

**Subject: FMNP Benefit Management****Item: FMNP Benefit Security and Integrity**

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**PURPOSE:**

To establish procedures for benefit accountability, security, and integrity for the Farmers' Market Nutrition Program (FMNP) provided by the California Department of Public Health/Women, Infants and Children Division (CDPH/WIC).

**POLICY:**

- I. The local agency (LA) FMNP Coordinator must control and provide accountability for the receipt, inventory, storage, transportation, distribution, issuance, reconciliation, security and disposition of all FMNP benefits that are issued to participants, voided, or returned.

**PROCEDURE(S):**

- I. Security
  - A. The LA must ensure the integrity of the FMNP benefits by maintaining separation of duties for FMNP benefit handling and distribution as follows:
    1. Assign responsibilities to primary and secondary staff members for all processes that involve the handling of FMNP benefits.
    2. The primary staff person must be responsible for receipt, shipment verification, storage, physical inventory and reporting of FMNP benefit. The secondary staff person must participate in the verification process of shipment, inventory, issuance and disposition of all FMNP benefits using the WIC management information system (WIC MIS). FMNP benefits must not be within one person's control at any time.
    3. LA staff must maintain separation of duties between providing nutrition education to participants, assigning FMNP benefits in WIC MIS, and distributing FMNP benefits to participants. The following table provides FMNP-specific tasks for benefit issuance and distribution (WPPM 950-02):

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Staff Person	FMNP Functions
<b>Person A</b>	<p><b>Screens and educates participants</b>                      Provides and documents nutrition education received by the participants. Screens participants for their interest and ability to use the FMNP benefit at nearby authorized farmers’ markets.</p>
<b>Person B</b>	<p><b>Verifies and Assigns FMNP benefits in WIC MIS</b>                      Verifies participant’s eligibility and assigns <u>one</u> FMNP benefit per family for each season in WIC MIS.</p>
<b>Person C</b>	<p><b>Distributes FMNP benefits</b>                      Obtains the participant’s or alternate’s signature on the <i>FMNP Benefit Issuance Log</i> (this is not optional). Verifies signature and gives the FMNP benefit to the participant.</p>
<b>Persons A and B</b>	<p><b>Duties may be combined</b>                      The same staff person may screen and educate participant AND verify and assign the benefit in WIC MIS.</p>
<b>Persons A and C</b>	<p><b>Duties may be combined</b>                      The same staff person may screen and educate participant AND distribute the benefit AND obtain signature on the <i>FMNP Benefit Issuance Log</i>.</p>
<b>Persons B and C</b>	<p><b>Duties must <u>not</u> be combined.</b>                      The same staff person must <u>not</u> verify and assign the FMNP benefit in WIC MIS AND obtain the participant’s or alternate’s signature on the <i>FMNP Benefit Issuance Log</i> and distribute the benefit to the participant.</p>

4. FMNP benefits must never be left unattended or unsecured at WIC sites or during transit to and from a Farmers’ Market.
5. FMNP benefits must be stored in a secure, locked location with the

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keys accessible only to authorized LA staff.

**B. Alternate Procedures to Separation of Duties.**

1. The LA FMNP Coordinator may request approval of an alternate procedure to the separation of duties requirement if there is only one staff member at any given WIC FMNP benefit distribution location.
  - a. To request approval, the LA FMNP Coordinator must complete the document in WPPM 950-01 and submit to the CDPH/ WIC FMNP for review and approval.
  - b. If the alternate procedure from separation of duties is approved, the LA must put into place the continuous quality assurance procedure, as identified on the *Alternate Procedure Request Form*, to prevent fraud and abuse.
  - c. Approved *Alternate Procedures for Separation of Duties* requests are valid until the expiration of the WIC contract.
2. In the event of a disaster, CDPH/WIC must determine if a short term exemption from the separation of duties requirement necessary; the LA(s) affected; and the minimum length of time needed for the exemption. If approved, CDPH/WIC will notify the affected LA(s) of the temporary exemption and timeframe.

