

Montana WIC

Nutrition Program for Women, Infants and Children



Local Agency Retail Coordinator Manual (LARC) - 2015

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Local Agency Retail Coordinator (LARC) Position Overview

The Local Area Retail Coordinator (LARC) cooperates with the State Vendor Staff to ensure vendors (retailers and farmers) are able to effectively serve WIC participants. LARCs communicate program procedures to vendors; they perform duties to increase vendor efficiency, and request information and services from state staff that will benefit vendors.

Responsibilities:

1. Liaison between vendors, participants, local agency staff and state agency staff.
2. Document questions, problems, and follow-up actions that are taken.
3. Problem resolution;
 - A. Ensure Retailer/Farmer Complaint and Participant Fraud/Abuse form is completed when applicable and supporting documents are sent to the State Office.
 - B. Ensure participants that have received alleged abuse complaints from a vendor or the State Office have had the issue discussed with them and appropriate education and/or sanctioning has occurred and reported to the State Office.
4. Ensure Local Agency Staff use the "Participant Booklet" to train participants on the approved foods and how to redeem their WIC benefits at the store.
5. Update fellow Local Agency Staff on policy changes regarding vendors.
6. Notify the State Office with any information on a new store in your area, change in ownership, or closures of any stores.
7. Ensure your local agency is in compliance with "on – site review" requirements regarding retail/farm issues such as;
 - A. A current authorized retailer list is dated and posted in a visible location in the clinic.
 - B. A "We Accept WIC Benefits" sign is posted in the Clinic.
 - C. A file for participants and retailer complaints exists, and that all staff members know the form, documenting, scanning and routing procedures.
 - D. Follow-up on participant fraud/abuse is occurring and documentation is being sent to the State office.
8. Consult and assist with new vendor applications, including the:
 - A. Initial Visit Form and Training Outline for retailers;
 - B. Application, Training and Farm Direct agreement form for farmers.
9. Training requirements.
 - A. Annual training of all retailers is required. The training may be, but is not limited to on-site, interactive, DVD, or newsletter. LARCs participate in and support the trainings and read the training newsletters when they are included in the WIC Weekly Information & Communication newsletter.
 - B. Retailers are required to attend interactive training at least once every three years. LARCs assist in providing this training during routine monitoring visits.

- C. Annual training of all farmers is required. The training must be face-to-face for the first year of their agreement. This training is completed by LARCs, who also ensure the proper documentation is sent to the State office.

10. Educational/Monitoring Visits

- A. An educational/monitoring visit for retailers needs to occur at least once during each three-year contract period. Monitoring is conducted by the LARC and an educational buy will take place as a part of the monitoring process.
- B. Federal Requirements state that at least 10% of all authorized farmers be monitored each year. Monitoring will be conducted by the Local Agency which has signed the farmer up for the program and the State office will notify each Agency as to which farmers need to be monitored.

Policies and Procedures

There are many resources for Local Agency Retail Coordinators:

1. Chapter 9 of the Montana WIC State Plan outlines the policies and procedures for retailers authorized with the MT WIC Program. LARCs need to use this as a reference and be familiar with the policies. The [Montana WIC State Plan](#) is posted on the WIC website on the [Local Agency Staff](#) page.
2. [Retailer Reference Manual](#) – This guide is provided to each authorized retailer and can be found on the [Retailers](#) page of the WIC website.
3. [Retailer Booklets](#) are provided to stores for use at each cash register. LARCs need to be familiar with the retailer version of the booklet. An electronic copy can be found on the Retailers page of the WIC website.
4. [Farm Direct Handbook](#) – Each farmer receives a copy of the handbook during the application process and a copy can be found on the [Farm Direct](#) page of the WIC website.
5. The [LARC section](#) on the Local Agency Staff page of the Montana WIC Program website contains links to the LARC Manual (this document) and the [Retailer Training Guide](#).

