	Responsible Team(s)	Progress
Strengthen and improve the monitoring process by refining the LAME tool.	09/30/06	Operations, Nutrition	<i>Ongoing</i>
Utilize results from tracking system for monitoring findings.	01/01/06	Operations, Nutrition	<i>Identified top 10 results at March 2006 State WIC Conference</i>

## X. Civil Rights

- A. Goal 1 – Assure that all WIC staff, applicants and participants are knowledgeable of civil rights rules, regulations and procedures.

<b>Objectives</b>	<b>Target Date</b>	<b>Responsible Team(s)</b>	<b>Progress</b>
Develop or obtain new materials and provide civil rights training for state and local agency staff.	09/30/06	Operations	<i>Ongoing; MARO will provide training during State WIC Fall Conference(October 2006)</i>
Monitor compliance with civil rights training.	09/30/06	Operations	<i>Ongoing</i>

## I. VENDOR MANAGEMENT

Vendor management includes all those activities associated with selecting, authorizing, training, monitoring, and investigating the State agency's vendor population for the purpose of reducing fraud and abuse in the WIC Program food delivery system.

**A. Vendor Selection and Authorization – 7 CFR 246.4(a)(14)(i), (ii), and (iii):** identify the types of food delivery systems used in the State's jurisdiction, describe, if used, the State agency's limiting criteria, describe the State agency's selection criteria, attach a sample vendor agreement, and describe, if applicable, the supervision and instruction the State agency provides to local agencies to which vendor agreement signing has been delegated.

**B. Vendor Training – 7 CFR 246.4(a)(14)(xi):** describe State and local agency procedures for training WIC Program vendors and for documenting all relevant training.

**C. High-Risk Vendor Identification Systems – 7 CFR 246.12(j)(3):** describe the policies and procedures for monitoring and identifying high-risk vendors through the use of vendor peer groups, food instrument redemption screening and analysis of overcharging and other violations, the use of price lists, a system for tracking complaints, or other means. *This section may be submitted separately because it is no longer a State Plan requirement but must still be approved by FNS.*

**D. Routine Monitoring – 7 CFR 246.4(a)(14)(iv):** describe the methods and scope of on-site routine monitoring activities and the criteria used to select vendors for routine monitoring.

**E. Compliance Investigations – 7 CFR 246.4(a)(14)(iv):** describe the investigative practices and procedures used to conduct both compliance buys and inventory audits for the purpose of detecting, tracking, and documenting vendor noncompliance with program requirements.

**F. Vendor Sanction System – 7 CFR 246.4(a)(14)(iii):** attach a copy of the State agency's sanction schedule and describe, if applicable, any option exercised under § 246.12(l)(1)(i) regarding trafficking convictions.

**G. Administrative Review of State Agency Actions – 7 CFR 246.4(a)(14)(iii):** describe the procedures for conducting both full and abbreviated administrative reviews.

**H. Coordination with the Food Stamp Program – 7 CFR 246.4(a)(14)(ii), (14)(a)(iv), and (14)(a)(xxv):** describe the methods and procedures used to coordinate the monitoring and sharing of information on vendors who participate in both the WIC Program and the Food Stamp Program.

**I. Staff Training on Vendor Management – 7 CFR 246.4(a)(14)(ii), (a)(14)(iii), (a)(14)(iv), and (a)(14)(xi):** describe the distribution of responsibilities and activities of those individuals at both the State and local levels who are involved in vendor management activities.

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

**1. Number and Distribution of Authorized Vendors**

**a. The State agency uses limiting criteria to limit the number of vendors it authorizes:**

Yes                       No

**b. If yes, check the type of criteria used:**

- Vendor/participant ratio
- Vendors/local agency or clinic ratio
- Vendors/local service area or county ratio
- Vendors/geographic area (e.g., number per mile, city block, zip code)
- Vendor/State agency staff ratio
- Other (specify):

**ADDITIONAL DETAIL: Vendor Management Appendix: Vendor Management Appendix and/or Procedure Manual (cite): Retailer Selection and Authorization Policy 14.0**

**2. Vendor Application Periods**

**a. The State agency considers applications:**

- On an on-going basis
- Annually
- Every two years
- Every three years
- Other (specify):

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Application and Enrollment Policy 5.0**

**3. Vendor Selection and Authorization**

**a. The vendor selection criteria used to select vendors for program authorization include:**

- A competitive price criterion based on:
  - Vendor applicant price lists
  - WIC redemption data
  - A State agency standard drawn from a price survey
  - A standard drawn from another source
  - Other (specify):
- A minimum variety and quantity of supplemental foods criterion that is:
  - Statewide
  - Peer group specific

