Chapter 8
Food Benefit Issuance

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The North Carolina WIC Program provides WIC approved foods through a retail purchase system. This chapter discusses policies and procedures for issuing food benefits to WIC participants. It describes the North Carolina WIC Electronic Benefit Transfer (EBT) system, the steps involved in initial and subsequent issuance, special issuance situations, and various issues related to storage and security of eWIC cards.

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Electronic Benefit Transfer (EBT) is a food benefit delivery system that permits electronic access to WIC food benefits using a plastic card with a magnetic stripe. In North Carolina, the WIC EBT system is called eWIC. Each eWIC card has a 16-digit Primary Account Number (PAN) that is linked to the family’s Electronic Benefit Account (EBA). The card becomes active when food benefits are issued to the EBA. The card can be used to purchase food benefits after the cardholder self-selects a four-digit Personal Identification Number (PIN). The PIN is a numeric password used to authenticate the individual to the eWIC system. The PIN acts as an electronic signature at the point of purchase.

Local agency staff initiate the EBT process through the Crossroads Management Information System (MIS). Each family is assigned a PAN and an eWIC card is issued. Aggregated food benefits for the family are issued to the EBA and the food benefits are purchased by the cardholder at WIC-authorized vendors and pharmacies. All food benefits, including supplemental foods prescribed to each participant, infant formulas and WIC-eligible nutritionals (WEN), and/or a fixed-dollar amount to purchase fruits and vegetables (Cash Value Benefit or CVB) are listed on a family shopping list called Shopping List Remaining Benefits. Only the prescribed foods, formula and WEN on the Shopping List may be purchased using the eWIC card.

Sample NC eWIC Card
Food Benefit Issuance

Local agency staff must complete the following activities when food benefits are issued. Procedures may vary as noted in the content of this section. The activities in this section assume required nutrition education contacts have been completed. Refer to Chapter 5: Nutrition Education.

- **Proof Of Identity**
  - **Issuance of NC eWIC Card**: The individual who receives a NC eWIC card (initially or as a replacement) must be the WIC participant, parent/guardian 1, parent/guardian 2 or caretaker. Refer to Chapter 6A on representatives for infants and children. Before issuing a NC eWIC card, local agency staff must view proof of identity of the individual. If the individual cannot verify their identity, then NC eWIC card issuance cannot occur. Selecting the radio button corresponding to the individual’s name on the Issue EBT Card screen in Crossroads indicates that staff has viewed the proof of identity. Refer to Chapter 6A, Attachment 1 for acceptable proofs of identity.
  - **Food Benefit Issuance**: Before issuing food benefits, local agency staff must view proof of identity of the individual. If a participant/parent/guardian/caretaker/proxy cannot verify their identity, then food benefit issuance cannot occur. Refer to Chapter 6A, Attachment 1 for acceptable proofs of identity.

- **Issuance Frequency**
  In most situations, food benefits are issued for three months. Local agency staff may assign a different issuance frequency in the Crossroads system when needed. Refer to Chapter 8, Section 3 for additional information.

- **Documentation Of Issuance**
  The Crossroads system automatically documents issuance in the participant’s record.

- **Obtain A Signature**
  At each food benefit issuance, local agency staff must obtain the signature of the participant/parent/guardian/caretaker/proxy by signing the electronic signature pad. The individual’s signature indicates that staff has viewed the individual’s proof of identity.
  - **Failure to obtain a Signature**
    - If staff fails to obtain the signature of the individual, staff must select their own name on the Print Food Instruments and Sign box in the Crossroads system, sign their own name, and write “forgot to sign.” An entry should be made in the participant’s record in Crossroads as to why staff is signing for the food benefit issuance.
    - If the individual cannot write his/her name, instruct the individual to make his/her "mark" on the electronic signature pad. If the individual does not have a usual "mark" staff must have the individual make an “X.” Staff then must print the person's name on the signature pad, initial and date this entry.
Offer The Option Of Naming A Parent/Guardian 2 And/Or Caretaker
Staff should explain the role of the parent/guardian 2 and caretaker as being able to perform all the functions of the parent/guardian 1 as the representative for an infant or child. Naming a second or third representative provides convenience to the parent/guardian 1 by allowing them to bring the infant/child to mid-certification and subsequent certification appointments, as well as signing for food benefits. Refer to Chapter 6A, on representatives for infants and children.

