

ISSUE DATE: April 14, 2016

TO: WIC Program Coordinators
Other WIC Policy and Procedure Manual owners

FROM: Holly Wilkalis
Oregon WIC Program – Nutrition & Health Screening
OHA Office of Family Health

SUBJECT: **WIC Policy Update 2016-03**



EXPLANATION:

- ◆ **480 – Voter Registration-National Voter Registration Act**
 - Added new regulatory references.
 - Clarifies procedure for completing the voter registration form (§5.0 - §5.2).
 - Adds a deadline for monthly submission of the Agency Voter Registration Report.
- ◆ **511e – Food Benefit Issuance**
 - Removing information on maintaining separation of duties (§4.1) that is duplicated in ◆595.
- ◆ **561e – Program Integrity: Replacement of Food Benefits**
 - Removes information on handling formula exchanges and adds reference to ◆735.
 - Clarifies requirements for documenting unavailable/stolen formula.
- ◆ **614 – Income Eligibility: Current Income Guidelines**
 - Updates Appendix A, income guidelines table, effective May 1, 2016.
 - Deletes Appendix B, Calculating Screening Total Household Income Manually.
- ◆ **1100 – Farm Direct Nutrition Program: Local Program Responsibilities**
 - Adds requirement to display “And Justice for All” poster at all locations where FDNP checks are distributed and/or FDNP nutrition education takes place.

WIC Policy Updates Issued for 2016 (Year-To-Date)

Manual Update Number	Policy Number	Policy Title	Manual Page Number(s)	Issue Date
2016-01	710	Breastfeeding: Definition, Promotion and Support Standards	710.0 – 710.9	January 11, 2016
2016-01	712	Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines	712.0 – 712.12	January 11, 2016
2016-01	713	Breastfeeding: Use of Supplemental Formula	713.0 – 713.4	January 11, 2016
2016-01	716	Breastfeeding Peer Counseling (BFPC) Program Requirements	716.0 – 716.10	January 11, 2016
2016-01	730	Bid Formula: Use and Description	730.0 – 730.5	January 11, 2016
2016-01	880	Referrals: Alcohol, Tobacco and Other Drug Use	880.0 – 880.2	January 11, 2016
2016-01	885	Other Referrals: Required and Recommended	885.0 – 885.3	January 11, 2016
2016-01	711	<i>Merged into policy 710 and DELETED -</i> Breastfeeding: Benefits and Contraindications	---	January 11, 2016
2016-02	452	Civil Rights	452.0 – 452.12	March 8, 2016
2016-02	710	Breastfeeding: Promotion and Support Standards	710.8 – 710.9	March 8, 2016
2016-02	717	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Personnel Guidelines	---	March 8, 2016
2016-02	718	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Job Parameters, Protocol and Scope of Practice	---	March 8, 2016
2016-02	719	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Training	---	March 8, 2016
2016-03	480	Voter Registration-National Voter Registration Act	480.0 – 480.9	April 14, 2016
2016-03	511e	Food Benefit Issuance	511e.0 – 511e.4	April 14, 2016
2016-03	561e	Program Integrity: Replacement of Food Benefits	561e.0 – 561e.2	April 14, 2016
2016-03	614	Income Eligibility: Current Income Guidelines	614.0 – 614.2	April 14, 2016
2016-03	1100	Farm Direct Nutrition Program: Local Program Responsibilities	1100.0 – 1100.7	April 14, 2016



SECTION: Local Program Operations 480
SUBJECT: Voter Registration-National Voter Registration Act
DATE: April 14, 2016 (*revised*)

POLICY: Local WIC programs will provide potential voters with the opportunity to register to vote, will assist those who request help in completing the form, will send completed registration forms to local election offices, and will report registration to the Secretary of State’s office.

PURPOSE: To comply with the National Voter Registration Act (NVRA) and increase the number of Americans registered to vote.

RELEVANT REGULATIONS: PL 103-31—National Voter Registration Act of 1993
7 CFR §246.8 ¶(c)—Non-English materials
OAR 165-005-0055 Designating NVRA Voter Registration Agencies
OAR 165-005-0060 Collection of Registration Cards
OAR 165-005-0065 Compiling and Reporting Registrations
OAR 165-005-0070 Agency Registration Procedures
OAR 165-005-0130—Residence address disclosure exemption
ORS 247.208—Voter registration agencies; designation; prohibited activities; required services
ORS 247.965—Disclosure of residence address or signature of electors
ORS 247.967—Conditions where disclosure of elector’s residence address required; procedure

OREGON WIC PPM REFERENCES: ♦425—Ordering State Produced Materials
♦426—Record Retention Period
♦452—Civil Rights

DEFINITIONS: *NVRA* National Voter Registration Act
SED State Elections Division
Agency Voter Registration form The special voter registration form (form SEL-503) produced by the State Elections Division (SED) for use by public assistance and other agencies when implementing NVRA.
Voter or potential voter Program applicants, participants, parents or caregivers who are offered the opportunity to register to vote or update their voter registration address.
Voter registration The part of the Agency Voter Registration form which is sent to local elections offices.

VOTER REGISTRATION (NVRA), *cont.*

(DEFINITIONS:)	<i>Declination</i>	The document signed by the applicant that indicates the desire to register or declines the invitation to register. WIC uses the special declination that is included on the Participant Signature form. If completed, this portion is retained for two years by local programs.
	<i>Reporting form</i>	Form SEL-504—The electronic form used by local programs to report the number of voter registrations collected to the elections division. See ¶10.0 of this policy.

BACKGROUND: NVRA requires all agencies that provide public assistance to give potential voters the opportunity to register to vote. WIC is designated as one of these agencies. The WIC program has worked closely with the SED to make this process as simple as possible. To assist local efforts, the elections division has provided the “National Voter Registration Act Manual for Covered Agencies.” The guide is available at <http://sos.oregon.gov/elections/Documents/nvra-manual.pdf>

Since multiple agencies are required to offer voter registration, certain people may have been offered voter registration on multiple occasions. This does not change WIC’s requirement to offer registration.