## I. VENDOR MANAGEMENT

### A. Vendor Selection and Authorization

- Other (specify):
- A business integrity criterion that includes:
  - No history, during the past six years, among the vendor's owners, officers, or managers of criminal convictions or civil judgments for activities listed in 7 CFR 246.12(g)(3)(iii)
  - No history of other business-related criminal convictions or civil judgments
  - Lack of previous WIC sanctions
  - Lack of a current Food Stamp Program disqualification or civil money penalty for hardship
  - Other (specify):
- A requirement to obtain infant formula only from sources included in the State agency's list of State licensed infant formula wholesalers, distributors, and retailers, and manufacturers registered with the U.S. Food and Drug Administration
- Stock a full range of foods in addition to WIC supplemental foods
- A location necessary to ensure adequate participant access
- Redemption of a minimum number/volume of food instruments
- Satisfactory compliance with previous vendor agreement
- Certification by an approved State or local health department
- Proof of authorization as an FSP retailer, including FSP authorization number
- Hours of operation which meet State criteria (specify): Minimum of 50 hours per week.
- Other criteria (specify): Applicant's revenue estimates will not be more than 50% of sales from the WIC Program. All applicants and authorized stores must be food stamp authorized at the time of application and remain authorized and in good.
- Not applicable (explain):

**b. Explain how the State agency uses the competitive price criteria identified in item 3a to select vendors for authorization.**

**(1) The State agency exempts from competitive price criteria pharmacies that provide only exempt infant formula or WIC-eligible medical foods to participants?**

- Yes       No

**(2) The State agency has exempted non-profit WIC vendors (other than health or human services agencies that provide food under contract with the State agency) from competitive price criteria.**

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

Yes       No

**c. The State agency authorizes vendors that derive more than 50 percent of their annual food sales from WIC transactions (i.e., above-50-percent vendors):**

Yes       No

**If “Yes,” please respond to the following:**

**(1) How many above-50-percent vendors are currently authorized (include all above-50-percent vendors and not just WIC-only vendors)?** two

**(2) Does the State agency allow above-50-percent vendors to provide incentive items?**

Yes       No

**If yes, does the State agency require above-50-percent vendors to obtain prior State agency approval to provide incentive items to WIC participants?**

Yes       No

**d. On-site preauthorization visits are conducted to verify information received during the application process:**

**by SA**

**by LA**

For vendors at initial authorization

For all vendors at authorization/reauthorization

**e. The State agency routinely verifies with the FNS field office information provided by vendor applicants regarding the status of their Food Stamp Program retailer authorization.**

Yes       No

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Retailer Selection and Authorization Policy 14.0**

**4. Vendor Peer Groups**

*If the State agency does not have a vendor peer group system, proceed to item 4e.*

**a. Vendors are assigned to peer groups for selection/authorization:**

Yes       No

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

**b. Vendors are assigned to peer groups for reimbursement purposes:**

Yes                       No

**c. Peer groups are based on the following (check all that apply):**

- WIC sales volume
- Gross food sales volume
- Number of cash registers
- Square footage of store
- Type of store
- Location of store
  - Local agency service areas
  - City, county or regional divisions
  - Urban/suburban/rural
  - Zip codes
  - Unique economic location (e.g., rural island, single metro area)
  - Other (specify): Business Economic Area(BEA) and average

number of participants served for selective BEAs that have an adequate number of authorized store locations. The special formula contractor (CAP) is assigned to a separate peer group.

Other (specify):

**d. Using the chart on the next page, describe the peer groupings (e.g., supermarkets, medium and small grocery stores, convenience stores, etc.) that the State agency plans to use during the upcoming fiscal year.**

**e. The State agency has received an exemption from the vendor peer group system requirement:**

Yes                       No

**(1) If “yes,” the State agency’s exemption was based on documentation that showed that (*check the applicable box*):**

The State agency had no above-50-percent vendors; or

Above-50-percent vendors accounted for less than five percent of the total WIC redemptions.

**(2) Based on the latest available data for the current fiscal year (which covers the period from \_\_\_\_\_ to \_\_\_\_\_), the State agency:**

Does not have any above-50-percent vendors;

## **I. VENDOR MANAGEMENT**

### **A. Vendor Selection and Authorization**

Paid above-50-percent vendors \_\_\_\_\_ percent of the total annual WIC redemptions to date.

