

**DEPARTMENT OF HEALTH
PUERTO RICO WIC PROGRAM
POLICY AND PROCEDURE MANUAL**

**POLICY AND PROCEDURE: 6.04
EFFECTIVE DATE: MAY, 2017**

VENDOR MANAGEMENT
ROUTINE MONITORING REVIEWS

POLICY:

According to 7 CFR 246.12 (j) (2) *Routine monitoring*: “The State agency must conduct routine monitoring visits on a minimum of five percent of the number of vendors authorized by the State agency as of October 1 of each fiscal year, in order to survey the types and levels of abuse and errors among authorized vendors and to take corrective actions, as appropriate”.

The Puerto Rico WIC Program (PRWIC) will conduct routine unannounced monitoring reviews to WIC authorized stores at any time during their operating hours to ensure compliance with all applicable State and Federal rules and regulations. All routine monitoring reviews will remain unannounced until the WIC inspector comes to the store on the scheduled date. PRWIC reserves the right to perform as many routine monitoring reviews deemed necessary.

PRWIC defines *pattern of violation* as follows: When a WIC-authorized vendor incurs in a conduct classified by the Code of Federal Regulations (CFR) and/or Regulation #8896 Article 12 as an incidence of the same violation occurring on more than one occasion during an investigation. A pattern may be identified during the life of the vendor agreement.

PROCEDURE:

1. The Vendor Management Division (VMD) will have the discretion to select vendors to be monitored based on a random or targeted sample.
2. The VMD Director will develop an annual schedule for the implementation of routine unannounced monitoring visits to authorized stores.
3. The VMD Director will assign two (2) WIC Inspectors to conduct each monitoring review visit to an authorized store.
4. The WIC Inspector will document the monitoring evidence on site through a “Vendor’s Monitoring Report” form (see Attachment A).

5. The scope for each routine monitoring review of an authorized vendor will include as a minimum:
 - a. Verification of the redemption of Food Instruments (FI's) present in the store to validate that they were transacted in accordance to vendor management policies and procedures and Federal regulation.
FIs must be:
 1. Accepted within the first date to use and last date to use
 2. Stamped
 3. Signed
 4. Without overcharges
 - b. authorized store infrastructure and sanitary conditions
 - c. compliance with required minimal inventory of authorized WIC products (as established in the current WIC
 - d. verification of WIC products within expiration dates and appropriately storage
 - e. verification that all products included in the "Puerto Rico WIC Minimum Stock Requirements" list are available in the store in the amounts required by the program (see Attachment B),based on applicable WIC authorized store size (see Attachments C for small, D for medium, and E for large store).
 - f. verification of receipts to validate that contracted infant formula is from Program's authorized sources
 - g. verification of updated documents required to operate a business
6. The WIC Inspector will document any technical assistance provided to the vendor or his/her authorized representative at the end of the monitoring review visit, based on the monitoring results and/or identified needs in the "WIC Authorized Vendor Monitoring Findings and Technical Assistance" form (See Attachment F).
7. After completing the "Vendor's Monitoring Report", the WIC Inspector will discuss it with the vendor, and ask him/her to write any comments in the available space. The WIC Inspector will obtain the vendor's signature at the end of the monitoring results discussion. If the vendor refuses to sign the report the WIC Inspector will document the stated reason in the completed form.
8. The WIC Inspector will provide a written summary of the monitoring visit findings to the vendor on site which will be signed by both parties. (see Attachment G)
9. The final monitoring report will be referred to the VMD Director for the determination of the corresponding actions, based on the monitoring findings. Potential actions include:
 - a. Violation notification ("warning letter") (see Attachment H)

- b. Sanction notification that could include fines, disqualification or civil money penalty in lieu of disqualification (see Attachment I)
 - c. Termination
10. The PR WIC Program will refer to the Department of Justice any monitoring review results disclosing a suspected felony.
 11. The WIC Inspector will attend and testify at the administrative hearings held as a result of the routine monitoring review, as needed.



