

**GEORGIA WIC PROGRAM**  
**NOTICE OF CHANGE IN WIC REQUIREMENTS**  
**Effective: November 15, 2015**  
**Addendum No. 16-01**

The following are amendments to requirements for authorized Georgia WIC vendors. All of these amendments will become effective November 15, 2015. All corresponding documents, including the Georgia WIC Vendor Handbook, will be revised to correspond with these amendments. Please complete, sign, and date the Addendum Verification Checklist included with this notice by November 13, 2015. Please MAIL the checklist, using a TRACEABLE delivery method, to: Georgia WIC Program, Office of Vendor Management, Attn: WIC Program Addendum 16-01, 2 Peachtree Street, 10<sup>th</sup> Floor, Atlanta, Georgia 30303-3142. Faxes and emails will not be accepted. Failure to submit a completed checklist will result in termination from the Georgia WIC Program.

The chart below provides a detailed comparative analysis of content modifications made to the Georgia WIC Program Vendor Handbook, effective November 15, 2015. Content changes are highlighted in **yellow & red** within the right column below.

Georgia WIC Program Vendor Handbook Effective April 1, 2014	Georgia WIC Program Vendor Handbook Effective November 15, 2015
<p>Page 8: <i>Process for Vendor Selection and Authorization</i> (paragraph 1)</p> <p>The WIC program is funded by federal tax dollars. Because of this, serving as an authorized WIC vendor is a public trust. Authorization to participate in the program as a vendor is a privilege, not a right. As a steward of public funds, Georgia WIC must balance the need for participant access with the duty to obtain the lowest fair prices for WIC foods and to prevent fraud.</p>	<p>Page 6: <i>Process for Vendor Selection and Authorization</i> (paragraph 1)</p> <p>The WIC program is funded by federal tax dollars. Because of this, serving as an authorized WIC vendor is a public trust. <b>Vendor authorization is the process by which the State Agency assesses, selects, and enters into agreements with the stores that apply or subsequently reapply to be authorized as WIC vendors.</b> Authorization to participate in the program as a vendor is a privilege, not a right. As a steward of public funds, Georgia WIC must balance the need for participant access with the duty to obtain the lowest fair prices for WIC foods and to prevent fraud.</p>
<p><b>New content: <i>Vendor Authorization and Participation</i></b></p>	<p>Page 6 <b>Vendor Authorization and Participation - <i>Number and Distribution of Authorized Vendors</i></b></p> <p><b>The Georgia WIC Women, Infants and Children Program shall not discriminate against an applicant or vendor on the basis of race, color, national origin, age, sex, handicap, disability, or other impermissible basis as set forth in applicable state or federal law. Federal regulations require that Georgia WIC establish standards for vendor authorization to secure a sufficient number and distribution of vendors</b></p>

	<p>that will ensure reasonable participant access and permit effective management of the program. Georgia WIC may establish criteria to limit the number of stores it authorizes as long as the limiting criteria are applied consistently.</p> <p>The primary method of regulating the number of authorized vendors is through the use of a vendor-to-participant ratio. The vendor –to participant ratios are determined prior to each application/authorization period. For vendor authorization, exceptions to the vendor-to-participant ratio conclusions may be considered under the following circumstances:</p> <ul style="list-style-type: none"> <li>• The need to ensure that each food instrument issuance clinic site in the state has an authorized vendor within a 10 mile radius.</li> <li>• The need to provide adequate service to participants in a population center of at least ten (10) individuals who have no access to an authorized vendor within a 10 mile radius of the population center.</li> <li>• The need to provide adequate service to participants when circumstances make it necessary. Those circumstances may include, but are not limited to, the following: <ul style="list-style-type: none"> <li>A. New clinic site opening;</li> <li>B. Participant caseload increases;</li> <li>C. New participant population center recognized;</li> <li>D. Store closings, either voluntary or due to catastrophe;</li> <li>E. Problems with WIC Program compliance;</li> <li>F. Problems caused by non-compliance with Food Stamp regulations</li> </ul> </li> </ul>
<p>Page 14 <b>Vendor Authorization and Participation: <i>Application Acceptance Periods; Re-application Limitations After Application Denial</i></b> (paragraph 1)</p> <p>Applications for WIC vendor authorization will only be accepted during the following periods: Between October 1st to December 31st and March 1st to June 30th of each federal fiscal year.</p>	<p>Page 7 <b>Vendor Authorization and Participation: <i>Application Acceptance Periods; Re-application Limitations After Application Denial</i></b> (paragraph 1)</p> <p>Applications for WIC vendor authorization will only be accepted during the following periods: Between October 1<sup>st</sup> to December 31<sup>st</sup> and March 1<sup>st</sup> to May 31<sup>st</sup> of each federal fiscal year.</p>
<p>Page 8 <b>Vendor Authorization and Participation: <i>Selection Criteria and Continuing Compliance with Selection Criteria</i></b></p> <p>The selection criteria represent the requirements to be considered for authorization as a Georgia WIC vendor. All applicants and vendors must meet the selection criteria at the time of</p>	<p>Page 7-8 <b>Vendor Authorization and Participation: <i>Selection Criteria and Continuing Compliance with Selection Criteria</i></b></p> <p>The selection criteria represent the <b>minimum</b> requirements to be considered for authorization as a Georgia WIC vendor. All applicants and vendors must meet <b>or</b></p>

<p>authorization and maintain them throughout the agreement period unless there is inadequate participant access in that area. Vendors are also required to adhere to any changes in the selection criteria made by Georgia WIC during their agreement period, or face termination. Georgia WIC may reassess any authorized vendor at any time during the vendor's agreement period using the selection criteria in effect at the time of reassessment, and must terminate the agreement of any vendors that fail to meet the current criteria.</p>	<p><b>exceed all</b> the selection criteria at the time of authorization and maintain <b>compliance</b> throughout the agreement period. Vendors are also required to adhere to <b>any</b> changes in the selection criteria made by Georgia WIC during their agreement period, or face termination. Georgia WIC may reassess any authorized vendor at <b>any</b> time during the vendor's agreement period using the selection criteria in effect at the time of reassessment, and must terminate the agreement of any vendors that fail to meet the current criteria. <b>Failure or difficulty meeting any of the selection criteria may be used as just cause for denial of a vendor application for authorization.</b></p>
<p><b>New Content: Vendor Authorization and Participation</b></p>	<p>Page 8 Vendor Authorization and Participation: <b>Exception to WIC Limiting and Selection Criteria</b></p> <p><b>The Georgia WIC Program reserves the right to make exceptions to (waive) the limiting and/or vendor selection criteria to address inadequate participant access to supplemental foods. However, competitive pricing and meeting the minimum WIC approved food stocking requirements are not waivable, per federal regulations.</b></p>
<p><b>New Content: Vendor Authorization and Participation</b></p>	<p>Page 8 Vendor Authorization and Participation: <b>Inadequate Participant Access</b></p> <p><b>Federal regulations require that the State Agency ensures that all WIC participants have adequate access to purchase their WIC food items. By ensuring adequate access to authorized vendors, the Program assists WIC participants in meeting their nutritional goals. Participant access is not defined as participant convenience or preference. Inadequate participant access would cause a hardship to participants. Denial based upon the selection criteria may be waived (see "Exception to WIC Limiting and Selection Criteria"). The Georgia WIC Program will review participant access on a case-by-case basis. Inadequate participant access occurs when the distance between authorized WIC vendors is ten (10) miles or more.</b></p> <p><b>Note: Should an applicant location be identified as an area where there is inadequate participant access, it does not absolve an applicant from the responsibility to comply with the terms of the application process as outlined, as a condition of authorization.</b></p>
<p>Page 9 Vendor Authorization and Participation: <b>Competitive Prices</b></p>	<p>Page 9 Vendor Authorization and Participation: <b>Competitive Prices</b></p>

All applicants and vendors are required to submit and maintain prices that are at, or lower than other vendors currently participating in the program. Applicant prices for the products on the vendor application will be reviewed and compared against the maximum prices allowed for vendors in that Peer Group currently participating in the program. If a prospective vendor's prices are more than ten percent higher than the maximum prices of others in its Peer Group on more than three items – the vendor will be notified that its pricing is not competitive and the vendor may receive technical assistance. Applicants will be given one additional opportunity to re-submit prices after notification. Upon the second submission, those failing to submit prices that are lower than the allowable maximums will be denied. Vendors are required to maintain cost competitiveness after authorization. Vendors may be assessed at any time and those whose prices remain non-competitive will be terminated from the Program.

All applicants and vendors are required to submit and maintain prices that are at, or lower than, other vendors currently participating in the program.

**Applicant** – The prices, for the products listed on the application, will be reviewed and compared against the maximum prices allowed in the proposed Peer Group for vendors currently participating in the program. If a prospective vendor's prices are more than ten (10) percent higher than the maximum prices of actual vendors in the applicant's proposed Peer Group on more than three (3) items – the applicant will be notified that its pricing is not competitive and the applicant may receive technical assistance. Applicants will be given one (1) additional opportunity to re-submit prices after the initial notification. Upon the second submission, those applicants failing to submit prices that are lower than the allowable maximums will be denied authorization.

If this is a cost plus 10% store, the final price must be submitted on the price list as well as posted on the shelf or on signage in the aisle. This is the pricing that is used to determine competitiveness.

**Authorized vendor** – Vendors are required to submit and maintain prices that are at, or lower than other vendors currently participating in the program, within their designated peer group. Vendors must submit shelf pricing each quarter, at a minimum. If a vendor's prices are more than ten (10) percent higher than the maximum prices of others in its Peer Group on more than three (3) items – the vendor will receive a written notification that its pricing is not competitive. WIC vendors are required to maintain competitiveness during the entire agreement period. Vendors may be assessed at any time and those whose prices remain non-competitive for three (3) additional assessments, the vendor agreement will be terminated for a period of twelve (12) months.

