

Chapter DWD 14

ELECTRONIC BENEFIT TRANSFER

DWD 14.01	Authority and purpose.
DWD 14.02	Definitions.
DWD 14.03	Mandatory participation.
DWD 14.04	Card issuance.
DWD 14.05	PIN selection.
DWD 14.06	Primary cardholder.
DWD 14.07	Secondary cardholder.
DWD 14.08	EBT card and PIN security.
DWD 14.09	Training.
DWD 14.10	Retailer owned or leased POS equipment.
DWD 14.11	Vendor deployment of EBT-only POS equipment.
DWD 14.12	Access to benefits.
DWD 14.13	Benefit availability dates.
DWD 14.14	Recipient customer service.

DWD 14.15	Retailer customer service.
DWD 14.16	Card replacement.
DWD 14.17	PIN replacement.
DWD 14.18	Liability for lost benefits.
DWD 14.19	Fraudulent activity.
DWD 14.20	Confidentiality.
DWD 14.21	EBT system security.
DWD 14.22	Resolution of disputes.
DWD 14.23	Conversion to coupons.
DWD 14.24	State accounts.
DWD 14.25	Expungement.
DWD 14.26	Questt standards.
DWD 14.27	Future programs.

DWD 14.01 Authority and purpose. This chapter is promulgated under the authority of s. 49.129 (7), Stats., for the purpose of administering an electronic benefit transfer (EBT) system for delivery of food stamp benefits, as an alternative to issuing food stamp coupons.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.02 Definitions. In this chapter:

(1) "Authorized buyer" means an individual designated by a food stamp group to have access to the food stamp account as a secondary cardholder on behalf of the group.

(2) "Card issuer" means the entity designated by the department to issue EBT cards and maintain the card issuance data base.

(3) "Coupon" means any coupon, stamp, access device or type of certification provided under 7 CFR 271, subchapter C, for the purchase of eligible food.

(4) "Department" means the department of workforce development.

(5) "EBT" or "electronic benefit transfer" means an electronic system that allows a recipient on-line access to their food stamp benefits through the use of a POS device at an FNS-authorized retailer, thereby authorizing the electronic payment of federal funds to the retailer to settle the approved purchase of eligible food items.

(6) "EBT account" means an account established by the department or its EBT vendor on behalf of the food stamp group.

(7) "EBT vendor" means the entity that is, or is teamed with, a financial institution or fiscal intermediary that the department has contracted with to provide EBT services.

(8) "Economic support (ES) agency" means a county department of social services or human services, a W-2 agency or a tribal agency which administers economic support programs, including food stamps.

(9) "FNS" means the food and nutrition service, a subdivision of the United States department of agriculture that has administrative responsibility for the food stamp program.

(10) "Food stamp act" means the food stamp act of 1977 as amended, 7 USC 2011 to 2036.

(11) "Food stamp group" means those persons whose financial eligibility for food stamps is determined together.

(12) "Food stamp payee" means an individual designated by a responsible member of the food stamp group to receive an EBT card and have access to the food stamp account on behalf of the food stamp group.

(13) "Food stamp regulations" means the regulations of the US department of agriculture found in title 7, chapter II of the code of federal regulations.

(14) "Group living arrangement" has the meaning given in 7 CFR 271.2 and is a public or private nonprofit residential setting that serves no more than 16 residents and is certified by a regulating state or local agency.

(15) "IPV" or "intentional program violation" has the meaning given in 7 CFR 273.16(c), and shall consist of having intentionally: a) made a false or misleading statement, or misrepresented, concealed or withheld facts, or b) committed any act that constitutes a violation of the food stamp act, the food stamp program regulations, or any state statute relating to the use, presentation, transfer, acquisition, receipt, or possession of food stamp coupons.

(16) "Manual transaction" means a purchase of eligible food items at an FNS authorized retailer that does not use a POS device.

(17) "On-line" means immediate access, via the EBT card, to benefit information stored in a central computer database for the purpose of authorizing electronic food stamp transactions at the point of sale.

(18) "PAN" or "primary account number" is the number on the EBT card that is linked to the food stamp account established on behalf of the food stamp group.

(19) "PIN" or "personal identification number" means a secret number assigned to the cardholder for use in conjunction with the EBT card to access benefits in a secure manner.

(20) "Primary person" means the person whose name is listed first on the application form as the person applying for food stamps for his or her household.

(21) "POS" or "point of sale" means the place in a retail food store where consumers pay for goods and services.

(22) "POS terminal" means an electronic hardware device used at the point of sale which is connected to the computer system of a third party processor or the EBT vendor and is designed to record, forward and obtain approval for electronic transactions.

(23) "Retail food store" has the meaning given in 7 CFR 271.2.

