

# FMNP/SFMNP Conflict of Interests/Sanctions Administration

### I. PURPOSE

This policy includes detailed descriptions of regulations related to addressing of Conflict of Interests and Imposing Sanctions when necessary.

### II. APPLIES TO

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

### III. DEFINITIONS

CE— Contracting Entity (referred to as Sponsor in USDA documents)

CFR— Code of Federal Regulations

FMNP - Farmer's Market Nutrition Program

SFMNP- Senior Farmer's Market Nutrition Program

Sites – Farmer's Market/Agency location where vouchers are issued and redeemed

TDA- Texas Department of Agriculture

USDA— U.S. Department of Agriculture

### **IV. POLICY**

All Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all sites served by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### **V. PROCEDURES**

The Wichita Falls Area Food Bank (CE) will ensure that no conflict of interest(s) exist between our organization, Agencies and Farmers Market Associations participating in the FMNP/SFMNP by following state- mandated guidelines such as providing initial training outlining program participation requirements, allowing only authorized FMAs and related farmers to redeem vouchers. Also do regular monitoring of roadside markets to verify program compliance.



Additionally, WFAFB and agents of same will not participate in any activity that conflicts with any participating FMAs and/or farmers or their performance of FMNP/SFMNP duties.

The WFAFB (CE) policy in relation to farmers documented as having violated program regulations

will be issuance of sanction points per the State guidelines and prohibition of program participation for periods as listed in section 4615 of the Texas Department of Agriculture FMNP & SFMNP handbooks (December 2015/March 2016). After completion of disqualification period, the farmer or association will be on probation for the following season and there will be enhanced monitoring to ensure program compliance moving forward. Any further non-compliance issues could result in permanent termination from the program.

### VI. Comments

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322.



### FMNP/SFMNP Voucher Issuance

### I. PURPOSE

This policy includes detailed descriptions of the record-keeping system including, but not limited to, the system for maintain records pertaining to financial operations, voucher issuance and redemption, and FMNP/SFMNP participation.

### **II. APPLIES TO**

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

### III. DEFINITIONS

CE— Contracting Entity (referred to as Sponsor in USDA documents)
CFR— Code of Federal Regulations
FMNP— Farmer's Market Nutrition Program
SFMNP— Senior Farmer's Market Nutrition Program
Sites— Farmer's market/Agency locations where vouchers are issued and redeemed TDA— Texas Department of Agriculture
USDA- U.S. Department of Agriculture

### IV. POLICY

All Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all sites served by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### **V. PROCEDURES**

Wichita Falls Area Food Bank and Vernon FMA will issue vouchers to WIC recipients and is responsible for providing details to the local WIC office of dates and hours the WFAFB will be issuing vouchers. Information should also be included with a list of what Farmer's Markets will accept vouchers as payment and the day and hours they are open.



### **FMNP**

Vouchers are to be distributed only to eligible WIC mothers and children as noted in the FMNP Program Handbook from TDA. Vouchers may only be distributed in the months allowed by the program. Vouchers are for a one-time benefit and are numbered sequentially.

During distribution vouchers booklets should be kept secure so that they are not in jeopardy of being inappropriately managed or stolen.

Participants must present their WIC Shopping List at the time of voucher distribution. The person assigned to voucher distribution must verify eligibility for the FMNP program prior to issuing vouchers. Each qualifying person in a household is eligible to receive one voucher booklet. The eligibility category on the Shopping List must be one of the following to receive a voucher booklet:

- \*PR=Pregnant
- \*BR=Breastfeeding
- \*PP=Postpartum
- \*CH=Child

Infants are **not** eligible for voucher booklets as the foods allowed in the FMNP program are not appropriate for children of that age.

The person issuing the vouchers will record the applicant's name, Participant Category, voucher booklet received and proxy if designated on the Participant Voucher Issuance Log and will have the applicant sign the log acknowledging receipt of the vouchers. Person issuing vouchers will then initial and enter date vouchers were issued.