- (3) If the State agency does not use a vendor peer group system, describe the State agency's alternative system for comparing the prices of new vendor applicants and currently authorized vendors and selecting for authorization or reauthorization vendors that offer the program the most competitive prices.**

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

**DESCRIPTION OF VENDOR PEER GROUP SYSTEM**

Peer Group					Comparable Vendors Peer Group Number (6)	
Peer Group ID (1)	Description (e.g., supermarkets, chain stores, pharmacies) (2)	Number of Vendors in Peer Group				
		Regular Vendors (3)	Above-50% Vendors (4)	Total (5)		
6	CAP	Special Formula Contractor (Vendor #2222)	1	0	1	N/A
10	BEA 49 (single)	All stores located in either Accomack/Northampton	12	0	12	N/A
11	BEA 66 (single)	All stores located in any of these major cities/counties including: Galax City/Martinsville cities/Carroll/Grayson & Patrick Counties	41	0	41	N/A
12	BEA 71 (single)	All stores located in any of these major cities/counties including: Harrison/Lexington/Staunton/Buen a Vista/Waynesboro Cities/Augusta, Bath, Page, Rockbridge, Rockingham Counties, etc.	37	0	37	N/A
13	BEA 81 (single)	All stores located in any of these major cities/counties including: Bristol & Norton Cities/ Buchanan, Dickerson, Lee, Scott, Tazewell, Washington Counties, etc.	69	0	69	N/A
14	BEA 133 (single)	All stores located in Halifax county.	5	0	5	N/A
15	BEA 137 (3 subgroups)	All stores located in any of these major cities/counties, including: Petersburg, Richmond, Emporia	72	0	72	N/A

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

Peer Group					Comparable Vendors Peer Group Number (6)	
Peer Group ID (1)	Description (e.g., supermarkets, chain stores, pharmacies) (2)	Number of Vendors in Peer Group				
		Regular Vendors (3)	Above-50% Vendors (4)	Total (5)		
		<p>Cities/Amelia, Brunswick, Caroline, Chesterfield, Dinwiddie, Goochland, Henrico, Hopewell, Louisa, Northumberland, Nottoway, Powhatan, Richmond Counties, etc.</p> <p>All stores in these locations that serviced 1-100 unique participants.</p> <p>Any newly authorized stores in these locations without redemption history will be initially assigned to this category.</p>				
16	BEA 137	<p>Same location breakdown as Peer Group 15, plus</p> <p>Plus stores that serviced 101-250 unique participants.</p>	68	0	68	N/A
17	BEA 137	<p>Same location breakdown as Peer Group 15, plus</p> <p>Plus stores that serviced 251 or more unique participants.</p>	44	0	44	N/A
25	BEA 138 (3 subgroups)	<p>All stores located in any of these major cities/counties, including: Roanoke, Clifton Forge, Covington, Salem cities/Alleghany, Botetourt, Craig, Franklin and Roanoke</p>	35	0	35	N/A

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

Peer Group					Comparable Vendors Peer Group Number (6)
Peer Group ID (1)	Description (e.g., supermarkets, chain stores, pharmacies) (2)	Number of Vendors in Peer Group			
		Regular Vendors (3)	Above-50% Vendors (4)	Total (5)	
		counties. All stores in these locations that serviced 1-100 unique participants. Any newly authorized stores located in any of these locations without any redemption history will be initially assigned to this category.			
26	BEA 138	Same location breakdown as Peer Group 25, plus  Plus these stores serviced 101-250 unique participants.	46	0	46
27	BEA 138	Same location breakdown as Peer Group 25, plus  Plus these stores serviced 251 or more unique participants.	23	0	23
35	BEA 173 (3 subgroups)	All stores located in any of these major cities/counties, including: Chesapeake, Franklin Hampton, Newport News, Norfolk, VA Beach, Suffolk, Williamsburg cities/Gloucester, Isle of Wight, Surry, York counties, etc.	38	0	38

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

Peer Group					Comparable Vendors Peer Group Number (6)
Peer Group ID (1)	Description (e.g., supermarkets, chain stores, pharmacies) (2)	Number of Vendors in Peer Group			
		Regular Vendors (3)	Above-50% Vendors (4)	Total (5)	
		Plus these stores serviced 1-100 unique participants.  Any newly authorized stores that are located in any of these locations without any redemption history will be initially assigned to this category.			
36	BEA 173	Same location breakdown as Peer Group 35, plus  Plus these stores serviced 101-250 unique participants.	64	1	64
37	BEA 173	Same location breakdown as Peer Group 35, plus  Plus these stores serviced 251 or more unique participants.	80	0	80
45	BEA 174 (3 subgroups)	All stores located in any of these major cities/counties, including: Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, Winchester cities/Arlington, Fairfax, Loudoun, Rappahannock, Shenandoah, Westmoreland counties, etc	36	0	36

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

Peer Group					Comparable Vendors Peer Group Number (6)
Peer Group ID (1)	Description (e.g., supermarkets, chain stores, pharmacies) (2)	Number of Vendors in Peer Group			
		Regular Vendors (3)	Above-50% Vendors (4)	Total (5)	
		Plus any stores that serviced 1-100 unique participants that are located in any of these locations.  Any newly authorized stores located in any of these locations without any redemption history will be initially assigned to this category.			
46	BEA 174	Same location breakdown as Peer Group 45, plus  Plus these stores serviced 101 – 250 unique participants.	71	0	71
47	174 BEA	Same location breakdown as Peer Group 45, plus  Plus these stores serviced 251 or more unique participants.	57	0	57

***Instructions:***

Column 1 – Assign a sequential number to each peer group.