Attachment A

Date: _____
Time of arrival: _____
Time of exit: _____

VENDOR MONITORING REPORT

VENDOR INFORMATION

Store name: _____ Type of Vendor: _____ Regular

Vendor Stamp: _____ Above 50%



Vendor's Name: _____

Physical address: _____

Postal Address: _____

Region: _____

City: _____

Store's telephone: _____

Residence: _____

Fax: _____

Inspector's Name: _____

DETERMINATION OF VENDOR'S VIOLATIONS INCIDENCES

In accordance with CFR§246.12(l)(2)(i) the Puerto Rico WIC Program shall impose sanctions for vendor violations that are not specified in Federal WIC regulations. Imposed sanctions by the Puerto Rico WIC Program will be based on a pattern of incidences. The violations and sanctions will be applied as established in Article XII from the Puerto Rico WIC Program Violations and Sanction Schedule contained in the Authorized Vendor Regulation #8896. A determination of non-compliance indicates a violation and possible subsequent sanction, once a pattern has been determined.

Section A - Violations

Type A Violations

COMPLIANCE DETERMINATION

1. The vendor identifies the store as a WIC authorized store with posters provided by the Puerto Rico WIC Program. Yes No
Comments: _____

2. The vendor identifies WIC authorized products with shelf talkers provided by the PR WIC Program. Yes No
Comments: _____

3. The vendor's stamp, a copy of the WIC Vendor Regulations and the updated PR WIC authorized food list, are available in the cash register area. Yes No
Comments: _____

4. The vendor identifies the Puerto WIC Program's authorized food products, their prices, or exhibits the updated authorized food list with the approved prices. Yes No
Comments: _____

5. The vendor extends actual sale prices or any special offers carried out by the store to WIC Program participants. Yes ____ No ____
Comments: _____

6. The vendor did submit the following valid documents to the PR WIC program, and have copies available in the store: Yes ____ No ____

- a. A valid municipal patent Expiration date: _____
- b. A valid sanitary license Expiration date: _____
- c. A valid "OGPe" permit Expiration date: _____
- d. A valid lease agreement, if applicable Expiration date: _____
- e. A valid negative criminal record certificate Expiration date: _____

Comments: _____

7. The vendor accepts food instruments and cash-value vouchers and verifies they are validated with the WIC clinic official payer's stamps. Yes ____ No ____
Comments: _____

8. The vendor accepts food instruments or cash-value vouchers and verifies if the WIC-ID number corresponds to the WIC-ID number on participant's or representative identification card. Yes ____ No ____
Comments: _____

9. The vendor requests participant to sign the food instrument or cash-value voucher only after writing the prices of the authorized food product(s). Yes ____ No ____
Comments: _____

10. The vendor does not accept nor redeems food instruments or cash-value vouchers before their "first date of use" or after their "last date of use." Yes ____ No ____
Comments: _____

11. The Vendor accepts food instruments or cash-value vouchers after the participant or proxy receives the authorized food products. Yes ____ No ____
Comments: _____

12. The vendor stamps its authorization seal on the food instrument or cash-value voucher immediately after dispatching the food to the participant. Yes ____ No ____
Comments: _____

13. The vendor has the required minimum inventory and minimum variety of authorized brands. Yes ____ No ____
Comments: _____

14. The vendor accepts WIC food instruments without requiring other purchases. Yes ____ No ____
Comments: _____

15. The vendor does not collect sales tax on a WIC food purchase. Yes ____ No ____
Comments: _____

16. The vendor does not use the PR WIC Program logo and/or the WIC acronym as part of the business name or in advertising or promotional literature, except to inform the public that the vendor is authorized by WIC. Yes ____ No ____
Comment: _____

17. The vendor does not allow consumption of alcoholic beverages in and/or the premises of his/her WIC authorized store. Yes ____ No ____
Comment: _____

18. The vendor does not demand from the participant restitution for the value of food instruments or cash value vouchers not paid by the PR WIC Program. Yes ____ No ____
Comment: _____

19. The vendor allows the participant to use coupons or other promotional specials. Yes ____ No ____
Comment: _____

Type B violations

COMPLIANCE DETERMINATION

1. The vendor provides access to store premises, and/or facilitates WIC Authorized Staff or any State or Federal Investigator to conduct a monitoring, onsite education, inventory audit or investigation visit. Yes ____ No ____
Comments: _____

2. The vendor maintains inventory records or other records required by the PR WIC Program for a three-years period. Yes ____ No ____
Comments: _____

3. The vendor purchases infant formula from a source listed on the PR WIC Program list of infant formula manufacturers, wholesalers or distributors. Yes ____ No ____
Comments: _____

