



SECTION: Farm Direct Nutrition Program 1100
SUBJECT: **FARM DIRECT NUTRITION PROGRAM: LOCAL PROGRAM RESPONSIBILITIES**
DATE: September 15, 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.

RELEVANT 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.

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- 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.

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- 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.*

- 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.

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| <i>Civil rights complaints</i> | 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. |
| <i>“And Justice For All” signage</i> | 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. |
| <i>FDNP complaints/abuse</i> | 17.0 | All FDNP-related complaints are to be handled according to Policy ♦588—Program Integrity: Complaints. |
| <i>Monitoring requirements</i> | 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: <ul style="list-style-type: none">• 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 ★ |

**If you need this in large print or an alternate format,
please call (971) 673-0040.
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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:

If you need this information in an alternate format,
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**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 Poppina
	234567-01	9109461	9109465	Dorothy Bessy
	234567-02	9109466	9109470	
	345678-03	9109471	9109475	Holly Hobbes
	" -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	