



SECTION: Local Program Operations 560
SUBJECT: PROGRAM INTEGRITY: REPLACING FOOD
INSTRUMENTS
DATE: July 31, 2009 (*Revised*)

POLICY: Food instruments (FIs) will be replaced only under limited circumstances as described below.

PURPOSE: To provide guidance on when it is appropriate to replace FIs and how to replace them.

RELEVANT REGULATIONS: 7 CFR §246.12 ¶(u)—Participant Violations and Sanctions
7 CFR §246.23 ¶(c)—Claims against participants
Oregon Administrative Rules 333-053-0030 through 333-053-0110

OREGON WIC PPM REFERENCES: ♦155—Flow Chart of Food Instruments (FIs)
♦451—Change in Guardianship
♦505—FI Issuance and Local Printing
♦506—Exceptions for Mailing Food Instruments
♦540—Proxy System
♦570—Formula Exchange
♦590—Program Integrity: Participant Abuse

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 804—Transfers
Chapter 3, Lesson 808—Foster Families and Custody Changes
Chapter 5, Lesson 102—Printing FIs: Print on Demand
Chapter 5, Lesson 105—Void Issued Vouchers

APPENDICES: 560.9 Appendix A Lost/Stolen Food Instrument Documentation (English)
560.10 Appendix B Lost/Stolen Food Instrument Documentation (Spanish)
560.11 Appendix C Voiding Vouchers Due to Category Change form (English)
560.12 Appendix D Voiding Vouchers Due to Category Change form (Spanish)

DEFINITIONS: *Claim* A demand for repayment of benefits.

Food Instrument (FI) “Food instrument” or “FI” means a negotiable financial instrument by which WIC benefits are provided to participants. Food instruments can provide either specific amounts of WIC authorized foods or formulas or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Voucher” or “CVV”). Food instruments are also referred to as “checks” or “vouchers.” Cash Value Vouchers are also referred to as “Fruit and Vegetable Vouchers.”

FI210R The “Lost/Stolen Food Instrument Documentation” report. A TWIST report that is completed by the local program, signed by the participant and mailed to the state WIC office. The purpose of this report is to identify possible participant abuse. (Spanish version is FI220R)

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, cont.

<i>(DEFINITIONS:)</i>	<i>Original FIs</i>	The first set of food instruments issued to a participant.
	<i>Replacement FIs</i>	Food instruments that are used to replace original food instruments.
	<i>TWIST</i>	The WIC Information System Tracker: The data system for the Oregon WIC Program.

PROCEDURE:

When to replace FIs

- 1.0 FIs will be replaced only under limited circumstances:
- FIs damaged by participant (only if damaged FIs are brought in);
 - FIs destroyed in fire (with a fire report);
 - FIs stolen (with a police report). Note: This could be an actual police report or just a police report number. Procedures vary by police department;
 - Lost formula FIs (once during participant’s certification period)
 - Transfers to Oregon from another state;
 - Incorrect formula or food package (must bring in the incorrect formula or FIs);
 - Change in category resulting in new benefit eligibility;
 - Change in guardianship (refer to ♦451 for additional guidance);
 - FIs in location that pose a threat to individual (domestic violence).

FIs damaged by participant

- 1.1 Replacement FIs may be issued if the participant returns damaged FIs that are identifiable and have valid dates.
- 1.1.1 Void the FIs as “Damaged” in TWIST and replace FIs.
- 1.1.2 Shred damaged FIs. Do not send to the state WIC office.

NOTE: If the dates on the FIs are not readable, look up the FIs in TWIST to ensure that they are not expired. Do not replace expired FIs. Void them in TWIST and shred. Do not send to the state WIC office.

FIs destroyed by fire

- 1.2 Replacement FIs may be issued if the participant provides a fire report that substantiates that the FIs have been destroyed by fire.
- 1.2.1 Verify that the FIs have not been redeemed. (Do not replace FIs if they have already been redeemed, see ¶1.3.1.)
- 1.2.2 Void the FIs as “Lost-FIs replaced” in TWIST and replace FIs.
- 1.2.3 Complete the required documentation for lost/stolen FIs (see ¶4.0).
- 1.2.4 Document the date and the fire report number in the “WIC Notes” field on the “Intake” screen.

