



COMMONWEALTH of VIRGINIA

Department of Health

B. Cameron Webb, MD, JD
State Health Commissioner

P O BOX 2448
RICHMOND, VA 23218

TTY 7-1-1 OR
1-800-828-1120

Email

April 21, 2026

Subject: WIC Compliance and Monitoring Reminder

Annually, the Virginia WIC Program makes this compliance and program integrity reminder available to authorized WIC stores and corporate contacts. To ensure compliance with Federal and State regulations the WIC Program performs several important monitoring functions, including:

1. Unannounced on-site monitoring reviews
2. Secret Shopper / Compliance Buys
3. Supply Validation
4. Desk review of infant formula purchasing records

The purpose of these administrative procedures is to ensure that all stores comply with critical WIC program integrity requirements.

1 Unannounced On-site Monitoring Reviews:

The WIC Program conducts on-site monitoring reviews during all store operating hours including weekends, holidays and evenings. Monitoring may be completed by state WIC office, local agencies, and other trained staff. During these unannounced reviews, agency representatives will review the following areas for compliance:

- a. Record inventory levels of the items subject to the WIC Minimum Stocking Requirement*, Collect shelf prices and compare against actual redemptions from the payments system
- b. Review WIC items for accurate and consistent use of the “Wholesome Informed Choices” or custom WIC shelf labels
- c. Review of the contents of the WIC retailer binder and other materials located at cash registers

*Additional details may be found at; [Resources – WIC Retailers](#)

Failing the Minimum Stocking Visit Requirement three (3) times in 12 months may result in disqualification from the WIC Program or the possibility of a civil monetary penalty (CMP).

2 Covert Secret Shopper / Compliance Buys:

The WIC Program uses an independent investigative company that assigns “secret shoppers” to conduct undercover buys. The secret shopper completes at least two buys as part of the compliance investigative process. Investigations begin without notifying the store. If violations are observed with the first buy the store will receive written notice of violations before additional buys take place. After receiving written notification corrective action must be taken to prevent these types of violations from re-occurring. Failure to take corrective action may lead to a documented pattern of program violations and could result in store disqualification from WIC and / or Supplemental Nutritional Assistance Program (SNAP). Please review our updated Sanction Schedule at:

[Resources – WIC Retailers](#)

3 Supply Validation:

Federal regulations require the WIC Program to ensure that authorized stores only sell infant formula purchased from an approved supplier/distributor (approved supplier list location is below). The process below is specific to infant formulas and other items follow a similar process

Review selected stores’ contract infant formula purchasing records:

- a. Confirm that the supplier identified by the store is authorized by VA WIC*
- b. Compare formula redemptions to total infant formula sales
- c. Complete a beginning and ending physical inventory of infant formula at selected stores

*Additional details may be found at; [Resources – WIC Retailers](#)

WIC authorized stores are required to maintain a minimum of 12 months of their most recent Infant Formula purchase records from all sources and make them available to the State Agency upon request. As part of the Supply Validation, four months of Infant Formula purchase records must be available for review, but additional months of records may be required. It is critical that you ensure your store complies with this requirement and can produce these purchasing records within the timeframes of Supply Validation period.

4 Desk Review of Infant Formula Purchasing Records:

To validate your store is purchasing contract infant formula from an approved supplier/distributor the WIC Program also conducts desk reviews of purchasing records for infant formula. Please refer to the latest copy of the formula flyer to identify the contract and special infant formula affected by this review process.

The WIC Program documents the level of compliance for these monitoring functions with state/federal WIC regulations. To prevent your store from receiving sanctions or monetary fines, I recommend that you carefully review all available resources, including:

- a. WIC Approved Food List
- b. Formula Flyer
- c. Minimum Stocking Requirement Guidelines
- d. eWIC Cashier Handbook
- e. Sanction Schedule, Compliance and Program Violations Guidelines

Please note changes from prior versions:

- i. Redundant items have been combined
- ii. Outdated items have been removed
- iii. Violation Descriptions are simplified

The Administrative Actions are now consistent for each section. Additional details for above topics may be found at; [Resources – WIC Retailers](#)

I encourage you to contact your assigned Vendor Liaison (804-864-7800) if you need assistance to obtain any of the resources identified in this reminder. Additionally, please ensure your cashiers and other store personnel fully understand the information contained in these resources.

Sincerely,

Bob Altermatt

Bob Altermatt
Virginia WIC Vendor Manager

VDH - Division of Community Nutrition

Pc: General Communications/WIC Retailer/2026/Annual Compliance Reminder