

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

## **8.0 Food Benefit Issuance/EBT Card Security**

*Effective Date: 05/31/2019*

### **8.05 Returned Formula and Re-Issuance of Benefits**

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

#### **A. POLICY:**

1. Agencies shall provide replacement EBT formula benefits when a change in a formula-containing food package is indicated and there are remaining benefits for the month. (Refer to Policies 7.03 Food Package for Qualifying Conditions and 7.05 Customized Food Package.) 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.
2. EBT formula benefits shall be re-issued according to the proration amount indicated for the current month's food package. (See MI-WIC Policy 8.02 Benefit Proration.) Staff shall check the EPPIC 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.
3. 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.
4. Unused/returned formula shall not be re-issued to WIC clients.
5. 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.
6. Unused/returned formula that is not donated must be disposed.
7. The acceptance and donation or disposal of unused/returned formula must be electronically documented on the WIC Formula Acceptance and Action Log (see MI-WIC Policy 8.05A WIC Formula Acceptance and Action), including:
  - a. Date returned
  - b. Client name or ID
  - c. Formula (select from available dropdown options)
  - d. Formula quantity
  - 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.

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- i. Notes (document 'other' formula names, sizes, and forms for formulas not listed in dropdown)
  
8. WIC agencies shall store returned formula in a locked area with limited WIC staff access, and out of view of WIC clients.
  
9. 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.
  
10. Local agency staff must educate clients on how to redeem and use WIC formula benefits to minimize amount of unused formula, and 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 MI-WIC Policy 9.01 Client Compliance).
  
12. 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:

Federal Regulations 246.10(b)(2)(iii)  
Federal Regulations 246.12(u)  
USDA WIC Food Package Policy and Guidance, March 2018, Chapter 6  
USDA, March 2019, Re: Clarification: Unused and Returned WIC Formula

### Cross References:

7.03 Food Package for Qualifying Conditions  
7.05 Customized Food Package  
8.02 Benefit Proration  
9.01 Client Compliance

### Exhibit:

8.05A: WIC Formula Acceptance and Action Log