When vouchers are issued to the clients, the following talking points are covered for each client regardless of previous participation in the program:

- 1. No cash change will be given for the vouchers if you don't use the full \$ value.
- 2. Lost, stolen, or expired vouchers will not be replaced
- 3. These booklets are only distributed once per year
- 4. Like a regular check, sign and write the date on the voucher at the time that you pay the farmer (not before)
- 5. Remember that you have until October 31<sup>st</sup> (or last day Farmers Market is open for the season) to spend your voucher. After this time, they will expire
- 6. Show list of allowed/disallowed fresh fruit and vegetable that you can buy using the vouchers.

In accordance with TDA policy, along with vouchers, the participant will receive a list of all markets that accept the vouchers, picture of posters participant needs to look for, Participant Rights, Responsibilities and Fair Hearing Request, and a list of allowed and disallowed foods. WFAFB Administrative Director will consolidate these items to make the process as streamlined as possible.

The Participant Voucher Issuance Log must be kept by WFAFB for three years and three months. No documentation of WIC recipients' personal information is kept by the Farmer's Markets or the Wichita Falls Area Food Bank.



### **SFMNP**

- Wichita Falls Area Food Bank is responsible for providing details to the local media of dates, hours and locations of Sites that will be issuing the SFMNP vouchers. Information should also be included with a list of what Farmer's Markets will accept vouchers as payment and the day and hours they are open.
- Vouchers are issued to qualified individuals only during months allowed by the program. Vouchers are for a one-time benefit and are numbered sequentially.
- During distribution vouchers booklets should be kept secure so that they are not in jeopardy of being inappropriately managed or stolen.
- Individuals wishing to participate in the SFMNP program must show an ID (used to verify age) and fill out an application (TDA for H1230). All eligible person in the household are able to apply however a separate application is need for each person.
- Qualification for SFMNP are 60 years of age or older at the time of application. Meet the income guidelines (income is self-declared, no proof of income is necessary) and live in the service area.
- Applicant or issuer may fill out the application, applicant must sign the application, and may designate a proxy to shop on their behalf if desired.
- Issuer will certify eligibility (section 3) and mark if the applicant is eligible, on the waiting list or ineligible. If found ineligible the issuer must indicate why. The CE name, address and phone number must be on the application. If the applicant is ineligible due to age, income, or service area the application is to be returned to them. It is permitted to prescreen applicants by asking if they are over 60 and meet the income guidelines.

Applicant will sign and date section 3 and indicate a Proxy if desired.

Issuer will complete section 4

When vouchers are issued to the clients, the following talking points are covered for each client regardless of previous participation in the program:

- 1. No cash change will be given for the vouchers if you don't use the full \$ value.
- 2. Lost, stolen, or expired vouchers will not be replaced
- 3. These booklets are only distributed once per year
- 4. Like a regular check, sign and write the date on the voucher at the time that you pay the farmer (not before)
- 5. Remember that you have until October 31<sup>st</sup> (or last day Farmers Market is open for the season) to spend your voucher. After this time, they will expire
- 6. Show list of allowed/disallowed fresh fruit and vegetable that you can buy using the vouchers.

In accordance with TDA policy, along with vouchers, the participant will receive a list of all markets that accept the vouchers, client's rights and responsibilities, the Application Agreement, Rights, Obligations and Fair Hearing Request (page 3 of the application), a list of allowed and disallowed foods, and Nutritional information for older adults. WFAFB



Administrative Director will consolidate these items to make the process as streamlined as possible.

The person issuing the vouchers will record the applicant's name, voucher booklet received and proxy if designated on the Senior Voucher Issuance Log and will have the applicant sign the log acknowledging receipt of the vouchers. Person issuing vouchers will then initial and enter date vouchers were issued.

The Participant Voucher Issuance Log and SFMNP Participant Application must be kept by WFAFB for three years and three months.

The use of Proxies is allowed by the WFAFB. One person may be a proxy for no more than five (5) people. The Proxy should print their name clearly in the Name of Proxy column and then sign in the Participant/Proxy Signature box.

Vernon Farmers Market Association/Sites helping to distribute SFMNP/FMNP vouchers must submit Voucher Issuance Logs for all vouchers received and distributed. The log lists the recipients who have received their booklets. When Vernon FMA/Sites request additional vouchers, the Voucher Issuance Log is cross referenced with the SFMNP/FMNP Voucher Reconciliation Spreadsheet to ensure the site has distributed the vouchers they were given and claimed to have distributed.

