



SECTION: Local Program Operations
SUBJECT: WIC Cardholder Requirements
DATE: June 3, 2016 (*revised*)

510

POLICY: Local agency staff must identify a cardholder and issue at least one eWIC card in order to provide food benefits to WIC participants.

PURPOSE: To ensure local agency staff appropriately issue eWIC cards to WIC families.

RELEVANT REGULATIONS: §246.12 ¶(r)—Issuance of food instruments, cash value vouchers and authorized supplemental foods.
§246.7 ¶(f)(2)(iv) – Processing Standards: Time frames for processing applicants
Oregon Administrative Rules 333-053-0075 – eWIC Cards

OREGON WIC PPM REFERENCES:

- ◆451—Change in Guardianship
- ◆501—Ordering and Securing eWIC Cards
- ◆511—Benefit Issuance
- ◆590—Participant Violations
- ◆595—Program Integrity: Separation of Duties
- ◆610—Required Proofs – Identity, Residency, Income
- ◆620—Certification and Issuing Benefits or eWIC Cards to Co-Workers, Relatives, and Friends
- ◆621—Providing WIC Services During Home Visits
- ◆635—Participant Notification: Eligibility and Rights & Responsibilities
- ◆636—Participant Notification: Ineligibility and Termination from WIC

TWIST TRAINING MANUAL REFERENCES: Chapter 2, Lesson 100—Client Search and Demographics
Chapter 3, Lesson 101—Producing a WIC ID Card
Chapter 3, Lesson 1200—Family Cardholder Screen

DEFINITIONS:

Caretaker A person who has significant responsibility for providing food to the infant or child. The caretaker is usually part of the family unit, for example the parent or legal guardian of the infant or child.

Individual An applicant or a participant.

Cardholder A person authorized by WIC to use the eWIC card to shop for WIC food benefits at WIC-authorized vendors.

First Cardholder The required cardholder for a WIC family Electronic Benefit Account (EBA). The first cardholder is either the woman participant or the parent or caretaker from the same household as the infant or child participant, therefore sharing the same address.

Second Cardholder The optional second cardholder who has been issued their own eWIC card with the permission of the first cardholder.

eWIC Cardholder Requirements, cont.

- (DEFINITIONS:)**
- eWIC Card* Magnetic stripe card used to purchase WIC authorized foods or formulas from a WIC family’s Electronic Benefit Account. Each card has a 16-digit Primary Account Number (PAN). Also referred to as a “food instrument.”

 - Electronic Benefit Account (EBA)* An account established for each WIC family administered by Oregon’s banking contractor. Accounts are identified by the WIC family ID number assigned to that family. Food benefits for all participants in the family are aggregated into a single account.

 - Food Benefits* The foods a participant receives on WIC for a selected month. Depending on the participant category, food benefits provide specific amounts of WIC authorized foods, formulas, and/or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Benefit” or “CVB”).

 - PIN* A Personal Identification Number (PIN) is a 4 digit number set by the cardholder via the banking contractor website or customer service phone number to keep access to their food benefits secure.

PROCEDURE:

- Required Cardholder*** 1.0 Every WIC family will be assigned an Electronic Benefit Account (EBA) with Oregon’s banking contractor. The banking contractor will use the family’s WIC ID number as the EBA number. In order to access food benefits issued to that EBA, each family must have at least one eWIC cardholder identified in TWIST with a valid card issued.
 - 1.1 At least one eWIC card shall be issued at the time the first family member is found eligible for WIC.
- Optional Cardholder*** 1.2 A second optional card may be issued for the convenience of the family.

- Cardholder rights and responsibilities*** 2.0 The first cardholder is either the woman participant or the parent or caretaker from the same household as the infant or child participant.
 - First Cardholder*** 2.1 The first cardholder may bring an infant or child in for follow-up or certification appointments, attend nutrition education appointments, request transfers to another agency or state, choose or remove a second cardholder, and purchase WIC food benefits using the eWIC card.
 - 2.1.1 If the woman participant is unable to perform the duties of the first cardholder, she may select another household member to be the first cardholder.

eWIC Cardholder Requirements, cont.