Authorization Process for New Retailers

In order to effectively serve WIC participants in Montana, it is important WIC authorized retailers are located in areas where participants shop so distance does not become a barrier to service. For WIC authorized retailers, it is also important that participation in the program be beneficial; for this reason, a balanced ratio of participants to retailers is maintained. Not all retailers requesting WIC authorization will have it granted. The LARC plays an important role in this screening process since they have a better idea of where participants shop and how many participants frequent their clinic.

1. If a prospective retailer contacts the LARC, direct them to the Vendor Coordinators at the State Office for a pre-screening.
2. The state office will pre-screen the retailer and contact the LARC to determine if the retailer meets the following criteria:
 - A. participant need justifies adding a new retailer;
 - B. retailer is capable of meeting stocking and cost containment requirements; and
 - C. if previously WIC authorized, there were few, if any, participant complaints or stocking issues.
3. Based on the LARC's feedback, the state office will either send the retailer an application packet or a letter informing them of a lack of current need for new WIC authorized retailers.

Retailer Contracts (Memorandum of Understanding)

If the retailer meets the criteria and completes the application process, and MOU will be processed and three copies will be issued by the state office. Upon receipt of the signed MOU, state staff will issue a stamp and schedule an initial visit. Though it is not required, the LARC is encouraged to attend this visit (schedule permitting) to meet the store staff and ensure they receive a consistent message from WIC staff. Store management will be provided with training, a Retailer Reference Guide, "Report of Participant Abuse" forms, "We Accept WIC" sign, a set of shelf tags, a Training Packet and Training DVD at this time.

Training Retailers

The goal of retailer education and training is to reduce errors, prevent abuse and improve program services. Retailer training is designed to be consistent statewide, and may be conducted for the following reasons:

1. Initial Training

The State or Local Agency will provide training to all retailers at initial authorization. Training is mandatory, must be face to face and must be completed before the store is allowed to accept WIC benefits. Retailer training is designed to assure the most effective, efficient and courteous delivery of service to WIC participants. Retailer training will provide, at a minimum, an understanding of:

- A. The purpose of the WIC Program
- B. The terms of the Retailer MOU
- C. The procedures for handling WIC benefits
- D. The sanctions that can result from incorrect administration of the program rules and regulations.

2. **Annual Training**

The Montana WIC Program will provide training annually through formats such as, but not limited to newsletters, a DVD or the Retailer Newsletter. This training is provided by the State office staff.

3. **Interactive Training (required by USDA)**

At least one representative from each retailer is required to participate in interactive training once during their three-year contract. This training must be completed or reauthorization will not take place. This training is conducted by a LARC during a routine monitoring visit. Documentation of this training is included in the monitoring report that is sent to the state office for review.

4. **Mandatory Training (for a corrective action)**

Mandated training may be deemed necessary when the Montana WIC Program determines a particular retailer needs it. This required training is usually in response to a program violation and a retailer may be asked to complete a Corrective Action Plan.

- A. A Corrective Action Plan is a strategy or plan for correcting or eliminating a nonconformance that has occurred. The plan needs to address the area of violation and it may include a training aimed at educating retail staff on WIC Program policy and procedure, customer service, or a plan to address stocking issues. A timeline in which the issue is addressed will be included in the plan, as well as follow-up to assure requirements are completed.
- B. If training is required, LARC staff may be asked to conduct the training.

5. **Requested training**

The Montana WIC Program will also provide training at the request of the retailer. State or LARC staff may conduct the training.

Training Guide

USDA requires that specific areas be covered during retailer training. The [Retailer Training Guide](#) provides information on each required area. The agenda may be used to guide the training and once the basic information has been covered, tailor the training to the needs of the retail staff. This guide can be found on the Local Agency page of the Montana WIC website under the LARC link.