If Administrative Director notices any incorrect logs, they will reach to the person who completed the log for clarification and if necessary, schedule refresher training with that person.

Once logs have been verified by the Administrative Director, they fulfill the request by hand delivering the vouchers the designated site personnel.

### **Unused Voucher Disposal**

At the end of the program year, the Administrative Director will collect any voucher booklets that have not been distributed from all participating site by October 15<sup>th</sup>. These vouchers and any vouchers that were still in the CE's possession will be counted and documented (including the voucher ID numbers) and shredded. Documentation of destruction must be sent to TDA.

### **VI.COMMENTS**

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322.



## FMNP/SFMNP Training

### I. PURPOSE

WFAFB is required to train agencies, farmer/farmers market managers participating in FMNP/SFMNP on an annual basis.

### **II. APPLIES TO**

The policy applies to all farmers that have been trained to redeem program vouchers.

### **III. DEFINITIONS**

CE – Contracting Entity
CFR — Code of Federal Regulations
FMNP- Farmers Market Nutrition
Program
SFMNP — Senior Farmers Market Nutrition
Program
FMA — Farmers Market Association
TDA — Texas Department of
Agriculture USDA-U.S. Department
of Agriculture WFAFB — Wichita
Falls Area Food Bank

### **POLICY**

WFAFB will conduct annual training for farmers/farmers market managers and agencies participating in the FMNP/SFMNP. WFAFB will conduct a face-to-face training for all farmers, agencies, and farmers' market managers who participate in the program prior to commencing participation in the FMNP/SFMNP annually.

All farmers, agencies and farmer's market managers must complete Civil Rights training on an annual basis.

WFAFB, as the CE, and all markets/agencies served by WFAFB, must operate in accordance with the provisions of any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.



### **III PROCEDURES**

On an annual basis WFAFB will conduct training and emphasize instructions on the following:

- Eligible Food Choices
- Proper FMNP/SFMNP coupon redemption procedures, including deadlines for submission of coupons for payment
- Equitable treatment of FMNP/SFMNP recipients, including the availability of produce to FMNP/SFMNP recipients that is of the same quality and cost as that sold to other customers.
- Civil rights compliance and guidelines
- Guidelines for storing FMNP/SFMNP coupons safely
- Guidelines for cancelling FMNP/SFMNP coupons such as the signature on the coupons
- Guidelines on how many voucher booklets is allowed per each client's shopping list
- Guidelines on how to initial the WIC clients shopping list to avoid duplication of voucher distribution to the clients
- Guidelines on how to properly complete the Participant Voucher Issuance Log and the Control Log
- The necessary posters that must be displayed at participating farmers markets include the In Justice for All poster, and a sign indicating that they are participating in FMNP/SFMNP
- That each farmer/FMA/agency will comply with the nondiscrimination provisions of USDA regulations.
- Guidelines on how to properly complete the SFMNP Participant Application and SFMNP Application Notification forms

### **IV COMMENTS**

- Any returning farmer that cannot attend the training must submit a copy of their proof of training on Civil Rights.
- Procedures for handling recipient and farmers/farmer's market complaints will be discussed with the farmers.
- Any questions regarding this policy should be directed to the Wichita Falls Area Food Bank at 940-766-2322.



## FMNP/SFMNP Monitoring & Compliance

### I. PURPOSE

This policy includes descriptions of procedures related to addressing of Site Monitoring and Corrective Actions/Follow up of FMAs/Farmers with Identifiable Problems.

### **II.APPLIES TO**

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

#### III. DEFINITIONS

CE-Contracting Entity (referred to as Sponsor in USDA documents)

CFR - Code of Federal Regulations

FMA - Farmers' Market Association

FMNP - Farmer's Market Nutrition Program

SFMNP – Senior Farmer's Market Nutrition Program

Sites-Farmer's market/Agency locations where vouchers are issued and redeemed

TDA - Texas Department of Agriculture

USDA - U.S. Department of Agriculture

WIC – Special Supplemental Nutrition Program for Women, Infants, Children

WFAFB – Wichita Falls Area Food Bank

### **IV.POLICY**

All FMAs and Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all FMAs and sites served by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.