Explain How To Select A Personal Identification Number (PIN)
To use the NC eWIC card, a PIN must be assigned. Staff should provide instructions on PIN self-selection. Only the participant/parent/guardian/caretaker can select the PIN.

Review Food Benefits
At initial issuance, staff must explain to the participant/parent/guardian/caretaker that supplemental foods issued are provided for each eligible participant and aggregated (combined) into family-based benefits. Review the aggregated food benefits on the Food Instrument List screen with the participant/parent/guardian/caretaker/proxy prior to issuing food benefits.

Issue Electronic Food Benefits And Print The Shopping List
Local agency staff issue food benefits to the participant from the Issue Food Instruments screen in Crossroads. The food benefits are issued to the participant’s Electronic Benefits Account (EBA) and the eWIC card is used to access those benefits at authorized vendors or pharmacies. Print the Shopping List Remaining Benefits after issuing food benefits and review with the participant/parent/guardian/caretaker/proxy.

Food Benefit Issuance To A Proxy
The participant/parent/guardian/caretaker must be offered the option of appointing up to two proxies. A proxy is any individual appointed by a participant/parent/guardian or caretaker of an infant or child. A proxy must be 18 years of age and is only authorized to pick up food benefits and use the NC eWIC card on behalf of the family. A proxy is not authorized to act as the parent/guardian/caretaker of an infant or child at certification or mid-certification assessments. A proxy must read or have read to them in their language of preference, the statements of rights and responsibilities under the WIC Program. Refer to Chapter 6D, Section 1, on rights and responsibilities. A proxy who has not been previously appointed must have a dated note signed by the participant/parent/guardian/caretaker giving him/her the authority to receive food benefit issuance for the participant.

When a local agency staff person who is authorized to provide food benefit issuance also serves as a proxy, then issuance must be performed by a different staff person.

A proxy is limited to signing for one month’s food benefit issuance when a pregnant woman is within two weeks of her expected delivery date (EDD).

Explain How To Use The NC eWIC Card
Local agency staff must provide written information on using electronic food benefits.
Explain How To Select WIC Approved Foods
At initial certification, staff must instruct the participant/parent/guardian/caretaker on how to select the food items specified on the “Shopping List Remaining Benefits.” Staff should provide the brochure “North Carolina WIC Program Shopping Guide.” Staff must also explain the use of the Cash Value Benefit. If the cost of the approved fruits and vegetables exceeds the maximum amount, the participant/parent/guardian/caretaker may pay the difference or return item(s). Payment can be made using any form the vendor accepts, including Food and Nutrition Services EBT cards. No tax can be charged on payments made with an EBT card. Tax will be charged on payments made by cash, debit or credit card.

At any subsequent issuance, staff should ask if a review of how to select WIC approved foods is needed or if there are any questions on how to select or about the WIC approved foods.

Explain How To Use The App
Staff should provide instructions on Solutran’s eWIC phone app, BNFT®.

Explain How To Use Coupons, “Valued Customer” Cards And “In-Store Specials”
Staff must instruct the participant/parent/guardian/caretaker/proxy that they are entitled to use coupons (i.e. manufacturer or store coupons), “valued customer” cards, and “in-store” specials for WIC approved foods just as they would use them with any other purchases. The participant/parent/guardian/caretaker/proxy is not responsible for paying tax on the value of the coupon or “in-store special.”

At any subsequent issuance, staff should ask if a review is necessary or if there are any questions pertaining to the use of coupons, valued customer cards or in-store specials.

Provide Information On NC eWIC Card Replacement
Staff must explain the policy on replacement of the NC eWIC card. The eWIC card can be replaced in person by the participant/parent/guardian/caretaker at the local clinic. Replacement cards may not be issued to proxies. The eWIC card can also be replaced by mail if the cardholder calls the eWIC Customer Service system (also known as the Interactive Voice Response (IVR) system). Mailed cards may take up to 7 days to be received. Local clinic staff may not mail replacement cards.

The eWIC card may be replaced if destroyed, damaged, stolen or lost. Examples include but are not limited to: fire, flood, repossessed or totaled car, housing eviction, domestic violence. The reason (self-reported or verified by a third party) must be documented in the Crossroads system.

