

WIC Vendor Unit  
Nutrition  
Services Branch

## VENDOR ROUTINE MONITORING

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### Objectives

What is routine monitoring?

Monitoring in the Crossroads System

Basic components of monitoring

Minimum inventory requirements

Documenting monitoring findings correctly

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### What is Routine Monitoring?

- Unannounced, on-site visits to authorized vendors as a means to check compliance with WIC Program regulations
- Required by federal regulations
- Supports integrity of the WIC Program and protects against fraud
- Completed by Local WIC Agency staff



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## Basic Components of Monitoring

- Check pharmacy services for exempt infant formulas, where applicable
- Review invoices/receipts for infant formula sources
- Review vendor procedures for eWIC and split tender transactions




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## Basic Components of Monitoring

- Ensure eWIC equipment accessibility and compliance with minimum lane coverage criteria
  - [7 CFR 246.12(z)(2)]
- Review quality of service and treatment of WIC customers
- Assure required minimum inventory is available, fresh and clearly marked with shelf price




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North Carolina Department of Health and Human Services  
 Division of Public Health • Women's and Children's Health Section  
 Nutrition Services Branch, Adult Vendor Unit  
 MSC 1914 Raleigh, NC 27699-1914

Pre-Authorization       Routine  
 Second Pre-Authorization       Follow-up  
 Special Request

**WIC VENDOR MONITORING REPORT**

Program No. \_\_\_\_\_ WIC Program Name (no abbreviations) \_\_\_\_\_ WIC Vendor Name & Store # \_\_\_\_\_  
 Vendor Number \_\_\_\_\_ Date of Visit \_\_\_\_\_ Current Store Manager's Name \_\_\_\_\_

### The 5 Different Types of Monitoring Visits

1. Pre-authorization
  - Only type of monitoring visit that is announced
2. Second Pre-authorization
3. Routine
4. Follow-up
5. Special Request

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# 1. Pre-authorization

## Retail Vendors complete sections:

- I. Pharmacy Services, when applicable
- II. Infant Formula Source(s)
- III. Vendor Procedures (review only)
- IV. eWIC Equipment
- V. Inventory
- VII. Findings

## Pharmacy Vendors complete sections:

- I. Pharmacy Services
- II. Infant Formula Source(s)
- III. Vendor Procedures (review only)
- IV. eWIC Equipment
- VII. Findings

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# 2. Second Pre-Authorization

- Hold the first Pre-Authorization monitoring report if vendor applicant fails
- Complete the second Pre-Authorization monitoring report within 14 days
- Mail both reports at the same time to the State WIC Agency



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# 3. Routine

## Routine Monitoring Requirements:

- Monitor at least 1/3 of all vendors each year
- Each vendor must be monitored at least once every 3 years
- Annual monitoring is required for vendors with 2 or more occurrences of any violation/sanction in the previous year or a recent disqualification
- New vendors by the end of the following Federal Fiscal year must be monitored

! Note: Mail reports within 2 days of monitoring visit

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### 3. Routine

#### Note Regarding Sanctions:

- Sanctions (each occurrence of a violation) remain on a vendor's record for 1 year after the date of visit.
  - If you monitored store XYZ on April 15<sup>th</sup> last year and they passed the monitoring visit, **do not** monitor the store before April 15<sup>th</sup> this year
    - Important if they had any sanctions last year, prior to the clean visit
- As a general rule; monitor a year plus a day after the last monitoring visit.
  - In certain instances, there are exceptions to this rule, especially as the date approaches September 30<sup>th</sup>. For further explanation, contact your Vendor Consultant.

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### 4. Follow-up Monitoring

- Follow-up when deficiencies are found
- Complete within 21 days
  - If follow-up cannot be done, document in vendor's record
- Continue until vendor has no deficiencies or reaches the point of disqualification
- **DO NOT** complete a follow-up monitoring visit for a vendor before receiving a copy of the Notice of Violation (NOV) for the prior visit. If you do not receive a copy of NOV letter within two weeks of sending the monitoring report to the State Office, contact your Vendor Consultant.