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- FIs stolen* 1.3 Replacement FIs may be issued if the participant provides a police report that substantiates that the FIs have been stolen.
- 1.3.1 Verify that the FIs have not been redeemed. If any of the FIs have been redeemed and the participant states s/he did not redeem them, call the state WIC office to obtain an image of the FI. Check if the signature on the FI matches the signature on the WIC ID card. If it **does not match**, then replace the FIs. If it **does match**, do not replace the FIs and review the “*Rights and Responsibilities*” form with the participant, parent or caretaker (form 57-630).
- 1.3.2 Void the FIs as “Stolen-FIs replaced” in TWIST and replace FIs.
- 1.3.3 Complete the required documentation for lost/stolen FIs (see ¶4.0)
- 1.3.4 Document the date and the police report number in the “WIC Notes” field on the “Intake” screen.
- Lost formula FIs* 1.4 Replacements for lost **formula** FIs may be issued **once** during a participant’s certification period.
- 1.4.1 Verify that the FIs have not been redeemed. (Do not replace FIs if they have already been redeemed, see ¶1.3.1.)
- 1.4.2 Check the participant’s TWIST record to see if the participant, parent or caretaker has already reported a loss of formula FIs during the participant’s current certification period. If the TWIST record shows that the participant has already received replacements for formula FIs reported lost within the current certification period, additional replacements must not be issued.
- 1.4.3 Void the FIs as “Lost-FIs replaced” in TWIST and replace FIs.
- 1.4.4 Complete the required documentation for lost/stolen FIs (see ¶4.0)
- Transfers from another state* 1.5 Replacement FIs may be issued when a participant transfers to Oregon from another state.
- 1.5.1 If the participant brings in FIs from out of state with valid (current or future) dates:
- 1.5.1.1 Void the originating state’s FIs and (clinic staff) mail back to the originating state.
- 1.5.1.2 Replace FIs.

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, *cont.*

(Transfers from another state)

1.5.2 If the participant brings in FIs from out of state that have expired:

1.5.2.1 Void the originating state's FIs and (clinic staff) mail back to the originating state.

1.5.2.2 Determine whether the participant is eligible for this month's FIs, and if appropriate, issue FIs.

1.5.2.3 If the participant has already redeemed FIs for the current benefit month, **do not** issue replacements.

1.5.3 When transferring participants from out of state, follow the procedures in the TWIST Training Manual, Chapter 3, Lesson 804—Transfers.

Transfers within Oregon

NOTE: When transferring participants from within Oregon, FIs do not need to be replaced, since FIs are valid at any vendor location that is authorized by the Oregon WIC Program. Only replace FIs in this situation if there is also a change of WIC ID number (see ¶1.7).

Incorrect formula or food package

1.6 FIs may be replaced when the participant reports that one or more foods on the voucher is no longer appropriate **only** if the participant brings in the FIs or formula they want to replace. When making a replacement, ensure that the maximum amounts of food or formula allowed per month are not exceeded. Refer to ♦570 for more information on formula exchange. Follow the procedures in the TWIST Training Manual, Chapter 5, Lesson 105 for voiding and reissuing incorrect food packages.

1.6.1 When a participant brings in incorrect FIs, void the FIs in TWIST using "Incorrect formula/foods." Shred the voided FIs. Do not send to the state WIC office.

Category change

1.7 If a participant changes category and has been issued future vouchers based on their previous category, they may be getting more food than they are eligible for with their new category. When this happens, future month vouchers must be voided and replaced with vouchers appropriate for their new category.

Women changing category

1.7.1 Women changing category may keep their current month's vouchers.

1.7.2 Void all future month vouchers in TWIST using the void reason "Category Change – Women."

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, *cont.*

(Women changing category)

- 1.7.2.1 If the participant has brought the vouchers being voided to the clinic, shred them after they have been voided.
- 1.7.2.2 If the participant does not have the vouchers being voided with them, complete the required documentation for vouchers voided due to a category change (see ¶5.0). Inform them that spending the voided vouchers is considered misuse of WIC funds and they may be required to reimburse the program for these spent vouchers and/or may be disqualified from participating in the program for up to one year.

NOTE: If the participant has called the clinic for information regarding a category change or the question of what to do if their category change arises during an in-person interaction, encourage the participant to bring into the clinic all currently issued vouchers during a visit to change their current category.

- 1.7.3 Change the client's category in TWIST.
- 1.7.4 Assign the appropriate food package for the new category.
- 1.7.5 Print vouchers to replace the voided original vouchers.
 - 1.7.5.1 If the participant is changing category from WE to WB or WE/WB to WBN up to six months post-partum, you will be able to assign and print a new appropriate food package.
 - 1.7.5.2 If the participant is changing category from WE/WB to WBN after six months post-partum, they are no longer eligible and will not receive replacement vouchers.
- 1.7.6 Complete the required documentation for vouchers voided due to a category change (see ¶5.0).