Other agencies designated by NVRA as voter registration sites include:

- Addictions and Mental Health Division (AMH)
- Children, Adults and Families (CAF)
- Senior and People with Disabilities (SPD)
- Oregon Department of Transportation (ODOT-DMV)
- Oregon Commission for the Blind (OCB)
- Oregon Disabilities Commission (ODC)
- Division of Medical Assistance Programs (DMAP)
- Office of Vocational Rehabilitation Services (OVRS)

PROCEDURES:

Core NVRA Requirements

- 1.0 Compliance with the NVRA entails local agencies performing six core requirements:
- Offering voter registration and providing assistance with registration to all potential voters coming to WIC for certification, recertification, or address changes
 - Reviewing submitted registration forms for completeness
 - Dating voter registration forms with the date received
 - Retaining declinations for 24 months
 - Submitting registration forms to local elections officials within 5 days of receipt
 - Reporting the total forms received to the Secretary of State’s Election Division at least monthly

VOTER REGISTRATION (NVRA), cont.

**When and how
to offer registration**

2.0 Offer voter registration to applicants, participants, guardians, or caretakers at certification, each re-certification, and when an address change occurs.

2.1 Offer voter registration whenever a potential voter changes their address in person or by phone.

2.2 Offer voter registration by asking, “**If you are not registered to vote where you live now, would you like to register here today?**”

Use form SEL-503

2.3 If the client chooses to register when physically in the WIC office, WIC programs must use English form SEL-503 or Spanish form SEL-503(a), “*Agency Voter Registration Form*” from SED. This voter registration form is slightly different than the standard registration form seen in post offices and banks.

2.3.1 The voter registration form is available online in English and Spanish at:

<http://sos.oregon.gov/elections/Pages/electionforms.aspx>

2.3.2 The voter registration form in English or Spanish is the only form accepted by elections officials. Local programs shall not adapt or alter the form. Photocopies of the registration form are **not allowed**.

Who can register?

3.0 Local WIC programs shall offer potential voters who meet the requirements to vote in Oregon the opportunity to complete a voter registration form or update their registration address.

3.1 A person may register to vote if they are at least 17 years of age, even though they will not receive a ballot until an election occurs on or after their 18th birthday.

3.2 A person who is **known** not to be a U.S. citizen does not need to be offered the opportunity to register. Do not assume a person is not a citizen because they cannot speak English. See ¶16.4 for more information

3.3 A person must be an Oregon resident to register to vote. A person visiting Oregon or in Oregon temporarily is not considered a resident. Refer the potential voter to local elections offices if clarification is necessary.

3.4 Local programs shall not require proof of identity, date of birth or citizenship to offer voter registration.

3.5 It is not the responsibility of the WIC staff to ensure that all adults accompanying the applicant to the WIC office are offered registration.

3.6 Potential voters can also register online or download registration forms at <http://www.oregonvotes.gov/>

VOTER REGISTRATION (NVRA), *cont.*

- Documenting the offer** 4.0 At certification and recertification, the potential voter’s response to the offer of voter registration must be documented on the declination portion of either the “*Participant Signature Form*” (form 57-629), form SEL-503, or SEL-503d.
- 4.1 Local programs **may not develop** their own declination form and may not copy the state provided declination onto their own forms.
 - 4.2 Photocopies of approved declinations may be used if necessary.
 - 4.3 Use the translated “*Participant Signature Form*” for potential voters who read Spanish, Russian, Vietnamese, Chinese, Somali, or Arabic. These forms are available on the WIC website.
- Completing the registration form** 5.0 The potential voter completing the forms should answer the question on the declination, “**If you are not registered to vote where you live now, would you like to register here today?**”
- If “Yes”*
- 5.1 If the answer is “Yes,” have the voter sign and date the declination form, and then the voter may:
 - 5.1.1 complete the voter registration form (in private) and give it to the local WIC staff person; or
 - 5.1.2 request help in completing the form from the local WIC staff; or
 - 5.1.3 take the form home to complete and mail to the elections office herself. If they choose this option, retain the declination and make sure they know the address of the local elections office. These are located on the back of the registration card.
- If “No”*
- 5.2 If the answer is “No,” have them sign and date the declination form.
 - 5.2.1 If they do not complete the declination, offer the voter registration form.
 - 5.2.2 If the potential voter refuses to sign or complete the declination, the staff person should offer the voter registration form,” indicate the refusal on the declination and initial the form.
 - 5.2.3 If the potential voter informs you they are already registered to vote where they live, consider that a “No” response since they don’t need to register at this time.
 - 5.3 If the potential voter is not sure what registering to vote means, staff may explain that “Registering to vote allows US citizens over the age of 18 to vote in government elections.”

VOTER REGISTRATION (NVRA), cont.

Providing assistance

- 5.4 WIC staff must provide the same amount of assistance to a potential voter completing the voter registration form as they would to someone completing the WIC forms. See ♦452—Civil Rights.
 - 5.4.1 If a potential voter is unable to read, a staff person must read the form to her.
 - 5.4.2 If a potential voter is sight impaired, a staff person must read the form to her and assist her in completing the form.
 - 5.4.3 If a potential voter reads a language other than English, provide an interpreter or translated instructions to assist the voter in completing the form.
 - 5.4.4 If a potential voter is disabled and unable to sign the form, have them use their signature stamps or make their mark, write “her mark” and initial the notation.

*SEL-540:
Signature Stamp
Attestation*

- 5.4.4.1 Local agency staff must then complete form SEL-540, “*Signature Stamp Attestation*” and submit it along with the voter registration form. These forms are available to download at <http://sos.oregon.gov/elections/Pages/electionforms.aspx>

*SEL-550:
Public record
exemption form*

- 5.5 If a potential voter feels uncomfortable registering to vote because it makes their address a public record, they may complete form SEL-550, “*Application to Exempt Residence Address From Disclosure as a Public Record.*” Completing this form and submitting it with the registration form allows an individual to apply to have their residence address exempted from disclosure as a public record. This may be of interest to potential voters with concerns related to domestic violence. The potential voter must attach some evidence, such as a police report, court order, affidavit or medical record, in order to justify the request to have their residence and/or telephone number kept confidential. The County Clerk may contact the potential voter and request additional documentation. The individual must reapply for this exemption each time they update their voter registration. These forms are available to download at <http://sos.oregon.gov/elections/Pages/electionforms.aspx>
- 5.6 After providing any necessary assistance, if the potential voter does not complete the declination form, assume the potential voter chooses not to register at that time. No further request to complete the declination is required.
 - 5.6.1 Staff should indicate refusal and initial the form.
- 5.7 Offering registration must be documented in TWIST. See the TWIST Training Manual, Chapter 3, Lesson 102—Enrollment.
- 5.8 Regardless of the potential voter’s response, when the declination is completed, follow the procedure in ¶8.0.

