Maine Center for Disease Control and Prevention WIC Nutrition Program

Effective: October 1, 2011 Policy No. VM-3
Revised: October 1, 2019

High-Risk Vendor Identification Systems

Authority

7 CFR §246.12(j)(3)

Policy

1. A high-risk vendor is identified by the State Agency as a vendor having a high probability of committing a vendor violation. The State Agency utilizes, but is not limited to, the following criteria to make its determination:
   - 1.1 Statistical analyses, including low variance in the redemption price and high mean value of WIC Instruments
   - 1.2 Participant/staff complaints and/or observations
   - 1.3 Review of vendor redemption reports and queries
   - 1.4 Vendor history of program violations/non-compliance
   - 1.5 Suspicious pattern of redemptions
   - 1.6 Previous WIC or Supplemental Nutrition Assistance Program (SNAP) suspension
   - 1.7 SNAP determination of high-risk

Procedures

1. The State Agency maintains a formal system for receiving complaints about vendors through the following:
   - 1.1 A toll-free number handled by State Agency staff
   - 1.2 A standard complaint form that the complainant sends to the State Agency
   - 1.3 E-mail
2. The State Agency uses the following in its high-risk vendor analysis:
   - 2.1 A full monthly food package for a woman, child or infant
   - 2.2 A standard food instrument type with multiple food items (e.g. milk, cheese and cereal)
   - 2.3 A three-month aggregate of the vendor's redemptions
3. Vendor redemption patterns are compared to applicable peer group patterns.
4. The State Agency will identify high-risk vendors and generate high-risk vendor reports at least once per year.