(24) "Settlement" means the exchange of information that produces the transfer of funds from one entity to another, completing a financial transaction.

(25) "Supermarket" means a type of business having annual gross sales of \$2 million or more.

Note: The type of business is selected by the retailer on the Food Stamp Program Application for Stores (FNS 252).

(26) "Third party processor" has the meaning given in 7 CFR 274.12 (h) (5).

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.03 Mandatory participation. All food stamp households in Wisconsin shall participate in the EBT system. The

department shall ensure access to the EBT system for special needs groups such as the elderly and disabled.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.04 Card issuance. (1) When a food stamp group has been determined eligible for food stamps at the economic support agency, the department shall provide an EBT card which allows the food stamp group to access food stamp benefits in its EBT account. The department shall authorize the card issuer to issue the EBT cards. The card issuer shall mail the card to the food stamp group. The department shall also require economic support agencies to maintain temporary card issuance capability for emergency issuances. A statement of nondiscrimination shall be included in the mailer that is sent with the card. The department may require a special activation procedure for cards to assure that the rightful food stamp group receives the card.

Note: This provision varies from federal food stamp regulations in 7 CFR 274.12(h)(6)(j)(B) as allowed by a waiver approved by the U.S. department of agriculture.

(2) The card shall physically resemble a financial transaction card similar to a debit card. It shall contain a primary account number (PAN) and the address of the office where it can be returned if found or no longer in use. The card, as distinguished from the EBT system, may be used by another program for benefit or service access supported by the other program's computer system. The card is the property of the state of Wisconsin.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.05 PIN selection. The department shall provide for PIN selection by the cardholder. The department shall allow the PIN to be changed if the cardholder requests it. The department shall provide instructions on use of the card with the PIN, including how to change the PIN if the cardholder wishes to do so.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.06 Primary cardholder. The department shall provide one designated EBT card and PIN to the primary person or a designated payee to access the food stamp account. The primary person's or designated payee's name and signature shall be on the permanent EBT card. For residents of drug and alcohol treatment centers and group living arrangements, the department may issue the card to a person employed by the facility who is designated as the food stamp payee.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.07 Secondary cardholder. The department shall provide a card and PIN to an individual designated by the food stamp group as an authorized buyer. The authorized buyer's name and signature shall be on the permanent EBT card. The PAN shall be different from that of the primary cardholder but shall be linked to the same food stamp account. There shall be a limit of one secondary cardholder per food stamp group.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.08 EBT card and PIN security. (1) **RECIPIENT RESPONSIBILITY.** The recipient is responsible for protecting the security of his or her EBT card and PIN. Benefits will not be replaced if they are lost or stolen after the recipient gives the card and PIN to another person. The recipient shall report a lost or stolen card or compromised PIN to recipient customer service. When the recipient reports one of these events, the EBT vendor shall immediately disable card access to the food stamp account. The department may require that the recipient sign a card and PIN security responsibility statement prior to issuance of benefits via EBT.

(2) **RETAILER RESPONSIBILITY.** The retailer is authorized to accept the EBT card presented with a valid PIN.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.09 Training. (1) **PROVISION OF TRAINING.** The department shall provide training on the use of the EBT system to benefit recipients; advocates for benefit recipients; appropriate

county, state, and tribal governing body employes; and food retailers. The department shall involve representatives of the affected groups in the design of the training.

(2) **RECIPIENTS.** (a) The department shall train recipients and their representatives on the use of the EBT system and EBT card prior to receipt of benefits via EBT. Recipient training shall include: information on unlimited transactions, access to account balances, transaction receipts, availability of benefits, issuance and replacement of cards and PINs, security of cards and PINs, the recipient's responsibilities for reporting lost or damaged EBT cards, accessing customer service, stale account handling, benefit availability, manual transactions, access to retail stores and dispute resolution procedures.

(b) The department shall provide an informational pamphlet to all EBT households as part of its training efforts. The department intends to make client training material available in retail stores, community centers, and other designated areas.

(c) The department shall make an informational EBT video available for viewing at EBT training sites and each economic support agency.

(d) The department shall provide one to one training in the use of EBT equipment for accessing benefits and obtaining account balance information if requested by the recipient or if any recipient is identified as having actual or potential problems using the EBT system.

Note: This provision varies from federal food stamp regulations in 7 CFR 274.12(f)(10)(ii) as allowed by a waiver approved by the U.S. department of agriculture.

(e) The department shall provide training for bilingual households and for households with disabilities as prescribed by state and federal law. Written materials shall be provided for bilingual households as prescribed in 7 CFR 272.4(b).

(3) **CLIENT ADVOCATES.** The department shall make the training provided to recipients available to client advocates.