VOTER REGISTRATION (NVRA), *cont.*

- Change of address** 6.0 When changing addresses in the WIC office, offer voter registration to the potential voter and document their response on either form SEL-503 or form SEL-503d.
- 6.1 If the potential voter’s response is “yes”, have them complete the declination on form SEL-503. Retain the completed declination portion and give the registration portion to the voter to complete.
- 6.2 If the potential voter’s response to the offer of voter registration is “no”, have them complete the declination only form SEL-503d.
- 7.0 Offer voter registration to potential voters who call the WIC office to change their address by asking **“If you are not registered to vote where you live now, would you like to register?”** If they say yes, offer to either mail the voter registration form or email them the Voter registration website link.
- 7.1 If the voter requests a form to be mailed, complete the declination on form SEL-503.
- 7.1.1 Check yes, fill in the voter’s name in the signature space, and date.
- 7.1.2 Note the voter registration form is being mailed and initial the declination.
- 7.1.3 Mail the registration portion of the form to the voter.
- 7.2 If the voter requests information to be emailed, complete the declination on form SEL-503d.
- 7.2.1 Check yes, fill in the voter’s name in the signature space, and date.
- 7.2.2 Note the voter registration website is being emailed and initial the declination.
- 7.2.3 Email the voter registration website to the voter.
- 7.2.4 Clients who were registered to vote at their previous address or have an Oregon Driver’s License or ID may be directed to the online registration site <http://oregonvotes.gov/>. They can select the **My Vote** link to update their address or select the **Register** link to register if they have an Oregon Drivers License or DMV issued ID.
- 7.3 Documentation of refusal of the offer for voter registration over the phone is not required.

VOTER REGISTRATION (NVRA), cont.

***Processing
completed
registrations***

- 8.0 If the potential voter chooses to complete the voter registration at the program site, the local WIC staff will:
 - 8.1 Review the registration form to make sure it is complete and legible.
 - 8.1.1 Check that the required sections are complete. Required sections include eligibility questions, name, address, date of birth, proof of identity, party affiliation, signature and date.
 - 8.1.2 Staff do not need to check for accuracy, correctness, or view the proof of identity provided.
 - 8.1.3 If the form is not complete, inform the voter and let them decide if they want to make any changes.
 - 8.2 Tear the declination from the registration form.
 - 8.3 Date stamp the registration form with the current date. If a stamp is unavailable, hand write the date. The date goes to the right of the bar code.
 - 8.4 Retain the declination according to ¶11.0.
 - 8.5 Follow the procedure for reporting and mailing the registration forms to the correct agency. Follow the guidelines in ¶9.0.

***Submitting
completed
forms***

- 9.0 Mail completed registration cards to local county elections offices within five calendar days of receiving the completed forms.
 - 9.1 Assign a staff person to process the forms weekly. Mailing forms every Friday will ensure that the five day requirement is met.
 - 9.2 Count the registration forms before mailing them out.
 - 9.3 Mail the registration cards to the local elections office. You are encouraged to use special envelopes (SEL-505). If these are not available, you must use blank envelopes for mailing the registrations. This ensures the anonymity of the potential voter by removing the agency information from the registration process.
 - 9.3.1 If using blank envelopes, print #3 on the flap of the envelope to indicate agency type.
 - 9.3.2 SEL-505 envelopes are for agency use only and should not be given to potential voters.
 - 9.4 Local elections office addresses are printed on the back of the registration forms.
 - 9.5 All registration forms may be sent to one local elections office. They will sort and forward registration forms from other counties.
 - 9.6 Use the U.S. Postal Service unless you have made arrangements with the local elections office to do differently. Local elections officials are to treat all agency registrations the same as other voter registrations.

VOTER REGISTRATION (NVRA), *cont.*

- Reporting Form instructions**
- 10.0 Local programs must report the number of registrations submitted to the Secretary of State Elections Division at least **monthly**. Agencies must submit a monthly report no later than the 15th of the following month. Reports must be submitted via the online form at <http://sos.oregon.gov/elections/Pages/voter-registration-reporting.aspx>.
- 10.1 In addition to the number of registration forms submitted that month, you will need to provide your local program name, agency ID from SED, clinic address and main telephone number for identification.
- 10.1.1 Agency ID numbers from SED are not related to your WIC agency numbers. Contact the SED at 503-986-1518 for your agency ID number.
- 10.2 Consider submitting the report at the same time as the registration forms are sent to the local elections office.
- 10.3 Local program staff **must** submit a report to the Secretary of State’s office monthly to report “0” registrations if no registrations have been collected during a calendar month.
- Retention of declinations**
- 11.0 The local WIC program is responsible for retaining declinations for 2 years.
- 11.1 When using form SEL-503, separate the declination from the registration form.
- 11.2 When using the “*Participant Signature Form*” (form 57-629), refer to ♦426—Record Retention for instructions on retention.
- 11.3 Declinations may be kept in an aggregate file.
- 11.4 The declinations on file may be audited by federal or state elections staff or program monitoring personnel to determine whether programs are complying with NVRA.
- 11.5 Local programs are not required to keep track of the number of declinations on file.
- 11.6 Declinations on forms SEL-503 or SEL-503d may be aggregated and stored separately since they have a shorter retention period than the “*Participant Signature Form*”.
- Required notification of address change**
- 12.0 Local WIC programs are required to notify SED officials and the state WIC office of change of address or telephone number of the main WIC clinic, or change of coordinator within 10 days.
- Question about registration forms**
- 13.0 If you are unsure about the validity or accurateness of the information on a particular completed registration form, send it to the local elections office and let them make the decision about the validity of the registration.
- 13.1 Notice of registration will go directly from the elections office to the voter.
- 13.2 Refer questions about registration and the voting process to the local elections office.