A cost plus 10% store must post the final price on the shelf or on signage in the aisle. Pricing must be submitted for all WIC eligible items sold or anticipated being sold at the store location.

Page 11 Vendor Authorization and Participation: *Minimum Inventory of WIC-Approved Foods*

Expired foods do not count towards minimum inventory.

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Expired foods do not count towards minimum inventory and is a sufficient ground for denying the application. Note: All observed concerns with sanitation and food

	<p>safety will be immediately reported to the Georgia Department of Agriculture and may result in an application denial.</p>
<p><b>New Content: Vendor Authorization and Participation</b></p>	<p>Page 11 Vendor Authorization and Participation: <i>Authorization Training</i></p> <p>A vendor applicant must attend training and pass the post-training evaluation with a score of 80 or above. Georgia WIC will provide an initial training session in an interactive format prior to authorization, and at least once every two or three years thereafter during the corresponding vendor re-authorization period. Georgia WIC will provide vendors with at least one alternate date on which to attend interactive training. Attendance at training will be documented, a checklist of items discussed must be signed by the vendor and a Post Vendor Training Evaluation will be given. A passing score of eighty (80) points or higher is required to become authorized. Vendor applicants cannot attend the initial authorization training session until an application for authorization has been submitted and the vendor has registered to attend.</p> <p>Upon request, the Georgia WIC Program will provide language assistance or accommodation to ensure meaningful access to training for vendor applicants and vendors with a language barrier or a disability.</p>
<p>Page 11 Vendor Authorization and Participation: <i>Pre-approval Visits</i></p> <p>Only those vendor applicants that pass initial screening will receive on-site pre-approval visits from Georgia WIC representatives to verify the information listed on the application and inventory. For non-corporate vendors, pre-approval visits will not be conducted until the vendor has attended training and passed the evaluation with a score of 80 or above. For corporate vendors, only one authorized representative from the store is required to attend training.</p>	<p>Page 12 Vendor Authorization and Participation: <i>Pre-approval Visits</i></p> <p>Only those vendor applicants that pass initial screening will receive on-site pre-approval visits from Georgia WIC representative to verify the information listed on the application and inventory. For non-corporate vendors, pre-approval visits will not be conducted until the vendor has attended training and passed the evaluation with a score of 80 or above. For corporate vendors, only one authorized representative from the store is required to attend training.</p>
<p>Page 11 Vendor Authorization and Participation: <i>Adequate Access for Participants</i></p> <p>The store (with the exception of military commissaries and pharmacies) must be open for business at least eight hours per day, six days per week, and must be open during the hours specified on the Vendor Application. In the event an applicant or vendor's hours are changed, they must notify Georgia WIC within twenty days of the change. Military commissaries and pharmacies must be open for business at least five hours per day, five days per week. There should be no barriers to participant entry to the store during opening hours (e.g. required store membership or controlled access or entry to the store.)</p>	<p>Page 12 Vendor Authorization and Participation: <i>Required Minimum Store Hours</i></p> <p>To ensure adequate access to food items for participant, the store (with the exception of military commissaries and pharmacies) must be open for business at least eight hours per day, six days per week and must be open during the hours specified on the Vendor Application. In the event an applicant or vendor's hours are changed, they must notify Georgia WIC within twenty (20) days of the change. Military commissaries and pharmacies must be open for business at least five hours per day, five days per week. There should be no barriers to participant entry to the store during</p>

	opening hours (e.g. required store membership or controlled access or entry to the store).
<p><b>Page 12 Vendor Authorization and Participation: <i>Suitable Store Location</i></b></p> <p>For new stores applying to Georgia WIC for the first time, the minimum square footage requirement for vendors is 3,000 square feet of continuous retail food sales space open to the public, excluding administrative and storage space. Stores participating in the program prior to October 1<sup>st</sup>, 2013 may remain at the previously required minimum of 3,000 square feet, including administrative and storage space. <b>This exception will end on September 30, 2015, unless the vendor agreement expires or is terminated prior to this date.</b> No portion of the store may be located inside of a separate building, nor may any portion be located inside of a facility that is not food retail in nature (e.g. suite on the upper floors of an office building, inside of a community center, daycare, floral shop, etc.). The applicant must provide proof of a lease for at least a three-year period, or proof of ownership of the store location. There must be a store sign to identify the store with the name of the business clearly marked.</p>	<p><b>Page 12 Vendor Authorization and Participation: <i>Suitable Store Location</i></b></p> <p>For new stores applying to Georgia WIC for the first time, the minimum square footage requirement for vendors is 3,000 square feet of continuous retail food sales space open to the public, excluding <b>all</b> administrative and storage space.</p> <p><b>Note: Not all areas of an applicant or vendor’s store are counted towards the minimum square footage requirement. The square footage areas that are not “continuous retail food sales space open to the public” and are used for other purposes that are irrelevant to the purpose of the Georgia WIC Program will not be considered as a part of the minimum square footage requirement.</b></p> <p><b>See Federal Regulations 7 C.F.R. § 246.12, which states: “Retail food delivery systems are systems in which participants, parents or caretakers of infant and child participants, and proxies obtain authorized supplemental foods by submitting a food instrument or cash-value voucher to an authorized vendor.” The program utilizes grocers as part of its retail food delivery service.</b></p>
<p><b>Page 12 Vendor Authorization and Participation: <i>Licensed by the Georgia Department of Agriculture</i></b></p> <p>Each store must have a valid Retail Food Sales Establishment License in the current owner’s name. Pharmacies and military commissaries are exempt from this requirement. Stores that are on the border of Georgia and another state must have a comparable food sales establishment license from that other state’s Department of Agriculture.</p>	<p><b>Page 13 Vendor Authorization and Participation: <i>Licensed by the Georgia Department of Agriculture</i></b></p> <p>Each store must have a valid Retail Food Sales Establishment License in the current owner’s name <b>and be in compliance with all state, municipal, and local sanitation standards. A current Health certificate must be posted in the store.</b> Pharmacies and military commissaries are exempt from this requirement. Stores that are on the border of Georgia and another state must have a comparable food sales establishment license from that other state’s Department of Agriculture. <b>Note: All observed concerns with sanitation and food safety will be immediately reported to the Georgia Department of Agriculture.</b></p>
<p><b>Page 6 WIC Acronym and Logo, Advertisements and Incentives: <i>Use of the WIC Acronym and Logo</i></b></p> <p>A WIC vendor must not use the acronym “WIC”, the WIC logo, or close facsimiles thereof, in total or in part, either in the vendor’s official registered name or in the name under which it does business.</p>	<p><b>Page 17 WIC Acronym and Logo, Advertisements and Incentives: <i>Use of the WIC Acronym and Logo</i></b></p> <p><b>To identify the retailer as an authorized WIC vendor, vendors are required to prominently display in plain sight a poster or decal provided by Georgia WIC which states that the store accepts WIC. The WIC logo is very helpful in areas</b></p>

<p>A WIC authorized vendor shall not use the WIC acronym, the WIC logo, or close facsimiles thereof, in total or in part, in an unauthorized manner on packages, product labels, proprietary materials including pamphlets and brochures, or in any form of marketing, promotional material or advertisement of the store. Any person who uses the acronym “WIC” or the WIC logo in an unauthorized manner, including close facsimiles thereof, in total or in part, may be subject to injunction by the United States Department of Agriculture and the payment of damages. Georgia WIC will terminate the Vendor Agreement for misuse or unauthorized use of the WIC acronym or the WIC logo. If a vendor applicant misuses the WIC acronym or the WIC logo prior to or at application, the Vendor Application will be denied.</p>	<p><b>where language barriers exist.</b> A WIC vendor must not use the acronym “WIC”, the WIC logo, or close facsimiles thereof, in total or in part, either in the vendor’s official registered name or in the name under which it does business. A WIC authorized vendor shall not use the WIC acronym, the WIC logo, or close facsimiles thereof, in total or in part, in an unauthorized manner on packages, product labels, proprietary materials including pamphlets and brochures, or in any form of marketing, promotional material or advertisement of the store. Any person who uses the acronym “WIC” or the WIC logo in an unauthorized manner, including close facsimiles thereof, in total or in part, may be subject to injunction by the United States Department of Agriculture and the payment of damages. Georgia WIC will terminate the Vendor Agreement for misuse or unauthorized use of the WIC acronym or the WIC logo. If a vendor applicant misuses the WIC acronym or the WIC logo prior to or at application, the Vendor Application will be denied.</p>
<p>Page 6 <b>WIC Acronym and Logo, Advertisements and Incentives: <i>Channel Strips and Shelf Talker, and “We Welcome WIC” posters</i></b></p> <p>The Vendor is permitted to use shelf talkers or channel strips stating “WIC approved” or “WIC eligible” on grocery shelves at the exact spot that contains WIC approved foods. These items have been developed by Georgia WIC and are available upon request. Vendors who wish to develop their own shelf talkers or channel strips must obtain written permission from Georgia WIC by submitting a copy or sample of the final version for approval <b>prior to use</b>. To identify the retailer as an authorized WIC vendor, vendors are required to prominently display in plain sight a poster or decal provided by Georgia WIC which states that the store accepts WIC.</p>	<p>Page 17 <b>WIC Acronym and Logo, Advertisements and Incentives: <i>Channel Strips and Shelf Talker, and “We Welcome WIC” posters</i></b></p> <p>The Vendor is permitted to use shelf talkers or channel strips stating “WIC approved” or “WIC eligible” on grocery shelves at the exact spot that contains WIC approved foods. These items have been developed by Georgia WIC and are available upon request. <b>Authorized</b> vendors who wish to develop their own shelf talkers or channel strips must obtain written permission from Georgia WIC by submitting a copy or sample of the final version for approval <b>prior to use</b>.</p> <p>To identify the retailer as an authorized WIC vendor, vendors are required to prominently display in plain sight a poster or decal provided by Georgia WIC which states that the store accepts WIC.</p> <p><b>Authorized vendors must submit the final artwork/graphic image of the proposed shelf label, along with a written request for consideration of approval, to the Georgia WIC Office of Vendor Management. The request must include the proposed size, color, and any other distinguishing features. All requests must be submitted at least thirty (30) days prior to the intended use date. A decision will be sent by the Georgia WIC Office of Vendor Management within thirty (30) days of receipt of request. The proposed shelf label and request can be submitted via email or regular mail to:</b></p> <p style="text-align: right;"><b>Email Address: <a href="mailto:WIC-VM@dph.ga.us">WIC-VM@dph.ga.us</a></b>  <b>U.S. Mail: Georgia Department of Public Health</b></p>