Column 2 – Describe the vendors in the peer group.

Column 3 – Insert the number of authorized vendors that are regular vendors.

Column 4 – If the State agency authorizes above-50-percent vendors, insert the number of above-50-percent vendors currently authorized.

Column 5 – Insert the total number of authorized vendors. This number should be the sum of columns 3 and 4, since the State agency must identify each vendor as being either a regular vendor or an above-50-percent vendor.

## **I. VENDOR MANAGEMENT**

### **A. Vendor Selection and Authorization**

Column 6 – For each peer group that contains above-50-percent vendors, insert the number of the peer group that contains comparable regular vendors. The comparable vendor peer group is the peer group that the State agency uses to derive the competitive price criteria and maximum reimbursement levels that it applies to the above-50-percent vendors. If above-50-percent vendors are placed in a peer group with regular vendors, then the number in column 1 should be the same as that in column 6. If above-50-percent vendors are in separate peer groups, then the number in column 1 will be different from that in column 6

Note: Presently, there is one 50% Vendor authorized by the Virginia WIC Program (Start Healthy – Vendor #9614, Peer Group 36). The new peer group structure was implemented as of July 1, 2006. The breakdown provided in this response is based upon the profile of authorized stores as of March 30, 2006.

## I. VENDOR MANAGEMENT

### A. Vendor Selection and Authorization

#### ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Peer Group Classification System 13.0

f. How does the State agency assess the effectiveness of its peer group system?

The State agency makes this assessment—

- Annually
- Biennially
- Every three years
- Other (please specify)

### 5. Vendor Agreements

a. The following reflect the State agency's vendor agreement practices:

- All vendors have a written agreement with the State agency
- A standard vendor agreement is used statewide
- Vendor agreements are subject to the State's procurement procedures
- Vendor agreements/handbooks are subject to the State's Administrative Procedures Act
- A nonstandard vendor agreement is used for:
  - Military commissaries
  - Pharmacies that only provide exempt infant formula and/or WIC-eligible medical foods
  - All pharmacies
  - Home food delivery contractors
  - Mobile stores
  - Other (specify): Community Action Program(CAP)-special formula service provider.
- Vendors are authorized for a period of 3 years
- Vendors are authorized/reauthorized under renewable agreements, provided no vendor violations occurred during the previous vendor agreement period
- All vendors are provided at least 15 days advance written notice of the expiration of the vendor agreement
- Other (specify): Service a minimum number of unique participants quarterly, maintain Food Stamp authorization status.

b. In addition to the requirements in 7 CFR 246.12(h)(3)-(h)(6), the vendor agreement includes:

- Periodic submission of vendor price lists. If so, specify frequency : 4x per year or more based upon demand by the State WIC Office.
- Maintenance of records in addition to the required inventory records. If so, specify types of records:

**I. VENDOR MANAGEMENT**

**A. Vendor Selection and Authorization**

- Submission of food instruments within a shorter timeframe than required by program regulations. If so, specify timeframe:
- Redemption of a minimum number/volume of food instruments
- Minimum hours of operation
- Other (specify): Minimum number of unique participants served quarterly and maintain food stamp authorization status-in good standing.

**c. The State agency delegates the signing of vendor agreements to its local agencies:**

- Yes       No

**If yes, provide a description of the supervision and instruction provided to local agencies to ensure the uniformity and quality of this activity.**

**Please attach a copy of the Vendor Agreement or provide the appropriate Procedure Manual reference below.**

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Retailer Agreement**

## I. VENDOR MANAGEMENT

### B. Vendor Training

#### 1. Vendor Training - General

**a. Annual vendor training covers the following content (check all that apply):**

- Purpose of the WIC Program
- Supplemental foods authorized by the State agency
- Minimum varieties and quantities of supplemental foods that must be stocked
- Obtaining infant formula only from sources included in the State agency's list of State licensed infant formula wholesalers, distributors, and retailers, and manufacturers registered with the U.S. Food and Drug Administration
- Procedures for obtaining prior State agency approval to provide incentive items to WIC participants
- Procedures for transacting and redeeming food instruments
- Vendor sanction system
- Vendor complaint process
- Claims procedures
- Changes in program requirements since the last training
- Recordkeeping requirements
- Replacement food instruments
- Participant complaints
- Vendor requests for technical assistance
- Reauthorization
- Reporting changes of ownership, location, or cessation of operations
- Procedures for appeal/administrative review
- Training employees
- WIC/FSP sanction reciprocity and information sharing
- Other (specify): Website Updates