VOTER REGISTRATION (NVRA), cont.

- Ordering supplies** 14.0 Order registration form SEL-503 Agency Voter Registration Forms and SEL-505 Voter Registration Envelopes according to ♦425—Ordering State Produced Materials.
- 14.1 All NVRA forms except for the SEL-505 Voter Registration Envelopes can also be downloaded electronically from <http://sos.oregon.gov/elections/Pages/electionforms.aspx>
- SEL-504 Reporting Forms (postcard)
 - SEL-540 Signature Stamp Attestation
 - SEL-550 Application to Exempt Residence Address from Disclosure as a Public Record
- Local WIC program responsibilities** 15.0 Local WIC programs are responsible for developing a procedure outlining clinic-specific methods of implementing NVRA. This procedure will include at a minimum:
- the filing method for declinations;
 - how registrations will be distributed; and
 - who is responsible for reporting information to elections officials.
- Staff guidelines** 16.0 Every effort should be made by local WIC staff to make sure potential voters are comfortable with the registration process. Listed below are some ideas and information that may help.
- 16.1 The declination states that the amount of assistance (or WIC eligibility) will not be affected by answering “No” on the declination form.
- 16.2 The information on the declination is confidential, as is the site of registration.
- 16.2.1 Voter registration information can be used to identify potential jurors for jury duty, but jury duty is also drawn from driver’s license data.
- 16.3 Never assume that a potential voter is not eligible to vote. If you are unsure, offer the registration form.
- Civil rights** 16.4 There is a concern about civil rights violations when the issue of citizenship arises. Once again, **do not assume a person is or is not a citizen. Do not ask them if they are a citizen. When in doubt, offer the registration form, even if the person does not speak English.** If the potential voter requires clarification of the form, simply read the declination or provide a translation of the form. The registration form includes the information on the requirements to register to vote (Oregon residency, age 17 or older, and U.S. citizenship).

VOTER REGISTRATION (NVRA), cont.

- 16.5 Notify local community groups that serve undocumented immigrants about the requirements to offer voter registration. Explain that WIC does not have a citizenship requirement and that eligibility for WIC is not connected to eligibility to vote. Encourage these groups to refer women and children who meet WIC eligibility requirements.
- 16.6 WIC staff shall not influence a potential voter's decision to register or choice of political preference. Refer to the Implementation Guide online for more information.
 - 16.6.1 WIC staff shall not display or wear anything which could be construed as having political connotations, such as political preference or party allegiance.
 - 16.6.2 WIC staff should be aware of non-verbal cues, such as body language and attitude, when offering registration forms. Staff concern over the extra time it takes to process the registration forms should not be communicated in any way to potential voters.
 - 16.6.3 WIC staff should be mindful of verbal cues, such as tone of voice and wording choices, when offering registration forms.
- 16.7 Refer all complaints or inquiries not answered in this policy to local elections officials or the SED at:

Secretary of State
Elections Division
255 Capitol St. NE Suite 501
Salem, Oregon 97310-0722
Phone: 503-986-1518
FAX: 503-373-7414 ★

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



SECTION: Local Program Operations
SUBJECT: **FOOD BENEFIT ISSUANCE**
DATE: April 14, 2016 (revised)

511e

POLICY: Local programs shall implement a food benefit issuance procedure to ensure WIC participants receive food benefits at their initial certification and at subsequent nutrition education and follow up appointments.

PURPOSE: To provide guidance for local WIC program staff on when to appropriately issue food benefits.

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 WIC PPM REFERENCES:

- ◆451—Change in Guardianship
- ◆501e—Ordering and Securing eWIC cards
- ◆510e—eWIC Cardholder Requirements
- ◆561e—Program Integrity: Replacement of Food Benefits
- ◆595e—Program Integrity: Separation of Duties
- ◆610e—Required Proofs: Identity, Residency, Income
- ◆616—Unavailable Proofs
- ◆620—Certification and Issuing Benefits to Relatives, Friends and Co-workers
- ◆635e—Participant Notification: Eligibility and Rights & Responsibilities
- ◆640e—Documentation Requirements in TWIST
- ◆641e—Documentation Requirements in the Absence of TWIST
- ◆646—Mid-Certification Health Assessment
- ◆655—Homeless Applicants
- ◆712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines
- ◆735—Exchange and Handling of Returned Formula
- ◆769—Assigning WIC Food Packages
- ◆823e—Nutrition Education: Second Nutrition Education Using Online Education
- ◆835e—Nutrition Education: Attendance or Refusal

TWIST TRAINING MANUAL REFERENCES:

Chapter 3, Lesson 1100 —Family Summary Screen

DEFINITIONS:

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”).

FOOD BENEFIT ISSUANCE, cont.

<i>Electronic Benefit Account (EBA)</i>	An account established for each WIC family administered by the Oregon’s eWIC 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.
<i>Food Benefit Balance</i>	Unspent issued food benefits which are available for purchase by a cardholder during authorized benefit timeframe.
<i>eWIC Card</i>	Magnetic stripe card used to purchase WIC authorized foods or formulas from a WIC family’s Electronic Benefit Account (EBA). Each card has a 16-digit Primary Account Number (PAN).
<i>First cardholder</i>	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(s), therefore sharing the same address.
<i>Second cardholder</i>	The optional cardholder who has been issued the second eWIC card with the permission of the first cardholder. The second cardholder may attend nutrition education appointments, bring in a child for certification appointments and purchase WIC food benefits using an eWIC card.
<i>Single issuance</i>	When a participant is issued Food Benefits for one month (also referred to as “one month issuance”).
<i>Double issuance</i>	When a participant is issued Food Benefits for two months (also referred to as “two month issuance”).
<i>Triple issuance</i>	When a participant is issued Food Benefits for three months (also referred to as “three month issuance”).