Retailer Monitoring Visits & Educational Buys

Retailer Monitoring refers to the regular review of authorized retailers to determine adherence to Program policies and procedures and to identify specific areas that are found to be deficient during the review. There are four parts to a routine monitoring visit.

- 1. Food Inventory
- 2. List of Observances
- 3. Educational Buy
- 4. Interactive Training

A LARC may visit the store unannounced or after previously contacting store management. Introduce yourself to the store manager and let them know you will be conducting a monitoring visit for the Montana WIC Program. The visit will include an inventory of stock, an educational buy as well as a review to ensure:

1. The “WE Accept WIC” decal is posted
2. The store meets the minimum inventory requirements
3. Foods are not out of date
4. Retailer Booklets are available at all registers
5. WIC benefits on hand have been correctly redeemed
6. WIC shelf tags are properly placed
7. Interactive training is provided

An **educational buy** is defined as an overt purchase made with WIC benefits by WIC staff. The visit is typically made with the knowledge of management, though not necessarily of the retail staff. The purpose of the educational buy may help determine problem areas in retailer procedures. This training tool will not result in sanctions.

Contact the State Office prior to the planned educational buy since a purchase is included in the agenda. The State Office will issue WIC benefits for the educational buy purchase.

1. Criteria

- A. Educational buys are a required part of monitoring visits, but can be done at any time at the discretion of the LARC or request of the retailer or State Office staff.
- B. The purpose of the educational buy is to educate/train retailer staff in the appropriate WIC transaction procedures. This purchase may help determine issues in retailer procedures.

2. Procedure

- A. WIC staff will enter the premises of the retailer, noting date and time of the visit on the “Monitoring Visit” form. The LARC may previously contact the retail manager and explain the purpose of the visit. Explain the following to the retail manager: *An educational buy will be done to determine if cashiers require training in completing a WIC transaction.*
 - i. WIC staff will select items (may be non-authorized WIC foods, larger sizes of authorized foods or non-food items) and proceed to the check stands.
 - ii. Do not mix personal items with WIC items during this educational purchase.
 - iii. Have a variety of eligible and non-eligible items. Try purchasing:
 - a. Baby food meat if only fruits/veg are listed on the benefit;
 - b. Fruit drink instead of juice;
 - c. Non-authorized cereal (Fruit Loops);
 - d. Infant cereal with fruit;
 - e. Block of cheese larger than a pound or sliced cheese;
 - f. 2% milk when the check states whole;
 - g. Fresh fruits/veg in excess of the value listed on the benefit.
 - iv. Advise the cashier that a WIC benefit will be used before the transaction begins.
 - v. The WIC staff member should follow any instructions the store personnel may give with regard to the transaction.
 - vi. Do not question or dispute any instructions given by the cashier.
 - a. Answer questions asked by the cashier with an “I’m not sure” response. Do not give a “sob story” to the clerk. This type of reply is considered coercion and can lead to entrapment.
 - b. Once the cashier has asked you to sign the benefit (or if they don’t ask) introduce yourself and ask them to void the transaction and let them know

the food items can be returned to the shelf. Explain the purpose of your visit, thank them for participating, and ask if they will call the manager while you re-stock your items.

3. Follow-up

- A. Discuss the results of the visit with the retail manager.
- B. Suggest the cashier(s) be allowed to listen.
- C. Complete the visit form, including the signature of the retail manager.
- D. Advise the retail manager that they will receive a copy of the visit form after it has been reviewed by state staff.
- E. If the visit resulted in numerous errors:
 - i. Discuss the need for store personnel training. Suggest they review the Montana WIC Retailer Training DVD (check if they have a copy), and offer on-site training by WIC staff.
 - a. Explain that numerous errors during an educational buy may lead to a “compliance investigation”.
 - b. Notify the manager that he/she may request an additional training visit from you if they feel it would benefit the staff.

4. Interactive Training

USDA requires that the following topics be covered during training. This outline of mandatory topics provides information on each area and supporting materials and information have also been included.

