

# California WIC Program Manual WIC 800-41

---

**SECTION: FARMERS' MARKET NUTRITION PROGRAM**

**SUBJECT: FMNP Check Management**

**ITEM: FMNP Check Security and Integrity**

---

## **Policy:**

The Local Agency (LA) FMNP Coordinator shall control and provide accountability for the receipt, inventory, storage, transportation, distribution, issuance, reconciliation, security and disposition of all FMNP checks that are issued to participants, voided, or returned.

## **Required Procedures:**

- I. Security
  - A. The LA FMNP Coordinator shall ensure the integrity of the FMNP check booklet by maintaining separation of duties for FMNP check booklet handling and distribution as follows:
    1. Assign responsibilities to primary and secondary staff members for all processes that involve handling of FMNP check booklets.
    2. The primary staff person shall be responsible for receipt, shipment verification, storage, physical inventory and reporting of FMNP checks. The secondary staff person shall participate in the verification process of shipment, inventory, issuance and disposition of all FMNP check booklets using the Integrated State Information System (ISIS). FMNP check booklets must not be within one person's control at any time.
    3. LA staff shall maintain separation of duties between providing nutrition education to participants, assigning FMNP check booklets in ISIS, and distributing FMNP check booklets to participants.

Refer to the Job Aid on Separation of Duties for Farmers' Market Nutrition Program for scenarios and guidance (WIC Appendix 950-02)

The following table provides FMNP-specific tasks for check issuance and distribution. See Job Aid 950-02.

---

<b>Staff Person</b>	<b>FMNP functions</b>
<b>Person A</b>	<b>Screens and educates participants</b>  Provides and documents nutrition education received by the participants. Screens participants for their interest and ability to use FMNP checks at nearby authorized farmers' markets.
<b>Person B</b>	<b>Verifies and Assigns FMNP check booklets in ISIS</b>  Verifies participant's eligibility and assigns <u>one</u> FMNP check booklet per family for each season in ISIS
<b>Person C</b>	<b>Distributes FMNP check booklets</b>  Obtains the participant's or alternate's signature on the FMNP Check Booklet Issuance Log (this is not optional). Verifies signature and gives the FMNP check booklet to the participant.
<b>Persons A and B</b>	<b>Duties may be combined</b>  The same staff person may screen and educate participant AND verify and assign check in ISIS.
<b>Persons A and C</b>	<b>Duties may be combined</b>  The same staff person may screen and educate participant AND distribute check booklet and obtain signature on FMNP Check Booklet Issuance Log.
<b>Persons B and C</b>	<b>Duties must <u>not</u> be combined.</b>  The same staff person must <u>not</u> verify and assign the check booklet in ISIS AND obtain the participant's or alternate's signature on the FMNP Check Booklet Issuance Log and distribute the check booklet to the participant.

---

4. FMNP check booklets shall never be left unattended or unsecured at WIC sites or during transit to and from a Farmers' Market.
5. FMNP check booklets must be stored in a secure, locked location with the keys accessible only to authorized WIC local agency staff.

B. Alternate Procedures to Separation of Duties

1. The LA FMNP Coordinator may request approval of an alternate procedure to the separation of duties requirement if there is only one staff member at any given WIC FMNP check distribution location.
  - a. To request approval, the LA FMNP Coordinator shall complete the document in the WPM Appendix 950-01 and submit to the State WIC FMNP Coordinator for review and approval.
  - b. If the alternate procedure from separation of duties is approved, the LA shall put into place the continuous quality assurance procedure, as identified on the Alternate Procedure Request form, to prevent fraud and abuse.
  - c. Approved Alternate Procedures for Separation of Duties requests are valid until the expiration of the WIC contract.
2. In the event of a disaster, the State WIC Program shall determine if a short term exemption from the separation of duties requirement is necessary; the LA(s) affected; and the minimum length of time needed for the exemption. If approved, the State WIC Program will notify the affected LA(s) of the temporary exemption and timeframe.

II. Limited Access

- A. Only authorized WIC staff shall have access to locked storage areas.
- B. Access to the locked area by non-authorized WIC staff, non-WIC staff and participants shall be restricted.

III. Accounting for unissued FMNP check booklets.

- A. There are several reasons that the FMNP check booklets are unable to be issued from ISIS including, but not limited to, checks booklets that are lost, stolen, damaged, double issued, or they are unable to be entered due to ISIS technical issues. The State WIC Program cannot replace FMNP checks under any circumstance.
  1. If FMNP checks/booklets cannot be issued in ISIS, the LA staff shall:

- a. Complete the WIC Unissued FMNP Check Report Form (WPM Appendix 950-03) and report to the State within five (5) business days of the incident;
  - b. Document all lost, stolen, damaged, double issued FMNP checks in ISIS by updating the booklet with the proper inventory code (see WPM Appendix 950-07 for ISIS procedures).
  - c. Document checks that are unable to be documented in ISIS due to technical issues using the WIC Unissued FMNP Check Report Form only.
  - d. Report all checks documented on the WIC Unissued FMNP Check Report on the FMNP End of Year Report as described in Section IV of this document.
2. If checks/booklets are returned unused by participants, the LA shall:
- a. Record returned checks on the FMNP Check Booklet Issuance Log that was signed by the participant.
  - b. Record returned checks in ISIS FMNP Booklet Inventory page
    1. If checks are returned unused prior to September 30, they can be re-issued to a different participant by following the ISIS Job Aids (Appendix 950-07).
    2. If checks are returned unused after September 30, they cannot be re-issued to a different participant and the status code "V" must be used in ISIS FMNP Booklet Inventory page.
  - c. Any checks that cannot be reissued must be shredded by the end of the season. Please see the procedures in Section V, End of Season Check Booklet Shredding in this document.

#### IV. Check Booklet Reconciliation at End of Season

- A. At the end of each FMNP season, FMNP check booklets that remain at the WIC Local Agency and those that have been recorded on an Unissued FMNP Check Report Form must be reported to the State on the FMNP End of Year Report. The LA FMNP Coordinator shall:
  1. Complete the FMNP End of Year Report (Appendix 950-04) by the deadline established by State.
  2. Email, mail or fax the FMNP End of Year Report to the State FMNP Coordinator. Maintain a copy on file for 3 years.
  3. Send amendments to the State WIC Program if checks are returned by participants after the FMNP End of Year Report is sent to the State WIC office.

4. Shred all FMNP checks remaining at the Local Agency on October 1 following the procedures in Section V of this document.

V. End of Season Check Booklet Shredding

A. FMNP check booklet shredding guidelines are as follows:

1. Record all serial numbers as void in the ISIS FMNP Inventory Screen (Appendix 950-07).
2. After recording the voided check booklets in ISIS the FMNP Coordinator must verify that staff (other than themselves) shred the checks.
3. Do not mail unused FMNP checks to the State WIC Program.
4. The WIC Local Agency FMNP Coordinator must confirm with site supervisors that all FMNP checks remaining in the WIC local agency and/or clinic are properly destroyed on October 1.
5. The Local WIC Agency FMNP Coordinator must sign the FMNP End of Year Report to certify that all FMNP checks/booklets remaining in the clinics have been destroyed.

**Authority**

7CFR 248.4 11i  
7 CFR 248.10 f 2,3  
7 CFR 248.10 h