PROCEDURE:

When to issue food benefits

- 1.0 Food benefits issuance should be coordinated with regularly scheduled WIC appointments whenever possible. Once the CPA has assigned the appropriate food package, food benefits shall be issued for participants for the following reasons:
 - 1.1 Initial program enrollment for new WIC participants.
 - 1.2 The next three months of food benefits are available to issue (should be issued at a nutrition education contact).
 - 1.3 Recertification of WIC participants.
 - 1.4 To replace food benefits as allowed by ♦561e–Program Integrity: Replacing Food Benefits

FOOD BENEFIT ISSUANCE, cont.

- Last month to issue food benefits* 2.0 Participants are eligible to receive food benefits through the last month of their certification period.
- 2.1 A **child** may receive food benefits through the month of his or her fifth birthday.
- 2.2 A **nonbreastfeeding** or **some breastfeeding postpartum woman** may receive food benefits through the sixth month after her pregnancy ends. A **some breastfeeding** woman may continue to receive all other program benefits through the month of her child's first birthday.
- 2.3 An **exclusively or mostly breastfeeding woman** may receive food benefits through the month of her child's first birthday.
- 2.4 A **pregnant woman** may receive food benefits for six weeks after the end of pregnancy rounded to the end of the month.
- Food Benefit Issuance* 3.0 Issue **three months** of food benefits, unless there is a situation that warrants less than triple issuance (see ¶3.2 and ¶3.3). Food benefits may be issued to the first or second eWIC cardholders who provide appropriate documentation of identity. See ♦610—Required Proofs: Identity, Residency, Income.
- Partial packages* 3.1 Issue a partial package for the current month if a participant, parent or caretaker is receiving food benefits on or after the 20th of the month. Partial packages will carry the participant to the next month's issuance.
- Single issuance required* 3.2 In the following situations, single issuance of food benefits is **required**:
- RX or HP authorization needed (automatic single issuance in TWIST);
 - Eligibility pending (automatic single issuance in TWIST);
 - Missed nutrition education appointment (see ♦835—Nutrition Education: Attendance or Refusal for more information and for exceptions to the single issuance requirement);
 - Missed mid-point health assessment for infants (see ♦646—Mid-Certification Health Assessment for more information and for exceptions to the single issuance requirement);
 - Custody dispute;
 - Unresolved program integrity issue (program abuse, sanctions, overdue Lactina breastpump, etc.).
- Single or double issuance optional* 3.3 Local program staff **may** issue single or double month's food benefits on a case by case basis. Examples are listed below.
- Foster child
 - Lactina breastpump on loan
 - High risk participant
 - Trial of new formula

FOOD BENEFIT ISSUANCE, cont.

- NE Refusal* 3.4 Local agencies may issue up to three months of food benefits in the rare situation when a participant refuses all nutrition education (NE) and the refusal is documented in TWIST. Refer to ♦835—Nutrition Education: Attendance or Refusal.
- Issuance of benefits over the phone* 4.0 Issuance of benefits may be done over the phone in the following situations:
- 4.1 After receiving proofs of identity, residence, and income via fax or mail and “eligibility pending” status is removed.
 - 4.2 After changes have been made to the WIC food package, mid-certification, by a competent professional authority (CPA).
 - 4.3 Issuance of supplemental formula, mid-certification, to a participating infant by a CPA following a full assessment (see Policy 713: Breastfeeding: Use of Supplemental Formula).
 - 4.4 Change in the form of formula (for example, from powder to concentrate) in the middle of a certification period.
 - 4.5 Upon completion of online NE & required phone follow-up with a designated WIC staff person, mid-certification. Refer to ♦823—Second Nutrition Education Using Online Classes.
- Timeframe for food benefit issuance following a paper certification* 5.0 After completing a paper certification, local program staff have **two working days** to enter the data into TWIST and issue food benefits for the participant. Refer to ♦641—Documentation Requirements in the Absence of TWIST for more information.
- Issuing food benefits to relatives, friends and co-workers* 6.0 Local WIC program staff members **may not** issue food benefits for themselves, relatives, friends or co-workers. Refer to ♦620—Certification and Issuing Food Benefits to Relatives, Friends and Co-workers for additional guidelines.
- Hospitalized or institutionalized participants* 7.0 Benefits may not be issued to a WIC participant who is hospitalized or institutionalized.
- 7.1 When a WIC participant is in a hospital, long term care facility or institution, WIC food benefits cannot be issued until discharge, since the institution is responsible for feeding the patient.
 - 7.2 If an infant is with the mother who is staying in a residential treatment center, See ♦655—Homeless Applicants for an exception which allows the infant to receive infant foods and infant formula.

FOOD BENEFIT ISSUANCE, *cont.*

- Written procedure is required*** 8.0 Local programs are required to have a written procedure for food benefit issuance that addresses the following:
- When food benefits are single or double issued;
 - When food benefits are issued over the phone;
- 8.1 If any local policy is more restrictive than state policy, the local policy must be approved by the state WIC program prior to implementation. Refer to ♦420—Approval Process for Local Program Policies and Procedures.

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SECTION: Local Program Operations 561e
SUBJECT: **PROGRAM INTEGRITY: REPLACEMENT OF FOOD BENEFITS**
DATE: April 14, 2016 (*revised*)

POLICY: Issued and redeemed food benefits will not be replaced under any circumstances and redeemed formula benefits will be replaced only under limited circumstances as described below.

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

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

OREGON WIC PPM REFERENCES: ♦451—Change in Guardianship
 ♦510e—eWIC Cardholder Requirements
 ♦511e—Food Benefit Issuance
 ♦590—Program Integrity: Participant Abuse

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 808—Foster Families and Custody Changes
 Chapter 3, Lesson 504—Formula Exchange and Replacement

DEFINITIONS:

<i>Issued Food Benefits</i>	The benefits that have been sent to the eWIC contractor which are/will be available for purchase by a cardholder.
<i>Redeemed Food Benefits</i>	The benefits that have been used by the cardholder(s) to purchase foods that were issued to a participant.
<i>TWIST</i>	The WIC Information System Tracker: The data system for the Oregon WIC Program.

PROCEDURE:

When to replace redeemed benefits

1.0 Issued and redeemed food benefits will not be replaced under any circumstances and redeemed formula benefits will be replaced only under these limited circumstances:

- Formula exchange: For formula being returned for a formula exchange, refer to Policy 735: Handling Returned Formula.
- Custody change or domestic violence situation: When the redeemed formula does not accompany the infant or child and safety would be compromised if the authorized cardholder attempted to retrieve the WIC formula.