**b. Vendors or vendor representatives receive training on the following occasions and/or through the following materials (check all that apply):**

- On-site (in-store) meetings/conferences
- Off-site meetings/conferences
- During routine monitoring visits (e.g., educational buys)
- When specialized technical assistance is requested
- Written materials (e.g., newsletters)
- Audiotapes or videotapes
- Teleconference or videoconference
- Vendor hotline
- State or local agency website
- Other (specify): Internet based retailer application

**I. VENDOR MANAGEMENT**

**B. Vendor Training**

c. **Vendors or vendor representatives receive *interactive* training as follows (check all applicable responses):**

- At or before initial authorization
- At least once every three years
- Annually or more frequently than once every three years

d. **The following method(s) are used to evaluate the effectiveness of vendor training (check all that apply):**

- Evaluation forms provided with training materials
- Pre-tests and/or post-tests regarding vendor policies, procedures, and practices
- Statistical indicators, such as a reduction in food instrument errors
- Educational buys
- Record reviews
- Informal feedback from vendors and/or participants
- Vendor advisory councils
- Not applicable
- Other (specify):

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Store Training Policy 11.0**

**2. Delegation of Vendor Training**

a. **The State agency delegates its vendor training to:**

- Its local agencies
- A contractor
- A vendor association/representative; specify: certified WIC corporate trainers
- Another State agency; specify:
- Not applicable

b. **Indicate the frequency at which the State agency performed the following activities during the past fiscal year:**

<b><u>Times/FY</u></b>	<b><u>Activity</u></b>
2	Provided comprehensive training materials to delegated trainers
2	Provided instruction on vendor training techniques to delegated trainers
As needed	Monitored performance of delegated trainers to ensure the uniformity and quality of vendor training
<input type="checkbox"/>	Not applicable
<input type="checkbox"/>	Other (specify):

**I. VENDOR MANAGEMENT**

**B. Vendor Training**

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Store Training 11.0**

**3. Documents for and Documentation of Vendor Training**

**a. The State agency or the entity to which it delegates vendor training documents the content of and vendor participation in annual vendor training:**

Yes       No

**b. Vendors or vendor representatives are required to sign an acknowledgement of training when they have received the following types of training (check all that apply):**

<input checked="" type="checkbox"/> Interactive training	<input checked="" type="checkbox"/> Annual training
<input type="checkbox"/> Educational buys	<input checked="" type="checkbox"/> Monitoring visits
<input checked="" type="checkbox"/> Remedial training	<input type="checkbox"/> Other (specify):

**c. The State agency produces a Vendor Handbook:**

Yes       No

**If yes, provide in Vendor Management Appendix or cite Procedure Manual Reference.**

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Vendor Manual for the Virginia WIC Program, Cashier Training Guide and Annual Training bulletin**

**I. VENDOR MANAGEMENT**

**C. High-Risk Identification Systems**

**1. Vendor Complaints**

**a. The State Agency has a formal system for receiving complaints about vendors:**

No

Yes, complaints are received through the following:

A toll-free number handled by State agency staff

A standard complaint form which the complainant sends to:

State agency

Local agency or clinic

Other (specify): email notes from participants and/or local agency personnel

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Handling Participant Complaints 3.0**

**2. Identifying High-Risk Vendors**

**a. What criteria does the State agency use to identify high-risk vendors:**

Low-variance

High-mean value

New vendor

Complaints against vendors

Other (specify): past compliance history

**b. Which high-risk indicators has the State agency found to be most effective?**

Low-variance

High-mean value

New vendor

Complaints against vendors

Other (specify): past compliance history

**c. Identify the frequency for generating high-risk vendor reports:**

Monthly

Annually

Quarterly

No set schedule

Semiannually

Other (specify):

**d. Check below the type of food instruments used in the high-risk vendor analysis:**

A full monthly food package for a:

Woman

Infant

Child

Other (specify):

**I. VENDOR MANAGEMENT**

**C. High-Risk Identification Systems**

- Standard food instrument type with multiple food items (e.g., milk, cheese, and cereal)
- Standard food instrument type with a single food item
- Constructed food instrument (State agencies with nonstandard food instruments)
- Other (specify): contract formula only food instruments

**e. To perform the high-risk vendor analysis, the State agency's system aggregates a vendor's redemptions over the following time period:**

- 1 month     2 months     3 months     4 months     5 months     6 months
- Other (specify): User defined time periods are available