### **V. PROCEDURES**

WFAFB is responsible for monitoring and reviewing at least 10% of all sites each year using the FMNP/SFMNP Farmers' Market Review form. A mystery shopper will visit random sites one time per year as decided by the program administrator and complete a Vendor Integrity Evaluation Report.

WFAFB will use a risk spreadsheet to identify high-risk sites and ensure on-site compliance by enhanced monitoring as needed.

If problems are identified, WFAFB will initiate a Corrective Action Procedure (CAP) form within two weeks of the finding. The CAP will state how the finding will be corrected by the Farmer/Site/FMA by providing an outline of action(s) to be taken, the expected outcome of the action(s), and the deadline for implementation of each action. The CAP will also schedule a Farmers' Market Review to determine if the violation has been eliminated.

WFAFB may disqualify a Site from participation in the SFMNP/FMNP if the sanction score reaches 15 points or more during the year of participation. The disqualification periods are

Total Number of	Disqualification Period		
Points			
15 Points	1 Year	May not accept vouchers for the current period	
20 Points	2 Years	May not accept vouchers for the current period and the next year	
25 Points	3 Years	May not accept vouchers for the current period and the next two years	

### **APPEALS PROCEDURE**

If problems are not resolved, the issuance of sanction points and suspension from SFMNP/FMNP for the prescribed time as detailed in the Farmers and Farmers' Market Handbook will be imposed. A Site has the right to appeal proposed sanctions by providing, in writing, the sanction(s) being appealed and include a photocopy of the sanction notice. This written appeal must be sent within fifteen (15) calendar days by mail or fax to:

Texas Department of Agriculture Legal Division Attn: Docket Clerk P.O. Box 12847 Austin, TX 78711

Fax number (800) 909-8520



## Texas Farmers/Farmers' Market Sanction Policy

Infraction		Explanation/Example	Points
1	Redemption of invalid vouchers:  • Missing signature  • Redeemed after end date	Must not exceed 5% of redeemed vouchers	1 Point
2	Providing unauthorized food or goods, with the exception of firearms, ammunition, or controlled substances as defined in 21 USC 802 (including alcohol and tobacco), which have a higher points penalty. See #9 below	Nuts or Clothing	5 Points
3	Charging FMNP customers more than other customers	\$6.00 worth of food for a participant is less than for a non-participant	4 Points
4	Requiring cash to be paid by FMNP participant in addition to voucher		5 Points
5	Asking FMNP participants to pay for vouchers not redeemed by TDA		5 Points
6	Falsifying information on vouchers	Date redeemed	5 Points
7	Charging for food items not received	Rain checks	5 Points
8	Providing false information on farmer/farmers' market application		15 Points
9	Exchanging vouchers for money or non-food items	Alcohol, tobacco, firearms, ammunition or other controlled substance	25 Points
10	Refusing to provide access to records, prices, redeemed vouchers to TDA staff or contractors		15 Points

## VI. COMMENTS

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322.

This policy includes descriptions of procedures related to addressing of Site Monitoring and Corrective Actions/Follow up of FMAs/Farmers with Identifiable Problems.



# FMNP/SFMNP Voucher Redemption/Compliance Verification

### I. PURPOSE

This policy includes descriptions of the record-keeping system related to voucher redemption and verification of proper paperwork and validity of vouchers.

### II. APPLIES TO

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

### **III. DEFINITIONS**

CE - Contracting Entity (referred to as Sponsor in USDA documents)

CFR - Code of Federal Regulations

FMNP - Farmer's Market Nutrition Program

SFMNP – Senior Farmer's Market Nutrition Program

Sites - Farmer's market locations where vouchers are issued and redeemed

TDA - Texas Department of Agriculture

USDA - U.S. Department of Agriculture

### **IV.POLICY**

All Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all sites served by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### **V. PROCEDURES**

Farmers and FMAs should only accept vouchers that are valid. In order to be redeemed at participating markets, each voucher must include a unique number with the current year printed on it and must be signed by the participant or proxy and dated at the time of redemption. Vouchers are printed in a different color each year to help identify valid vouchers.

Farmers receive vouchers from participants in exchange for eligible food items of an equal value to the voucher value. The participant (or proxy) must sign and date each voucher used. Farmers are not allowed to give change. If the participant does not purchase the full voucher value, the farmer must provide additional food to



meet the value of the voucher.

