

FMNP/SFMNP Conflict of Interests/Sanctions Administration

PI. 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



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
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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.

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V. PROCEDURES

Wichita Falls Area Food Bank 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.

Wichita Falls Area Food Bank is responsible for providing details to the local media of dates, hours and locations of Agencies 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.

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.

The Participant Voucher Issuance Log must be completed by the WFAFB for each booklet of vouchers issued with the Participant's name printed, their signature, the Participant Category, issuing staff initials and the date issued.

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.

VI.COMMENTS



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

FMNP - Farmer's Market Nutrition Program

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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

Monitoring and review of sites by CE will include development & use of a system to identify high-risk sites and ensure on-site compliance by enhanced monitoring. If problems are identified CE will suggest corrective actions to remedy issue(s), follow up to make sure that the Site implements those actions and conduct on-site training, as needed. If problems are



not resolved, the next step would be the issuance of sanction points and suspension from program for prescribed time according to the number of sanction points. An FMA/farmer has the right to appeal proposed sanctions by providing, in writing, the sanction(s) being appealed and include a photocopy of the sanction(s) notice. This written appeal request must be sent within ten calendar days by mailing or faxing to:

Texas Department of Agriculture Legal Division

Attn: Docket Clerk

P.O. Box 12847 Austin, Texas 78711

Fax number (800) 909-8520

VI. COMMENTS



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

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FMNP - Farmer's Market Nutrition Program

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Sites - Farmer's market locations where vouchers are issued and redeemed TDA - Texas Department of Agriculture

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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.

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V. PROCEDURES

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 *FVRL* and valid vouchers, the vouchers are then re-counted 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.

VI. COMMENTS



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

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IV. POLICY

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V. PROCEDURES

The Food and Nutrition Division of the TDA in Austin ships vouchers, upon request, to the WFAFB.

When a shipment of vouchers are received, 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.

WFAFB will issue the FMNP vouchers in sequential serial number to WIC Clients and Agencies 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



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

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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 http://ascr.usda.gov/camplaint_filing_c ust.html 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: (202) 690-7442 or

Emailing to: program.intake@usda.gov

VI. COMMENTS



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 WIC clients.

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 farmer/Farmers Market Association 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 EMNP or SEMNP
- 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.

The Farmers' Voucher Redemption List and the Request for Payment will both be turned in to 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.