	<p style="text-align: center;"><b>WIC Office of Vendor Management</b>  <b>2 Peachtree Street, N.W. Floor 10</b>  <b>Atlanta, GA 30303</b></p> <p><b>Store personnel are responsible for monitoring the use of all posted shelf labels, regardless of the sources, in order to ensure that each label accurately and consistently identifies all WIC approved foods. Failure to do so is a category II sanction and can result in disqualification from the program for eight (8) months on the third violation. Vendors are required to utilize shelf talkers that reflect the current State Agency administering the Georgia WIC Program, the Georgia Department of Public Health (DPH).</b></p>
<p><b>Page 16 Responsibilities and Procedures for Selected Vendors Types: Incorporated Vendors</b> (paragraph 2)</p> <p>Incorporated applicants must complete and submit a Corporate Information Form along with the vendor authorization application. To access the Corporate Information Form, visit <a href="http://dph.georgia.gov/vendor-information">http://dph.georgia.gov/vendor information</a>, and select “Corporate Information Form”. If an applicant does not have access to the internet, a request can be made for a hardcopy of this form by calling the Office of Vendor Management, at (866) 814-5468.</p>	<p><b>Page 19 Responsibilities and Procedures for Selected Vendors Types: Incorporated Vendors</b></p> <p>Incorporated applicants must complete and submit a Corporate Information Form along with the vendor authorization application. To access the Corporate Information Form, visit <a href="http://dph.georgia.gov/vendor-information">http://dph.georgia.gov/vendor information</a>, and select “Corporate Information Form”. If an applicant does not have access to the internet, a request can be made for a hardcopy of this form by calling the Office of Vendor Management, <b>at 404-657-2900 or toll free, within Georgia, at 1-866-814-5468.</b></p>
<p><b>Page 18 Vendor Training: <i>Pre-authorization and Re-authorization Training</i></b> (paragraph 1)</p> <p>Georgia WIC will provide an initial training session in an interactive format prior to authorization, and at least once every three years thereafter during vendor re-authorization. Georgia WIC will provide vendors with at least one alternate date on which to attend interactive training. Attendance at training will be documented, a checklist of items discussed must be signed by the vendor and a Post Vendor Training Evaluation test will be given. A passing score of eighty (80) points or higher is required to become authorized. Vendor applicants cannot attend the initial authorization training session until an application for authorization has been submitted and the vendor has registered to attend.</p>	<p><b>Page 21 Vendor Training: <i>Pre-authorization and Re-authorization Training</i></b> (paragraph 1)</p> <p>Georgia WIC will provide an initial training session in an interactive format prior to authorization, and at least once every <b>two or three thereafter during the corresponding vendor re-authorization period.</b> Georgia WIC will provide <b>applicant</b>/vendors with at least one (1) alternate date on which to attend interactive training. Attendance at training will be documented, a checklist of items discussed must be signed by the <b>applicant</b>/vendor and a Post Vendor Training Evaluation test will be <b>administered.</b> A passing score of eighty (80) points or higher is required to become authorized. <b>There are no exceptions to the requirement to obtain a passing score of a minimum of 80 points. Each applying store should give the appropriate consideration and preparation when determining the representative sent to complete the authorization training.</b> Vendor applicants cannot attend the initial authorization training session until an application for authorization has been submitted and the vendor has registered to attend. <b>Upon request, the Georgia WIC Program will</b></p>

<p>Page 20 <b>WIC Approved Foods: List of Infant Formula Wholesalers, Distributors, and Manufacturers</b></p> <p>All vendor applicants are required to purchase infant formula solely from the suppliers selected and approved by Georgia WIC. The Georgia WIC Program does not permit vendors to purchase infant formula from other program vendors. Only purchases from the manufacturers, distributors and wholesalers will be permitted. Records of the infant formula purchase must be maintained for a minimum of three previous years plus the current year (or until any pending investigations are closed). In the event of an investigation, only purchase invoices from those suppliers will be considered as legitimate. The program may also require vendors to supply the program with written permission to confirm their infant formula purchase history with suppliers.</p>	<p><b>provide language assistance or accommodation to ensure meaningful access to training for vendor applicants and vendors with a language barrier or a disability.</b></p> <p>Page 23 <b>WIC Approved Foods: List of Infant Formula Wholesalers, Distributors and Manufacturers</b></p> <p>All vendor applicants <b>and authorized vendors</b> are <u>required</u> to purchase infant formula, <b>to be exchanged for WIC food instruments, directly from a WIC approved supplier or manufacturer included on a list provided by the Georgia WIC Program.</b> <u>The Georgia WIC Program does not permit vendors to purchase infant formula from other authorized program vendors or retailers.</u> <b>Only purchases from the approved list will be permitted.</b></p> <p><b>Records of the infant formula purchases must be maintained for a minimum of three (3) previous years plus the current year (or until any pending investigations are closed). In the event of an investigation, only purchase invoices from those approved suppliers will be considered as legitimate. The program may also require vendors to supply the program with written permission to confirm their infant formula purchase history with suppliers.</b></p> <p><b>The approved list includes manufacturers registered with the Food and Drug Administration (FDA) as well as licensed wholesalers, distributors and suppliers. Only Georgia WIC approved Infant Formula is eligible for purchase and distribution. A current list is posted on the Georgia WIC Vendor Management (OVM) Website and available to applicants and authorized vendors. Manufacturers and wholesalers/distributors/suppliers are listed separately. The Infant Formula supplier list will be updated as suppliers are added or at a minimum, annually. Annual updates shall observe the Federal Fiscal year of October 1<sup>st</sup> through September 30<sup>th</sup>. Vendors may not appeal the State's decision to include or exclude an infant formula wholesaler, distributor or manufacturer from the approved list.</b></p> <p><b>The Approved Infant Formula Suppliers List can be located on the Georgia WIC Vendor Management Website at: <a href="https://dph.georgia.gov/vendor-information">https://dph.georgia.gov/vendor-information</a>.</b></p> <p><b><u>Obtaining Approval to be Placed on the Georgia WIC Approved Infant Formula Supplier List</u></b></p>
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Wholesalers, distributors, and suppliers may apply to be placed on the approved list by contacting the WIC Office of Vendor Management at 404-657-2900 or toll free 1-866-814-5468. The newly posted Georgia WIC Approved Infant Formula Supplier List will have an effective date that reflects the date that the last supplier(s) was added to the approved list.

Page 21 WIC Approved Foods: *Minimum WIC Food Inventory Requirements*

Effective December 1, 2013

JUICE	Ready to Serve Container	48 oz.	12 Containers – 2 Types
	Non-Frozen Concentrate	11.5 oz.	
	Frozen Concentrate	11.5 – 12 oz.	
	Ready to Serve Container	64 oz.	12 Containers – 2 Types

<b>FISH</b> Least Expensive of type selected	Tuna Pink Salmon	5 oz, 6 oz, or 14.75 oz
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INFANT FRUITS & VEGETABLES	Fruit and/ or Vegetable	4 oz. Jars	96 Jars Combined
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Page 26 The WIC Food Instrument: *Food Instruments Types and Descriptions*

Cash Value/Fruit and Vegetable Vouchers (CVV). A CVV is issued for fruits and vegetables.

- CVVs are used to purchase approved fresh, frozen, and canned fruits and vegetables.
- CVVs have a maximum amount listed (e.g. \$6, \$7, \$8 and \$10.)

Page 25 WIC Approved Foods: *Minimum WIC Food Inventory Requirements*

Effective April , 2015

JUICE	Ready to Serve Container	48 oz.	12 Containers – 2 Flavors	
	Non-Frozen Concentrate	11.5 oz.		Any Combination
	Frozen Concentrate	11.5 – 12 oz.		12 Containers - 2 Flavors
	Ready to Serve Container	64 oz.		

<b>FISH</b> Least Expensive of type selected	Tuna Pink Salmon	5 oz, 6 oz, 7.5 oz or 14.75 oz
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INFANT FRUITS & VEGETABLES	Fruit and/ or Vegetable	4 oz. Jars or 8 oz. Twin Packs	96 Jars Combined or 49 – 8 oz. Twin Packs
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Page 30 The WIC Food Instrument: *Food Instruments Types and Descriptions*

Cash Value/Fruit and Vegetable Vouchers (CVV). A CVV is issued for fruits and vegetables.

- CVVs are used to purchase approved fresh, frozen, and canned fruits and vegetables.
- CVVs have a maximum amount listed.