Purpose of the MT WIC Program

- For over 30 years, the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) has been an integral part of Montana’s public health system. Promoting healthy habits early, when they make the most powerful difference in the lifelong health of a child, is what WIC is all about. With each new eligible family WIC reaches, public health grows stronger and more effective in the fight against obesity and other debilitating and life threatening conditions. The Montana WIC Program serves about 20,000 participants each year.

WIC Transaction/Redemption Procedure

- Review benefit redemption procedures
- Use packet to help guide you through the process

WIC Foods Authorized in Montana

- Review the Approved Food List
 - Review allowed size substitutions
- the participant MAY get one 16-oz container of infant cereal in place of two 8-oz containers
 - the participant MAY get two half-gallons of milk in place of one gallon of milk
 - the participant MAY get one 8-quart box of powdered milk in place of three 3-quart boxes

- the participant MAY get two 8-oz packages of cheese in place of a one 16-oz package

Minimum Variety and Quantity of Stocking Requirements

- Retailers are required to stock certain authorized items at all times in sufficient quantities to meet Participant demand. Specific Montana WIC-authorized brands and sizes for WIC foods are as defined in the Montana WIC *Approved Food List* (Food List) and as shown on the WIC benefit. Your store's role in ensuring WIC participants receive only the food prescribed for them is **vital**.
- Review Minimum Stocking Requirements if violation involves stocking issues.
- All infant formula must be purchased from a vendor on the Montana WIC Infant Formula Wholesalers/Distributors/Retailers/Manufacturers list, which is located on the Montana WIC website.

Special Circumstances

- Problems may occur during a WIC transaction. Often, the problems arise from participant or cashier error. Most of these problems can be resolved by referring to the WIC benefit, the Montana WIC Approved Food List, or the participant's WIC ID Packet. The retail staff's high level of customer service ensures that each situation is handled with respect.
- On occasion, a Montana WIC participant may violate WIC Program requirements. If the retailer cannot resolve the conflict by informing the participant of the proper WIC procedures, then the retailer needs to report the incident on a *Participant Complaint Form*. Please complete the form with all relevant information. If possible provide the participant's name and ID number and as many details of the incident as possible as this will aid in the discussion with the participant at the clinic. WIC participants are not permitted to cause a disturbance in your store, abuse your employees or violate the procedures for redeeming benefits.

Violations and Sanctions

- WIC has a system of sanctions to ensure that WIC customers receive the correct nutritious foods prescribed for them. WIC-authorized stores, as well as WIC customers, may be sanctioned if found to have committed violations abusing the Program.
- Store violations are detailed in the Retailer Reference Manual. Store sanctions range from nonpayment of a WIC benefit to disqualification from the program. The main store violations to keep in mind are:
 - Not training store staff on foods and policies,
 - Accepting unapproved food items, and
 - Not allowing the purchase of approved items.

Use of Incentive Items

- WIC-authorized vendors may not treat WIC customers differently from non-WIC customers by excluding them from in-store promotions—this includes disallowing the use of coupons or other vendor discounts in WIC transactions that are allowed in non-WIC transactions. Similarly, WIC-authorized vendors may not treat WIC customers differently by offering them incentive items, vendor discounts, coupons or other promotions that are not offered to non-WIC customers.
- Failure to provide the same courtesies to WIC participants, as outlined above, is a violation of Federal WIC Regulations, thereby constituting a vendor violation.

Resources available if you have a question about WIC

- The MT WIC Approved Food List (online)
 - The physical WIC benefit redeemed
 - The Benefit Redemption Guide (packet, Retailer Reference Manual (online))
 - Your local WIC contact – The Local Agency Retailer Coordinator
 - The State WIC office Retail Services staff (1-800-433-4298, option 2)
- **Other Issues**
 - Discuss any other questions or items.

Once the interactive training and monitoring visit are completed return the completed form, inventory sheet, and ed. buy benefits to the State Office for processing.