Additional Performance requirements:

EVIDENCED

1. The authorized vendor has trained new store employees after signing the authorization agreement. Yes ____ No ____
Comments: _____

2. The vendor requests the signature of the participant or authorized representative when redeeming food instruments or cash-value vouchers. Yes ____ No ____
Comments: _____

3. The vendor writes the purchase date on the food instrument or cash-value voucher before requiring the participant to sign it. Yes ____ No ____
Comments: _____

4. The vendor writes the total value of the purchase on the food instrument or cash-value voucher before requiring the participant to sign it. Yes ____ No ____
Comments: _____

5. The vendor removes expired merchandise or merchandise to be destroyed from the dispatching and service area, separating it from those in good condition, when relocating it in the storage area. Yes ____ No ____
Comments: _____

6. The vendor does not store opened and/or partially consumed products with unopened authorized food products in a refrigerator. Yes ____ No ____
Comments: _____

7. The vendor accepts WIC participants to pay the difference when a fruit or vegetable purchase exceeds the value of the Cash Value-Voucher (CVV) Yes ____ No ____
Comments: _____

8. The vendor does not accept altered food instruments and/or cash-value vouchers. Yes ____ No ____
Comments: _____

9. The vendor stamps the food instruments or cash-value vouchers with the vendor's stamp, after verifying if the authorized foods products are available. Yes ____ No ____
Comments: _____

10. The vendor has established operating hours in a schedule that services participants at least eight (8) hours a day from Monday to Saturday, except holidays. Yes ____ No ____
Comments: _____

11. The vendor had been authorized by the Puerto Rico WIC Program when using their own sign in addition to the one provided by the Puerto Rico WIC Program. Yes ____ No ____
 Comments: _____

12. The Vendor does not apply stickers, tags, or printed promotions (such as channel strips or shelf talkers) on their shelves bearing the WIC acronym or logo to identify WIC approved foods, except those provided by the PR WIC Program. Yes ____ No ____
 Comments: _____

13. The vendor dispatches all authorized food products prescribed in the food instrument. Yes ____ No ____
 Comments: _____

14. The vendor and/or store employees allow State or Federal employees to perform any inspection functions, exhibiting no aggressive behaviors during their visit. Yes ____ No ____
 Comment: _____

15. The vendor exhibits a poster with the nondiscrimination clause including the content of race, color, national origin, sex, age and disability. Yes ____ No ____
 Comments: _____

16. The vendor does not alter participant's information, dates, amount of authorized food items and/or the maximum value printed on the food instruments or cash-value vouchers. Yes ____ No ____
 Comments: _____

17. The vendor does not discount products from FIs or CVVs if the price of the products exceeds the maximum monetary value printed on the food instruments or cash-value vouchers. Yes ____ No ____
 Comments: _____

18. The vendor relocated the authorized store notifying the Puerto Rico WIC Program in accordance with Article IX of Authorized Vendor's Regulation #8896. Yes ____ No ____
 Comments: _____

Section B – Mandatory Federal Sanctions that entail a One-Year Disqualification Period

Pursuant to 7 CFR 246.12 (l) (1) (iv), a pattern of the following violations entail a one (1) year disqualification period:

EVIDENCED

1. A pattern of providing unauthorized food items in exchange for food instruments and cash-value vouchers. Yes _____ No _____

Comments: _____

2. A pattern of charging for supplemental foods provided in excess of those listed on the food instrument or cash value voucher Yes _____ No _____

Comments: _____

3. A pattern of an above-50-percent vendor providing prohibited incentive items to customers. Yes _____ No _____

Comments: _____

Section C- Mandatory Federal Sanctions that Entail a Three Year Disqualification Period

Pursuant to 7 CFR 246.12(l)(1)(iii)(A)(B)(C)(D)(E)(F), the following violations entail a three (3)-year disqualification period:

EVIDENCED

1. One incidence of the sale of alcoholic beverages or tobacco products in exchange for food instruments or cash-value vouchers. Yes ____ No ____

Comments: _____

2. A pattern of charging for supplemental foods not received by the participant. Yes ____ No ____

Comments: _____

3. A pattern of providing credit or non-food items, other than alcohol, alcoholic beverages, tobacco products, cash, firearms, ammunition, explosives, or controlled substances as defined in 21 U.S.C. 802, in exchanges for food instruments and cash-value vouchers. Yes ____ No ____

