

## Compliance Module

### Introduction to the Compliance Module

Welcome to the Minnesota WIC Compliance Module. This module will help you understand some important information regarding policy and rules of the WIC Program. At the end of this module, there is a short quiz to complete. In order to get credit for completing this module, you must complete and submit the quiz.

### Language Needs? Let us Know!

We want you to understand the information in this training. If you need this training module interpreted into another language, please let us know by emailing [health.wicvendor@state.mn.us](mailto:health.wicvendor@state.mn.us).

### Why is this training required?

You have been asked to complete this training module because your store has committed or is suspected of committing one or more serious violations of WIC Program rules. This module will help remind you of some important WIC rules that will help you succeed as a WIC Vendor. Committing serious violations of WIC Program rules can result in you being required to repay money to the WIC Program or disqualification as a WIC Vendor, which means you can no longer accept WIC benefits at your store. If you are disqualified from the WIC Program, you may also be disqualified from the SNAP EBT program resulting in a double loss for your business.

### Why does WIC have so many rules?

The WIC Program is a nutrition program. When participants receive benefits for foods to use at grocery stores, they receive specific information on those foods and how they can help improve their health or their children's health. The foods that are offered in the WIC benefits are meant to address food types that are typically low in WIC participants' meals and snacks. These foods have nutrients that help improve the health of WIC participants, and when children get enough of these nutrients, it helps their brains develop, so they may do better in school. In addition to better brain development, WIC foods can also help prevent serious physical health conditions that can happen when not enough of the right foods are eaten. If participants do not receive WIC foods, or substitution of those foods are made, it can mean that the participant is more at risk of developing these serious physical conditions.

## The importance of scanning WIC Products

Your store cashiers MUST scan each and every product selected for purchase with a WIC card. You can NEVER scan UPCs from a sheet or UPCs from example products instead of scanning the actual products themselves. Scanning UPCs from anything other than the foods being purchased is a very serious violation. If we find or think your store may be doing this, your store may be audited or investigated in some other way and may be required to pay the WIC Program money and be disqualified from WIC and even SNAP. If your store is committing fraud, you could even be criminally prosecuted for it.

## Entering CORRECT prices for WIC

You may NEVER charge WIC customers more than you charge non-WIC customers. Charging WIC customers more than you would charge a non-WIC customer is called overcharging. Entering the correct prices in WIC transactions is extremely important. In integrated store POS systems (when a store uses their regular cash register system to accept all payment types), food prices are programmed into the register, so the price charged to all customers is always the correct price. But, for Stand-Beside terminals, since the prices are typically entered by hand for each product, mistakes and overcharges are possible. "overcharging" and is a form of fraud. Overcharging is a federal violation that will result in disqualification from WIC and even SNAP. People can also be criminally prosecuted for overcharging.

## Your Register/Point of Sale System Matters!

Pricing violations are easier to prevent with an integrated cash register system. Using Stand-Beside terminals can lead to serious violations when cashiers make mistakes hand-keying prices into the terminal. If you are interested in updating to an integrated point-of-sale system, we have a list of the systems that can be used in Minnesota. If a company is not listed on our website, it means that company's system is not currently able to accept WIC cards in Minnesota.

## WIC can see every detail of WIC card purchases

When a WIC card is swiped in your store, we can see details about the transaction. We can see all the prices you are charging WIC customers and the products you are selling them. We can see what items are deducted from the card and what the remaining balance is on the card. We can see when you have large WIC transactions, including those in which the entire card balance is used at once, or in two or three transactions, one after the other. Very large transactions in small stores are unusual. WIC will audit or otherwise investigate stores that have unusual or suspicious looking transactions.

### Example of pricing data

This example of pricing data shows the level of detail WIC can see in prices that stores charge WIC participants for WIC allowed foods.

### Example of WIC product data

In this example of product data, it shows exactly what WIC products are being sold and the number of each of those products in a single transaction.

### Example of transaction for all or most of the WIC benefits

This example shows the amount of the WIC transaction, and the items still available on the card after the transaction is complete.

### Minimum Stock Requirements

WIC vendors must meet minimum stock requirements at all times. Meeting these requirements means that you have enough WIC foods to serve your customers. You may see what the requirements are by clicking the link on this slide. There are some WIC allowed items, such as infant meats or lactose free milk, that do not need to be carried at all times, but you do need to order them for a WIC customer and have them available within seven days of a request, if you are able to order the items through your normal supplier. If you have the WIC foods in your store, WIC customers will be able to shop regularly at your store, and it will reduce the request for substitutions if you are out of certain foods. Remember, scanning a code for a WIC food and giving a non-WIC food is a serious violation and can result in you paying money back to the WIC Program or losing your authorization to accept WIC benefits.

### Invoices and Purchase Records

All WIC vendors must keep the most recent three years of invoices or stock purchase records. Three months of those records must be kept at your store's address. It is important for your store to keep these invoices and/or purchase records, because they will help prove that you have purchased the WIC foods you have sold at your store, if you are ever audited. If you are asked to provide the invoices or purchase records for your store, you must provide them within 15 days of the request. It is recommended that these invoices and purchase records are kept in date order and photocopied or scanned electronically, if you store them that way, so that these documents are easy for you to provide, if you are asked to provide them.

### Additional Training Opportunities

Additional training modules are available on the Minnesota WIC website. Completing these modules can help cashiers understand the things they need to know when transacting WIC cards and general information about WIC policies and procedures. You may find these modules at the link on this slide. Additionally, if you would like in-person training at your store, please contact us, and we will look into the possibility of providing more training for you or your cashiers. Remember, when your cashiers make a mistake, it is still a violation for your store, even though you did not personally make the mistake.

### **Module Complete**

This completes the Compliance Module. Please click the button below to take a quiz about the information provided in this training. If you do not complete the quiz, you will not get credit for completing this training.