(4) **FOOD RETAILERS.** (a) The EBT vendor shall provide training to food retailers and their staff if the vendor has vendor-installed POS equipment. Training shall include technical instruction on the specific EBT equipment in the retailer's store, manual procedures, and customer service contact numbers. The department shall make one to one training available at retailer request.

(b) The EBT vendor shall provide information to retailers using owned or leased POS equipment on manual, customer service and settlement procedures for internal training use.

(5) **STAFF TRAINING.** The department shall provide training to state and local agency staff on topics such as training recipients on the use of the EBT system; installation, operation, and use of any administrative equipment; card issuance and PIN selection equipment; use of the vendor's administrative system; dispute resolution procedures; system security; and recipient and retailer customer services.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.10 Retailer owned or leased POS equipment. (1) **FEE PAYMENT.** During the first 2 years of EBT operations, the department shall pay a fee of \$.08 per food stamp purchase and merchandise return transactions, and balance inquiries conducted on POS terminals owned or leased by retailers which have signed an agreement with the EBT vendor to use such equipment. The department shall require that the vendor disburse the fee on a monthly basis through a deposit separate from the daily settlement deposits.

(2) **STUDY TO DETERMINE ACTUAL COSTS.** During the 2 year period, the department shall commission a study by an independent entity to determine actual EBT costs incurred by retailers and any offsetting savings from the elimination of paper food coupon handling. In signing the vendor agreement, the retailers shall affirm their intent to cooperate with the independent entity in gathering relevant cost data. The department shall elicit the assistance

of representatives of the retailer community, financial institutions, state and local agencies and others in guiding the conduct of the study.

(3) **CONTINUATION OF A FEE.** Based on the study results and other relevant factors, the department shall determine by the end of the 2 years if a transaction fee shall continue to be paid and, if so, at what amount. The department shall publish its decision in the Wisconsin Administrative Register. If, for reasons directly attributable to actions of the department or its agents, the department cannot make the decision by the end of the 2 years, it will continue to pay the fee at the established rate until publication of the decision in the register.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.11 Vendor deployment of EBT-only POS equipment. The department will afford all authorized retailers, including non-traditional retailers, the opportunity to participate in the EBT system. By federal regulation, the department may not require authorized retailers to pay costs essential to and directly attributable to EBT system operations as long as the equipment or services are provided by the EBT vendor or its agent and are utilized solely for food stamp benefit issuance. If the vendor or agent must provide equipment to a retailer to afford the opportunity to participate in the EBT system, the following criteria shall apply:

(1) **POS TERMINALS.** (a) The retailer must have \$100 or more per month in food stamp redemption activity and have the capability to support operation of the terminal.

Note: This provision varies from federal food stamp regulations in 7 CFR 274.12(g)(4) as allowed by a waiver approved by the U.S. department of agriculture.

(b) The following POS terminal deployment formula, as specified in 7 CFR 274.12(g)(4)(ii), will be followed: 1) When food stamp redemption activity is 15% or more of total food sales, the retailer shall have POS terminals for all checkout lanes. 2) When food stamp redemption activity is less than 15% of total food sales, designated supermarkets shall have one POS terminal for every \$11,000 in monthly redemption activity up to the number of lanes per store. All other retailers shall have one POS terminal for every \$8,000 in monthly redemption activity. A retailer whose redemption activity qualifies for 3 or more EBT-only POS terminals may request an additional POS terminal for use by clients to check their food stamp balance if the terminal is located in a designated area of the store and is available for self-service use by clients.

(2) **MANUAL TRANSACTION CAPABILITY.** The department shall provide manual transaction capability to retailers who do not qualify for a POS terminal. Refer to s. DWD 14.12 (3).

(3) **TELEPHONE LINES.** A retailer with average food stamp redemptions of at least \$5000 per month may request a dedicated telephone line for exclusive EBT use and the EBT vendor shall install such a line. In providing retailers access to the vendor's system, the EBT vendor shall comply with the regulations in 7 CFR 274.12, as amended and clarified by FNS.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.12 Access to benefits. (1) ACCESS BY RECIPIENT. The department shall provide the capability for the cardholder to access the appropriate food stamp account in retail food stores authorized by FNS within the Wisconsin EBT project area.

(2) **POS ACCESS.** (a) When paying for eligible food items in a store equipped with a POS terminal, the food stamp recipient's card is swiped through the terminal and the recipient enters the PIN to access the food stamp account. The system electronically verifies the PIN and the account balance, and sends an authorization or denial back to the retailer. If authorized, the recipient's account is debited for the amount of the purchase. If the total cost of the food items exceeds the balance in the account, the transaction will be denied. The account balance will be provided on the denial receipt. The recipient may then effect a second purchase

transaction utilizing the account balance for selected eligible food items.