<p>Page 27 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Minimum Requirements for Payment</i></b></p> <ul style="list-style-type: none"> <li>• Food instruments must be issued by Georgia WIC or its authorized local agencies, printed on official Georgia WIC paper, and unaltered.</li> <li>• Food instruments are accepted on the “First Day to Use” date through the “Last Day to Use” date.</li> <li>• An authorized WIC vendor stamp appears on the food instrument, is legible, and the food instrument is deposited to the single account provided to Georgia WIC by the vendor.</li> <li>• Deposited within sixty days of the “First Day to Use” date.</li> <li>• The amount of purchase is entered in the “PAY EXACTLY SPACE” in ink.</li> <li>• A signature is obtained from the participant, in ink, at the time of purchase.</li> <li>• For cash value vouchers, the vendor must not issue change to a WIC customer for purchases that are less than the total value of the cash value voucher.</li> <li>• For cash value vouchers, the WIC customer may use his/ her own funds for purchase amounts in excess of the monetary limit for his/her cash value voucher.</li> </ul>	<p>Page 31 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Minimum Requirements for Payment</i></b></p> <ul style="list-style-type: none"> <li>• Food instruments must be issued by Georgia WIC or its authorized local agencies, printed on official Georgia WIC paper, and unaltered.</li> <li>• Food instruments are accepted on the “First Day to Use” date through the “Last Day to Use” date.</li> <li>• An authorized WIC vendor stamp appears on the food instrument, is legible, and the food instrument is deposited to the single account provided to Georgia WIC by the vendor.</li> <li>• Deposited within sixty days of the “First Day to Use” date.</li> <li>• The amount of purchase is entered in the “PAY EXACTLY SPACE” in ink.</li> <li>• <b>When stamping, use black ink ONLY with your WIC vendor stamp DO NOT use any other color of ink.</b></li> <li>• A signature is obtained from the participant, in ink, at the time of purchase.</li> <li>• For cash value vouchers, the vendor must not issue change to a WIC customer for purchases that are less than the total value of the cash value voucher.</li> <li>• For cash value vouchers, the WIC customer may use his/ her own funds for purchase amounts in excess of the monetary limit for his/her cash value voucher.</li> </ul>
<p>Page 22 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Steps to Follow When Accepting WIC Food Instruments</i></b></p> <p>5. Print in ink the amount of the WIC purchase in the “Pay Exactly” space on the food instrument in the presence of the WIC customer. Complete this step for one food instrument prior to moving on to the next food instrument.</p>	<p>Page 32 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Steps to Follow When Accepting WIC Food Instruments</i></b></p> <p>5. Print in <b>black</b> ink the amount of the WIC purchase in the “Pay Exactly” space on the food instrument in the presence of the WIC customer. Complete this step for one food instrument prior to moving on to the next food instrument.</p>
<p>Page 28 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Steps to Follow When Accepting Cash Value Vouchers (CVV)</i></b></p> <p>6. CVVs will be in \$6, \$7, \$8, and \$10 amounts.</p> <p>8. Write the price of the purchase in the “Pay Exactly” space in ink in the presence of the WIC Customer. Complete this step for one CVV before moving on to the next CVV.</p>	<p>Page 33 <b>The WIC Food Instrument: Processing WIC Food Instruments Including Cash Value Vouchers - <i>Steps to Follow When Accepting Cash Value Vouchers (CVV)</i></b></p> <p><b>6. CVVs will be issued in specified, maximum dollar amounts.</b></p> <p>8. Write the price of the purchase in the “Pay Exactly” space in <b>black</b> ink in the presence of the WIC Customer. Complete this step for one CVV before moving on to the next CVV.</p>
<p>Page 30 <b>The WIC Food Instrument: <i>Important Notes about the WIC Customer for</i></b></p>	<p>Page 34 <b>The WIC Food Instrument: <i>Important Notes about the WIC Customer for</i></b></p>

<p><b>Cashiers and Store Managers</b></p> <p>5. Must be allowed to purchase all foods listed on the food or CVV, regardless of price.</p> <p>8. Must be charged the same shelf prices as other customers.</p>	<p><b>Cashiers and Store Managers</b></p> <p>5. Must be allowed to purchase all foods listed on the food <b>instrument</b> or CVV, regardless of price.</p> <p>8. Must be charged the same shelf prices as other <b>non-WIC</b> customers.</p>
<p>Page 33 <b>WIC Food Instrument: <i>Redemption Assessment</i></b></p> <p>Any vendor with less than \$2,000.00 in annual WIC redemptions or not redeeming any WIC food instruments in sixty (60) days will be terminated from the program for a period of one (1) year. Food Instrument redemption data on all vendors will be reviewed on a quarterly basis. A vendor must remain price-competitive throughout the agreement period. Non-competitive pricing occurs when the amount paid per food instrument by Georgia WIC to a vendor for a month's payment for all food instruments except cash value food instruments, exempt infant formulas, and medical foods exceeds the statewide average amount paid per food instrument redeemed within the peer group by more than 50%. If a vendor is found to be non-competitive during an assessment, the vendor will receive written notice. If the vendor is identified as non-competitive for three additional assessments, the vendor agreement will be terminated for a period of twelve months.</p> <p>Pharmacies and military commissaries are exempt from this redemption assessment</p>	<p>Page 37 <b>WIC Food Instrument: <i>Vendor Redemption and Pricing Assessments</i></b></p> <p>Any vendor with less than \$2,000.00 in annual WIC redemptions or not redeeming any WIC food instruments in sixty (60) days will be terminated from the program for a period of one (1) year. Food Instrument redemption data on all vendors will be reviewed on a quarterly basis. A vendor must remain price-competitive throughout the agreement period. Non-competitive pricing occurs when the amount paid per food instrument by Georgia WIC to a vendor for a month's payment for all food instruments except cash value food instruments, exempt infant formulas, and medical foods exceeds the statewide average amount paid per food instrument redeemed within the peer group by more than 50%. If a vendor is found to be non-competitive during an assessment, the vendor will receive written notice. If the vendor is identified as non-competitive for three additional assessments, the vendor agreement will be terminated for a period of twelve months.</p> <p><b>Vendors are required to submit and maintain prices that are at, or lower than, other vendors currently participating in the program, within their designated peer group. Vendors must submit shelf pricing each quarter, at a minimum. If a vendor's prices are more than ten (10) percent higher than the maximum prices of others in its Peer Group on more than three (3) items – the vendor will receive a written notification that its pricing is not competitive. WIC vendors are required to maintain competitiveness during the entire agreement period. Vendors may be assessed at any time and those whose prices remain non-competitive for three (3) additional assessments, the vendor agreement will be terminated for a period of twelve (12) months.</b></p> <p>Pharmacies and military commissaries are exempt from this redemption assessment.</p>
<p><b>New Content: The WIC Food Instrument</b></p>	<p>Page 37 <b>The WIC Food Instrument: <i>Vendor Cost Containment</i></b></p> <p><b>All redeemed food items must have a corresponding and preceding shelf price</b></p>

	<p><b>submission for each authorized store location. Shelf price data is used to establish a database of prices and will aid in alleviating redemption issues for infrequently used food instruments. Vendors are encouraged to submit prices for new items as well as price changes of existing items at any time.</b></p>
<p>Page 35 <b>Changes in Vendor Information: <i>Changes in Store Location or Information</i></b></p> <p>The vendor must provide Georgia WIC with at least twenty-one (21) days advance written notice of any changes in store location. Each store is authorized based on the ownership and physical address that exists at the time of authorization, and authorization is not transferable to another store location.</p>	<p>Page 39 <b>Changes in Vendor Information: <i>Changes in Store Location or Information</i></b></p> <p>The vendor must provide Georgia WIC with at least twenty-one (21) days advance written notice of any changes in store location <b>or information provided on the most recent vendor application.</b> Each store is authorized based on the ownership and physical address that exists at the time of authorization, and authorization is not transferable to another store location.</p>
<p>Page 35 <b>Changes in Vendor Information: <i>Changes in Ownership (including addition of owner and Cessation of Operation)</i></b></p> <p>The vendor must provide Georgia WIC with at least twenty-one (21) days advance written notice of any changes to the ownership, operation, corporate structure, and management of its business or cessation of business and the effective date. Georgia WIC will acknowledge the receipt of this information.</p> <p>If business changes involve the addition of new owners, corporate officers, partners, and/or affiliates, a vendor must include the full name, social security number, and date of birth for each individual in its notice to the Department. New people added to an existing business, or who acquire the business must pass the Department’s Business Integrity checks. A vendor will be immediately terminated from the program if it fails to provide the Department with advance written notice of such changes and fails to provide the requisite information the Department needs to conduct its Business Integrity checks. For locations where none of the initial owners retain any ownership interest or for locations ceasing operation, the vendor authorization number will be terminated on the effective date of the change. Any food instruments submitted for payment after the effective date will be returned unpaid. If the vendor wishes to change the effective date, a written notification is required. Otherwise, the vendor authorization number will be terminated, as originally confirmed. Once termination occurs, a vendor must submit a new application and meet all current selection criteria. New owners must submit an application, since WIC vendor agreements are not transferable.</p> <p>If Georgia WIC discovers that a change in ownership has occurred before notice is received, then the vendor authorization number will be immediately terminated. All food instruments</p>	<p>Page 39 <b>Changes in Vendor Information: <i>Cessation of Operation</i></b></p> <p>The vendor must provide Georgia WIC with at least twenty-one (21) days advance written notice of any changes to the ownership, operation, corporate structure, and management of its business or cessation of business and the effective date. Georgia WIC will acknowledge the receipt of this information.</p> <p><b>WIC-authorized vendors must provide Georgia WIC with at least twenty-one (21) days advance written notice of any plan to cease operations, whether temporarily (e.g., remodeling) or permanently (e.g., store closure). An agreed upon cessation date for accepting and processing WIC food instruments will be established and adhered to. All WIC operations will be suspended during the time that store is closed. The store location is unable to redeem WIC Food Instruments. In order to determine store readiness, an updated application review and satisfactory site visit are required before WIC operations resume. If Georgia WIC discovers that an authorized location has temporarily closed without receipt of prior notice, the vendor authorization number will be immediately terminated. All food instruments submitted for payment will be returned unpaid and Georgia WIC will establish a claim for reimbursement of redemptions.</b></p>