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### 4. Follow-up Monitoring

- If a vendor reaches the point of disqualification:
  - **DO NOT** continue to go back for additional monitoring visits
  - The Nutrition Services Branch will request participant hardship information
  - Vendor may be disqualified or be assessed a civil money penalty



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## 5. Special Request Monitoring

Must monitor within 7 days when requested by Nutrition Services Branch

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## Monitoring Toolbox Items

- Official agency name badge
- Clipboard
- **Current year** WIC Vendor Monitoring Report
- Blank WIC Vendor Information Update forms
- Supply of NC WIC Vendor Transaction Guides
- Approved Infant Formula Source List
- Vendor Quarterly Redemption Report
- State Vendor Consultant's phone number
- Your business card or contact information
- Copy of instructions for completing Monitoring Report

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# Stop!



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## 8 Steps to a Successful Monitoring

1

Prepare as much of the monitoring report in your office and check for accuracy

2

Take your monitoring "toolbox"

3

Check in with manager and ask for formula receipts

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Accurately complete Section V, the inventory check, on page 2 of the report.

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## 8 Steps to a Successful Monitoring

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Review formula receipts and document findings in Section II.

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Discuss findings with manager and complete Section VI: Quality of Service

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Complete and sign Section VII: Monitoring Visit Findings

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Mail report to State WIC Agency within 2 days of visit

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## 2019-2020 Monitoring Report- Page 1

Check Contact Information of Health and Human Services, Department of Health Services, and Children's Health Services  
 Division of Public Health, 800 N. Lincoln Ave., Salem, OR 97331  
 WIC 10-K-2019-2020

Pin Authorization     Routine  
 Special Pre-Authorization     Follow-up  
 Special Request

**WIC VENDOR MONITORING REPORT**

Program No. \_\_\_\_\_ WIC Program State (or abbreviation) \_\_\_\_\_ WIC Vendor Name & Store # \_\_\_\_\_

Vendor Number \_\_\_\_\_ Date of Visit \_\_\_\_\_ Contact State Manager's Name \_\_\_\_\_

**I. PRELIMINARY SERVICES** (where applicable)  
 (Check all that apply; check appropriate boxes for all items of interest from Local WIC Agency)  
 Yes     No     Not Applicable

**B. INFANT FORMULA (SHEETS)** (Use sample of receipts for lot numbers)  
 Apparent correct (checked)     Not apparent correct (checked)  
 Vendor unable to produce other formula receipt (checked)

**III. VENDOR PROCEDURES** (Shelter Services)  
 Vendor procedures for WIC transactions  
 Vendor procedures for sign vendor transactions (specimens that allow the participant, authorized representative or proxy to pay the difference when a check or vegetable purchase amount has been used (VVC))  
 Procedures for reporting participant payment and WIC transactions

**IV. WIC EQUIPMENT** (see attached form on back of this page)  
 Device for participant used in receipt (checked) is accessible to the WIC participant  
 Number of WIC (PIN) receipts \_\_\_\_\_  
 Item not used (checked)     Item not used (checked)

**V. INVENTORY OF WIC AUTHORIZED FOODS** (see page 2)  
 (Check all that apply; WIC Vendor (checked) must be the same as the item listed on the WIC approved food)  
**VI. QUALITY OF SERVICE** (See completed other sheets (7) page 2)  
 1. Does the vendor permit WIC vendors to buy from WIC food items with WIC funds?  
 Yes     No  
 2. Are the WIC vendors allowed the same convenience as non-WIC customers?  
 Yes     No  
 3. Problem/impediment requested by vendor:  
 Yes     No  
 4. Vendor unable to accept WIC?     Yes     No  
 (If yes, also check) \_\_\_\_\_

(Signature) \_\_\_\_\_    Reading    When Copy - Item WIC Office    Vendor Copy - Local WIC Office    Risk Copy - WIC Vendor    Page 1 of 2

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## Monitoring Free-standing Pharmacies

Complete only Page 1 of the Vendor Monitoring Report

Section V on Page 2 *should not* be completed for free-standing pharmacies

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### Section I Pharmacy Services

"Vendor agrees to supply exempt formula within 24-48 hours of request from Local WIC Agency."