Anyone who accepts vouchers at a participating market should be sure the following things are true:

- The voucher is for the current program year and appears to be an original voucher (as opposed to a copy).
- The voucher is signed and dated by the participant (or proxy)
- A farmer vendor number is added to the voucher.

If the participant (or proxy) signature is not present, the person receiving the voucher should ask the participant (or proxy) to add the signature at that time. Vouchers without signature cannot be reimbursed.

Farmers, farmer representatives, and FMA staff should all watch for invalid vouchers. These vouchers should be politely taken from the customer and explained that the vouchers are not eligible to be used at the market. Invalid vouchers should be reported to the CE and then destroyed.

Farmers turn in the redeemed vouchers to the FMA. FMA are to only accept valid vouchers that include an appropriate date and participant (or proxy) signature. The vouchers must also be from the current program year and redeemed with the "dates of use."

When a farmer is ready to redeem vouchers that have been accepted for trade at the Farmer's Market(s) they must fill out a Farmers' Voucher Redemption List with the FMA's name, address, ID number, contact person, phone number and email address along with the farmer's vendor number, farmer's name, number of vouchers being redeemed and a total dollar amount.

Upon receipt of the Farmers' Voucher Redemption List and valid vouchers, the vouchers are then recounted to verify correct number, checked for correct completion of required vendor number, signature and date. Copies of the Claims for Reimbursement and FVRL are provided to WFAFB accountant department for issuance of check which is mailed to Farmer Market Associations after processing. A copy of the check stub is attached to the copies of the Claims for Reimbursement and FVRL form. The vouchers are then placed in a locked cabinet and the copy of the check stub and documents are locked in the filing cabinet in the Finance office for secured storage until disposal is authorized.

If the Administrative Director receives vouchers that have been redeemed but do not look like they match our valid record of issuance they will do the following:

- 1. Determine what FMA the vouchers had been redeemed from
- 2. Look on the Voucher Reconciliation Spreadsheet for voucher number (all vouchers' numbers received from TDA are entered into this spreadsheet)
- 3. If Voucher number is not on the Voucher Reconciliation Spreadsheet the Administrative Director will notify TDA and wait for instructions
- 4. Administrative Director will not redeem the voucher to the farmer until there has been a resolution.
- 5. Administrative Director will send an email to the farmer explain the delay in redemption.

FMAs determine their own process for reimbursing farmers for redeemed vouchers.

SFMNP/FMNP participants may redeem vouchers at participating FMAs from May 1 through October 31. WFAFB SFMNP/FMNP season may vary slightly from this schedule.



The last day vouchers can be issued to participants is September 30<sup>th</sup>.

Farmers should submit vouchers to the FMA by the 5<sup>th</sup> of each month, but they have until November 15<sup>th</sup> to get all vouchers to the FMA for reimbursement. After that date, the vouchers will not be able to be reimbursed.

### **VI. COMMENTS**

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322



## FMNP/SFMNP Voucher Booklet Accountability

### I. PURPOSE

The WFAFB shall control and provide accountability for the receipt and issuance of FMNP/SFMNP coupons.

### **II. APPLIES TO**

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

### III. DEFINITIONS

CE— Contracting Entity (referred to as Sponsor in USDA documents)

CFR - Code of Federal Regulations

FMA-Farmers' Market Association

FMNP – Farmer's Market Nutrition Program

SFMNP – Senior Farmer's Market Nutrition Program

Sites – Farmer's market/Agency locations where vouchers are issued and redeemed

TDA – Texas Department of Agriculture

USDA- U.S. Department of Agriculture

WFAFB - Wichita Falls Area Food Bank (also referred to as CE)

WIC - Special Supplemental Nutrition Program for Women, Infants and Children

### **IV. POLICY**

All FMAs and Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all FMAs and sitesserved by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### V. PROCEDURES

- 1. Vouchers are ordered by going online at squaremeals.org.
- 2. Vouchers are mailed USPS or sent via FedEx or UPS to the CE. Notification of vouchers being sent is generally received via email from TDA to the WFAFB's Administrative Director
- 3. When vouchers are received from TDA, the Administrative Director will verify the correct



vouchers have been received, the amount of vouchers match what was ordered, and the voucher numbers match the shipping label. The voucher numbers are on the CE Voucher Reconciliation Log with the date received, beginning booklet number, ending booklet number; ensuring that number of booklets entered match the number received.

