Chapter 8 Food Benefit Issuance

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The North Carolina WIC Program provides WIC approved foods through a retail purchase system. This chapter discusses policies and procedures for issuing food benefits to WIC participants. It describes the North Carolina WIC Electronic Benefit Transfer (EBT) system, the steps involved in initial and subsequent issuance, special issuance situations, and various issues related to storage and security of eWIC cards.

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Electronic Benefit Transfer and North Carolina eWIC

Electronic Benefit Transfer (EBT) is a food benefit delivery system that permits electronic access to WIC food benefits using a plastic card with a magnetic stripe. In North Carolina (NC), the WIC EBT system is called eWIC. Each eWIC card has a 16-digit Primary Account Number (PAN) that is linked to the family's Electronic Benefit Account (EBA). The card becomes active when food benefits are issued to the EBA. The card can be used to purchase food benefits after the cardholder self-selects a four-digit Personal Identification Number (PIN). Both the eWIC card and the PIN are required at point of purchase. The PIN is a numeric password used to authenticate the individual to the eWIC system. The PIN acts as an electronic signature at the point of purchase.

Local agency staff initiate the EBT process through the Crossroads Management Information System (MIS). Each family is assigned a PAN and an eWIC card is issued. Aggregated food benefits for the family are issued to the EBA and the food benefits are purchased by the cardholder at WIC-authorized vendors and pharmacies. All food benefits, including supplemental foods prescribed to each participant, infant formulas and WIC-eligible nutritionals (WEN), and/or a fixed-dollar amount to purchase fruits and vegetables (Cash Value Benefit or CVB) are listed on a family shopping list called Shopping List Remaining Benefits. Only the prescribed foods, formula and/or WEN on the Shopping List may be purchased using the eWIC card.

Sample NC eWIC Card



Issue a North Carolina eWIC Card

Only a WIC participant, Parent/Guardian 1, Parent/Guardian 2, or Caretaker (Participant/PG1/2/Caretaker) can be issued an NC eWIC card (initial or replacement). An eWIC card may not be issued to a proxy. Refer to Chapter 6A for information on representatives for infants and children.

In Crossroads, the selection of the radio button corresponding with the Participant/PG1/2/Caretaker name on the Issue Electronic Benefit Transfer (EBT) Card screen indicates that the staff member who is issuing the NC eWIC card has verified the individual's identity. Refer to Chapter 6A, Attachment 1 for acceptable proofs of identity.

• Issuance of an initial eWIC card.

The local agency staff member issuing the initial NC eWIC card must verify proof of identity of corresponding Participant/PG1/2/Caretaker.

- *In hand at the local agency*. The issuance of an initial eWIC card in hand at the local agency is the default issuance method and is sufficiently documented in the Crossroads journal of transactions.
- *By mail.* If a family is being served remotely and requests issuance of an initial eWIC card by mail, the local agency staff must:
 - verify identity of Participant/PG1/2/Caretaker being issued the eWIC card and verify mailing address in Crossroads;
 - explain that mailing the initial eWIC card will not change the amount of food benefits in the family EBA; however, the family will not have immediate access to the active food benefits until the eWIC card is received by the family; and
 - create a Family alert in Crossroads to document: Participant/PG1/2/Caretaker request for issuance of initial eWIC card by mail, Participant/PG1/2/Caretaker understanding and consent to a delay in access to food benefits, and date the local agency staff mailed the eWIC card.

• Issuance of a replacement eWIC card.

- *In hand at the local agency*. The issuance of a replacement eWIC card in hand at the local agency is sufficiently documented in the Crossroads journal of transactions.
- *By mail.* The eWIC card can be replaced by mail after the cardholder calls the eWIC Customer Service system (also known as the Interactive Voice Response [IVR] system). Mailed cards may take up to 7 days to be received. Local clinic staff may not mail replacement cards.

Explain How To Use The NC eWIC Card

Local agency staff must provide written information on using electronic food benefits.

Explain How To Select A Personal Identification Number (PIN)

To use the NC eWIC card, a PIN must be assigned. Only the Participant/PG1/2/Caretaker can select the PIN. Staff should provide instructions on PIN self-selection.

Provide Information On NC eWIC Card Replacement

When a replacement NC eWIC card is requested, the local agency staff must document in the family record the reported reason for eWIC card replacement (self-reported or verified by a

third party). Reported seasons for an eWIC card replacement can be the original card was destroyed, damaged, stolen or lost. The eWIC card may be replaced in hand at the local agency staff or by mail after the cardholder calls the eWIC Customer Service. The eWIC card should be replaced when the card does not swipe at the vendor and the vendor has to key in the eWIC card number.