Document  
• Yes  
• No  
• Not Applicable

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### Section I Pharmacy Services

- Corporate grocery stores that have participating pharmacies include:
  - Food Lion
  - Harris Teeter
  - Ingles
  - Lowes
  - Publix
  - Wal-Mart
- Local Agency staff are required to check that the pharmacies located within these stores, are supplying formula upon request.

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## Section II Infant Formula Source(S)

- Vendor must provide receipts from an approved infant formula source
- Document 'Approved Supplier,' 'Not Approved Supplier' or 'Vendor Unable to Produce Infant Formula Receipts'
- If vendor is unable to produce infant formula receipts, document when the vendor intends to produce the receipts: Must be within 21 days
- If vendor is unable to produce infant formula receipts within 21 days of monitoring visit, it is considered a deficiency, even if no other deficiencies are noted within the monitoring visit



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## Section III Vendor Procedures

Review the following:

Cashier procedure for eWIC transactions

Cashier procedure for split tender

Procedure for reporting problems with participants and eWIC transactions

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## Section IV eWIC Equipment

- IV. eWIC EQUIPMENT (See criteria listed on back of this page)
- Ensure that equipment used to transact eWIC is accessible to the WIC participant
- Number of eWIC POS terminals:
- Meets minimum lane coverage criteria
  - Does not meet minimum lane coverage criteria

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### Minimum Lane Coverage Guidelines for Superstores and Supermarkets

• 1 Point-of-Sale (POS) terminal is required for every \$11,000 in average monthly WIC redemption

# Of Terminals	Monthly Redemption Threshold
1	\$0- \$11,000
2	\$11,001- \$22,000
3	\$22,001- \$33,000
4	\$33,001 and above

• Up to a total of 4 POS terminals **or** the number of lanes, whichever is less

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### Minimum Lane Coverage Guidelines for All Other Vendors

• 1 Point-of-Sale (POS) terminal is required for every \$8,000 in monthly redemption total

# of Terminals	Monthly Redemption Threshold
1	\$0 - \$8,000
2	\$8,001 - \$16,000
3	\$16,001 - \$24,000
4	\$24,001 & above

• Up to 4 POS terminals **or** the number of lanes in the location, whichever is less

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### Minimum Lane Coverage Exercise

**Question**

- Vendor has \$80,000.00 in WIC Redemption
- Vendor has 1 cash register
- Vendor has 1 POS terminal

• Does this meet minimum lane coverage criteria?

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## Minimum Lane Coverage Exercise

### Answer

- Yes
  - Vendor meets minimum lane coverage
  - Vendor only has 1 cash register/lane
  - Vendor has 1 POS terminal
- WIC cannot require a vendor to have multiple cash registers/lanes because of their redemption
  - If they had more registers/lanes, up to 4 would have to be eWIC capable

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## Section V

Documenting Required Minimum Inventory of WIC Approved Foods (Page 2)




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## 2019-2020 Monitoring Report- Page 2

WIC Vendor Name and Store#		Vendor Number		Date			
V. INVENTORY OF WIC APPROVED FOODS							
Required Food Item, Size and Quantity	Type/UPC	Quantity In Stock	Price of Product	Market Price/UPC	Shelves (Quantity and/or Type)	Valid Expires Date/UPC	Expired Food, Date, Quantity and any Additional Comments
Fruit milk	2 pints	Whole Fruit, plain					
	2 pints	Strawberry Fruit, plain					
Cheese	2 packages	Lowfat, part-skim					
Yogurt	2 pints	Greek & Large, White					
Canned	4 packages	1 can, 12 ounces, baby, 100% fruit, unsweetened					
	4 containers	Single strength, 40 ounce cans					
	4 containers	Single strength, 40 ounce cans					
20oz pasta and sauce	2 packages	Lowfat, part-skim					
Protein bar	2 containers	14 to 18 ounce container					
Infant formula	4 boxes	Formula box					
Infant formula	4 cans	Infant formula, 12.5 to 14.5 ounces					
Infant formula	4 cans	Infant formula, 12.5 to 14.5 ounces					
Infant formula	4 cans	Infant formula, 12.5 to 14.5 ounces					
Infant formula	4 cans	Infant formula, 12.5 to 14.5 ounces					
Tuna	4 cans	1 to 6 ounce can					
Beans	2 packages	14 to 16 ounce package					
Breakfast cereal	2 boxes	14 to 16 ounce package					
Flour	2 bags	5 lb bag					
Spent coffee	2 bags	5 lb bag					
Spent coffee	2 bags	5 lb bag					
Spent coffee	2 bags	5 lb bag					
Spent coffee	2 bags	5 lb bag					