5. LARC Future Training

The LARC will be informed of the results of the educational/training visit for use in responding to future training questions.

Compliance Investigations

Usually, State Office Staff will conduct compliance investigations of retailers, but LARCs may be asked to assist in this process.

High Risk Criteria for Compliance Buys

Criteria are needed to evaluate how the WIC Program is handled at the retail sites, and to ensure that benefits are processed according to established WIC procedures. Criteria will show where abuse or fraud may take place and allow for re-education and correction. It is the policy of the Montana WIC Program that standardized criteria are used as guidelines to evaluate WIC retailers on a yearly basis. Such criteria will be applied equally to all retailers. Retailers identified by one or more items will be evaluated to determine if on-site training, a monitoring visit or a compliance investigation is warranted.

Guidelines

1. High-risk criteria will include, but not be limited to:

- A. Low variance in benefit prices by retailer;
- B. High average cost in benefit prices by retailer;
- C. High cost food benefits by retailer;
- D. Number of high risk complaints received;
- E. New retailers;
- F. Large increase of benefits redeemed over time.

Procedures for Compliance Buys

A compliance buy is defined as a covert purchase made with WIC benefits by WIC staff or their contracted designee. The purchase is made without the knowledge of the retailer's management or staff. A compliance investigator will pose as a WIC participant or proxy and complete a WIC purchase in order to confirm WIC Program state and federal regulations are adhered to by authorized retailers. It is important for LARCs to understand the procedures of compliance buys because although the State Office generally takes the lead, LARCs are sometimes asked to conduct or participate in compliance buys.

1. Procedure

- A. The compliance investigator will review the retailer's file and become familiar with the retailer.
- B. Training and education will be provided by the State Agency to the investigator prior to the compliance purchase. The training will include:
 - i. not to invoke sympathy or try in any way to convince or coerce the cashier to allow any possible non-authorized foods to be purchased;
 - ii. that the cashier may be embarrassed and if the situation does become embarrassing or hostile, leave the store immediately;
 - iii. exactly what to purchase, and the procedures for cashing a WIC benefit;
 - iv. the investigator assigned to the case will complete as much of the WIC Investigation Report Form as possible prior to the visit to the retailer;
 - v. the investigator will be issued a WIC ID packet by the State Agency along with WIC benefits. These benefits will be computer generated and the benefits will be attached to the WIC Investigation Report Form.
- C. The investigator observes and documents the time he/she enters the store. The investigator will:
 - i. select the items he/she has been instructed to purchase. The investigator will tell the cashier before the items are rung up that he/she will be using WIC benefits. If the investigator is told he/she cannot purchase any unauthorized food items, she should return them and pick up the items listed on the WIC benefits or requested by the retailer.
 - ii. the investigator will take the receipt and the items purchased, leave the store and complete the appropriate documentation.
- D. All food items obtained during a compliance purchase will be photographed by the compliance investigator and then donated to a non-profit agency. A receipt, which is filed

with the final report, will be obtained from the non-profit agency acknowledging the donation.

- E. A letter will be sent to the retailer after each compliance visit, describing the results of the buy. Follow up training and education will be offered as necessary. The retailer will be informed of possible sanctions being assigned if a pattern of violations continue to occur.
- F. Follow-up Action
 - i. The State Agency will view the benefits used in the compliance purchase after redemption. A case file will be completed on the investigation by the State Agency. This will include:
 - a. any reports or complaints that were used to select the retailer for a compliance purchase;
 - b. the investigation report;
 - c. any receipts from the transaction, and the benefits used for the compliance purchase;
 - d. any document of prior warnings or retailer visits; the letter sent to the retailer notifying the retailer of the compliance purchases;
 - e. any correspondence from the retailer regarding the case, including documentation of phone contact;
 - f. any materials relating to a fair hearing if one is requested, including the decision of the hearing office.
 - ii. The retailer will be notified by mail of the results of the compliance investigation.
 - a. The Local Agency will receive a copy of the letter.