An eWIC card may be replaced as many times as needed; however, families who need their card replaced more than three times should be encouraged but are not required to use the eWIC Customer Service system for a mailed replacement. It is recommended that local staff review the reasons for multiple (excessive) replacements and discuss ways to reduce card replacement with the cardholder as needed.

Replacing the NC eWIC card does not change the amount of food benefits in the family EBA. The PIN for the card remains the same as the previous card. Any current food benefits reported as missing or stolen from an eWIC card cannot be reissued. Refer to Section 3 for the replacement of redeemed food benefits reported as destroyed or damaged due to personal misfortune.

Note: In times of natural disasters such as a hurricane, the State WIC Program will provide guidance on handling replacement of destroyed NC eWIC cards.

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Food Benefit Issuance

Local agency staff must complete the following activities to prepare and issue food benefits. Procedures may vary as noted in the content of this section. The activities in this section assume required nutrition education contacts have been completed as indicated in Chapter 5: Nutrition Education.

Verify Proof of Identity

Local agency staff must verify identity of Parent/Guardian 1, Parent/Guardian 2, Caretaker, or Proxy (PG1/2/Caretaker/Proxy) before food benefit issuance. Refer to Chapter 6A, Attachment 1 for acceptable proofs of identity.

Determine Issuance Frequency

In most situations, a maximum of three months of benefits may be issued to eligible participants. Local agency staff may assign a different issuance frequency in the Crossroads system when needed. Refer to Chapter 8, Section 3 for additional information.

Documentation Of Issuance

The Crossroads system automatically documents issuance in the participant's record.

• Obtain A Signature

At each food benefit issuance, local agency staff must obtain the signature of the PG1/2/Caretaker/Proxy by signing the electronic signature pad. The individual's signature indicates that staff has verified the individual's proof of identity.

Failure To Obtain A Signature

- If staff fails to obtain the participant or representative's signature, staff must select their own name on the Print Food Instruments and Sign box in the Crossroads system, sign their own name, and write "forgot to sign." Staff must document their reason for signing in the participant's record.
- If the individual cannot write his/her name, instruct the individual to make his/her "mark" on the electronic signature pad. If the individual does not have a usual "mark" staff must have the individual make an "X." Staff then must print the person's name on the signature pad, initial and date this entry.

■ Offer The Option Of Naming A Parent/Guardian 2 And/Or Caretaker

Staff should explain the role of the parent/guardian 2 and caretaker as being able to perform all the functions of the parent/guardian 1 as the representative for an infant or child. Naming a second or third representative provides convenience to the parent/guardian 1 by allowing them to bring the infant/child to mid-certification and subsequent certification appointments, as well as signing for food benefits. Refer to Chapter 6A, on representatives for infants and children.

Review Food Benefits

At initial certification, staff must explain to the participant/parent/guardian/caretaker that supplemental foods benefits are issued for each eligible participant and aggregated

(combined) into family-based benefits. Review the aggregated food benefits on the Food Instrument List screen with the participant/parent/guardian/caretaker/proxy prior to issuing food benefits.

Issue Electronic Food Benefits And Print The Shopping List

Local agency staff issue food benefits to the participant from the Issue Food Instruments screen in Crossroads. The food benefits are issued to the participant's Electronic Benefits Account (EBA) and the eWIC card is used to access those benefits at authorized vendors or pharmacies. Print the Shopping List Remaining Benefits after issuing food benefits and review with the participant/parent/guardian/caretaker/proxy.

Food Benefit Issuance To A Proxy

The participant/parent/guardian/caretaker must be offered the option of appointing up to two proxies. A proxy is any individual appointed by a participant/parent/guardian or caretaker of an infant or child. A proxy must be 18 years of age and is only authorized to pick up food benefits and use the NC eWIC card on behalf of the family. A proxy is not authorized to act as the parent/guardian/caretaker of an infant or child at certification or mid-certification assessments.

- A proxy must read or have read to them in their language of preference, the WIC Program rights and responsibilities (refer to Chapter 6D). A proxy who has not been previously appointed must have a dated note signed by the participant/parent/guardian/caretaker giving the proxy authority to pick-up and redeem food benefit issuance for the participant. By signing the signature pad, the proxy is indicating understanding of the rights and responsibilities as related to the WIC Program and for food benefit issuance.
- When a local agency staff person who is authorized to provide food benefit issuance also serves as a proxy, then issuance must be performed by a different staff person.
- A proxy is limited to signing for one month's food benefit issuance when a pregnant woman is within two weeks of her expected delivery date (EDD).