<p>submitted for payment will be returned unpaid and Georgia WIC will establish a claim for reimbursement of redemptions.</p> <p>Upon the sale of the store, the authorized WIC vendor should inform the new owner that the Georgia WIC Vendor Agreement is non-transferable and that the new owner must submit an application to be considered for authorization as a WIC vendor. If the new owner submits a Vendor Application, then the new owner will be required to provide proof of purchase of the store from the previous WIC vendor.</p> <p>If a vendor is disqualified from Georgia WIC, the vendor shall not continue operating as a Georgia WIC vendor by selling, assigning or otherwise transferring ownership to the vendor's partners, members, owners, officers, directors, employees, relatives by blood or marriage, heirs or assigns. Similarly, upon or after the assessment of a sanction, the vendor may not withdraw from the program, close the store or transfer ownership of the store to the vendor's partners, members, owners, officers, directors, employees, relatives by blood or marriage, heirs or assigns. Failure to abide by this provision may subject the vendor to civil liability, fines, and penalties.</p>	
<p>Page 36 <b>Changes in Vendor Information: <i>Reporting and Changing Shelf Prices</i></b></p> <p>Each vendor is required to submit the shelf prices for WIC food items carried in each store. Georgia WIC collects mandatory shelf prices quarterly, but reserves the right to collect shelf prices outside of that time frame at its discretion. Georgia WIC may request shelf prices for as many or as few items as it desires. Should an authorized Georgia WIC vendor change prices subsequent to authorization, the vendor is requested to inform Georgia WIC of such changes within forty-eight (48) hours of implementing the new prices. The vendor should make the changes at <a href="https://sendss.state.ga.us/wicpricing">https://sendss.state.ga.us/wicpricing</a>. To access the database, please use the password provided in the notice for shelf price collection. In the event the vendor fails to update Georgia WIC of such changes, WIC may rely on the latest submission of shelf prices by the vendor in determining its current shelf prices. Collection of shelf prices is neither approval nor denial by Georgia WIC of the actual shelf prices that the vendor charges WIC participants.</p>	<p>Page 41 <b>Changes in Vendor Information: <i>Reporting and Changing Shelf Prices</i></b></p> <p><b>Shelf price surveys are used to identify stores that are in compliance with competitive pricing criteria.</b></p> <p><b>USDA regulations require the Georgia WIC Program to “ensure that a vendor selected for participation in the program does not, subsequent to selection, increase prices to levels that would make the vendor ineligible for authorization.” USDA regulations require a shelf price survey to be completed at least every six months following authorization.</b></p> <p>Each vendor is required to submit the shelf prices for WIC food items carried in each store <b>location</b>. Georgia WIC collects mandatory shelf prices quarterly, but reserves the right to collect shelf prices outside of that time frame at its discretion. <b>All “cost plus 10% store locations must submit the final price charged for a food item.</b> Georgia WIC may request shelf prices for as many or as few items as it desires. Should an authorized Georgia WIC vendor change prices subsequent to authorization, the vendor is requested to inform Georgia WIC of such changes within forty-eight (48) hours of implementing the new prices. The vendor should make the changes at</p>

	<p><a href="https://sendss.state.ga.us/sendss/wicpricing.wiclogin">https://sendss.state.ga.us/sendss/wicpricing.wiclogin</a>. To access the database, please use the password provided in the notice for shelf price collection. In the event the vendor fails to update Georgia WIC of such changes, WIC may rely on the latest submission of shelf prices by the vendor in determining its current shelf prices. Collection of shelf prices is neither approval nor denial by Georgia WIC of the actual shelf prices that the vendor charges WIC participants.</p> <p><b>Pricing must be submitted for all food items sold or anticipated being sold at each store location. Failure to submit shelf pricing for an item subsequently redeemed is a sanction-able violation (see "Sanction System"). Collection of shelf prices does not constitute either approval or denial by Georgia WIC of the actual shelf prices the vendor charges WIC participants.</b></p>
<p>Page 37 <b>Performance Compliance</b></p> <p>A vendor is subject to monitoring for compliance with Georgia WIC policies and procedures. Any violations that are found may result in sanctions (See Sanction System).</p> <p>Compliance with Georgia WIC policies and procedures is determined using the following methods:</p> <ol style="list-style-type: none"> <li>1. Covert (undercover) compliance investigations</li> <li>2. Overt unannounced monitoring visits</li> <li>3. Inventory audits</li> <li>4. Research of programmatic reports and database</li> </ol>	<p>Page 42 <b>Performance Compliance</b></p> <p><b>Pursuant to federal regulations, Georgia WIC is required to monitor all vendors for possible violations of the Georgia WIC Program's rules, regulations, policies or procedures. Program integrity is further maintained by WIC program representatives that monitor the use and handling of WIC benefits. The Georgia WIC Program utilizes multiple methods to monitor vendors and determine possible violations, including covert compliance investigations and routine monitoring visits to the store location. Any violations that are found will result in the imposition of sanctions (See "Sanction System").</b></p> <p>Compliance with Georgia WIC policies and procedures is determined using the following methods:</p> <ol style="list-style-type: none"> <li>1. Covert (undercover) compliance investigations</li> <li>2. Overt <b>announced and</b> unannounced monitoring visits</li> <li>3. Inventory/<b>Record</b> audits</li> <li>4. Research <b>and analysis</b> of programmatic <b>data, files,</b> and reports.</li> </ol>
<p>Page 37 <b>Performance Compliance: Covert Compliance Investigation</b></p> <p>Vendors may be identified for covert compliance investigations via:</p> <ol style="list-style-type: none"> <li>1. Research of programmatic reports and vendor database, including but not limited to the Vendor Score section of the Vendor Profile report;</li> <li>2. Vendors who have been reported for potentially violating program policies; or</li> <li>3. Random selection if less than five (5) % of vendors are high risk.</li> </ol>	<p>Page 42 <b>Performance Compliance: Covert Compliance Investigation</b></p> <p>Vendors may be identified for covert compliance investigations via:</p> <ol style="list-style-type: none"> <li>1. Research of programmatic reports and vendor database, <b>such as high risk reports and redemption activity;</b></li> <li>2. Vendors who have been reported for potentially violating program policies; or</li> <li>3. Random selection if less than five (5) % of vendors are high risk.</li> </ol>

<p>4. If the total number of vendors that are identified as high risk is greater than five (5) %, the investigations of those high risk vendors will be prioritized based on which indicators are flagged.</p>	<p>4. If the total number of vendors that are identified as high risk is greater than five (5) %, the investigations of those high risk vendors will be prioritized based on which indicators are flagged.</p>
<p>Page 37 <b>Performance Compliance: Overt Monitoring</b></p> <p>Representatives of the federal or state agencies may conduct unannounced overt monitoring visits any time that the store is open for business. All records must be available for review by the representative of the agency upon request.</p>	<p>Page 43 <b>Performance Compliance: Overt Monitoring</b></p> <p>Representatives of the federal or state agencies may conduct <b>announced and</b> unannounced overt monitoring visits any time that the store is open for business. All records must be available for review by the representative of the agency upon request.</p>
<p>Page 38 <b>Performance Compliance: Audits</b></p> <p>Georgia WIC may conduct record or inventory audits on any vendor at any time. Inventory audits will include the examination of food invoices or other proofs of purchase to determine whether a vendor has purchased sufficient quantities of supplemental foods to provide WIC customers the quantities specified on food instruments redeemed by the vendor during a given period of time. Purchase invoices should reflect the name and address of the wholesaler or supplier, date of the purchase, list of the items purchased, size, stock number, quantity, unit price and total dollar amount for the quantity purchased. Itemized cash receipts must include the name and address of the store or a code number by which the store can be identified, the date of purchase, description of the items purchased, unit price and total purchase price. Itemized cash receipts that do not completely describe the item should have a computer code that can be verified by calling the store manager. Affidavits or oral statements are not acceptable as proof of inventory. During an audit, the vendor must supply Georgia WIC or its representative with documentation of pertinent records upon request. Vendors must retain copies of all invoices relating to the purchase of WIC food items for the three previous years plus the current year.</p>	<p>Page 43 <b>Performance Compliance: Audits</b></p> <p><b>Georgia WIC may conduct record or inventory audits on any vendor at any time. Vendors are required to maintain inventory records for the three (3) prior years plus the current year, and make these records available to authorized WIC representatives. Inventory audits will include the examination of food invoices or other proofs of purchase to determine whether a vendor has purchased sufficient quantities of supplemental foods to provide WIC customers the quantities specified on food instruments redeemed by the vendor during a given period of time.</b></p> <p><b>Acceptable Records of Inventory</b></p> <p><b>An acceptable record of inventory is a purchase invoice from a wholesaler or supplier. Purchase invoices should reflect the name address of the wholesaler or supplier, date of the purchase, list of the items purchased, size, stock, number, quantity, unit price and total dollar amount for the quantity purchased. Itemized cash receipts must include the name and address of the store or code number by which the store can be identified, the date of purchase, description of the items purchased, unit price and total purchase price. Itemized cash receipts that do not completely describe the item should have a computer code that can be verified by calling the store manager. Affidavits or oral statements are not acceptable as proof of inventory. During an audit, the vendor must supply Georgia WIC or its representative with documentation of pertinent records upon request.</b></p> <p><b>An authorized WIC vendor must certify that it purchases infant formula only from sources identified on the Georgia WIC Program list of approved suppliers. The certification includes producing retained invoices, copies of purchase orders,</b></p>

	<p>receipts or any other proofs of purchase that clearly outline all purchases were made from an approved suppliers on the list at the time of purchase. Proofs of purchase should detail, at a minimum:</p> <ol style="list-style-type: none"> <li>1) Preparation entirely by the supplier from whom the WIC vendor makes the purchase</li> <li>2) The name of the seller</li> <li>3) The name of purchase (WIC Vendor)</li> <li>4) Date of purchase</li> <li>5) Date vendor received merchandise at the store (if different from the date of purchase)</li> <li>6) A description of each formula purchased, to include brand name, unit size, unit price, type or form and quantity</li> </ol> <p>A vendor must retain all records of purchases, gross sales receipts, and invoices for all authorized supplemental foods stored at any of its locations or that are otherwise under the vendor's control for a period of three (3) previous years plus the current year. Upon request, the vendor shall make available the records to Georgia WIC. If any litigation, claim, negotiation, audit, or other action involving the records has begun during the three-year period, the vendor shall keep the records until all issues have been resolved.</p> <p>A Georgia WIC Program representative may request proof of purchases via compliance visit, a written or verbal request.</p> <p>A vendor shall be given a specific timeline (generally 14 to 21 days) to submit purchase invoices to the Program. The vendor's failure to retain and provide purchase invoices to the Program upon request of within the period specified, in subject to a sanction and can lead to an authorized WIC vendor's disqualification from the Georgia WIC Program.</p> <p>If acceptable purchase invoices do not support amounts paid to the authorized vendor for WIC food instruments submitted to the Program, the Program shall recover monies overpaid to the retail vendor.</p>
<p>Page 38 Performance Compliance: <i>Programmatic Reports and Database</i></p> <p>The WIC Program will review data from specific programmatic reports or databases to identify</p>	<p>Page 44 Performance Compliance: <i>Programmatic Reports and Database</i></p> <p>The WIC Program will review data from specific programmatic reports or databases to</p>