**f. Vendor redemption patterns are generally compared to:**

- Applicable peer group patterns
- All vendors' patterns Statewide
- Other (specify):

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): High Risk Retailer Policy 6.0**

**I. VENDOR MANAGEMENT**

**D. Routine Monitoring**

**1. Routine Monitoring Visits**

**a. Routine monitoring visits are conducted by:**

- State agency staff
- Local agency staff
- Other (specify):

**b. Identify the activities performed during a routine monitoring visit:**

- Check the vendor's inventory of supplemental foods and/or inventory records to determine if the vendor meets the State agency's requirements for the minimum variety and quantity of supplemental foods
- Check the vendor's inventory of non-supplemental foods and/or inventory records to provide information on whether the vendor is an above-50%-percent vendor
- Determine whether the vendor accepts forms of payment other than WIC food instruments, such as cash, personal checks, and credit cards, to provide information on whether the vendor is an above-50%-vendor
- Check the vendor's receipts of infant formula to ensure that the infant formula is obtained only from the State agency's list of infant formula manufacturers registered with the Food and Drug Administration, and infant formula wholesalers, distributors, and retailers licensed under State law
- If the vendor is an above-50%-percent vendor, check its stock of incentive items to ensure that such items have been approved by the State agency
- Obtain the vendor's shelf prices and/or validate the vendor's price list
- Review food instruments in the vendor's possession for vendor violations
- Compare food instruments in vendor's possession with shelf prices to test for vendor overcharges
- Observe food instrument transactions
- Conduct an educational buy
- Interview manager and/or employees
- Review employee training procedures
- Conduct annual vendor training or provide vendor with annual training materials
- Examine the sanitary conditions of the store
- Other (specify): Review returned food instruments, examine authorization stamp, confirm updated vendor manual is stored onsite, which included Cashier Training Guide, Tip Card and WIC Approved food list. For stores flagged for price verification visits only, then shelf prices are compared against submitted pricing data. For formula monitoring visits only, then receipts of infant formula are compared to ensure the vendor purchased formula from a valid source.

**c. Generally, routine monitoring visits are conducted:**

- Annually                       Twice a year                       As needed

**I. VENDOR MANAGEMENT**

**D. Routine Monitoring**

Other (specify): At least twice a year for high risk, probationary and 50% vendors.

**d. The following procedures are used in determining whether a vendor is selected for a routine monitoring visit (check all that apply):**

Random selection

Periodic/scheduled review

Periodic/scheduled training

Complaints

Other (specify): High volume stores, stores flagged as not having an on-site monitoring visit

**e. What percent of vendors received monitoring visits during the past fiscal year?**

Less than 5 percent

5 percent

More than 5 percent

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Store Monitoring Policy 8.0 and Formula Monitoring  
Policy 8.2**

**I. VENDOR MANAGEMENT**

**E. Compliance Investigations**

**1. Investigative Practices**

**a. The State agency conducts:**

- Compliance buys (a covert, on-site investigation in which a representative of the Program poses as a participant, parent or caretaker of an infant or child participant, or proxy; transacts one or more food instruments; and does not reveal during the visit that he or she is a Program representative.)
- Inventory audits (the examination of food invoices or other proofs of purchase to determine whether a vendor has purchased sufficient quantities of supplemental foods to provide participants the quantities specified on food instruments redeemed by the vendor during a given period of time.)
- Not applicable (Proceed to the next section.)

**b. The following procedures are used to determine which vendors are selected for a compliance investigation (check all that apply):**

- Vendor is identified by the high-risk vendor identification criteria
- Random selection
- Geographical considerations
- Volume of WIC redemptions
- Participant complaints
- Other (specify): WICNET ad hoc redemption reports and banking reports

**c. The State agency uses standard procedures for conducting and documenting compliance buys and inventory audits:**

- Yes. If yes, please provide the guidelines in the Vendor Management Appendix or cite the Procedure Manual reference: Compliance Investigation Training Plan
- No

**d. The results of compliance investigations are used to assess the effectiveness of the State agency's high-risk vendor identification criteria:**

- Yes
- No

**If yes, check the items below that describe how the results of compliance investigations are used to assess the effectiveness of high-risk vendor identification criteria:**

- The State agency compares data on the prevalence of vendor violations detected among high-risk versus non-high-risk vendors.
- The State agency discards a high-risk vendor identification criterion if compliance investigations of high-risk vendors identified by the criterion result in no vendor violations after \_\_\_\_\_ months.