Second Cardholder

- 2.2 If considering a second cardholder, the first cardholder must be informed that the second cardholder has these same responsibilities and has access to the family’s food benefits. The first cardholder should be encouraged to carefully consider the selection of any second cardholder.
- 2.3 The second cardholder may attend nutrition education appointments, bring in a child for follow-up or certification appointments and purchase WIC food benefits using the eWIC card.
- 2.4 The second cardholder does not have to be part of the same household as the first cardholder and participants. There is no age, relationship, or other criteria or restrictions as to whom the first cardholder may select as their second cardholder.
- 2.5 The second cardholder cannot change or remove the first cardholder, discontinue WIC services or transfer participants to another agency or state.
- 2.6 WIC staff or staff from the organization within which WIC is located (e.g. health department, tribal organization) cannot be assigned as a cardholder for a WIC EBA, unless it is for themselves or a family member. See ¶4.7 for information on issuing eWIC cards to family members.
- 2.7 If a family chooses to have two cardholders, they must identify two different people to be cardholders. One person cannot be both the first and the second cardholder.

No proxies

- 2.8 Cardholders may not send “Proxies” to the WIC clinic for services, even with a note. Most changes will not require office visits, for example food benefit changes can take place over the phone if the appropriate information can be provided. See ♦511—Benefit Issuance for more information.
 - 2.8.1 A non-cardholder may bring a child to the office to collect weights and heights with permission of a cardholder, as long as nutrition education, assessments, or certifications are done with a cardholder at another time.

Required cardholder data

- 3.0 All cardholders must have an address and date of birth entered in TWIST. This information is used for security purposes by both the WIC program and the eWIC banking contractor.
 - 3.1 The first cardholder address is the same as the participant address in TWIST and must be kept updated in Client Master.
 - 3.2 The first cardholder may provide required information on behalf of the second cardholder.
 - 3.3 The second cardholder’s address does not have to match the first cardholders, but must be complete.

eWIC Cardholder Requirements, cont.

Card issuance 4.0 The first cardholder must be identified in TWIST and an eWIC card issued at the same appointment as WIC eligibility is determined.

4.1 Cardholder assignment and eWIC card issuance may be entered by any WIC staff person at any time during the initial certification appointment, as long as card inventory and separation of duties policies are being met. See ♦501—Ordering and Securing eWIC Cards and ♦595—Program Integrity: Separation of Duties for more information.

4.2 The first cardholder must sign for the receipt of the eWIC cards when signing the Participant Signature form. See ♦635—Participant Notification: Eligibility and Rights & Responsibilities for more information.

4.3 Required cardholder and eWIC card data must be entered in TWIST before the eWIC card is given to the cardholder.

Card issuance at home visits

4.3.1 Cardholders cannot be assigned or cards issued over the phone.

4.3.2 Certifications done in the home by home visiting nurses must be completed in TWIST before the eWIC card can be given to the cardholder. The cardholder may come into the WIC clinic to pick up the eWIC card(s) or the home visiting nurse may deliver the card(s) to the cardholder on their next home visit. See ♦621—Providing WIC Services During Home Visits for more information.

4.3.3 Local agencies must have a procedure in place for tracking and auditing eWIC cards that are delivered to cardholders outside of the clinic if applicable.

4.4 The first cardholder may provide the required information about their second cardholder and receive a second card at any time. The second cardholder does not need to be present or show ID in order to be issued an eWIC card. The first cardholder may take the second cardholder's eWIC card to them.

Cardholder education

4.5 WIC staff must provide the first cardholder with instruction on setting a PIN and the correct use of the eWIC card. If the second cardholder is not present, provide the first cardholder with any requested copies of materials and request that they instruct the second cardholder on setting a PIN, the correct use of the eWIC card and how to shop for WIC approved foods. See ♦635—Participant Notification: Eligibility and Rights & Responsibilities for more information on cardholder instructions.

4.6 eWIC cards do not have to be signed by the cardholder. It is recommended that the signature line on the back of the eWIC card be used to write the WIC ID number.

4.7 WIC staff must not issue eWIC cards to themselves, their relatives, friends, or co-workers. See ♦620—Certification and Issuing Benefits or eWIC Cards to Co-Workers, Relatives, and Friends for more information.

eWIC Cardholder Requirements, cont.