<p>vendors who may be out of compliance. If a vendor is out of compliance because of overpricing based on a programmatic report, notification will be given to the vendor to provide an opportunity to reimburse Georgia WIC for the excess amount charged. Failure to repay will result in a program sanction (see “Sanction System”).</p> <p>Programmatic reports will also be generated to determine if a pharmacy vendor is accepting food instruments other than those for exempt or special infant formulas, including medical foods. Failure to comply shall result in termination of the vendor agreement for cause.</p> <p>Programmatic reports, such as the Vendor Profile report, also will be generated. If a vendor’s score causes a flag in any category, the vendor will be considered high risk and may receive a covert compliance investigation.</p>	<p>identify vendors who may be out of compliance. <b>For example, if a vendor is out of compliance due to overpricing, notification will be given to the vendor to provide an opportunity to reimburse Georgia WIC for the excess amount charged.</b> Failure to repay will result in a program sanction (see “Sanction System”).</p> <p><b>Programmatic reports will also be generated to determine if a vendor is accepting food instruments outside of what is permissible for their peer group. As an example, a pharmacy vendor’s redemptions will be assessed to determine if the location is accepting food instruments other than those for exempt or special infant formulas, including medical foods. Failure to comply shall result in termination of the vendor agreement for cause.</b></p> <p><b>Overall, Georgia WIC monitors all authorized vendors based on established high risk criteria to ensure that vendors remain in compliance with regulations, policies and procedures throughout their agreement period.</b></p>
<p><b>Page 38 Performance Compliance: <i>High Risk Identification</i></b></p> <p>Georgia WIC must identify high-risk vendors at least once a year using criteria developed by the USDA or other criteria developed by Georgia WIC. Compliance investigations will be conducted on vendors identified as high-risk.</p>	<p><b>Page 44 Performance Compliance: <i>High Risk Identification</i></b></p> <p>Georgia WIC must identify high-risk vendors at least once a year using criteria developed by the USDA or other criteria developed by Georgia WIC. Compliance investigations will be conducted on vendors identified as high-risk.</p> <p><b>Vendor monitoring takes place through the review of food transaction procedures, redemption patterns, and representative on-site visits. Compliance investigation will be conducted on vendors identifies as high-risk.</b></p>
<p><b>New Content: Performance Compliance</b></p>	<p><b>Page 45 New Content: Performance Compliance – <i>Conflict of Interest</i></b></p> <p><b>Conflict of interest is prohibited between the Program and the vendor or retailer, as well as the local agency and the vendor. A conflict of interest exists when there is a pecuniary relationship between the vendor and the Program or local agency. Additionally, a conflict of interest also exists when relatives serve WIC participants. Georgia WIC shall terminate the vendor agreement if the Program identifies a conflict of interest between the vendor and the Program or its local agency representatives.</b></p> <p><b>To ensure the integrity of the WIC Program, both of the Vendor Management oversight functions shall ensure that no undeclared conflict of interest or the</b></p>

appearance of a conflict exists for any employees of the Office of Vendor Management (OVM) and the Department of Public Health (DPH) Office of the Inspector General (OIG). Both offices shall ensure that no conflict of interest exists between their personnel and authorized retailers. A conflict of interest will be deemed to exist when an employee of a vendor oversight function is also a worker, owner or has relatives who work at or own a WIC approved retailer/vendor.

WIC OVM and OIG employees shall not engage in any activities which creates a conflict of interest between the employees' assigned function and any other interests or obligations or those of immediate family members or business associates.

WIC OVM and OIG employees shall not engage in activities which violate federal or state laws, WIC Policies, or which, in any way, diminish the integrity efficiency, or quality of the WIC Program.

WIC OVM and OIG employees shall not perform their official duties in a manner that would result in preferential or discriminatory treatment to any applicant or authorized vendor.

WIC OVM and OIG employees shall not abuse, misuse, or disclose confidential information in manner that can result in a direct benefit to employee or immediate family member or business associate.

WIC OVM and OIG employees must refrain from directing or recommending that a WIC participant choose or stay away from a specific vendor/retailer to redeem benefits.

WIC OVM and OIG employees must refrain from knowingly making a decision intended to benefit or to disadvantage a specific authorized WIC vendor/retailer.

An owner or spouse of an owner of a WIC authorized vendor is prohibited from being concurrently employed by WIC.

All conflicts of interest issues or complaints shall be reported directly the DPH Office of Human Resources.

**New Content: Performance Compliance**

**Page 46 New Content: Performance Compliance – *Complaints***

Georgia WIC must have procedures in place to capture, document and resolve all complaints from applicants, participants, parents or caretaker of infants and children, proxies, retailer/vendors, staff and general public. Complaints of civil rights discrimination must be handled in accordance with 7CFR§ 246.8(b).

The Georgia WIC Office is very concerned about all forms of program abuse and takes all complaints seriously. WIC customers are not allowed to verbally abuse retail store employees or violate the proper procedures for processing food instruments or cash value vouchers. Equally, WIC authorized vendors and held accountable for observing the program's policies, procedures and honoring the terms of the vendor agreement. The Georgia WIC Program provides a toll-free (in Georgia) customer service hotline (1-866-814-5468) that WIC vendors and participants may call to report complaints/incidents or to make inquiries. The participant may also contact their local WIC clinic to voice any complaint/incident.

The local agency must complete a complaint/incident form and begin the resolution process on all complaints from a WIC participant concerning a vendor. Once a complaint/incident is initiated at the local level, correspondence or contact is made with the State WIC office for additional processing. Resolution, at the State agency, will be initiated within twenty-four (24) hours of receipt. The local agency will receive notification regarding how and when the complaint/incident was resolved.

**Participant Complaints**

Authorized WIC vendors are encouraged to report all participant complaint to the Georgia WIC State Office. Examples of participant complaints include, but are not limited to:

- Adverse treatment of a vendor's owner, manager or employees;
- Use of altered WIC food instruments (i.e., changing dates, names, or food amounts);
- Purchase or attempted purchase of unauthorized foods with WIC food instruments

- Persistent attempts to purchase larger quantities of an authorized supplemental food item than listed on a WIC food instrument;
- Transaction of WIC food instruments outside of the valid period;
- Transaction of WIC food instruments at an unauthorized vendor;
- Sale of WIC food instruments or other Food and Nutrition Service (FNS) authorized coupons;
- Transaction of WIC food instruments by a person not listed on the Georgia WIC Program ID Card (WIC ID)

**Vendor Complaints**

Vendor complaints are those complaints filed by WIC participants or others concerning an authorized WIC vendor. Examples of vendor complaints include, but are not limited to:

- Adverse treatment of a WIC participant by a vendor's owner, manager or employee;
- Charging more to WIC participants than other customers;
- Providing outdated or spoiled food items;
- Refusal to accept manufacturers' coupons, or other store discounts; and
- Inadequate variety and/or quantity of WIC-authorized supplemental food items.

The Georgia WIC Program will take the appropriate follow up action on all complaints received.

**Responding to/Resolving Participant Complaints:**

Vendors may file a complaint against a WIC participant/proxy by calling the Customer Service Hotline or by contacting the Office of Vendor Management by mail. The Office of Vendor Management will refer the participant complaint to the Office of Program Integrity and Strategy for follow up resolution.

**Responding to/ Resolving Vendor Complaints:**

The Office of Vendor Management will accept, investigate, take the appropriate

follow up action and resolve all reported vendor related complaints.

**Resolution Process for complaints against Vendors:**

The WIC Vendor location identified in a complaint will be contacted by a representative of the Georgia WIC Program within one (1) business day of receipt of a complaint. The following steps will be taken:

- Discuss the specific details of the complaint;
- Provide technical assistance (if applicable);
- Request that vendor research the complaint and develop a corrective action plan for resolution, i.e.
  - Train employees
  - Contact complainant (if permitted)
  - Proactively correct non-compliance complaint
- Where a complaint cannot be investigated and resolved within the same business day, the Georgia WIC Program representative will request a response from the vendor in two (2) business days of less confirming a final disposition where the corrective action plan has been completed as agreed upon.
- After complete resolution has taken place, all parties involved are contacted to ensure satisfactory resolution has taken place.
- The details of the complaint and its final disposition will be formally documented and can result in additional program follow-up, depending on the nature of the complaint.

A vendor may be investigated when a complaint/incident appears to be a sanctionable offense. Follow-up efforts and final disposition may result in compliance visits, warning letters and notice of sanctionable offenses.

**Complaints of Civil Rights Violations**

Complaints of Civil Rights violations will be handled in accordance with Federal Law and the Department of Agriculture (USDA) Policy. The policy states:

The U.S. Department of Agriculture (USDA) prohibits discrimination against its

customers, employees and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derive from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html) or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442, or email at [program.intake@usda.gov](mailto:program.intake@usda.gov). Individuals who are deaf, hard of hearing, or have speech disabilities and wish to file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (for Spanish).

The Office of vendor Management will document all received complaints. If the referral is participant related, the complaint will be referred to the Office of Program Integrity and Strategy for follow up and resolution.