Explain How To Select WIC Approved Foods

At initial certification, staff must instruct the participant/parent/guardian/caretaker on how to select the food items specified on the "Shopping List Remaining Benefits." Staff should provide the brochure "North Carolina WIC Program Shopping Guide." Staff must also explain the use of the Cash Value Benefit. If the cost of the approved fruits and vegetables exceeds the maximum amount, the participant/parent/guardian/caretaker may pay the difference or return item(s). Payment can be made using any form the vendor accepts, including Food and Nutrition Services EBT cards. No tax can be charged on payments made with an EBT card. Tax will be charged on payments made by cash, debit or credit card.

At any subsequent issuance, staff should ask if a review of how to select WIC approved foods is needed or if there are any questions on how to select or about the WIC approved foods.

Explain How To Use The App

Staff should provide instructions on the eWIC app, *ebt*EDGESM.

Explain How To Use Coupons, "Valued Customer" Cards And "In-Store Specials"

Staff must instruct the participant/parent/guardian/caretaker/proxy that they are entitled to use coupons (i.e. manufacturer or store coupons), "valued customer" cards, and "in-store" specials for WIC approved foods just as they would use them with any other purchases. The participant/parent/guardian/caretaker/proxy is not responsible for paying tax on the value of the coupon or "in-store special."

At any subsequent issuance, staff should ask if a review is necessary or if there are any questions pertaining to the use of coupons, valued customer cards or in-store specials.

Provide A List of Authorized WIC Vendors And Pharmacies

At NC eWIC card issuance, staff must provide a list of currently authorized NC eWIC vendors and pharmacies in their service area to the participant/parent/guardian/caretaker/ proxy. Staff should provide an updated list of authorized vendors and pharmacies as needed.

Exchange Of WIC Food Benefits

At all issuances, staff must instruct the participant/parent/guardian/caretaker/proxy that exchanging the NC eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. Refer to Chapter 6F for further guidance on program abuse by participants.

Provide Appropriate Notice

At any issuance, staff must provide the appropriate program notice to all applicable family members. Refer to Chapter 6D, Section 2.

Determine The Next Appointment

Staff should determine the next appointment type and either schedule a day and time or instruct the participant/parent/guardian/caretaker/proxy when to return. For subsequent food benefit issuance, the participant/parent/guardian/caretaker/proxy should return no earlier than seven days prior to the family issuance day or no later than ten days after the family issuance day to allow for full benefit issuance.

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Food Benefit Issuance Variances

There are a variety of situations when food benefit issuance may vary from the issuance described in Section 2. These may include but are not limited to: monthly issuance, food package prescription changes, proration, primary caretaker changes, replacement of destroyed or damaged redeemed food benefits due to personal misfortune, and circumstances that prevent or do not require physical presence.

Monthly Issuance

There are times when monthly issuance is either required or preferred.

- **Required Monthly Issuance**. Staff must keep a family on monthly issuance when:
 - A pregnant woman is within two weeks of her expected date of delivery (EDD) or
 - A participant/parent/guardian/caretaker who informs the local agency staff that he/she is moving out-of-state within one month. Staff also should issue a Verification of Certification (VOC) sheet and remind the participant/parent/guardian/caretaker that the North Carolina eWIC card cannot be used outside of North Carolina. See Chapter 6E for information on Transfer of Certification.
- Preferred Monthly Issuance. Staff and/or a participant/parent/guardian/caretaker may request monthly or bi-monthly issuance.

Type of Infant Formula Or WIC-Eligible Nutritional Changes

Food benefits may be replaced when the type of Infant Formula (IF), Exempt Infant Formula (EXF) or WIC Eligible Nutritional (WEN) changes on the participant's food prescription. After staff receive appropriate medical documentation (if required) for the new formula and/or WIC-eligible nutritional, the new product should be provided to the participant as soon as possible. The food benefits should be adjusted on the Prescribe Food screen and using the Exchange/Increase Formula feature in Crossroads.

Incorrect Food Package Was Issued

If an incorrect food package was prescribed and issued, local agency staff may correct the prescribed food package and reissue food benefits as appropriate.

Amount Of Formula Changes

When an IF, EXF or WEN is added or quantity changed, the Competent Professional Authority (CPA) must update the food package prescription and benefits. For an infant participant, staff should review the food package for the woman and the infant(s).