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## Minimum Inventory Requirements

Required Food Item, Size and Quantity	Type	
Fluid Milk	2 gallons	Whole fluid: gallon
	6 gallons	Skim/Low Fat fluid: gallon
Cheese	2 packages	1 pound package
Eggs	2 dozen	
Cereals	6 packages total combined	2 types, Min. size: 12-ounces Refer to UPC listing-Whole Grain Only
Juices	4 containers	Single strength, 64-ounce container
	4 containers	Single strength, 48-ounce container
Dried peas and beans	2 packages	1 pound package
Peanut Butter	2 containers	16 to 18- ounce container

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## Minimum Inventory Requirements Cont.

Required Food Item, Size and Quantity	Type	
Infant cereal	6 boxes	8-ounce box
Infant Formula	8 cans	Gerber Good Start Gentle, Powder, 11.0 to 14.0-ounces
	4 cans	Gerber Good Start Soy, Powder, 11.0 to 14.0 ounces
Infant Fruits & Vegetables	64 ounces	3.5 or 4-ounce container 1 type fruit and 1 type vegetable
Tuna	6 cans	5 to 6-ounce can
Rice	2 packages	14 to 16-ounce package
Bread/Tortillas	2 loaves or packages or 1 loaf and 1 package	16- ounce loaf of bread or package of tortillas
Fruit	10 cans total combined	2 varieties- 14 to 16 ounce can without added sugar, fats, oils or salt
Vegetable	10 cans total combined	2 varieties- 14 to 16 ounce can without added sugar, fats or oils

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## Whole Grain Cereal and Minimum Inventory

- Only whole grain cereal can count towards minimum inventory.
- Some non-whole grain cereal are currently listed on the authorized product list (APL) and allowed for purchase; however, they **cannot** be counted toward minimum inventory. These include:
  - Rice Krispies
  - Corn Flakes
  - Corn Chex
  - Rice Chex
  - Dora the Explorer

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## Inventory Questions

- Do I see the required item?
- Do I see the correct types/varieties?
- Are the items the proper size?
- Do the items have a valid expiration date?
- How many items within date are present?
- Does the number of items meet required minimum inventory?
- Is there a shelf price on the required item?

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## Is there a shelf price visible?

Price can be on the:

- Shelf
- Display case
- Item itself- **Must be on ALL items**




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## Documenting Prices

WIC Vendor Name and Store#: \_\_\_\_\_ Vendor Number: \_\_\_\_\_ Date: \_\_\_\_\_

**V. INVENTORY OF WIC APPROVED FOODS**

Required Food Item, Size and Quantity	Type(s)	Quantity In Stock	Current Shelf Price Price of Product	Marked Yes/No	Shelving Quantity and/or Type	Valid Expiration Dates Yes/No/C	Expired Foods: Size, Type, Quantity, and Expiration Date and any Additional Comments
Fluid milk	2 gallons	Whole fluid gallon					

- Document the price of WIC items

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## Valid Expiration Date?