**I. VENDOR MANAGEMENT**

**E. Compliance Investigations**

- Investigative procedures and training are reevaluated if compliance investigations of high-risk vendors result in the detection of no vendor violations.
- Other (specify):

**e. How many vendors were authorized as of October 1 of the past fiscal year?**  
**805**

**How many vendors received compliance investigations during the past fiscal year?**  
**63 (as of June 1, 2006)**

**How many vendors who received compliance investigations were high risk during the past fiscal year?**  
19 \_\_\_\_\_

**Did the State agency give priority to high-risk vendors (up to the five percent minimum) in conducting compliance investigations during the past fiscal year?**  
Yes  No

**How many of all vendors were high risk during the past fiscal year?**  
20 \_\_\_\_\_

**(The State agency is required by § 246.12(i)(4)(i) to conduct compliance investigations of at least 5 percent of its vendors authorized as of October 1 of each fiscal year, including all high risk vendors up to the 5 percent maximum.)**

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Sanction Classification System Policy 15.0 and High Risk Retailer Policy 6.0**

**2. Compliance Buys**

**a. The State agency conducts the following types of compliance buys:**

- Trafficking buys (exchanging food instruments for cash)
- Safe buys (transacting food instruments for all food items listed to see if the vendor will overcharge)
- Short buys (transacting food instruments for fewer food items than those listed to see if the vendor will charge for food items not received)
- Major substitution buys (exchanging food instruments for non-food items or unauthorized food items that are not similar to those listed)
- Minor substitution buys (exchanging food instruments for unauthorized food items that are similar to those listed)
- Other (specify): Contract Formula

**I. VENDOR MANAGEMENT**

**E. Compliance Investigations**

**b. Compliance buys are usually conducted by:**

- WIC State agency staff
- WIC local agency staff
- State investigators
- Investigators retained on a contract basis (e.g., Pinkerton, Wells Fargo)
- Interns, neighborhood residents, or program participants employed by WIC
- Another WIC State agency
- Other (specify):

**c. Who is responsible for ensuring the proper execution of and follow-up on compliance buys:**

- WIC State agency vendor manager
- WIC local agency manager
- State investigators
- Contractor
- Another WIC State agency
- Other (specify):

**d. If no vendor violations are detected, how many compliance buys does the State agency conduct before closing a compliance investigation:**

- Two                       Other (specify):

**e. If the State agency conducts a standard number of compliance buys per compliance investigation, what is the basis for the prescribed number of buys:**

- State law or regulation
- State agency policy or procedure
- Level of evidence necessary to impose vendor sanctions
- Legal counsel's advice
- Other (specify):

**f. The vendor is provided written notification of a violation requiring a pattern of violations in order to sanction the vendor, prior to documenting another violation of the same kind, unless the State agency determines that such notice would compromise the investigation:**

- Yes                       No

**g. More than one compliance buy visit is needed to detect a pattern of violations:**

**I. VENDOR MANAGEMENT**

**E. Compliance Investigations**

Yes  No

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Sanction Classification System 15.0**

**3. Estimate the cost for conducting compliance buys, excluding expenses related to the vendor appeals/administrative review process:**

\$175.00 Cost per compliance buy

Unknown  
 Not applicable

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Compliance Investigation Services RFP**

**4. Inventory Audits** (If inventory audits are not performed, go to Question 5)

**a. The following factors are used to determine which vendors selected for compliance investigations will receive inventory audits rather than/or in addition to compliance buys:**

Vendor has highest risk based on State agency's high-risk identification criteria  
 Suspicion of vendor exchanging cash for food instruments (trafficking)  
 Inconclusive compliance buy results  
 Complaints  
 Other (specify): stores with the highest number of contract formula (powdered) reimbursements.

**b. The State agency conducts the following types of inventory audits:**

On-site inventory audits  
 State agency inventory audits (vendor sends records to State agency)  
 Local agency inventory audits (vendor sends records to local agency)  
 Other (specify): Contract Infant Formula only

**c. Inventory audits are conducted by (check all that apply):**

WIC State agency staff  
 WIC local agency staff  
 State investigators  
 Investigators retained on a contract basis (e.g., Pinkerton's, Wells Fargo)  
 Other (specify):

**ADDITIONAL DETAIL: Vendor Management Appendix**

**I. VENDOR MANAGEMENT**

**E. Compliance Investigations**

**and/or Procedure Manual (cite): Formula Monitoring Policy 8.2**

**5. Compliance Buy/Inventory Audit Tracking System(s)**

**a. The State agency has a means of recording and tracking staff person hours devoted to investigation activities:**

Yes       No       Not applicable

**b. The State agency has an automated system for tracking investigations that monitors the progress and status of each compliance investigation:**

Yes       No       Not applicable

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite):**

**I. VENDOR MANAGEMENT**

**F. Vendor Sanction System**

**Please attach and/or reference the location of the State agency's vendor sanction schedule.**

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Sanction Classification System Policy 15.0**

