

MI-WIC POLICY *Food Benefit Issuance/EBT Card Security*

8.0 Food Benefit Issuance/EBT Card Security

Effective Date: 12/01/2022

8.05 Returned Formula and Re-Issuance of Benefits

PURPOSE: To assist local agencies in managing unused/returned formula including appropriate re-issuance of benefits and donation or disposal.

A. POLICY:

1. Local agencies shall provide replacement EBT formula benefits when:
 - a. A change in formula within the standard/Class I food package is indicated and redeemed, unused formula benefits have been returned for the month.
 - b. A change in food package is indicated and there are remaining formula EBT benefits and/or redeemed, unused formula benefits have been returned for the month.
(Refer to Policies 7.01, Food Package Determination and Customization and 7.03, Food Package for Qualifying Conditions.)
2. If all benefits for the month have been redeemed and the client does not return any unused formula, no formula benefits may be re-issued for that month.
3. EBT formula benefits shall be re-issued according to the proration amount indicated for the current month's food package. (See Policy 8.02, Benefit Proration.) Staff shall check the EBT processor's system to determine amount of formula to be voided and void accordingly in MI-WIC. No replacement formula may be issued for formula returned after the benefit expiration date.
4. Clients must return redeemed, unused formula to the clinic for validation of non-use, prior to the re-issuance of EBT formula benefits, to minimize client fraud potential.
5. Unused/returned formula shall not be re-issued to WIC clients.
6. Unused/returned formula may be donated to a local non-profit agency. For local agencies choosing to donate unused/returned formula, a local agency policy and procedure for donation must be developed and approved by the local agency administration and/or legal counsel. This policy shall require local agencies to examine unused/returned formula for can condition and expiration date, and to dispose opened, dented or otherwise damaged and expired formula.
7. Unused/returned formula that is not donated must be disposed.
8. The acceptance and donation or disposal of unused/returned formula must be electronically documented in the MI-WIC Formula Acceptance and Action Log including:
 - a. Date returned
 - b. Client name or ID
 - c. Formula (select from available dropdown options)
 - d. Formula quantity

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- e. Staff Initials (rec'd)
 - f. Action taken
 - g. Date of action
 - h. Staff Initials. Note: The initials of two staff members taking the action (donated/disposed) are required to maximize integrity.
 - i. Notes (document 'other' formula names, sizes, and forms for formulas not listed in dropdown)
9. Local agencies shall conduct a monthly review of the Formula Acceptance and Action Log and resolve any flagged entries. Refer to the MI-WIC system help document: "Completing the Formula Acceptance and Action Log."
10. Local agencies shall store returned formula in a locked area with limited WIC staff access, and out of view of WIC clients.
11. For local agencies opting to dispose formula, it must be disposed on the day of receipt.
- a. Pour liquid formula down the drain.
 - b. Empty and pour powder formula into the trash.
12. Local agency staff must educate clients on how to redeem and use WIC formula benefits to minimize amount of unused formula, how to handle unused formula (i.e., proper disposal) and that attempting to sell, trade or gifting WIC food benefits qualifies as a client violation. (See Policy 9.01, Client Compliance.)
13. Any client reports of suspected formula tampering received by the local agency shall be reported to the State agency and respective vendor immediately.

B. GUIDANCE:

1. Clients with formula product concerns, as purchased (i.e., dented can, post expiration date, etc.), should exchange or return the product to the vendor, as opposed to the local agency.

References:

USDA WIC Food Package Policy and Guidance, March 2018, Chapter 6
WIC Policy Memorandum #2020-1: Donation of Unused, Returned Infant Formula

Cross References:

7.01 Food Package Determination and Customization
7.03 Food Package for Qualifying Conditions
8.02 Benefit Proration
9.01 Client Compliance