Violations and Sanctions

The role of LARCs in imposing sanctions is to refer issues to state office staff and to be familiar with sanctions. The list of violations and sanctions can be found in the Retailer Reference Manual.

Stocking Exemptions

Retailers who do not have any infants on the WIC Program that utilize their store may contact the State WIC Office to request an exemption to the stocking requirement.

If granted an exemption, the retailer must be able to supply the infant formula, infant cereal and/or baby food within 24-48 hours if a request for these WIC food items is received from a participant. If the retailer is unable to supply the infant formula, infant cereal or baby food within the 24-48 hour time frame, the retailer must contact the State WIC Office to request an exemption be made to extend the time frame to within five (5) days.

The State WIC Office will make a determination if an exemption can be granted in all cases. The retailer will then either be issued an exemption or be given notice that they must meet the stocking requirements.

Benefit Processing Issues

Banking Issues

The Retailer Reference Manual, Retailer Booklet and Farm Direct Handbook provides guidance on the redemption process, making corrections on benefits, and what to do with rejected benefits. If a retailer or farmer calls with a question, please refer them to the Vendor Coordinators at the State office.

Missing Signature

If the participant leaves the store without signing the WIC benefit, the retailer must complete the *Missing Signature Form* (on page 51 of the Retail Reference Manual) and follow this procedure:

1. Contact the Local WIC Agency, report the name of the participant on the benefit and request that they contact the participant and ask them to return to the store to sign the benefit.
2. Document the contact using the "Missing Signature" form.
3. If the participant returns to the store and signs the benefit, deposit it to the bank.
4. If the participant does not return to the store to sign the benefit within ten (10) days, send the benefit and contact documentation to the State office for review.
5. The State office or Local WIC Agency cannot release any information regarding WIC participant information to the retailer (phone number, address, etc.)
6. Retailers attempting to contact a WIC participant in order to correct a rejected benefit and/or requesting a WIC participant to pay for an error is a serious violation of the Montana WIC Retailer MOU.
7. Farmers with unsigned benefits should send the benefit and form directly to the State office for approval. Participants are not asked to return to the farmer's point of sale to sign benefits due to the ongoing changes in location.
8. All benefits submitted to the bank without a signature will be rejected and they are not eligible for re-deposit.
9. Below is an example of the retail form. The farmer's form is similar, but does not require the farmer to contact the Local Agency or to wait for the participant to return to sign the benefit.

Process Form: Missing Signature Benefits

Retailer Number: _____

Benefit Number	Contact Person At Local WIC Clinic	Date of Contact with Local Clinic	Date Sent to State Office

Use this form to document contact with the local WIC clinic. If the participant does not respond within 10 days, send this form and the benefit (check) to the State WIC office to be reviewed for approval.

Signs, Tags & Training Materials

1. **“We Accept WIC” decal/sign**
 - a. The window decal should be displayed in a highly visible location on or near the entrance to the store. Retailers with more than one entrance may request additional decals from the State office. Farmers must post their sign in a visible location at each point of sale.
2. **Shelf Tags**
 - a. State issued shelf tags may be used to identify WIC approved items in the retail store. The tags must be posted under the correct food items, and moved with the item if its location changes. Contact the State WIC office for additional sets of tags. Use of the tags is encouraged, but not required.
3. **Training Handbook & DVD**
 - a. Retailers are supplied with a training handbook and DVD, to be used to train staff on approved foods and redemption procedures. Copies can be found on the respective pages of the WIC website.

Fraud & Abuse – State Plan Policy 3.4

It is the policy of the Montana WIC Program that participants, authorized representatives, or employees who misrepresent their circumstances in order to receive WIC benefits or commit an identified fraud/abuse of the WIC Program will be issued sanctions. Standard and uniform procedures will be used to sanction a participant. Participant sanctions may include education and a warning, disqualification and repayment of benefits for participants.