**I. VENDOR MANAGEMENT**

**G. Administrative Review of State Agency Actions**

**1. Types of Administrative Reviews**

**The State agency conducts the following types of administrative reviews of vendor appeals for the adverse actions listed below. (Check all that apply):**

<b>Informal Desk Reviews</b>	<b>Abbreviated Admin. Reviews</b>	<b>Full Admin. Reviews</b>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Denial due to competitive price or minimum stocking selection criterion
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Denial due to business integrity or current FSP DQ or CMP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Denial based on limiting criteria
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Denial due to State agency selection criteria
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Denial due to application outside timeframe
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Denial because the vendor is expected to be an above-50-percent vendor
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DQ for WIC violations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DQ for Food Stamp Program DQ
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DQ for Food Stamp Program CMP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other WIC Sanctions, e.g., fine or CMP
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Termination of vendor agreement for cause

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite): Full Administrative Appeal hearing Policy 1.0 and Informal Settlement Meeting 15.1**

**2. Administrative Review Procedures**

**a. The State has a law or regulation governing WIC administrative reviews**

Yes       No

**If the State does have such a law or regulation, this includes:**

- State Administrative Procedures Act
- State law pertaining to WIC only
- State health department law
- State health department regulation
- State WIC regulation
- Other (specify):

**I. VENDOR MANAGEMENT**

**G. Administrative Review of State Agency Actions**

**b. At which level do administrative reviews of WIC vendor appeals take place:**

- WIC local agency
- WIC State agency
- State health department
- Other (specify):

**c. Administrative reviews are conducted by:**

- Hearing officers
- Administrative law judges
- Other (specify):

**d. The following procedures are followed for administrative reviews:**

<b>Abbreviated Admin. Review</b>	<b>Full Admin. Review</b>	
--	-----------------------------------	--

- |                          |                                     |   |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to examine evidence prior to review  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to reschedule review date  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to present its case  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to be represented by counsel   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to present witnesses   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Opportunity for vendor to cross-examine witnesses   |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Presence of a court reporter or stenographer  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | An impartial decision-maker, whose decision is based solely on whether the State agency correctly applied Federal and State statutes, regulations, policies, procedures |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | A written decision within 90 days from request for review   |
| <input type="checkbox"/> | <input type="checkbox"/>            | Other (specify):  |

**e. Check the party(ies) below who may present the State agency case during a full administrative review:**

- WIC staff person assigned to case
- WIC State agency vendor manager
- WIC State agency director
- Legal counsel (State Attorney General or General Counsel's office)
- Legal counsel (paid by WIC Program funds)
- Other (specify): Prevention Specialist

**Please attach and/or reference the location the State agency's administrative review procedures. Full Administrative Appeal Hearing Policy 1.0**

**ADDITIONAL DETAIL: Vendor Management Appendix**

**I. VENDOR MANAGEMENT**

**G. Administrative Review of State Agency Actions**

**and/or Procedure Manual (cite):**

**I. VENDOR MANAGEMENT**

**H. Coordination with the Food Stamp Program**

**1. WIC/FSP Information Sharing**

- a. An information sharing agreement between the WIC State agency and the FSP is in effect, as per FNS Instruction 906-1 or other FNS guidance, and is maintained at the State agency:**

Yes                       No

**If yes, an updated list of authorized vendors is sent to the FNS field office:**

- Once a year  
 Regularly, at intervals of less than one year (specify):  
 Periodically, as changes occur  
 Upon request  
 Other (specify):

- b. State agency compliance investigators coordinate their activities with their FSP counterparts:**

Yes                       No

- c. State statute, regulations, or procedures restrict the disclosure WIC vendor and FSP retailer information to those permitted under 7 CFR 246.26(e) and (f):**

Yes (specify):  
 No

**ADDITIONAL DETAIL: Vendor Management Appendix and/or Procedure Manual (cite):**

**I. VENDOR MANAGEMENT**

**I. Staff Training**

**1. Check below the routine formal training available to State and local level staff in vendor management practices:**

State	Local	Other (contractor)	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vendor selection and authorization
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vendor training
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Routine monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Compliance investigations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inventory audits
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Corrective actions and sanctions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Criminal investigations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vendor appeals/administrative reviews
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Federal and/or State WIC regulations
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Prevention of vendor fraud and abuse
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WIC/Food Stamp information sharing
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	High-risk vendor identification
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vendor management information system
<input type="checkbox"/>			Not applicable
<input type="checkbox"/>			Other (specify):

**2. State agency staff meet with vendor representatives as part of a vendor advisory council:**

Monthly  
 Quarterly  
 Other frequency:  
 No vendor advisory council

**ADDITIONAL DETAIL: Vendor Management Appendix  
and/or Procedure Manual (cite): Retailer Advisory Committee Policy 2.2**