PROGRAM INTEGRITY: REPLACING FOOD BENEFITS, cont.

(When to replace redeemed benefits)

- Stolen WIC formula with a police report. Note: This could be an actual police report or just a police report number. Procedures vary by police department.
- After a documented natural disaster (e.g. flood or earthquake) or other disaster like fire where the WIC formula is no longer available.

2.0 Assess that the participant or cardholder's request for replacement benefits is valid. If the participant has a valid request for replacement according to this policy, replace only the benefits that were originally issued to the participant in the current month and redeemed.

3.0 Use the Formula Exchange/Formula Replace function in TWIST to replace redeemed formula benefits:

3.1 Replacing stolen or unavailable formula: Replace only the amount issued and redeemed. Unredeemed formula benefits are still available to the cardholder.

3.1.1 Document the formula replacement (and the police report number for stolen formula) in the WIC Notes field on the Intake screen.

Partial packages

3.3 If a participant is to receive replacement formula 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 benefit issuance.

4.0 Local programs cannot replace previous months' benefits.

5.0 Local programs cannot issue retroactive benefits to disqualified participants who are reinstated following an administrative hearing.

Required documentation for unavailable/stolen infant formula

6.0 For all formula reported unavailable/stolen, clinic staff will complete the Documentation of Unavailable/Stolen Formula form (57-912), available on the Oregon WIC website at <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Documents/912-unavailable-stolen-formula.doc>.

6.1 Review the participant's WIC Notes on the Intake screen to determine if formula has been replaced in the past.

6.2 If this instance is not the first time that the participant has had formula replaced, contact the State WIC Office before proceeding.

6.2.1 The State WIC Office may validate police reports, statements, and other supporting documentation to determine, on a case-by-case basis, whether or not to replace formula for second and subsequent reports of unavailable/stolen formula.

PROGRAM INTEGRITY: REPLACING FOOD BENEFITS, cont.

***(Required
documentation for
unavailable/stolen
infant formula)***

- 6.3 Review the form with the participant, parent or caretaker.
- 6.4 Obtain the signature of the participant or cardholder on the form.
- 6.5 Document replacement formula, including the police report number for stolen formula, in WIC Notes on the Intake screen.
- 6.6 Within 3 days, send the signed form to the state WIC compliance coordinator. ★

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SECTION: Certification 614
SUBJECT: **Income Eligibility: Current Income Guidelines**
DATE: May 1, 2016 (*revised*)

- POLICY:** Local WIC staff will use the current income guidelines when determining income eligibility.
- PURPOSE:** To ensure that income eligible applicants and participants receive WIC services.
- RELEVANT REGULATIONS:** §246.7 ¶(d)(1)(ii)—Annual adjustments in the income guideline
 §246.7 ¶(d)(1)(iii)—Implementation of the income guideline annually
- OREGON WIC PPM REFERENCES:** ◆611—Income Eligibility: Determining Income Eligibility
- TWIST TRAINING MANUAL REFERENCES:** Chapter 3, Lesson 102, Enrollment
- APPENDICES:** 614.2 Appendix A Current Income Guidelines
 614.3 Appendix B Calculating Total Household Income Manually
- DEFINITIONS:**
- | | |
|---------------------------------|---|
| <i>Annual income guidelines</i> | USDA updates the federal poverty income levels annually. Local programs will implement the new guidelines according to State instructions. The statewide WIC income eligibility standard is 185% of the federal poverty income guidelines. |
| <i>Household size</i> | A person or group of people, related or not, who usually (though not necessarily) live together, and whose income and consumption of goods or services are related and who are not residents of an institution. The key consideration in determining when individuals or groups are a household (or economic unit) is whether they generate the income which sustains them, i.e., room, board and medical care. When determining a household size, count all pregnant women as two, or more, for expected multiple births, unless a woman specifically waives the increase in number. |
| <i>Income</i> | Gross income, including overtime, before deductions for income taxes, employees’ social security taxes, insurance premiums, bonds, etc. The determination of the amount of a household’s gross income shall not be considered reduced for any reason (e.g.; financial hardships, medical bills, child support). Farmers and self-employed use net income. Net income is determined by subtracting the operating expenses from the gross income. |

Income Eligibility: Current Income Guidelines, cont.

PROCEDURE:

- Current Guidelines** 1.0 WIC staff will use the current income guidelines provided by the state WIC program when determining income eligibility.
- 1.1 TWIST automatically calculates income using the current income guidelines. When unsure if printed sources are current, use TWIST or the income guidelines posted on the WIC web page.
 - 1.2 Income guidelines are generally updated once a year, usually in April or May. When new guidelines are provided all printed materials, local web pages, or outreach materials must be updated or replaced with new versions.
 - 1.3 Local agencies will be notified when updates occur or if the annual updates are being delayed for any reason.
- Public information** 2.0 WIC income guidelines are public information. Local programs must give information about current WIC income guidelines to the public upon request.
- 2.1 The WIC income guidelines are also posted on the WIC web page. Direct the public to <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/income.aspx> for more information. ★

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Appendix A



**OREGON WIC PROGRAM
Income Eligibility Criteria
Effective May 1, 2016**



The WIC income standard is 185% of the federal poverty level.

Number of	Gross Household Income
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Income Eligibility: Current Income Guidelines, cont.

Person(s) In Household	Annual	Monthly	Twice-Monthly	Bi-weekly	Weekly
1	\$21,978	\$1,832	\$916	\$846	\$423
2	\$29,637	\$2,470	\$1,235	\$1,140	\$570
3	\$37,296	\$3,108	\$1,554	\$1,435	\$718
4	\$44,955	\$3,747	\$1,874	\$1,730	\$865
5	\$52,614	\$4,385	\$2,193	\$2,024	\$1,012
6	\$60,273	\$5,023	\$2,512	\$2,319	\$1,160
7	\$67,951	\$5,663	\$2,832	\$2,614	\$1,307
8	\$75,647	\$6,304	\$3,152	\$2,910	\$1,455
Each additional household member add:	+\$7,696	+ \$642	+\$321	+\$296	+ \$148

Household: A person or group of people, related or not, who usually (though not necessarily) live together, and whose income and consumption of goods or services are related and who are not residents of an institution. The key consideration in determining when individuals or groups are a household (or economic unit) is whether they generate the income which sustains them, i.e., room, board and medical care. When determining a household size, count all pregnant women as two, or more, for expected multiple births, unless a woman specifically waives the increase in number.