Guidelines

1. The WIC program is to be alert for possible participant/employee abuse. When abuse is detected or suspected, the WIC agency must document it as completely as possible, including a narrative account of how abuse was detected and copies of any relevant food benefits or other documents.
2. This information is entered on the WIC Participant Fraud/Abuse Form, and discussed with the participant/authorized rep. The participant/authorized rep is given an opportunity to make a statement, but in no case should be forced to. If the participant/authorized rep will not, or cannot sign a statement, note this on the form.
3. If the offence requires “Education and/or a Warning Letter”, educate the participant on the issue and document the results of an additional offense. Document the discussion using the Warning Letter Form, sign and make a copy for the participant. The Warning Letter and Participant Fraud/Abuse Form are scanned into the participant file and the original copies are sent to the state office.
4. A first or second offense that results in disqualification should be documented using the End of Certification/Notice of Ineligibility Form. Document information, sign and date. Make a copy for the participant, scan the form into the participant’s file, and send the original to the state office with the other documentation.
5. A log is maintained by the state office regarding all reported fraud/abuse.

Forms

The Fraud/Abuse Form, Warning Letter and End of Certification/Notice of Ineligibility Form can all be found on the Local Agency page of the WIC website under Admin Forms.

Complaints

1. Retailer/Farmer Complaints against a Participant
 - A. On occasion, a Montana WIC participant may violate WIC Program requirements. If the retailer/farmer cannot resolve the conflict by informing the participant of the proper WIC procedures, then the retailer needs to report the incident on a *Participant Complaint Form*. Once the report is received at the State office a copy will be forwarded to the Local Agency for follow-up using the participant fraud & abuse procedures.
2. Participant Complaints against a Retailer/Farmer
 - A. In accordance with the Montana WIC Retailer MOU and the Farm Direct Agreement, the retailer/farmer must treat the WIC customer with the same respect and offer WIC participants the same courtesies as offered to other (non-WIC) customers. If the WIC participant feels they have not been treated well, they may complete a Complaint/Concern About a Retailer/Farmer Form. The LARC will follow-up with the retailer/farmer concerning the complaint and then forward the form to the State office for processing.

Forms can be found on the Local Agency page of the WIC website under Admin Forms.

FARM DIRECT PROGRAM

Farm Direct Program Overview

The Farm Direct Program is unique in that it combines the Farmers' Market Nutrition Program (FMNP) with the Montana WIC Program so that authorized farmers can accept both WIC FMNP and WIC Fruit & Vegetable Benefits (FVB) with a single Agreement. If your Local Agency has a current Farmers' Market Nutrition Program contract with the state, the FMNP benefits will be distributed in the same manner as previous years. Please note - a Local Agency does not have to have a Farmers' Market Nutrition Program contract to participate in Farm Direct – any Local Agency can participate and here is a look at how it can benefit your community.

1. WIC participants will be able to redeem both the FMNP benefits and the FVB's with authorized Farmers. They will have a wonderful array of locally grown fresh fruits and vegetables to choose from to feed their families, which may help reduce some of the barriers to a healthy diet that many low income families experience.
2. Participating in the Farm Direct Program provides Farmers with additional sales opportunities, promotes the production of locally grown fresh fruits and vegetables, and helps support the local economy.

Authorization of New farmers

1. If a farmer is interested in becoming authorized and they meet the selection criteria, provide them with copies of the Farm Direct Eligible Food List and Handbook for review. Answer any

of their questions and have them complete and sign the application. Review the application to be sure everything is filled in, signed and that they meet the basic set of requirements.