Comments: _____

4. A pattern of vendor overcharges. Yes ____ No ____

Comments: _____

Section D – Mandatory Federal Sanctions that entail a Six-Year Disqualification Period

In accordance with 7 CFR § 246.12(1)(1)(ii)(A)(B), the following mandatory federal sanctions entail a six (6)-year disqualification period:

1. One incident where the vendor buys or sells food instruments or cash-value vouchers for cash according to 7 CFR 246.12(1)(1)(ii)(A). Yes ____ No ____

Comments: _____

2. One incident where the vendor sells firearms, ammunition, explosives or controlled substances, as defined in 21 U.S.C. § 802, in exchange for food instruments or cash-value vouchers pursuant to 7 CFR 246.12(1)(1)(ii)(B) Yes ____ No ____

Comments: _____

_____ I have been notified that the Puerto Rico WIC program will further provide a summary of the findings identified in this routine monitoring visit, after a complete analysis of the gathered evidence.

THE VENDOR OR AUTHORIZED REPRESENTATIVE CERTIFIES HE/SHE HAS READ THIS REPORT BEFORE SIGNING AND INITIALING ALL PAGES.

INSPECTOR'S NAME

VENDOR'S NAME
OR REPRESENTATIVE

INSPECTOR'S SIGNATURE

VENDOR'S SIGNATURE

Exit hour: _____

Date: _____, 20____.

PUERTO RICO WIC MINIMUM STOCK REQUIREMENTS

MILK -BASED	CONTRACT BRAND FORMULA		
	Gerber Good Start Gentle 12.7 oz.	POWDER	
Small Vendors		Medium Vendors	Large Vendors
	10 Cans	20 Cans	30 Cans
Gerber Good Start Soothe 12.4 oz.	POWDER		
	Small Vendors	Medium Vendors	Large Vendors
	10 Cans	20 Cans	30 Cans
Gerber Good Start Gentle 12.1 oz.	CONCENTRATE		
	Small Vendors	Medium Vendors	Large Vendors
	10 Cans	20 Cans	30 Cans
SOY-BASED	POWDER		
	Small Vendors	Medium Vendors	Large Vendors
Gerber Good Start Soy 12.9 oz.	10 Cans	20 Cans	30 Cans
Gerber Good Start Soy 12.1 oz.	CONCENTRATE		
	Small Vendors	Medium Vendors	Large Vendors
	10 Cans	20 Cans	30 Cans

BABY FOOD STAGE 2	FRUITS AND VEGETABLES		
	Small Vendors	Medium Vendors	Large Vendors
	32 Jars	64 Jars	96 Jars
	<ul style="list-style-type: none"> Must stock 4 ounces jars 2 kinds of fruits and two kinds of vegetables Any authorized brands (Gerber, Beech-Nut) No dinner or desserts Added sugar or salt not allowed 		
	MEAT		
Small Vendors	Medium Vendors	Large Vendors	
31 Jars	62 Jars	93 Jars	
<ul style="list-style-type: none"> Must stock 2.5 ounces jars 2 kinds of meat Added broth or gravy NOT allowed Any authorized brands (Gerber, Beech-Nut) Added sugar or salt not allowed No dinners 			

INFANT CEREALS	Small Vendors	Medium Vendors	Large Vendors
	3 canisters	6 canisters	9 canisters
<ul style="list-style-type: none"> Must be 8 ounces canister Rice, Oatmeal and Mixed/Multigrain 2 kinds of cereal Any authorized brand (Gerber or Beech-Nut) 			

FRESH FRUITS AND VEGETABLES	Small Vendors	Medium Vendors	Large Vendors
	2 varieties of fruits 2 varieties of vegetables	2 varieties of fruits 2 varieties of vegetables	2 varieties of fruits 2 varieties of vegetables
	Totaling at least \$22.00 worth of fruits & vegetables	Totaling at least \$44.00 worth of fruits & vegetables	Totaling at least \$66.00 worth of fruits & vegetables
	<ul style="list-style-type: none"> Only fresh fruits and vegetables 		