Replacing the NC eWIC card does not change the amount of food benefits in the family EBA. The PIN for the card remains the same as the previous card. Any current food benefits reported as missing or stolen from an eWIC card cannot be reissued. Refer to Section 3 for the replacement of redeemed food benefits reported as destroyed or damaged due to personal misfortune.
An eWIC card may be replaced as many times as needed. Families who need their card replaced more than three times should be encouraged but are not required to use the eWIC Customer Service system for a mailed replacement. Local staff can use the Issue EBT Card screen to view reasons for multiple (excessive) replacements and discuss ways to reduce card replacement with the cardholder as needed.

Note: In times of natural disasters such as a hurricane, the State WIC Program will provide guidance on handling replacement of destroyed NC eWIC cards.

- **Provide A List of Authorized WIC Vendors And Pharmacies**
  At NC eWIC card issuance, staff must provide a list of currently authorized NC eWIC vendors and pharmacies in their service area to the participant/parent/guardian/caretaker/proxy. Staff should provide an updated list of authorized vendors and pharmacies as needed.

- **Exchange Of WIC Food Benefits**
  At all issuances, staff must instruct the participant/parent/guardian/caretaker/proxy that exchanging the NC eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. Refer to Chapter 6F for further guidance on program abuse by participants.

- **Provide Appropriate Notice**
  At any issuance, staff must provide the appropriate notice to all applicable family members. Refer to Chapter 6D, Section 2.

- **Determine The Next Appointment**
  Staff should determine the next appointment type and either schedule a day and time or instruct the participant/parent/guardian/caretaker/proxy when to return. For subsequent food benefit issuance, the participant/parent/guardian/caretaker/proxy should return no earlier than seven days prior to the family issuance day or no later than ten days after the family issuance day to allow for full benefit issuance.
Food Benefit Issuance Variances

There are a variety of situations where food benefit issuance may vary from the issuance described in Section 2. These may include but are not limited to: monthly issuance, prescription changes, primary caretaker changes, replacement of destroyed or damaged redeemed food benefits due to personal misfortune, and circumstances that prevent or do not require physical presence.

■ Monthly Issuance
There are times when monthly issuance is either required or preferred.

  ◦ **Required Monthly Issuance.** Situations when staff must keep a family on monthly issuance include:
    • A pregnant woman within two weeks of her expected date of delivery (EDD)
    • A participant/parent/guardian/caretaker who informs the local agency staff that he/she is moving out-of-state within one month. Staff also should issue a Verification of Certification (VOC) sheet and remind the participant/parent/guardian/caretaker that the NC eWIC card cannot be used outside of NC. (See Chapter 6E for information on Transfer of Certification.)

  ◦ **Preferred Monthly Issuance.** Staff and/or a participant/parent/guardian/caretaker may request monthly or bi-monthly issuance.

■ Type Of Infant Formula Or WIC-Eligible Nutritional Changes
Food benefits may be replaced when the type of infant formula or WEN changes on the participant’s food prescription. Once staff receives appropriate medical documentation (if required) for the new formula and/or WIC-eligible nutritional, the new product should be provided to the participant as soon as possible. The food benefits should be adjusted on the Prescribe Food screen and using the Exchange/Increase Formula feature in Crossroads.

■ Incorrect Food Package Was Issued
Food benefits may be reissued if an incorrect food package was prescribed and issued.

■ Amount Of Formula Changes
If formula or WEN amounts are added or increased, the CPA must make the appropriate prescription changes in Crossroads. Staff should reissue new food packages to both the woman (if additional food benefits are prescribed) and her infant(s).

■ Food Subcategory Change
In the current month, replacement can occur when the subcategory of a food item changes. The CPA must enter a new food prescription prior to staff replacing the food package. Examples include: milk changed to lactose-reduced, legumes changed from peanut butter to beans/peas.