**II. Limited Access**

- A. Only authorized WIC staff must have access to locked storage areas.
- B. Access to the locked area by non-authorized WIC staff, non-WIC staff, and participants must be restricted.

**III. Accounting for unused FMNP benefits.**

- A. There are several reasons that the FMNP benefits are unable to be issued from WIC MIS including, but not limited to, benefits that are lost, stolen, damaged, double issued, or due to WIC MIS technical issues. CDPH/WIC cannot replace FMNP benefits under any circumstance.
  1. If the FMNP benefit cannot be issued in WIC MIS, the LA staff must: complete the *Unissued FMNP Benefit Report Form* (WPPM 950-03) and report to the CDPH/WIC FMNP within five (5) business days of the incident;
  2. Document all lost, stolen, damaged, and double issued FMNP benefits in

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WIC MIS by updating the benefit with the proper inventory code (WPPM 950-07).

3. Document benefits that are unable to be documented in WIC MIS due to technical issues using the *Unissued FMNP Benefit Report Form*.
4. Report all benefits documented on the *Unissued FMNP Benefit Report* on the *FMNP End of Year Report* as described in Section IV of this document.

B. If the benefit is returned unused by participants, the LA must:

1. Record returned benefit on the *FMNP Benefit Issuance Log* that was signed by the participant.
2. Record returned benefit in WIC MIS.
  - a. If the benefit is returned unused prior to September 30, it can be re-issued to a different participant (WPPM 950-07).
  - b. If the benefit is returned unused after September 30, it cannot be re-issued to a different participant and the status code "V" must be used in WIC MIS "FMNP Booklet Inventory Screen".

C. Any benefit that cannot be reissued must be shredded after September 30. Please see the procedures in Section V, End of Season FMNP Benefit Shredding in this document.

**IV. FMNP Benefit Reconciliation at End of Season**

A. At the end of each FMNP season, FMNP benefits that remain at the WIC LA and those that have been recorded on an *Unissued FMNP Benefit Report Form* must be reported to the CDPH/WIC FMNP on the *FMNP End of Year Report*. The LA FMNP Coordinator must:

1. Complete the *FMNP End of Year Report* (WPPM 950-04) by the deadline established by State.
  2. Submit the *FMNP End of Year Report* to CDPH/WIC FMNP. Maintain a copy on file for 3 years.
  3. Submit amendments to the CDPH/WIC FMNP if the benefit is returned by participants after the *FMNP End of Year Report* is sent to CDPH/WIC FMNP.
  4. Shred all FMNP benefits remaining at the LA on October 1 following the procedures in Section V of this document.
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## V. End of Season FMNP Benefit Shredding

## A. FMNP benefit shredding guidelines are as follows:

1. Record all benefits as void in the WIC MIS "FMNP Inventory Screen" (WPPM 950-07).
2. After recording the voided benefit in WIC MIS, the LA FMNP Coordinator must verify that staff (other than themselves) shred the benefits.
3. Do not mail unused FMNP benefits to the CDPH/WIC FMNP.
4. The LA FMNP Coordinator must confirm with site supervisors that all FMNP benefits remaining in the WIC LA and/or clinic are properly destroyed on October 1.
5. The LA FMNP Coordinator must sign the *FMNP End of Year Report* to certify that all FMNP benefits remaining in the clinics have been destroyed.

**AUTHORITY:**

[7 CFR §248.4\(a\)\(11\)\(i\)](#)

[7 CFR §248.10\(f\)\(2\) and \(3\)](#)

[7 CFR §248.1\(h\)](#)

**CROSS REFERENCE**

WPPM 950-01 Alternate Procedures for Ensuring FMNP Check Security

WPPM 950-03 FMNP Unissued Check Report Form

WPPM 950-04 End of Year Report

WPPM 950-07 JOB AID for How to Enter Farmers' Market Inventory Maintenance Information