WHOLE GRAIN	100% WHOLE WHEAT BREAD / WHOLE GRAIN BREAD		
	Small Vendors	Medium Vendors	Large Vendors
	2 Loaves	4 Loaves	6 Loaves
	<ul style="list-style-type: none"> 16 Ounces (1 lbs) loaves 		
	BROWN RICE / WHOLE GRAIN TORTILLAS / WHOLE WHEAT TORTILLA / WHOLE WHEAT PASTA		
	Small Vendors	Medium Vendors	Large Vendors
2 lbs	4 lbs	6 lbs	
<ul style="list-style-type: none"> Must stock at least 1 kind of brown rice or soft corn tortilla 16 ounces package size 			

CEREAL	Small Vendors	Medium Vendors	Large Vendors
	72 ounces	144 ounces	216 ounces
	<ul style="list-style-type: none"> At least 2 kinds of cold cereal and 1 kind of hot cereal At least 1 of these must be whole grain Authorized packages and sizes 		

MILK	Small Vendors	Medium Vendors	Large Vendors
	12 – ½ Gallons	24- ½ Gallons	36 – ½ Gallons
	<ul style="list-style-type: none"> Must stock Whole and Low-fat (1% or non-fat) cow milk 		

MILK SHELF STABLE	Small Vendors	Medium Vendors	Large Vendors
	24 quarts	48 quarts	72 quarts
	<ul style="list-style-type: none"> Must stock Whole and Low-fat or Reduced (1% or non-fat) cow milk 		

CHEESE	Small Vendors	Medium Vendors	Large Vendors
	2 lbs	4 lbs	6 lbs
	<ul style="list-style-type: none"> Must stock 2 authorized variety (American, Swiss, Colby, Colby-Jack, Monterrey Jack, Muenster or Cheddar) 16 oz (1 lbs) package size 		

YOGURT	Small Vendors	Medium Vendors	Large Vendors
	1 jar (32 ounces)	2 jars (64 ounces)	3 jars (96 ounces)
	<ul style="list-style-type: none"> Yogurt Whole Plain Low Fat Plain, Vanilla, Strawberry and Peach Non Fat Plain, Vanilla 		

EGGS	Small Vendors	Medium Vendors	Large Vendors
	2 Dozens	4 Dozens	6 Dozens
	<ul style="list-style-type: none"> Dozen container any size Must be fresh 		

JUICE	Small Vendors	Medium Vendors	Large Vendors
	2-64 ounces / 3 Concentrated	4-64 ounces / 6 Concentrated	6-64 ounces / 9 Concentrated
	<ul style="list-style-type: none"> At least 2 variety of 64 oz Shelf-stable containers (Orange, Grape, Pineapple, Apple, Fruit Punch, Fruit juice, White Grape, Concord Grape, and Vegetable juice) At least 2 variety of 11.5 (shelf-stable) and 12 ounces frozen (Orange, Grape and Apple) 100% Juice – authorized brand 		

Attachment F:

**WIC AUTHORIZED VENDOR MONITORING VISIT FINDINGS
AND TECHNICAL ASSISTANCE**

I, _____, owner () or representative () of the store _____ which is a WIC authorized vendor located in the city of _____, certify that today _____ 20____, I received technical assistance from the WIC Inspector _____ regarding the procedures and norms that include the following topics (check all that apply):

- _____ 1. Authorized food list, minimum stock inventory, minimum variety of authorized brands, authorized formula and medical foods
- _____ 2. Redemption process; completion of the Food Instrument (FI), or Cash-Value Voucher (CVV) and price list
- _____ 3. Prohibited acceptance and/or redemption of FI's or CVV's before their "First Date of Use" or after their "Last Date of Use"
- _____ 4. Prohibited partial dispatch of food items prescribed in Food Instruments
- _____ 5. Existing Vendor's monitoring and investigations
- _____ 6. Violation and Sanction Schedule and ways the vendor can overcome them.
- _____ 7. Prohibited incentive items for the above-50-percent Vendors
- _____ 8. WICA Web Page for WIC Authorized Vendors
- _____ 9. Cashier guide
- _____ 10. Overcharging pattern
- _____ 11. Other technical assistance received today: _____ N/A

Indicate topics:

- 1. _____
- 2. _____

I certify that the WIC Inspector discussed with me the monitoring visit findings as well as how to correct them. In addition, I was oriented about the requirement to immediately cease and desist actions regarding: _____

_____.

Name of Recipient: _____

Signature: _____

Name of Inspector(s): _____

Inspector's Signature: _____

Attachment G:

SUMMARY OF WIC AUTHORIZED VENDOR'S ROUTINE MONITORING VISIT FINDINGS

I _____ as a WIC program Inspector, certify that today _____ of _____ of 20____, I performed a WIC authorized vendor monitoring visit in the following WIC-authorized store: _____, with the Vendor's identification number: _____, finding the following violation(s) to the Authorized Vendor's Regulation No. 8896 from December 30, 2016.