- 4. WFAFB Administrative Director will email TDA Staff to acknowledge receipt of the voucher shipment in its entirety.
- 5. Once vouchers are inventoried, they will be kept in a locked location. Vouchers submitted for payment shall also be kept in a secured location.
- 6. WFAFB Administrative Director will issue out SFMNP/FMNP vouchers to approved sites. A Voucher Receipt Log (provided by TDA form H1415) will be filled out with voucher booklet numbers that site will be receiving and have the site's designated personnel sign and date log when vouchers are picked up.
- 7. WFAFB Administrative Director will then place vouchers and participant handouts for FMNP or vouchers, participant handouts and participant applications for SFMNP in a closed box for designated site personnel to transport in a vehicle to site location.
- 8. All vouchers, at any location should be stored in a locked office or cabinet for security when not being distributed. During distribution, voucher booklets should be kept secure so that they are not in jeopardy of being inappropriately managed or stolen. All sites should know which vouchers numbers they have in their possession. All proper procedures for distributing vouchers should be followed as well.

WFAFB and Vemon FMA will issue the FMNP vouchers in sequential serial number to WIC Clients and Agencies sites should issue SFMNP vouchers to participants in the same manner.

When the Participant Voucher Issuance Logs are returned to the Administrative Director, information is recorded on the CE Voucher Reconciliation Log as to when each booklet was issued and noting if any vouchers in a sequence are missing. If any vouchers are deemed to be missing or misplaced, the Administrative Director will notify Agency responsible for the vouchers in an effort to locate and account for any missing booklets. This ensures that vouchers issued by WFAFB are distributed by the Agencies.

When the Participant Voucher Issuance Logs are returned to the Administrative Director, the Participant Category information is recorded on Farmer Market Voucher Issuance Totals spreadsheet. This information is totaled by month and used by the Administrative Director to prepare the reimbursement requests.

When the individual vouchers are presented for payment, they are checked that they are original vouchers (not copies) and for the participant's signature, date of redemption and Farmer's Market Identification number. Because of the volume of vouchers received and the WFAFB the only entity a twelve-county area issuing vouchers to Farmer's Market, it is assumed that all vouchers presented are valid.



All vouchers are kept in a locked cabinet in an office until they are transferred to an Agency representative who has authority to receive them. The Agency representative is responsible for the security of all vouchers. Vouchers should not be mailed to participants. A WFAFB staff member will enter their name, the date and Agency name on the CE Voucher Reconciliation Log. The WFAFB Administrative Director is responsible for conducting and maintaining a perpetual inventory of vouchers.

### **VI. COMMENTS**

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322.



# FMNP/SFMNP Discrimination/Civil Rights Complaints

### I. PURPOSE

This policy includes descriptions of the steps to be taken by recipient/participants who want to file a complaint regarding discrimination related to physical barriers, civil rights and sex and disability violations.

### **II. APPLIES TO**

The WFAFB policies apply to the WFAFB and all sites that are provided FMNP/SFMNP vouchers by the WFAFB.

### III. DEFINITIONS

CE— Contracting Entity (referred to as Sponsor in USDA documents)
CFR— Code of Federal Regulations
FMNP— Farmer's Market Nutrition Program
SFMNP— Senior Farmer's Market Nutrition Program
Sites— Farmer's market/Agency locations where vouchers are issued and redeemed TDA- Texas Department of Agriculture
USDA- U.S. Department of Agriculture

### **IV.POLICY**

All Sites served by WFAFB must follow the procedures set by WFAFB to ensure that vouchers are issued and redeemed in compliance with FMNP/SFMNP procedures.