All vendor complaints will be handled as outlined in "Vendor Complaints" and final report will be provided to the USDA.

#### Confidentiality of Retailer Information

The State of Georgia strongly supports public access to records in an effort to promote transparent and open government, and thus, finds that public records should be made available for public inspection without delay, except when specifically required by federal stature or regulation to be kept confidential.

The federal statute and regulations governing the administration of the Georgia WIC Program requires that confidential vendor information not be disclosed. Confidential vendor information is any information about a vendor (whether it is

obtained from the vendor or another source) that individually identifies the vendor, except for vendor's name, address, telephone number, Web site/email address, and vendor type and authorization status. The Georgia WIC Program will apply the same limitations to the use and release of information obtained from USDA-Supplemental Nutrition Assistance Program (SNAP) regarding SNAP retailers, whether or not the retailer is a WIC retailer. Except as otherwise permitted by this section, the Georgia Women, Infants and Children Program must restrict the use or disclosure of confidential vendor information to:

- 1) Individuals directly connected with the administration or enforcement of the WIC Program of the Georgia Department of Human Services – Supplemental Nutrition Assistance Program (SNAP) or whom Georgia WIC Legal Unit determines have a need to know the information for purposes of these programs.
- 2) Individuals directly connected with the administration or enforcement of any Federal or State law or local law or ordinance. Prior to releasing the information to one of these parties (other than a Federal agency), Georgia WIC must enter into a written agreement with the requesting party specifying that such information may not be used or disclosed except for purposes directly connected to the administration or enforcement of a Federal, or State law; and
- 3) A vendor that is subject to an adverse action, including a claim to the extent that the confidential information concerns the vendor subject to the adverse action and is related to the adverse action.

#### **WIC Vendor Agreement**

The State of Georgia WIC Vendor Agreement defines the roles and responsibilities of authorized retailers. By reference this WIC Vendor Handbook is made part of the Vendor Agreement and the policies and procedures outlined in this handbook are an integral part of the Vendor Agreement and the policies and procedures outlined in this handbook are an integral part of the Vendor Agreement. The Vendor Agreement, Vendor Handbook, federal regulation, and policy letters outline Georgia WIC Program policies and procedures that must be met by each authorized vendor location.

	<p>Georgia WIC may terminate the Vendor Agreement with an authorized vendor by providing fifteen (15) days advance written notice. The vendor may terminate the Vendor Agreement by providing twenty-one (21) days advance written notice. The parties shall not be released from the duty to perform their obligations to renew the Vendor Agreement.</p> <p><b>Vendor Agreement Renewal (Reauthorization ) and Amendments</b></p> <p>Prior to the end of an agreement period, as assigned by the Georgia WIC Program, the vendor must apply for renewal of the agreement. The reauthorization process requires the completion of re-authorization training (see “Vendor Training”), submission of a new application, submission of all required documentation as outlined in the vendor application as well as meeting &amp;/or exceeding the selection criteria as outlined prior to the end of the current agreement period (see “Vendor Authorization and Participation”). Renewal of the agreement will be based upon both the vendor limiting criteria and vendor selection criteria.</p> <p>Expiration of a contract or agreement with a grocer or pharmacy is not subject to appeal. Neither the State Agency, nor the vendor has an obligation to renew the contract or agreement.</p> <p>The vendor agreement may be amended, at any time, at the sole discretion of the Georgia WIC Program. Vendors, who do not accept, sign and return amendments to the agreement, as outlined are subject to expiration of their current vendor agreement after fifteen (15) days’ notice.</p>
<p>Page 40 <b>Termination of the Vendor Agreement: <i>Termination Upon Notice</i></b></p> <p>After being terminated from the Georgia WIC Program, the vendor will not be automatically reinstated as an authorized WIC vendor. The vendor may re-apply no sooner than one year after being terminated from Georgia WIC. To re-apply, the vendor must complete the application process in its entirety.</p>	<p>Page 51 <b>Termination of the Vendor Agreement: <i>Termination Upon Notice</i></b></p> <p>After being terminated from the Georgia WIC Program, the vendor will not be automatically reinstated as an authorized WIC vendor. The vendor may re-apply, <b>as a new applicant</b>, no sooner than one year after being terminated from Georgia WIC. To re-apply, the vendor must complete the application process in its entirety.</p>
<p>Page 41 <b>Sanctions and The Sanction System: <i>Sanctions</i></b></p> <p>2. All State agency sanctions assessed are retained in the vendor's file for a period of one year and will roll off at the end of that period.</p>	<p>Page 52 <b>Sanctions and The Sanction System: <i>Sanctions</i></b></p> <p>2. All State agency <b>violations</b> assessed are retained in the vendor's file for a period of one year and will roll off at the end of that period.</p>
<p>Page 42 <b>Sanctions and the Sanction System: <i>The Sanction System – State Agency</i></b></p>	<p>Page 53 <b>Sanctions and Sanction System: <i>The Sanction System – State Agency</i></b></p>

<p><b>Sanctions</b></p> <p>Below is a description of the Georgia WIC sanction system and how it works. For those violations that require a pattern, a pattern is established when the same violation occurs twice. Enforcement of all sanctions is required when violations have been committed.</p> <p>If a violation occurs in Category I, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs a second time, the vendor will receive another warning for the second offense. If the <b>same</b> violation occurs a third time, the vendor will be disqualified for the time period specified for that category (six months).</p> <p>If a violation occurs in Category II, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs a second time, the vendor will receive another warning for the second offense. If the <b>same</b> violation occurs a third time, the vendor will be disqualified for the time period specified for that category (eight months.)</p> <p>If a violation occurs in Category III, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs again after receiving the first warning, the vendor will be disqualified for the time period specified for that category (ten months).</p>	<p><b>Sanctions</b></p> <p>Below is a description of the Georgia WIC sanction system and how it works. For those violations that require a pattern, a pattern is established when the same violation occurs <b>at least</b> twice.</p> <p>If a violation occurs in Category I, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs a second time <b>within twelve (12) months from the date of this first offense warning notification</b>, the vendor will receive another warning for the second offense. If the <b>same</b> violation occurs a third time <b>within twelve (12) months from the date of this first offense warning notification</b>, the vendor will be disqualified for the time period specified for that category (six months).</p> <p>If a violation occurs in Category II, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs a second time <b>within twelve (12) months from the date of this first offense warning notification</b>, the vendor will receive another warning for the second offense. If the <b>same</b> violation occurs a third time <b>within twelve (12) months from the date of this first offense warning notification</b>, the vendor will be disqualified for the time period specified for that category (eight months.)</p> <p>If a violation occurs in Category III, the vendor will receive written warning for the first offense. If the <b>same</b> violation occurs again <b>within twelve (12) months from the date of this first offense warning notification</b>, after receiving the first warning, the vendor will be disqualified for the time period specified for that category (ten months).</p>
<p>Page 43 <b>Sanctions and the Sanction System: <i>The Sanction System – State Agency Sanctions Category I – Disqualification for six months on third violation</i></b></p> <p>1. Stocking one or more WIC food items outside of manufacturer's expiration date.</p>	<p>Page 54 <b>Sanctions and the Sanction System: <i>The Sanction System – State Agency Sanctions Category I – Disqualification for six months on third violation</i></b></p> <p><b>1. Stocking or selling out of date and/or inconsumable WIC food commodities to WIC participants. This will include any WIC product that has a specific expiration date, sell by, best if sold by or similar wording with a date printed on the container. Note: All observed concerns with sanitation and food safety will be immediately reported to the Georgia Department of Agriculture.</b></p> <p><b>6. Claiming reimbursement for a food item for which there has been no submitted shelf price.</b></p>
<p><b>New Content: Sanctions and the Sanction System: <i>The Sanction System – State Agency</i></b></p>	<p>Page 55 <b>Sanctions and the Sanction System: <i>The Sanction System – State Agency</i></b></p>

<p><b>Sanctions Category III – Disqualification for ten months on second violation</b></p>	<p><b>Sanctions Category III – Disqualification for ten months on second violation</b></p>
<p>Page 46 <b>Sanctions and the Sanction System: The Sanction System – Civil Money Penalties (CMP)</b> (paragraph 2)</p> <p>CMPs must be paid within thirty days of the notice of approval. Installments may be considered up to a maximum of six months. If a vendor does not pay, partially pays, or fails to pay a CMP assessed in lieu of disqualification on time, the Georgia WIC Program will disqualify the vendor for the length of the disqualification corresponding to the to the violation for which the CMP was assessed.</p>	<p><b>17. Tampering with the manufacturer dates on any food item.</b></p> <p>Page 58 <b>Sanctions and the Sanction System: The Sanction System – Civil Money Penalties (CMP)</b> (paragraph 2)</p> <p>CMPs must be paid within thirty days of the notice of approval. Installments may be considered up to a maximum of six months. If a vendor does not pay, partially pays, or fails to pay a CMP assessed in lieu of disqualification on time, the Georgia WIC Program will disqualify the vendor for the length of the disqualification corresponding to the to the violation for which the CMP was assessed. <b>A CMP does not relieve a vendor of financial liability for timely payment of claims assessed for vendor violations or errors. Assessed claims must be paid in addition to the CMP.</b></p>
<p>Page 47 <b>Sanctions and the Sanction System: The Sanction System – CMP Methodology for State Agency Sanctions</b></p> <p>CMPs will be assessed in lieu of disqualification for State Agency sanctions based on the chart below.</p> <p>For State agency Sanctions, the first CMP will be reduced by fifty percent if the vendor presents documented proof that they had an effective training program in place. The vendor must also submit documentation listing the names of the personnel trained and the date of training. This training date must be during the fiscal year and before the disqualification notification.</p> <p>CMPs cannot exceed \$11,000 per violation or \$44,000 per investigation. If more than one violation is detected during a compliance investigation, a CMP must be imposed for each violation (up to the \$11,000/\$44,000 limits.) Only two CMPs can be assessed against a vendor. CMPs cannot be imposed in lieu of disqualification for third and subsequent sanctions in these categories.</p>	<p>Page 58 <b>Sanctions and the Sanction System: The Sanction System – CMP Methodology for State Agency Sanctions</b></p> <p>A vendor may be assessed <b>a CMP</b> in lieu of disqualification if the disqualification will result in inadequate participant access. Upon assessment of a CMP, the disqualification period will be waived. Subsequent visits may be conducted during a waived disqualification period. If violations occur during a subsequent visit, <b>a vendor will be assessed a warning for those violations and may be issued another CMP in lieu of disqualification if the requisite pattern of violations is met. Only two (2) CMPs may be assessed against a vendor. A</b> vendor will be disqualified from the Georgia WIC Program for third and subsequent sanctions.</p> <p>CMPs will be assessed in lieu of disqualification for State Agency sanctions based on the chart below.</p> <p>For State agency Sanctions, the first CMP will be reduced by fifty (50) percent if the vendor presents documented proof that they had an effective training program in place. <b>At a minimum, the training content must be centered around cashier operations which have a direct impact on the quality of adhering to WIC policies and procedures as an authorized WIC vendor. The vendor is responsible for informing and training all of its cashiers and other staff on the most current WIC policies and procedures, at all times.</b></p> <p><b>The submitted training documentation must show proof of the following:</b></p>