- (Cardholder education)*
- 4.8 The first cardholder can remove the second cardholder at any time by informing the WIC clinic. WIC staff must remove the second cardholder in TWIST immediately to prevent the second cardholder from accessing any additional WIC food benefits or calling the eWIC banking contractor for an eWIC card replacement See ¶6.0.
 - 4.9 When a first cardholder is removed, the eWIC card assigned to that cardholder becomes deactivated. Ensure that a new first cardholder is assigned and an active card is issued in order for benefits to be accessed.
 - 4.9.1 First cardholders that are removed due to death, incarceration or program disqualification must be replaced with another first cardholder and a new eWIC card issued.

Card Security and PIN setting

- 5.0 If a cardholder does not have easy access to a phone or the internet, the WIC agency must provide them access to a phone or the internet in their clinic in order to set their PIN.
 - 5.1 Since access to the eWIC card and the PIN allows access to the food benefits, instruct cardholders on card and PIN security.
 - 5.2 Any address changes must be entered in TWIST by WIC staff immediately to ensure the eWIC banking contractor has the most current information.
 - 5.3 For security purposes, WIC staff shall not ask for a cardholder's PIN. Do not write the PIN on the eWIC card.

Replacing cards

- 6.0 If WIC staff receive any reports of lost, stolen, or damaged cards they must be entered in TWIST immediately. Either the first or second cardholder may report lost, stolen, or damaged cards.
 - 6.1 Cardholders may be issued replacement cards at the clinic if they cannot wait the 5-7 days to receive a replacement from the eWIC banking contractor or if it is close to the end of the benefit period.
 - 6.2 WIC clinics may not mail eWIC replacement cards to cardholders.
 - 6.3 Excessive card replacement will be tracked by the State WIC Compliance Coordinator.

eWIC cards are not proof of identity

- 7.0 Cardholders must show Proof of Identity at certification and recertification appointments. Identity must be confirmed at appointments when benefits are issued. The eWIC card does not act as Proof of Identity for cardholders. See ♦610—Required Proofs – Identity, Residency, Income for more information about acceptable forms of proof and situations where they are required.
 - 7.1 Cardholders are not required to bring the eWIC card to WIC appointments or to be issued WIC food benefits.

eWIC Cardholder Requirements, cont.

(eWIC cards are not proof of identity)

7.2 Information on the Family Cardholder Screen should be used to confirm the identity of cardholders calling the clinic or at non-certification appointments when benefits are issued such as second nutrition education.

Changes in families, e.g. custody

8.0 While WIC food benefits are issued to individual participants, they are aggregated and accessed via the eWIC cards assigned to each EBA or WIC family account. When a family member changes families, benefits are de-aggregated back to individual participants and are reassigned to the participant's new EBA. Since cardholders are associated with an EBA, changes to the WIC family ID number require new cardholder assignment and eWIC card issuance. See examples below and ♦451—Change in Guardianship for more information.

Issue new card

Example: A child is removed from their household and put in foster care. If they are given a new WIC ID number, this generates a new EBA which requires an eWIC card to be issued to the foster parent with new cardholder information entered in TWIST.

Multiple cards & EBAs

Example: A foster parent has multiple foster children, each with a different WIC ID number. The foster mom will have an eWIC card for each foster child and she will be identified as the first cardholder for each. She may set the same PIN for all the eWIC cards she is issued.

New card not needed

Example: The custody of a child is changed from the mother to the father. Both the mother and father have children on WIC in different WIC EBA's and have active eWIC cards. The WIC food benefits assigned to the child will be deducted from the mother's EBA and added to the father's EBA when the child's WIC ID number is changed from one to the other.

8.1 Termination of a participant will remove current or future benefits from the EBA depending on the termination reason but does not deactivate assigned cardholders or issued eWIC cards. See ♦636—Participant Notification: Ineligibility and Termination from WIC for more information on the appropriate notification needed for terminated participants.

8.1.1 Cards do not need to be deactivated when participants are terminated or transferred.

Proxies for disqualification

9.0 Disqualified cardholders may select a proxy cardholder in certain situations. See ♦590—Participant Violations for more information on this process. ★

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