1- Violation(s) established by the PR WIC PROGRAM (Violation(s) to Article XII of the Vendor's Regulation No.8896):

2- Federal Violation(s) (Violation(s) to Article XII the Vendor's Regulation No. 8896):

I certify the WIC Inspector Discussed with me the Violations found during the monitoring visit, in addition, I was informed the PR WIC Program will provide me a written notification of the corresponding sanctions.

Vendor's Name:

Vendor's Signature:

WIC Inspector's Name:

WIC Inspector's Signature:

Attachment H:

Date: _____
Mr(s). _____
Address: _____
_____, Puerto Rico, 00_____

VENDOR ID# _____

Re: VIOLATION NOTIFICATION

Dear Vendor:

In accordance to Article XII of the Puerto Rico Authorized Vendor Regulation No. 8896, dated December 30th, 2016, the PR WIC Program is informing you of an initial incidence of violation found upon a monitoring visit conducted by our inspectors to your business on _____ day of _____, 20_____.

Description of the incurred violation: _____

Violated Agreement Clause: Article _____, Section _____

The PR WIC program will conduct a follow up monitoring visit within fifteen (15) days. If you take no action to correct this violation within this period, and/or we find the same violation at the next visit, then the WIC Program will consider that you have incurred in a pattern of violation. In that event, the WIC program will apply the Vendor's Sanction, as established in Article XII of the Authorized Vendor's Regulation #8896 dated December 30th, 2016 that may lead to a fine or disqualification for a specified period. If a sanction is imposed, the WIC program will advise you of the rights and procedures that apply to your case.

Should you have any questions regarding this communication, please contact the Vendor Management Division Director, (787) 766-2805, ext. 5059.

Issued this _____ day of _____, 20_____.

Cordially,

VENDOR MANAGEMENT INSPECTOR
PUERTO RICO WIC PROGRAM

Attachment I

Date: _____, 20__

Mr(s). _____

Address: _____

_____, Puerto Rico, 00__

VENDOR ID# _____

Re: SANCTION NOTIFICATION # _____

Dear Vendor:

PR WIC inspectors performed a follow-up visit to your store on _____, _____ 20__, and conducted a monitoring visit. As a result, the inspectors detected the same violation identified on _____, 20__ monitoring visit, violating the norms established in the Vendor's Regulation #8896 and the agreement that you signed with the WIC Program.

Type of violation(s): _____

Determined sanction: Warning Letter: _____ or Fine Amount: _____

Disqualification determination: No: _____ Yes: _____

If affirmative (if you are being disqualified by the PRWIC Program) according to 7 CFR 246.12 (l) (1), the Program determined your disqualification as an authorized vendor will be effective for the term of _____ .

Civil Money Penalty in lieu of disqualification: Yes: _____ No: _____ Penalty Amount: _____

If you have previously been considered for a Civil Money Penalty (CMP) you must pay to the WIC Program the aforementioned amount to continue as a WIC Authorized Vendor.

This disqualification will be effective upon 15 days from the date of the receipt of this communication. After this date, you are required to immediately return the vendor stamp that identifies your store as an authorized WIC vendor.

If you disagree with a disqualification decision, you have the right to request an administrative review within 15 calendar days upon this notification. The administrative review request must explain the reasons for which the program should not disqualify you as an authorized vendor. In addition, you have the right to present your supporting evidence, to have a fair hearing with an impartial Examining Official; to an impartial decision based on your vendor file, to review the documental or demonstrative evidence, to refute evidence presented against you, and to be assisted by an attorney if you desire, even though is not required. If you have any questions, please communicate with the Vendor Management Division Director, at telephone number (787) 766-2805 ext. 5059.

Issued this _____ day of _____, 20_____.

Cordially,

EXECUTIVE DIRECTOR
PUERTO RICO WIC PROGRAM