- A. Please take a look at the three definitions on the application that help farmers figure out if they might qualify for the Farm Direct Program. If a farmers feels they meet each of these requirements, they are to initial in the box provided.
 - i. **Farmer** - Farmer means an individual authorized by DPHHS to sell locally grown, eligible fruits and vegetables to Montana WIC participants at farmers' market and/or roadside stands. The farmer may sell produce not self-grown, if at the beginning of each day, at least sixty (60) percent of the total volume of produce displayed and offered at the point of sale has been grown by the authorized farmer. Farmers selling only produce grown by others shall not be authorized to accept WIC benefits – no wholesalers.
 - ii. **Eligible Foods** - Fresh, locally grown fruits and vegetables as listed on the Farm Direct Food List.
 - iii. **Locally Grown** - Produce grown only within Montana borders, or counties adjacent to Montana borders where the farmer is selling the produce.
 - B. Once a Farmer has Farm Direct Authorization, they may sell their eligible produce at any location within the state. They may have multiple stands, stalls or booths in different locations, as long as they meet the produce requirements and have their sign posted.
2. If they meet the requirements outlined on the Application, conduct the training, using the Log Form, Farm Direct Handbook and Initial Training Agenda to guide you. Have the Farmer complete and sign the Initial Training Documentation Form.
 3. Once training is complete, the farmer needs to read and sign the Agreement. Farmers may not accept WIC benefits until their Agreement is fully executed – meaning it has been signed by DPHHS and the authorized farmer has received their Farm Direct stamp and packet from the State Office.
 4. Please send the signed Application, Initial Training Documentation and Agreement to the State Office for processing. The documents are reviewed and processed or reviewed and denied. The farmer whose application and agreement have been denied, will receive a letter stating such. The farmer whose application and agreement have been approved, will be submitted to DPHHS for authorized signatures. Incomplete documents will result in a delay in the authorization process.
 5. Once the agreement process is complete, the State WIC Office will send the Farmer copies of the signed documents, their Farm Direct stamp, signs, and a Training Guide so they can refresh their own memories and train their staff, Benefit Redemption Guides and more Food Lists. Each Authorized Farmer's information will be put into M-SPIRIT and a Farm Direct Authorized Farmer Location List will be made available on the Montana WIC website.

Training Farmers

Initial Training

An initial training must be done as a part of the authorization process. Initial training needs to be face-to-face, and may be done in a group or on a one-to-one basis. To prepare for the training, read the Farm Direct Handbook and become familiar with the program policies. Provide the applicant with a copy of the Handbook. Ensure the applicant has their questions answered and that they have a thorough understanding of the Farm Direct Program. Training documentation needs to be sent to the State office for processing. Along with the application and signed agreement.

Annual Training

Each spring, before the market season begins, each authorized Farm Direct Farmer is required to participate in annual training which will be conducted by the Agency which enrolled the farmer. This training does not necessarily need to be conducted face-to-face. You are encouraged to do so. You can complete this training over the phone if needed. Only initial farmers need to complete their training face-to-face. Supporting documentation will be sent to each Agency so training can be conducted. Upon completion, all signed training documentation will be sent to the State Office for processing. Farmers not participating in annual training will be in violation of their Agreement and they will be terminated from the Farm Direct Program.

Monitoring of farmers

Federal Requirements state that at least 10% of all authorized Farmers will be monitored each year. Monitoring will be conducted by the Local Agency which has signed the farmer up for the program and the State Office will notify each Agency as to which farmers need to be monitored annually.

Farmer monitoring includes ensuring a high quality of fruits and vegetables, pricing and labeling requirements are met, and the benefit redemption process is done correctly.

Farm Direct Agreements

Farm Direct Agreements are three year contracts with the State of Montana. Agreements expire January 31st of the final contract year. Prior to the expiration date, the State office will send the farmer a renewal application and agreement, which they will complete and return to the State office for processing. Annual training will take place in the spring and will be conducted by the Agency which enrolled the farmer.

Documents

Farm Direct documents and guidance can be found on the WIC website, Local Agency page and the [Farm Direct](#) page.