■ Proration Of Benefits
The Crossroads system automatically prorates a participant’s food package according to the following principles:
The cash value benefit is not prorated. The maximum value is always issued each month.
Some types of foods cannot be partially provided. Bread, rice, tortillas, pasta, eggs, cheese, and yogurt will be provided in full.
The remaining food package is prorated as follows:

<table>
<thead>
<tr>
<th>Number of Days remaining to the last date to spend (inclusive)</th>
<th>Food Package Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>11 – 19</td>
<td>2/3 Package</td>
</tr>
<tr>
<td>1 – 10</td>
<td>1/3 Package</td>
</tr>
</tbody>
</table>

Proration rules apply to any situation when the family issuance day is fixed and the provision of a full food package is not indicated. Examples: a participant receives food benefit issuance with fewer than 19 days before the last date to spend or a newborn is added to the program and given the same family issuance day as the rest of the family and there are 9 days remaining to the last date to spend. The family issuance date should never be changed to avoid proration. A family issuance date may be changed before issuance occurs if a family re-enrolls after more than three months off the program and has no unexpired food benefits.

**Primary Caretaker Of Infant Or Child Changes**
Each situation should be evaluated individually when the primary caretaker of an infant/child has changed due to abandonment, incarceration, death, a legal change of custody, or a change in foster care and that infant/child’s food benefits cannot be retrieved from the person to whom they were issued.

Staff must document the change of primary caretaker, after verifying through written documentation or verbal confirmation from an agency such as the police or sheriff’s department, or the Department of Social Services; or by a legal document or a public record such as a newspaper; or by self-report from the new primary caretaker.

Staff should try to retrieve any redeemed infant formula and/or WEN. If the infant or child is in the custody of the Department of Social Services, staff should ask the appropriate social worker for assistance. If the food benefits are not retrievable, staff should deactivate the previous card and issue a new NC eWIC card to the new primary caretaker and replace any unredeemed food benefits. Staff must document the situation for replacement in the participants record in Crossroads. When an infant requires an exempt formula or a child requires a WEN, staff should order these products from NSB.

**Issuing In The Last Month Of Certification Or Categorical Eligibility**
The Crossroads system issues to a participant in the last month of his/her certification period when the family issuance day is prior to the end of the certification period. Crossroads determines whether issuance can occur and how much to issue. If a subsequent certification is not completed, further issuance is not allowed.

The Crossroads system issues to a participant in his/her last month of categorical eligibility when the family issuance day is prior to the date of the end of the categorical eligibility. Further issuance is not allowed.
Issuing When The Certification Period Is Extended
Issuance of one month of food benefits is allowed if an infant or child’s certification period is extended. The Crossroads system will issue one month of food benefits beginning with the family issuance day. No further issuance is permitted. Refer to Chapter 6A, Section 8, Certification Periods.

Issuance When The Cardholder Is Not Physically Present
Local agencies may provide food benefits to cardholders when they are not physically present for the reasons defined in this section. Procedures may vary as noted in the content of this section. The activities in this section assume required nutrition education contacts have been completed and other appropriate issuance activities as described in Section 2 (for example, provision of required notices) have been completed. Staff must ask the individual who is requesting issuance to state their name, date of birth and address including zip code. If the individual cannot provide the information requested, issuance may not occur and the individual must present in person with a valid proof of ID. During issuance, staff must select their own name on the Print Food Instruments and Sign box in the Crossroads system and sign their own name. Selecting the radio button corresponding to the staff’s name on the Print Food Instruments and Sign box in Crossroads indicates that staff has confirmed the proof of identity. Staff must document the reason for the issuance without physical presence in the participant’s Crossroads record.

Participant hardship
Examples may include but are not limited to:
- Participant/parent/guardian/caretaker illness, quarantine, communicable disease, immune disorder
- Participant confinement to bed rest for pregnancy complications
- Inclement weather conditions
- Transportation limitations

Coordination with other services
If nutrition education is being provided to a participant by other providers or programs (examples include but are not limited to: EFNEP, WICHealth.org), staff may issue food benefits. Nutrition education must be verified and documented in the participant’s record before issuance can occur. Refer to Chapter 5 for guidance on nutrition education provision and documentation.

Local agency is experiencing a time limited hardship
Examples of a time limited hardship would include but are not limited to agency flooding/structural damage, agency is moving or undergoing significant construction, or a disease outbreak. Prior to issuance, staff must inform their Regional Nutrition Consultant. The local agency must:
- Describe the reason for issuance
- State the projected period
- Outline plans to ensure nutrition education requirements are met (for both low risk and high-risk participants)
- Describe how participants will be notified when their food benefits have been issued
Food Package Changes
Food package changes that do not require medical documentation or nutrition assessment (for example, food subcategory changes) may be completed without the cardholder’s physical presence. Formula exchange or increases must be assessed on a case-by-case basis. (For example, whether products must be returned or medical documentation is required and documented).