- Items may have:
  - A code
  - A date
  - Nothing
- Date, when available, must be valid
- Count only items within valid expiration date toward required minimum inventory
- Check dates prior to counting and documenting inventory

**EXPIRED**

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## Documenting "Type"

- ▶ Only Fruits, Vegetables, Adult Breakfast Cereals, and Infant Fruits and Vegetables require a "Type" to be documented
- ▶ Remember - Canned Beans (Legumes) are **NOT** a vegetable



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## Documenting Quantity

Document quantity of approved items on shelf in the "Quantity In Stock" column

- Items must have valid expiration dates only
- Can use "+" system
  - must document "minimum #" then "+"

### Example:

- Required Quantity = 4 containers of 64 oz juice
  - Vendor has allowed brands of 3 Orange, 1 Grape, and 2 Apple Juice
    - Document "4+" in "Quantity in stock" column
    - Not necessary to document each flavor individually

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## Minimum Inventory Requirements Met?

If yes, document the amount in "Quantity in Stock" column

If no, document the deficiency in the "Shortage" column

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### Required

- 2 types and 10 cans total combination of fruit

### In Stock

- 5 cans of peaches

### Deficiency

- 5 cans and 1 type

## Documenting Quantity and Type Deficiencies

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### Required

- 2 types and 6 packages Cereal – whole grain only

### In Stock

- 4 approved size boxes Honey Kix
- 1 approved size box Cheerios

### Deficiency

- 1 box cereal
- write "1" in the shortage column
- It is not necessary to write "box"

## Documenting Quantity Only Deficiencies

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## Documenting Expired Foods

Always Document **ALL** 4 components

- Size, Type, Quantity, Date

- Sanctions **cannot** be assessed if a component is missing

If **ALL** items on the shelf are expired

- “—” should be documented in all columns including the “Valid Expiration Date” column and the shortage should be documented
- Document the expired items in the “Expired Foods” column



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## Documenting Expired Foods Individual Types

If some items on shelf have a valid date and some do not

- “NO” – should be documented in the “Valid Expiration Dates” column
- An occurrence cannot be assessed if “Yes” is documented

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## Documenting Expired Foods Combined Types

If all of both types counted toward required minimum inventory have valid dates

- “YES” should be documented in the “Valid Expiration Date” column by both types

If some of the same type counted toward required minimum inventory have a valid date and some do not

- “NO” – should be documented in the “Valid Expiration Dates” column
- Document the expired items in the “Expired Foods” column

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## 2019-2020 Monitoring Report- Page 2

WIC Vendor Name and Address		Vendor Number		Date		
INVENTORY OF WIC APPROVED FOODS						
Required Food Item, Size and Quantity	Type(s)	Quantity on hand	Current Shelf Price	Shelf Life (Days)	Valid Expires Date (MM/YY)	Expired Foods, No. of Units, Quantity, and any Additional Comments
Fruit milk	2 pints Whole fruit, pasteurized	..	..	..	..	..
Cheese	2 packages 1 pound package	..	..	..	..	..
Eggs	2 dozen Grade A Large - White	..	..	..	..	..
Canned beans	4 packages 15 oz. cans canned	..	..	..	..	..
Pasta	4 containers Single strength, 6 1/2 ounce container	..	..	..	..	..
Instant pot or cereal	4 containers Single strength, 6 1/2 ounce container	..	..	..	..	..
Instant noodle	2 packages Instant package	..	..	..	..	..
Instant noodle	2 containers 14 to 16 ounce container	..	..	..	..	..
Instant noodle	4 boxes 8 ounce box	..	..	..	..	..
Instant noodle	4 cans Cupboard Good Fourth Grade, Protein, 11.7 to 13.5 ounces	..	..	..	..	..
Instant noodle	2 cans Cupboard Good Fourth Grade, Protein, 11.7 to 13.5 ounces	..	..	..	..	..
Instant noodle	4 packages 12 to 16 ounce package	..	..	..	..	..
Instant noodle	4 packages 14 to 16 ounce package	..	..	..	..	..
Instant noodle	2 packages 14 to 16 ounce package	..	..	..	..	..
Instant noodle	4 packages 14 to 16 ounce package	..	..	..	..	..
Instant noodle	4 packages 14 to 16 ounce package	..	..	..	..	..
Instant noodle	4 packages 14 to 16 ounce package	..	..	..	..	..