Food Subcategory Change

In the current month, benefit may be replaced when the subcategory of a food item changes (i.e. a change from milk to lactose-reduced milk). The CPA must enter a new food prescription prior to staff replacing the food package.

Proration Of Benefits

The Crossroads system automatically prorates a participant's food package according to the following principles:

- The cash value benefit is not prorated. The maximum value is always issued each month.
- Some types of foods cannot be partially provided. Bread, rice, tortillas, pasta, eggs, cheese, and yogurt will be provided in full.
- The remaining food package is prorated as follows:

Number of Days remaining to the last date to	Food Package Size
spend (inclusive)	
11-19	2/3 Package
1-10	1/3 Package

Proration rules apply to any situation when the family issuance day is fixed, and the provision of a full food package is not indicated. Examples: a participant receives food benefit issuance with fewer than 19 days before the last date to spend or a newborn is added to the program and given the same family issuance day as the rest of the family and there are 9 days remaining to the last date to spend. The family issuance date should never be changed to avoid proration. A family issuance date may be changed before issuance occurs if a family re-enrolls after more than three months off the program and has no unexpired food benefits.

Primary Caretaker Of Infant Or Child Changes

Each situation should be evaluated individually when the primary caretaker of an infant/child has changed due to abandonment, incarceration, death, a legal change of custody, or a change in foster care and that infant/child's food benefits cannot be retrieved from the person to whom they were issued.

Staff must document the change of primary caretaker, after verifying through written documentation or verbal confirmation from an agency such as the police or sheriff's department, or the Department of Social Services; or by a legal document or a public record such as a newspaper; or by self-report from the new primary caretaker.

Staff should try to retrieve any redeemed IF, EXF or WEN. If the infant or child is in the custody of the Department of Social Services, staff should ask the appropriate social worker for assistance. If the food benefits are not retrievable, staff should deactivate the previous card and issue a new NC eWIC card to the new primary caretaker and replace any unredeemed food benefits. Staff must document the situation for replacement in the participants record in Crossroads. When an infant requires an EXF or a child requires a WEN, staff should order these products from Community Nutrition Services Section (CNSS).

■ Issuing In The Last Month Of Certification Or Categorical Eligibility

The Crossroads system issues to a participant in the last month of his/her certification period when the family issuance day is prior to the end of the certification period. Crossroads determines whether issuance can occur and how much to issue. If a subsequent certification is not completed, further issuance is not allowed.

The Crossroads system issues to a participant in his/her last month of categorical eligibility when the family issuance day is prior to the date of the end of the categorical eligibility. Further issuance is not allowed.

■ Issuing When The Certification Period Is Extended

Issuance of one month of food benefits is allowed if an infant or child's certification period is extended. The Crossroads system will issue one month of food benefits beginning with the family issuance day. No further issuance is permitted. Refer to Chapter 6A, Section 8: Certification Periods.

■ Issuance When The Cardholder Is Not Physically Present

Local agencies may provide food benefits to cardholders when they are not physically present for the reasons defined in this section. Procedures may vary as noted in the content of this section. The activities in this section assume required nutrition education contacts have been completed and other appropriate issuance activities as described in Section 2 (for example, provision of required notices) have been completed. Remote issuance can be allowed per program policy. Staff must ask the individual who is requesting remote issuance to state their name, date of birth and address including zip code. If the individual cannot provide the information requested, issuance may not occur, and the individual must present in person with a valid proof of identification.

During remote issuance, staff must select their own name on the Print Food Instruments and Sign box in the Crossroads system and sign their own name. Selecting the radio button corresponding to the staff's name on the Print Food Instruments and Sign box in Crossroads indicates that staff has confirmed the proof of identity. Staff must document the reason for the issuance without physical presence in the participant's Crossroads record.

Participant hardship

Examples may include but are not limited to:

- Participant/parent/guardian/caretaker illness, quarantine, communicable disease, immune disorder
- Participant confinement to bed rest for pregnancy complications
- Inclement weather conditions
- Transportation limitations

Coordination with other services

If nutrition education is being provided to a participant by other providers or programs (examples include but are not limited to: EFNEP, WICHealth.org), staff may remotely issue food benefits. Nutrition education must be verified and documented in the participant's record before issuance can occur. Refer to Chapter 5 for guidance on nutrition education provision and documentation.