IE Infant over 6 months changing category

- 1.7.7 Current month vouchers: Void the two baby food meat and two of the baby food fruits and vegetables vouchers in TWIST using the void reason "Category Change-Infant."

NOTE: The participant may keep two of the originally issued four baby food fruits and vegetables vouchers. The above vouchers need to be voided to avoid an "Over Max" error in TWIST and allow the issuance of formula vouchers.

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(IE Infant over 6 months changing category)

1.7.8 Void all future month vouchers in TWIST using the void reason “Category Change – Infant.”

1.7.8.1 If the participant’s parent or caretaker has brought the vouchers being voided to the clinic, shred them after they have been voided.

1.7.8.2 If the participant’s parent or caretaker does not have the vouchers being voided with them, complete the required documentation for vouchers voided due to a category change (see ¶5.0). Inform them that spending the voided vouchers is considered misuse of WIC funds and they may be required to reimburse the program for these spent vouchers and/or the participant may be disqualified from the program for up to one year.

NOTE: If the participant’s parent or caretaker has called the clinic for information regarding a category change or the question of what to do if the infant’s category change arises during an in-person interaction, encourage the parent or caretaker to bring into the clinic all currently issued vouchers during a visit to change the infant’s current category.

1.7.9 Change the participant’s category in TWIST.

1.7.10 Assign the appropriate food package for the new category.

1.7.11 Print vouchers to replace the voided original vouchers.

1.7.12 Complete the required documentation for vouchers voided due to a category change (see ¶5.0).

Change in guardianship

1.8 FIs may be replaced when there has been a change in guardianship. Refer to ♦451 for the specific procedure to follow when replacing FIs in this situation.

FIs in location that poses threat to participant

1.9 FIs may be replaced if they are in a location that poses a threat to the participant, parent or caretaker (for example a domestic violence situation).

1.9.1 Void the current FIs in TWIST using “Lost - FIs replaced”.

1.9.2 Assign a new family WIC ID number.

1.9.3 Replace FIs.

1.9.4 Notify the state WIC Compliance Coordinator that current FIs are in the possession of a person who is not eligible to redeem them.

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, cont.

- Replacing FIs** 2.0 Assess that the participant’s request for replacement FIs is valid. If the participant has a valid request for replacement according to this policy, replace the FIs that were originally issued to the participant (one, two or three months). If a participant reports only part of their food package as damaged, stolen or lost, replace on an FI for FI basis.
- Partial packages** 2.1 If a participant is to receive replacement FIs after the 20th of the month, issue a partial package for the current month. Partial packages will carry the participant to the next month’s issuance.
- Previous month issuance** 2.2 Local programs shall not reissue FIs from the previous month, regardless of the “Last Day To Use” on the FI. FIs issued for a particular month provide nutritional support to the participant for that month only.
- 2.2.1 If a technical problem prevents FIs from being printed for a participant at their appointment and FIs cannot be printed before the end of the month (i.e. emergency situation where printer breaks on the last day of the month), contact the state WIC office for guidance.
- 2.3 Local programs shall not issue retroactive benefits to disqualified participants who are reinstated following an administrative hearing.
- When replacement is not justified** 3.0 FI replacement is not justified in the following situations:
- 3.1 **Do not** replace FIs that have already been redeemed.
- 3.2 **Do not** replace formula FIs if the participant, parent or caretaker has already reported formula FIs as lost and received replacements once within the participant’s current certification period.
- 3.3 **Do not** replace FIs that are lost in the mail. FIs are only to be mailed in limited circumstances, refer to ♦506 for more information.
- 3.4 **Do not** replace FIs that are past the expiration date. Cancel the FIs in TWIST and then shred the FIs.
- 3.5 **Do not** replace FIs for participants who are moving out of state. Cancel the FIs in TWIST and then shred the FIs.
- 3.6 **Do not** replace FIs for a deceased participant. Cancel the FIs in TWIST and then shred the FIs.
- 3.7 **Do not** replace FIs for any time period when a participant is disqualified. If the participant is reinstated, their benefit begins with the current month.

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, *cont.*

***Required
documentation
for lost/stolen FIs***

- 4.0 For all FIs reported lost or stolen, clinic staff will complete the “Lost/Stolen FI Documentation” report in TWIST. Refer to the TWIST Training Manual, Chapter 5, Lesson 105—Void Issued FIs for details on printing this report. See Appendix A and B for examples of the report in English (FI210R) and Spanish (FI220R).
 - 4.1 Review the report with the participant, parent or caretaker.
 - 4.2 Inform her/him that redeeming FIs that have been reported lost or stolen is considered misuse of WIC funds and is subject to penalties including disqualification from the program and a claim for reimbursement, even if FIs were cashed by two different authorized signers (e.g., father and mother).
 - 4.3 If the individual is reporting lost formula FIs, inform them that this is the only time FIs will be replaced during the participant’s current certification period. If necessary, suggest a different FI pick up schedule.
 - 4.4 Obtain the signature of the participant, parent or caretaker on the report.
 - 4.5 Within 3 days, send the report to the state WIC office, Attn: Batch Mail.