Income: means gross income, including overtime, before deductions for income taxes, employees' social security taxes, insurance premiums, bonds, etc. The determination of the amount of a household's gross income shall not be considered reduced for any reason (e.g., financial hardships, medical bills, child support).



SECTION: Farm Direct Nutrition Program 1100
SUBJECT: **FARM DIRECT NUTRITION PROGRAM: LOCAL PROGRAM RESPONSIBILITIES**
DATE: April 14, 2016 (*Revised*)

POLICY: Participating local programs shall follow the procedures below to ensure program compliance with the Oregon Farm Direct Nutrition Program, FDNP (formerly the Oregon Farmers' Market Nutrition Program).

PURPOSE: To clarify the responsibilities of local programs regarding check issuance and security, participant education, documentation, monitoring requirements and follow-up on complaints and abuse issues.

RELA VANT REGULATIONS: 7 CFR §248—Farmers' Market Nutrition Program
Oregon Administrative Rules 333-053-0030 through 333-053-0110

OREGON WIC PPM REFERENCES: ♦588—Program Integrity: Complaints
♦595—Program Integrity: Separation of Duties
♦830—Nutrition Education: Documentation

APPENDICES: 1100.5 Appendix A Sample FDNP Documentation of Check Inventory form
1100.6 Appendix B Instructions for completing FDNP Check Register
1100.7 Appendix C Sample Farm Direct Nutrition Check Register

PROCEDURE:

- Check delivery*
- 1.0 The state WIC program will coordinate the delivery of all Farm Direct Nutrition Program (FDNP) checks and check registers to participating local programs.
 - 1.1 Each participating local WIC program will be assigned a specific number series of checks by the state WIC office.
 - 1.2 FDNP checks will be delivered by UPS or similar delivery service. The check delivery will have an enclosed packing list of the check number series sent to the program.
 - 1.3 A local staff member will review the packing list and the checks to ensure that all numbers are present and will verify the receipt of all checks in TWIST.
 - 1.4 Report any missing checks in the sequence immediately to the state FDNP Coordinator. Do not verify receipt in TWIST until staff can account for all checks.
 - 1.5 The local program must distribute the check stock to the appropriate clinics in TWIST in order for the checks to be available to issue. Refer to TWIST Lesson 1000 - Farmers' Market Coupon Issuance, Chapter 3, Section 10.

FDNP: LOCAL PROGRAM RESPONSIBILITIES, cont.

- Eligible recipients** 2.0 Each eligible individual will be issued five \$4 checks (\$20 value). To be eligible, the individual must currently be receiving benefits under the WIC Program *and* belong to any of the following categories on the date of issuance:
- Pregnant woman;
 - Breastfeeding woman (including women who are doing some breastfeeding and not currently receiving a food package);
 - Postpartum non-breastfeeding woman;
 - Infant at least 4 months of age;
 - Children through the end of the month they turn five years old.
- 2.1 The local program must confirm the eligibility status of all recipients *prior* to issuing FDNP checks. To do so, staff may use the “Check Eligibility Report” that is available in TWIST.
- Participant orientation** 3.0 All FDNP check recipients must receive an orientation to the program upon receipt of the checks. The orientation must cover:
- 3.1 The purpose of the FDNP;
 - 3.2 How to use the FDNP checks;
 - 3.3 The eligible foods;
 - 3.4 The prohibition against cash change;
 - 3.5 The participant’s right to complain about improper practices and the process for making a complaint;
 - 3.6 The location of authorized markets and farm stands; and
 - 3.7 Nutrition education that emphasizes the relationship of proper nutrition to the total concept of good health, including the importance of consuming fresh fruits and vegetables.
- FDNP nutrition education as WIC second nutrition education contact** 4.0 As appropriate, the nutrition education provided to FDNP check recipients may be counted as the participant’s second nutrition education contact for the program.
- 4.1 Document that the participant has received nutrition education concerning fresh fruits and vegetables in the participant’s record. See ♦830—Nutrition Education: Documentation.
- Issuing checks** 5.0 FDNP checks will only be issued to the participant/caretaker in a face-to-face contact, and the participant/caretaker must receive a FDNP orientation when receiving checks for the first time in the current year. Nutrition education about the benefits of eating fresh fruits and vegetables must also be provided face-to-face by qualified staff (e.g. CPA, nutritionist, OSU Extension agent, etc.) if it is being used to meet the participant’s second nutrition education requirement.

FDNP: LOCAL PROGRAM RESPONSIBILITIES, cont.

- 5.1 Staff must document check issuance in TWIST as soon as possible, preferably within 24 hours of distribution to participants. This will ensure accurate check reconciliation.
 - 5.2 Staff may only issue checks that are assigned to their specific clinic.
- Benefit package** 6.0 The state WIC program will determine a standard benefit package per eligible individual and per family each year.
- 6.1 **Local programs may issue checks to no more than *the state's maximum number of FDNP-eligible individuals per family* unless otherwise notified by the state FDNP Coordinator.**
- Foster children** 6.2 Eligible individuals who are foster children may each be considered a separate family according to local program policy.
- Distribution dates** 7.0 FDNP checks may be distributed from May 1 until ***no later than*** September 30. To maximize participant shopping opportunities, it is preferred that the majority of checks be issued by August 1.
- 7.1 Local program staff may not issue checks to participants from another local program.
- Unissued checks** 8.0 **Prior to September 30**, the local program may return unissued checks and the matching check registers to the state WIC office for reallocation.
- 8.1 **If the program still has unissued checks after September 30**, the checks must be voided in the “Farmers’ Market Administration” screen in TWIST. The physical checks must be destroyed and the voided ranges should be marked as “VOID” on the corresponding check register(s) by November 30.
 - 8.2 The State FDNP coordinator may reallocate from one program to another any FDNP checks that have not yet been issued, after August 1.
- Lost/stolen checks** 9.0 Lost or stolen FDNP checks will ***not*** be replaced. Void in TWIST all checks reported as either lost or stolen.
- Returned checks** 10.0 Only **complete, unused** sets of issued FDNP checks that are returned by the participant for any reason may be re-issued to another participant. Incomplete sets of issued checks that are returned by the participant must be destroyed, the checks must be voided in the “Coupon Book Maintenance” screen in TWIST and the voided ranges should be marked as “VOID” on the corresponding check register(s).
- Check security** 11.0 FDNP checks must be kept under lock and key during non-clinic hours, breaks, and lunch hours. A staff person must attend unlocked checks at all times.