Local agency is experiencing a time limited hardship

Examples of a time limited hardship would include but are not limited to agency flooding/structural damage, agency is moving or undergoing significant construction, or a disease outbreak. Prior to issuance, staff must inform their Regional Nutrition Consultant

and document the following information:

- Describe the reason for issuance
- State the projected period
- Outline plans to ensure nutrition education requirements are met (for both low risk and high-risk participants)
- Describe how participants will be notified of when their food benefits have been issued

Food Package Changes

Food package changes that do not require medical documentation or nutrition assessment (for example, food subcategory changes) may be completed without the cardholder's physical presence. Formula exchange or increases must be assessed on a case-by-case basis. (For example, whether products must be returned, or medical documentation is required and documented).

Replacement Of Redeemed Food Benefits Destroyed Or Damaged Due To Personal Misfortune

WIC food benefits that have been exchanged by the WIC -participant for foods, IF, EXF, or WEN, between the first date to spend and before the last date to spend are called redeemed food benefits. Redeemed food benefits are not replaceable except for those destroyed or damaged due to an isolated personal misfortune or as indicated by the State WIC in response to a disaster. A personal misfortune exists when one or a few households are affected by a destructive incident such as a gas line explosion, water main break, or house fire. This exception does not apply to mass disasters where emergency feeding services are typically available.

As indicated in Chapter 1, Section 6 in addition to requirements for the personal misfortune exception for replacing redeemed food benefits include:

- Verification of Personal Misfortune. The personal misfortune must be verified with documentation from the fire department, the police department, or other community agency. A record of this documentation should be indicated within Crossroads.
- Only the redeemed food benefits damaged or destroyed because of the documented personal misfortune may be replaced.
- Replacement does not result in the replacement of prior month benefits.
- Quantity of replacement food benefits reflects the portion of food benefits for which the participant would still be eligible.
- Participant/parent/guardian/caretaker signs the 'Affidavit Attesting to WIC Food Benefit Loss' (Chapter 1, Attachment 3).
- The local agency notifies CNSS Customer Service Desk to assist with replacement.

Exchange Of WIC Food Benefits

At all issuances, staff must remind the participant/parent/guardian/caretaker/proxy that exchanging the NC eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. If an eWIC card does not work when swiped or the vendor has had to manually key in the card number at point of transaction, the eWIC card should be replaced. Refer to Chapter 6F for further guidance on program abuse by participants.

■ Issuing During Fair Hearings

Refer to Chapter 14 Administrative Appeals for guidance on food benefits issuance when an applicant/participant/parent/guardian/caretaker has requested a fair hearing.

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eWIC Card Orders, Storage And Security

To maintain security and accountability of NC eWIC cards, local agencies must follow procedures for storage and security of eWIC cards.

Initial eWIC Card Order

The Community Nutrition Services Section (CNSS) will initiate and coordinate eWIC card orders for each local WIC agency. Initial card order and replenishment threshold amounts will be determined by CNSS. The number of initial cards ordered is determined by the number of WIC families each agency supports, with additional amounts ordered to cover up to three (3) months of new WIC families and card replacements.

Card Shipment And Verification Of Receipt

eWIC cards will be shipped directly from the vendor to the local WIC agency main site physical address. Cards will not be shipped to satellite sites. When the eWIC card order is shipped, the CNSS Customer Service Desk will alert the local WIC agency with an email to the agency contact. The email will provide the number of boxes ordered and shipping address for the delivery. CNSS Customer Service Desk will follow up with a second email to request confirmation of receipt of the eWIC cards.

When the local agency receives a shipment of eWIC cards, send card receipt verification to the CNSS Customer Service Desk by either capturing a snapshot of the label affixed to each box and signing it or by signing the Card Order Manifest. Card receipt verification of the label or manifest must be emailed to <u>CNS.CustomerService@dhhs.nc.gov</u> or sent by fax to (919) 870-4863.

■ eWIC Card Storage And Security

eWIC cards should be stored in a secure locked location (cabinet, closet or desk drawer) inaccessible to anyone other than WIC staff.

Additional eWIC Card Information

- The magnetic stripe on the card contains the 16-digit card number.
- There is no participant data on the card itself.
- Until the card is issued, it is not usable.
- Even when the card is issued, all data resides within the eWIC processing system rather than on the card.

Records Retention

The local agency must retain the shipping manifest sent with eWIC Card shipments in accordance with the NCDHHS Office of the Controller's Records Retention and Disposition Schedule Spreadsheet (see: <u>https://www.ncdhhs.gov/about/administrative-offices/office-</u>

<u>controller/records-retention</u>.) Refer to Chapter 13 Records Retention and Disposition Schedule for additional information.