Replacement Of Redeemed Food Benefits Destroyed Or Damaged Due To Personal Misfortune
WIC food benefits that have been exchanged by the WIC-participant for foods, infant formula, or WIC-eligible nutritionals between the first date to spend and before the last date to spend are called redeemed food benefits. Redeemed food benefits are not replaceable with the exception of those destroyed or damaged due to an isolated personal misfortune or as indicated by the State WIC in response to a disaster. A personal misfortune exists when one or a few households are affected by some destructive incident such as a gas line explosion, water main break, or house fire. This exception does not apply to mass disasters where emergency feeding services are typically available.

As indicated in Chapter 1, Section 6 in addition to requirements for the personal misfortune exception for replacing redeemed food benefits include:

- **Verification of Personal Misfortune.** The personal misfortune must be verified with documentation from the fire department, the police department, or other community agency. A record of this documentation should be indicated within Crossroads.
- Only the redeemed food benefits damaged or destroyed as a result of the documented personal misfortune may be replaced.
- Replacement does not result in the replacement of prior month benefits.
- Quantity of replacement food benefits reflects the portion of food benefits for which the participant would still be eligible.
- Participant/parent/guardian/caretaker signs the ‘Affidavit Attesting to WIC Food Benefit Loss’ (Chapter 1, Attachment 3).
- The local agency notifies the NSB Customer Service Desk to assist with replacement.

Exchange Of WIC Food Benefits
At all issuances, staff must remind the participant/parent/guardian/caretaker/proxy that exchanging the NC eWIC card, WIC foods and/or formula, for cash, credit, non-food items, or non-WIC food, is a violation subject to federal and state sanctions. Refer to Chapter 6F for further guidance on program abuse by participants.

Issuing During Fair Hearings
Refer to Chapter 14 Administrative Appeals for guidance on food benefits issuance when an applicant/participant/parent/guardian/caretaker has requested a fair hearing.
eWIC Card Orders, Storage And Security

To maintain security and accountability of NC eWIC cards, local agencies must follow procedures for storage and security of eWIC cards.

- **Initial eWIC Card Order**
  The Nutrition Services Branch (NSB) will initiate and coordinate eWIC card orders for each local WIC agency. Initial card order and replenishment threshold amounts will be determined by NSB. The number of initial cards ordered is determined by the number of WIC families each agency supports, with additional amounts ordered to cover up to three (3) months of new WIC families and card replacements.

- **Card Shipment And Verification Of Receipt**
  eWIC cards will be shipped directly from the vendor to the local WIC agency main site physical address. Cards will not be shipped to satellite sites. When the eWIC card order is shipped, the NSB Customer Service Desk will alert the local WIC agency with an email to the agency contact. The email will provide the number of boxes ordered, and shipping address for the delivery. NSB Customer Service Desk will follow up with a second email to request confirmation of receipt of the eWIC cards.

  When the local agency receives a shipment of eWIC cards, send card receipt verification to the NSB Customer Service Desk by either capturing a snapshot of the label affixed to each box and signing it, or by signing the Card Order Manifest. Card receipt verification of the label or manifest must be emailed to NSB.CustomerService@dhhs.nc.gov or sent by fax to (919) 870-4863.

- **eWIC Card Storage And Security**
  eWIC Cards should be stored in a secure locked location (cabinet, closet or desk drawer) inaccessible to anyone other than WIC staff.

- **Additional eWIC Card Information**
  - The magnetic stripe on the card contains the 16-digit card number
  - There is no participant data on the card itself
  - Until the card is issued, it is not usable
  - Even when the card is issued, all data resides within the eWIC processing system, rather than on the card

- **Records Retention**
  The local agency must retain the shipping manifest sent with eWIC Card shipments in accordance with the NCDHHS Office of the Controller’s Records Retention and Disposition Schedule Spreadsheet (see: https://www.ncdhhs.gov/about/administrative-divisions-offices/office-of-controller). Refer to Chapter 13 Records Retention and Disposition Schedule for additional information.