***Required
documentation
for voiding
vouchers due to a
category change***

- 5.0 If the participant with a category change does not have the vouchers being voided with them, clinic staff must complete the “Voiding Vouchers Due to Category Change” form (57-911).
 - 5.1 Fill out a separate form for each participant receiving replacement vouchers due to a category change.
 - 5.1.1 If the information is the same for all rows in the “Original WIC Category,” “Voucher Issue Date,” “Void Date,” “New WIC Category,” and “Reissue (Print) Date” columns, this information need only be filled in once on the top row.
 - 5.1.2 The original and replacement vouchers will not necessarily be a one to one replacement, as in reporting lost or stolen vouchers, as participants may receive fewer or more vouchers with their new category. Until the report is programmed to automatically print from TWIST, list each original and reissued voucher number in the appropriate column without attempting to reconcile each original with a reissued voucher.

NOTE: The state WIC office will be able to determine the voucher issuance by benefit month for any required follow up.

- 5.2 Review the form with the participant, parent or caretaker.

PROGRAM INTEGRITY: REPLACING FOOD INSTRUMENTS, *cont.*

(Required documentation for voiding vouchers due to a category change)

- 5.3 Inform her/him that redeeming FIs that have been voided is considered misuse of WIC funds and is subject to penalties including disqualification from the program and a claim for reimbursement, even if FIs were cashed by two different authorized signers (e.g., father and mother).
- 5.4 Obtain the signature of the participant, parent or caretaker on the form.
- 5.5 Within three days, send the “Voiding Vouchers Due to a Category Change” form to the state WIC office, Attn: Batch Mail.

Missing FI stub

6.0 If there is a disagreement over FI issuance where the participant claims FIs were never received, TWIST shows that the FIs were issued, but the FI stubs cannot be located to prove they were received, follow the procedure below:

- 6.1 Inform that participant that spending two sets of FIs is considered program abuse. Have the participant sign the “Lost/Stolen FI Documentation” report.
- 6.2 Replace the FIs using “Lost-FIs replaced” in TWIST. ★

**If you need this in large print or an alternate format,
please call 971-673-0040.
WIC is an equal opportunity program and employer.**

Report ID: FI210R

11/29/2007 11:51 AM

Lost/Stolen Food Instrument/Documentation

WIC Local Agency: _____

Participant Name: _____

WIC ID Number: _____

WIC Category	FI Issue Date	FI Number Reported Lost or Stolen	Void Date	FI Reissue Number	Reissue Date (Print Date)

I am reporting that the above food instrument(s) have been lost or stolen. I understand that if the original food instrument(s) are found I must return them to the WIC Program.

I have been informed that using the original food instrument(s) after I have recieved replacements for them is considered misuse of WIC funds. I may be subject to penalties including suspension from the program if I cash the original food instrument(s).

Signature of Participant or Guardian: _____

Date Signed: _____

Report ID: FI220R

11/29/2007 11:52 AM

**Reporte De Cupones Perdidos o Robados
(Complete uno por cada participante)
Lost or Stolen Food Instrument Documentation**

Nombre de la Clinica de WIC _____
(WIC Local Agency)

Nombre del Participante _____
(Participant Name)

Numero de Identificacion _____
(WIC ID Number)

Categoria de WIC (WIC Category)	Fecha de distribucion de los cupones (FI Issue Date)	Perdidos o Robados (FI Number Reported Lost or Stolen)	Fecha de Anulacion del Cupon (Void Date)	Numero Nuevo (FI Reissue Number)	Fecha Nueva (Reissue Date)

 Estoy reportando que los cupones arriba indicados han sido perdidos o robados.
 Yo entiendo que si encuentro los cupones originales, tengo que devolverlos al programa WIC.
 Me han informado que el uso de los cupones originales despues de haberlos reemplazado es considerado abuso de los fondos del WIC. Si cambio los cupones originales por dinero, estare expuesto a sanciones incluyendo suspension del programa WIC.

Firma del Participante o Guardian _____
(Signature of Participant or Guardian)

Fecha _____
(Date Signed)