WFAFB, as the CE, and all sites served by WFAFB, must operate in accordance with the provisions of Title 7 CFR Part 248, any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### **V. PROCEDURES**

When a recipient/participant has a complaint related to physical barriers, civil rights and sex and disability violations and contacts the WFAFB (CE) they are instructed to contact the U.S. Department of Agriculture directly. The methods available and the steps needed to be taken are listed on the "AND JUSTICE FOR ALL" posters that must be prominently displayed at each Farmers Market stand. The complaining party is advised to file their grievance by completing



the USDA Program Discrimination Complaint Form, AD-3027online at <a href="https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-17Fax2Mail.pdf">https://www.ascr.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-17Fax2Mail.pdf</a> or at any USDA office or by writing a letter addressed to the USDA providing all the information requested in the form and mailing it to:

U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington. D.C. 20250-9410 or

Faxing to: (833)256-1665 or (202)690-7442 or

Emailing to: program.intake@usda.gov

If a Civil Rights complaint is filed with a CE or site, Wichita Falls Area Food Bank must forward it to TDA immediately.

### **VI. COMMENTS**

Any questions regarding this policy should be directed to the WFAFB at 940-766-2322.



## FMNP/SFMNP Fiscal Integrity/Financial Management Disbursing Program Funds

### I. PURPOSE

WFAFB is required to disburse the program funds to participating farmers after they have redeemed the vouchers from SFMNP/FMNP participants.

### **II. APPLIES TO**

The policy applies to all farmers that have been trained to redeem program vouchers.

### III. DEFINITIONS

CE - Contracting Entity

CFR - Code of Federal Regulations

FMNP—Farmer's Market Nutrition Program

SFMNP - Senior Farmer's Market Nutrition Program

FMA—Farmers Market Association

TDA-Texas Department of Agriculture

USDA—U.S. Department of Agriculture

WFAFB—Wichita Falls Area Food Bank

### **IV.POLICY**

WFAFB will reimburse each Farmers Market Association, who will then reimburse the farmers for all FMNP/SFMNP vouchers that they redeem from WIC clients/Senior for the purchase of eligible fruits and vegetables. The redemption value will be the same as the face of the voucher which is currently \$6 for FMNP and \$4 for SFMNP.

WFAFB, as the CE, and all markets served by WFAFB, must operate in accordance with the provisions of any instructions and handbooks issued by the USDA, and any instructions and handbooks issued by the TDA.

### V. PROCEDURES

At the end of the month, each FMA will complete the TDA form Farmers' Voucher Redemption List. Each submission will include:

- Checked box FMNP or SFMNP
- Date
- Farmers' Market Association
- Address, City, State and Zip
- Farmers' Market IDNumber
- Contact Person, Phone Number and E-mail address



For the lower portion of the form the participant will:

- Supply the Farmer's Vendor Number
- Farmer's Name
- Number of Vouchers
- Dollar Amount {each voucher is worth \$6 for FMNP and \$4 for SMNP)

Each date and/or farmer batch should be bundled with the total written on the back of each bundle that ties to the individual entry on the Redemption List

The bottom portion of the form will include:

- Total No. of farmers redeeming
- Total No. of Vouchers
- Total \$ Amount submitted

This form along with the bundled redeemed vouchers will be submitted to the Administrative Director for accuracy. The Administrative Director will then:

- Recount each batch and tie the total to the Redemption List
- Every voucher will be checked for a date, farmer vendor number, and a signature by the client
- Any and all adjustments will be made on the Redemption List and the Administrative Director will notify the representative of the FMA of any discrepancies.

Administrative Director will request an Income Statement from the CEO for SFMNP/FMNP programs. Once in hand they will go online to TX-UNPS to do the claims for reimbursements. All Administrative Expenses requested on reimbursement will be direct costs – no indirect cost will be requested for the SFMNP/FMNP programs.

The Farmers' Voucher Redemption List and the Claim for Reimbursement will be turned into the Accountant for processing.

Upon receipt, the Accountant will enter the bill into QuickBooks under the FMNP/SFMNP expense account for the amount requested for the payment period. The Accountant will then use the Pay Bills feature of the software to print the check.

Upon processing the check, the Accountant will present the unsigned check, the Request for Payment, and the Farmers' Voucher Redemption List to the CEO for signature. If the request is for more the\$1,500, the CEO will need to get a second signature on the check also.

The final check is mailed to the recipient by the Accountant.

### VI COMMENTS

Any questions regarding this policy should be directed to the WFAFB Administrative Director at 940-766-2322.