	<ul style="list-style-type: none"> <li>• An outline of training content covered</li> <li>• The name of the store personnel administering the training</li> <li>• The signature, date of signature by the trainer next to a statement attesting to having administrated the content as outlined</li> <li>• A list of the names of the personnel trained</li> <li>• A signature of personnel in attendance next to their listed name</li> <li>• The date and location of the training</li> </ul> <p><b>Note: This training <i>must be</i> held during the fiscal year and before the disqualification notification.</b></p> <p>CMPs cannot exceed \$11,000 per violation or \$49,000 per investigation. If more than one violation is detected during a compliance investigation, a CMP must be imposed for each violation (up to the \$11,000/\$49,000 limits.) Only two CMPs can be assessed against a vendor. CMPs cannot be imposed in lieu of disqualification for third and subsequent sanctions in these categories.</p>
<p>Page 46 <b>Sanctions and the Sanction System: The Sanction System – <i>CMP Methodology for Mandatory Sanctions</i></b></p> <p>For a violation that warrants permanent disqualification, the amount of the CMP shall be \$11,000 for each violation.</p> <p>Multiply the amount from step 2 above by the number of months for which the store would have been disqualified. This is the amount of the civil money penalty, provided that the civil money penalty shall not exceed \$11,000 per violation. The total amount of the CMP assessed for violations that occur during a single investigation may not exceed \$44,000.</p>	<p>Page 59 <b>Sanctions and the Sanction System: The Sanction System – <i>CMP Methodology for Mandatory Sanctions</i></b></p> <p>For a violation that warrants permanent disqualification, the amount of the CMP shall be \$11,000 for each violation, <b>not to exceed \$49,000.00.</b></p> <p>Multiply the amount from step 2 above by the number of months for which the store would have been disqualified. This is the amount of the civil money penalty, provided that the civil money penalty shall not exceed \$11,000 per violation. The total amount of the CMP assessed for violations that occur during a single investigation may not exceed \$49,000.</p>
<p><b>New Content: Administrative Review and Appeal Procedures: <i>Non-discrimination</i></b></p>	<p>Page 66 <b>Administrative Review and Appeal Procedures: <i>Non-discrimination</i></b></p> <p><b>Authorized Retail Store locations must offer WIC Participants the same courtesies as those offered to other customers, e.g., no separate lines or hours. Any practice that singles out Participants from other customers is prohibited.</b></p> <p><b>Such practices include:</b></p> <ul style="list-style-type: none"> <li>• Keeping lists of Participants</li> <li>• Having Participants sign cash register receipts,</li> <li>• Having specific register lines Participants must use,</li> <li>• Keeping folders for each Participant,</li> </ul>

- Keeping Participants' receipts, and
- The offering or denial of incentives solely to WIC participants (based on 7 CFR 246.12(h)(3)(iii) and WIC Policy Memorandum 2012-3, Vendor Incentive Items).

In accordance with federal law and U.S. Department of Agriculture policy, the Georgia WIC Program and all authorized Retailers are prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

The U.S. Department of Agriculture (USDA) prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and, where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individuals' income is derived from any public assistance program, or protected genetic information in employment or in any programs and/or employment activities.

If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at [program.intake@usda.gov](mailto:program.intake@usda.gov)

Individuals who are deaf, hard of hearing, or have speech disabilities and wish a file either an EEO or program complaint please contact USDA through the Federal Relay Service at (800) 877-8339 or (800) 845-6136 (in Spanish).

Persons with disabilities, who wish to file a program complaint, please see information above on how to contact us by mail directly or by email. If you require alternative means of communication for program information (e.g., Braille, large print, audiotape, etc.) please contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

USDA is an equal opportunity provider and employer.

<p><b>New Content: <i>Where to Get More Information</i></b></p> <p>In accordance with Federal Law and Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.</p> <p>To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish)</p>	<p>Page 67 <b><i>Where to Get More Information</i></b></p> <p>In accordance with Federal Law and Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability.</p> <p>To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish)</p> <p><b>Buying, selling, or otherwise misusing WIC benefits is a crime. To report suspected abuse, call 800-424-9121 or visit <a href="http://www.usda.gov/oig/hotline.htm">www.usda.gov/oig/hotline.htm</a>.</b></p>
<p><b>New Content: Civil Rights – <i>Limited English Proficiency (LEP)</i></b></p>	<p>Page 68 <b>Civil Rights – <i>Limited English Proficiency (LEP)</i></b></p> <p><b>Title VI of the Civil Rights Act of 1964, prohibits discrimination based on language. Any individual who applies to or participates in the WIC program who is not proficient in English must be provided with an interpreter. See <b>Federal Regulations: §246.8 (b)</b>, FNS Instruction 113-1, CNPP Civil Rights Policy Notice No. 2013-3</b></p> <p><b>All participants must be advised at the service delivery point of the availability of other language services. As the main food delivery channel for Georgia WIC, the Program asks that each authorized vendor location uses appropriate interpreters to communicate information, where applicable. <b>Limited English Proficiency (LEP)</b> resources are available to assure meaningful access for all WIC participants. Approved interpreters are provided via a language line service. See below for instructions outlining the use of the service:</b></p> <p style="text-align: center;"><b><u>Language Line Services Quick Reference Guide</u></b></p> <p><b>When <u>receiving</u> a call from a participant with limited – English, begin at Step 1; when managing a face-to-face service with a participant with limited- English, begin at Step 2:</b></p> <p><b>1. PRESS “Conf” to place the non-English speaker on hold</b></p>

	<p>2. DIAL: 1-866-874-3972</p> <p>3. ENTER on your keypad or provide the representative with the Client ID and Company Name:</p> <p><i>You may press 0 or stay on the line for assistance.</i></p> <ul style="list-style-type: none"> <li>• 6-digit Client ID: 5 1 3 1 8 2</li> <li>• Company Name: WIC Branch</li> </ul> <p>4. PRESS 1 for Spanish; Press 2 for all other languages (speak the name of the language when prompted)</p> <p><i>An Interpreter will be connected to the call.</i></p> <p>5. BRIEF the Interpreter. Summarize what you wish to accomplish and give any special instructions.</p> <p>6. Add the non-English speaker to the line or call.</p> <p><u>When placing a call to an individual with limited-English, begin Step 2 above.</u></p> <p><u>If you need assistance when placing a call to a non-English speaker, you may press 9 to transfer to a representative at the beginning of the call. The Interpreter will connect you with the person to whom you want to speak. Once connected, the Interpreter will translate your information and the individual's response.</u></p>
<p>Page 54 <b>Glossary</b></p>	<p>Page 69 <b>Glossary</b></p> <p><u>"Best if used by"</u> – Date limiting the sale or use of the food items as provided for in Federal Food Drug and Cosmetic Act.</p> <p><u>Claim</u> – A bill or request for reimbursement of funds.</p> <p><u>Confidential Vendor Information</u> – Based upon § 246.26(e), confidential vendor information is any information about a vendor that identifies the vendor's name, address, authorization status, telephone number, web-site/e-mail address and store type.</p>

**Conflict of Interest** – A conflict of interest exists when there is a pecuniary relationship between the Retailer and the Program or the local Agency; when relatives serve WIC Participants; and/or when a technical assistance, training or monitoring visit is conducted by a program staff person who may be related to the store owner or other store management staff.

**Cost-plus pricing or Cost-plus 10% pricing** – The practice, by a company, of determining the cost of their product to them and then adding a percentage on top of that price to determine the selling price to the customer.

**Incentive Items** – may include, but are not limited to, cash prizes, lottery tickets, transportation, sales or special and other free food or merchandise. Minimal courtesies of the retail food trade, such as bagging or helping load groceries are exceptions.

**Inventory Records** – Up-to-date records that are required for tax purposes and that include records on purchases, receipts, and inventory.

**Lack of Business Integrity** – Activities indicating a lack of business integrity include fraud, anitrust violations, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, receiving stolen property, making false claims, and obstruction of justice.

**LEP (Limited English Proficiency)** – an individual that is limited in the use of the English language.

**“Sell by”** – Date limiting the sale of use of the food item as provided for in Federal Food Drug and Cosmetic Act.

**Trafficking** – The exchange of WIC checks for cash.

Please ensure that all of the information you receive pertaining to Georgia WIC is official documentation. We consider official documentation to be any document you receive from Georgia WIC with the program logo, and/or the signature of the Director of the Georgia WIC program or Deputy Director of Vendor Management. If you have any questions pertaining to Georgia WIC or its processes, please contact Georgia WIC at 1-866-814-5468, or visit our website at <http://dph.georgia.gov/vendor-information>.