**Subject: Food Instrument Receipt and Distribution** 

**Item: Mailing Food Instruments** 

### **PURPOSE:**

This policy explains the circumstances under which food instruments (FIs) can be mailed to WIC program participants. The security protocols are necessary in order to prevent fraud or the misuse of FIs and to ensure the integrity of program services.

#### **POLICY:**

- I. Federal regulations require WIC participants to pick up FIs in person at their local agency (LA) site in order to coordinate food delivery with nutrition education, breastfeeding counseling, other health services, and to determine eligibility. LAs are allowed to mail FIs under specific circumstances described below. All other circumstances not listed require CDPH/WIC approval prior to mailing.
  - A. There must not be holds on income, residency, ID or proof of pregnancy.
  - B. Each participant in the family must be on track to meet the required number of nutrition education contacts (NEC) for their certification period. In other words, each participant must have met the NEC requirement or have sufficient time remaining in the certification period to meet the requirement.
  - C. Mailing FIs must be discontinued when the initial condition is resolved.
  - D. An alternate or proxy is not available to pick up FIs when applicable.
  - E. FIs can be mailed for up to three months.
  - F. Specific circumstances for mailing FIs:
    - 1. WIC management information system (WIC MIS) downtime.
    - 2. Nutrition education contact offered via phone and documented.
    - 3. Lack of transportation. LA staff must verify that an attempt to reschedule the appointment during the issuance month has been made.
    - 4. Online nutrition education contact offered and documented.
    - 5. Imminent childbirth or recent postpartum.
    - 6. Medically diagnosed illness, such as confinement to bed rest or the flu.
    - 7. A local weather/flood/fire "alert," "warning," or "advisory" from the National Weather Service (NWS), California Office of Emergency Services (Cal OES), or a County-based alert system. All other circumstances due to weather conditions without an NWS alert must be approved by CDPH/WIC prior to mailing FIs.
      - a. Only if the specific area designated by the NWS, Cal OES, or County-based alert includes the LA site or the participant's current address.
      - b. Only during the period designated by the NWS alert.

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- 8. Medically documented physical disability preventing travel or a family member with medically documented special health care needs.
- 9. Quarantine, a potentially severe communicable disease (e.g., influenza, chicken pox, etc.), and/or an immune disorder.
- 10. A local emergency situation, where the area population is advised to stay indoors by local authorities and/or the Emergency Broadcast System (e.g., a natural gas leak).
- 11. Site emergency resulting in closure.

# PROCEDURE(S):

- I. Prior to Mailing Fls to Eligible Families
  - A. Contact the participant to verify the participant's current mailing address.
  - B. Confirm that no alternate/proxy is available to pick up the FIs on behalf of the participant, when applicable.
  - C. Document in WIC MIS "Family Comments" the confirmation information (e.g., "no alt/proxy; address verified; attempted to reschedule appointment").
- II. Mailing Fls
  - A. Enter an "M" in the "ACT" field of the proxy row on the "Prepare Family Packages" screen of WIC MIS and choose the appropriate authorization code. This action creates an automatic note in "Family Comments" that includes the name of the user, the date, and the message.
  - B. Document the following on the FI log:
    - 1. Family Name or Family ID next to the first FI serial number issued to the family.
    - 2. WIC MIS log-on ID or staff name where the participant would have signed if present.
    - 3. The word "mailed" next to the appropriate FI serial numbers.
  - C. Mail the FIs through the United States Postal Service using First Class Mail within 24 hours of printing. LA staff must label each envelope "Return Service Requested", which is a free-of-charge postal service that provides senders with the new address or the reason for non-delivery.
  - D. Mail the WIC identification folder separately and in the same manner, if necessary.
- III. Fls Not Received By the Participant
  - A. If a participant notifies the LA that they did not receive the mailed FIs, LA staff must access the participant's information in WIC MIS and determine if the FIs have been redeemed.
  - B. LA staff must not re-issue FIs until five business days have passed in order to allow for sufficient mail delivery time.

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- C. If the FIs have not been redeemed, and five or more business days have passed since the FIs were mailed, LA staff must take the following actions:
  - 1. Void the FIs using the "reason" code "VD" on the "Void Food Instruments" screen of WIC MIS, and issue new FIs.
  - 2. Inform the participant that the first set of FIs are voided and should be returned to the LA if they arrive at a later date. Explain that the redemption of two sets of FIs in any single month may result in disqualification from the program.
- D. If the FIs have been redeemed, LA staff must take the following actions:
  - 1. Advise the participant that the FIs have been redeemed and cannot be reissued prior to an investigation.

## IV. CDPH/WIC Oversight

- A. CDPH/WIC will review the following indicators at least quarterly for all LAs:
  - The percentage of FIs mailed by the LA compared to the average mailed FI statewide percentage.
  - 2. Differences between an agency's redemption rates for mailed FIs and non-mailed FIs.
- B. CDPH/WIC will monitor for outliers and discrepancies in procedures and provide technical assistance to identified LAs as needed.
- C. LAs that do not adhere to the procedures outlined in this policy will be required to complete the CDPH/WIC Mailing Monitoring Log until correct mailing practices are achieved and maintained.
- D. LAs that are unable to achieve and maintain correct mailing practices may be denied CDPH/WIC approval to mail FIs.

### **AUTHORITY:**

7 CFR §246.12(r)(2) Signature requirement

7 CFR §246.12(r)(4) Food instrument and cash-value voucher pick up

22 CCR §40749(c) Participant use of food instruments