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## Section VI Quality of Service

- Discuss the question on the report regarding the service the vendor provides to the WIC customer
- Document any problems, complaints or comments the vendor expresses
- Document if the vendor needs follow-up training
- Document 'Yes' or 'No' on the report based on the vendor's answers

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## Section VII Monitoring Visit Findings

- Section VII-A- 'No deficiencies' found
- Authorized Vendor Representative and the WIC Monitor sign, document their title and date their signature
- Section VII-B- 'Deficiencies found'
- Vendor must document their plan and time frame to correct any deficiencies documented on the report in Section B
    - Plan must be written in English
  - Authorized Vendor Representative and the Local WIC Agency Monitor sign, document their title and write in the date
  - Local WIC Agency Monitor must document their phone number and e-mail address

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## State Vendor Sanctions

The number of occurrences are documented for each violation

The vendor will receive one occurrence for each violation found during the monitoring visit

\*\*Cannot assess two violations for the same item. Most punitive sanction executed.

A vendor may be disqualified for a certain number of occurrences of a violation. Disqualification periods for violations committed vary.

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## State Vendor Sanctions

Violations	Disqualification Period
Three occurrences within a 12-month period of failure to stock the minimum inventory	180 days
Three occurrences within a 12-month period of stocking WIC supplemental foods outside of the manufacturer's expiration dates	90 days
Three occurrences within a 12-month period of failure to mark the current shelf prices of all WIC supplemental foods on the foods or have the prices posted on the shelf or display case.	60 days

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## Local Agency Reminders

- Ensure that the current year's forms are used
- Use your Monitoring Toolbox
- Mail complete reports to the State Office within 2 business days
- Monitoring instructions are located in your Vendor Training Local WIC Agency Staff binder
- Call your Vendor Consultant with questions



Checklist

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## Vendor Monitoring Assistance

- Heather Todaro – (919) 707-5738  
[Heather.Todaro@dhhs.nc.gov](mailto:Heather.Todaro@dhhs.nc.gov)
- Jasmine Martin – (919) 707-5748  
[Jasmine.Martin@dhhs.nc.gov](mailto:Jasmine.Martin@dhhs.nc.gov)
- Lokia Jones – (919) 707-5747  
[Lokia.Jones@dhhs.nc.gov](mailto:Lokia.Jones@dhhs.nc.gov)
- Sue Cheek – (919) 707-5802  
[Sue.Cheek@dhhs.nc.gov](mailto:Sue.Cheek@dhhs.nc.gov)

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## Assurance of Civil Rights Compliance

The State Agency hereby agrees that it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C.2000d et seq.), Title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C.794), Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), Title II and Title III of the Americans with Disabilities Act (ADA) of 1990 as amended by the ADA Amendment Act of 2008 (42 U.S.C. 12131-12189) as implemented by Department of Justice regulations at (28 CFR Parts 35 and 36); Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency"; (August 11, 2009), all provisions required by the implementing regulations of the U.S. Department of Agriculture (7 CFR Part 15 et seq.); and FNS directives and guidelines to the effect that no person shall, on the ground of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity for which the Agency receives Federal financial assistance from FNS; and hereby gives assurances that it will immediately take measures necessary to effectuate this agreement.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants, and loans of Federal funds, reimbursable expenditures, grant, or donation of Federal property and interest in property, the detail of Federal personnel, the sole and lease of, and the permission to use Federal property or interest in such property or the furnishing of services without consideration, or at a consideration that is reduced for the purpose of assisting the recipient, or any improvements made with Federal financial assistance extended to the Program applicant by USDA. This includes any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of cash assistance for the purchase of food, and cash assistance for the purchase or rental of food service equipment or any other financial assistance extended in reliance on the representations and agreement made in this assurance.

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## USDA Non-Discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication (e.g. Braille, large print, audiotape, American Sign Language, etc.) should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

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- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

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