FDNP: LOCAL PROGRAM RESPONSIBILITIES, cont.

- Required check security procedure* 11.1 Local programs are required to have a written procedure for ensuring check security that must be made available to state staff during program reviews.
- Physical inventory* 12.0 Since FDNP checks are pre-printed negotiable instruments, the local program must track all checks that are on-hand and those that have been distributed to clinic or satellite sites. At all times during the FDNP season local programs must be able to account for all checks that have been received from the state WIC program. Local programs should be able to account for all checks via the following: 1) completed check registers and/or TWIST-generated issuance lists, 2) physical checks available for issuance and 3) any tools used to track distribution of checks to satellite clinics or individual staff for issuance purposes.
- 12.1 A physical inventory must be documented at least once during each FDNP season or issuance period at each site that stores checks. See Appendix A for an example of how to document such an inventory. If the local program already performs a “perpetual” or ongoing inventory throughout the season, then documentation of this type of inventory will meet this requirement.
- 12.2 Inventory documentation must be available to state staff during program reviews. This documentation must also be kept on file at the local program for a minimum of three years.
- Check register* 13.0 The local program must use the FDNP check register or TWIST-generated “Issuance List” and the “Farmers’ Market Issuance” screen in TWIST to document the issuance of FDNP checks.
- 13.1 **Only one FDNP recipient should be documented per check range.**
- 13.2 The local program must ensure that the WIC participant/caretaker signs the check register when receiving the checks. See Appendix B for more information on completing the check register, and Appendix C for a sample check register page.
- 13.2.1 The local program may collect signatures on the “Farmers’ Market Issuance List” from TWIST and staple the completed list to the appropriate check register, in lieu of completing the check register.
- 13.3 The original FDNP check register and issuance lists must be kept on file at the local program for a minimum of three years.
- Separation of duties* 14.0 Certification and FDNP check issuance duties must be performed by different staff members. Also, the inventory control duties (tracking and logging checks, physical inventory, etc.) must be split between at least two staff members. If this is not possible, the process must be verified by a second party to ensure that not all aspects of check management are within one person’s control. See ♦595—Program Integrity: Separation of Duties.

FDNP: LOCAL PROGRAM RESPONSIBILITIES, cont.

- Civil rights complaints*** 15.0 Civil rights complaints of discrimination on the basis of race, color, national origin, age, sex or disability will be handled according to Policy ♦588—Program Integrity: Complaints.
- “And Justice For All” signage*** 16.0 The USDA Civil Rights Poster AD-475A (“And Justice for All”) must be prominently displayed at all locations where FDNP checks are distributed and/or FDNP nutrition education takes place. This includes at farmers’ markets, at the actual site of the check distribution or at nutrition education sessions.
- FDNP complaints/abuse*** 17.0 All FDNP-related complaints are to be handled according to Policy ♦588—Program Integrity: Complaints.
- Monitoring requirements*** 18.0 Local programs that participate in the FDNP will be monitored for compliance every two years as required by federal rules. Reviews will cover the following:
- Verification of FDNP recipient eligibility;
 - Documentation of nutrition education in the participant’s TWIST record or master file;
 - Observation and/or documentation of check accountability procedures (FDNP check register); and
 - Observation and/or documentation of check security issues.
- 18.1 For a copy of the FDNP review tool, visit <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/wic-coordinator.aspx>★

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Sample FDNP Documentation of Check Inventory Form



Farm Direct (Farmers' Market) Documentation of Check Inventory

Local Agency: Ford County Clinic: Taurus

Inventory Date: 08/05/11 Conducted by (LA Staff): Mary Munster

WIC Coordinator: Sylvia Simpson

Documentation of Inventory

1. Number of sets received from State WIC Program: 100
2. Number of sets issued to date, according to completed check register pages and/or TWIST-generated issuance lists:
75
3. Number of sets available for issuance: 25
4. Are check sets kept in locked cabinet or secure storage area when not attended?
Yes No

Comments:

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57-1056-ENGL (04/2008)

**Instructions for completing the
Farm Direct Nutrition Program Check Register**

Date =	Date checks are issued to the participant. Every entry on each check register page must have either an issuance date or a line through it originating from another entry with an issuance date.
WIC ID Number =	A unique participant WIC ID number must be documented for each set of checks issued.
Check #s From/To =	Beginning and ending numbers of the checks issued to the participant are pre-printed.
Participant/ guardian signature =	The participant/guardian <u>MUST</u> sign. Issuer's initials should be the exception, not the rule e.g. participant/guardian physically unable to sign. When an individual is signing the FDNP check register for checks for multiple WIC participants, it is permissible for staff to draw a diagonal line through the rows of checks being issued and to have the individual sign along the diagonal line.

Sample Farm Direct Nutrition Check Register

OREGON WIC FARM DIRECT NUTRITION PROGRAM COUPON REGISTER

CLINIC NAME: Oregon County WIC

CLINIC NUMBER: 45

DATE	WIC I.D. NUMBER	COUPON #S		PARTICIPANT/GUARDIAN SIGNATURE
		FROM	TO	
6/5	123456-03	9109456	9109460	Mary Appina
	234567-01	9109461	9109465	Dorothy Bessy
	234567-02	9109466	9109470	
	345678-02	9109471	9109475	Holly Hobday
	" -03	9109476	9109480	
6/6	456789-01	9109481	9109485	Urene Finstone
	567890-04	9109486	9109490	Susan White
	678901-01	9109491	9109495	Renee Peel
	" -02	9109496	9109500	