Note: When the retailer is operating its own POS equipment, settlement of the transaction will occur to the bank holding the retailer's account on the next business day if received by the EBT vendor prior to their end of day cutoff. If there is a third party processor operating POS equipment, settlement of the transaction will occur to the third party processor's bank on the next business day. The third party processor is responsible for settling with the retailer according to their business agreement.

(b) Cash change will not be provided to the recipient.

(c) The EBT system shall provide a receipt to the recipient that will include the account balance.

(3) **MANUAL ACCESS.** (a) A manual process is required when a POS device is not available. A POS device is not available when the retailer does not have a POS device or the POS device is not useable. The retailer shall verify the recipient's account balance by calling retailer customer service. Except for situations in which the vendor's system is unavailable as provided in this subsection, if the retailer fails to verify the account balance and the recipient's account balance is insufficient to cover the amount of the transaction, the retailer is liable for the difference. The recipient shall sign the voucher and receive a copy of the voucher. If the retailer cannot access the EBT vendor's system because the EBT system is unavailable, the department shall allow purchases up to \$40 for which the EBT vendor would be liable.

(b) The amount of the purchase will be withdrawn from the recipient's account pending the vendor's receipt of the voucher from the retailer. If the retailer has not submitted the voucher within 30 days, the amount will be returned to the recipient's account. The retailer shall bear liability for the transaction if benefits are not available.

(4) **ACCESS IN BORDER STATES.** Under federal policy, interested retailers in states bordering Wisconsin may be provided EBT system access if the department determines that the store's participation in the EBT system is necessary for recipient access based on demonstrated household shopping patterns.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.13 Benefit availability dates. (1) DAILY BENEFITS. The department shall make daily (initial and supplemental) food stamp benefits available to recipients via their EBT account by a specified day and time.

(2) **MONTHLY BENEFITS.** The department shall make monthly food stamp benefits available to recipients via their EBT accounts on a staggered cycle over the first 15 days of the month. The department shall make the daily and monthly schedule available to recipients during EBT implementation and at the time of food stamp application.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.14 Recipient customer service. The department shall provide, through the contract with the EBT vendor or agent, ongoing assistance to recipients, on a 24 hours per day, seven days per week basis, on the recipients' use of the EBT system. Recipients shall access this customer service through the use of a toll-free number shown on the back of the EBT card and provided in training material. Recipients shall use customer service to report lost or stolen cards, obtain current account balances, obtain a transaction history for up to 2 months if transaction receipts are unavailable, institute card replacement and PIN change and resolve disputes regarding account transactions. The department shall assure that customer service is available in a language in addition to English as prescribed in state and federal law.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.15 Retailer customer service. (1) The department shall provide, through the contract with the EBT vendor, ongoing assistance to retailers, on a 24 hours per day, 7 days per week basis, on the retailers' use of the EBT system. Retailers shall access this customer service through the use of the toll-free number shown on the back of the EBT card, in the retailer training material, or both. The department shall assure that customer ser-

vice is available in a language in addition to English as prescribed in state and federal law.

(2) **FULL SERVICES.** The EBT vendor shall provide the following services to retailers with vendor-supplied equipment:

(a) manual transaction processing, settlement information and assistance,

(b) requests for repair and replacement of vendor supplied EBT-only POS terminals,

(c) reporting, and general problem resolution; and

(d) information in obtaining monthly reimbursement of POS supplies (i.e., printer ribbon, tape) used for the processing of food stamp transactions. Reimbursement shall be an ACH deposit paid monthly to the retailers for the amount of supplies used. Supply reimbursement shall be calculated based upon the number of EBT transactions performed by the retailer in the previous month.

(3) **LIMITED SERVICES.** The EBT vendor shall provide the following limited services to retailers operating their own equipment, retailers with third party processors, and retailers authorized to use manual vouchers: manual transaction approval and processing, settlement information and assistance, and requests for manual voucher supplies if not provided by a third party.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.16 Card replacement. (1) The household shall report the loss, theft or damage of the EBT card immediately to recipient customer service. The department shall replace the EBT card within 5 business days following notice by the household to recipient customer service.

Note: This provision varies from federal food stamp regulations in 7 CFR 274.12(f)(5)(ii) as allowed by a waiver approved by the U.S. department of agriculture.

(2) The department shall require ES agencies to maintain card issuance capability for emergency card replacement. The department may institute a card replacement fee not to exceed the actual cost to replace the card if the card loss rate is excessive. The fee may be subtracted from the current food stamp allotment.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.17 PIN replacement. The department shall replace the PIN if the PIN is compromised or the recipient wishes to change the PIN. The department shall provide PIN replacement through recipient customer service or at the local economic support agency. The department shall specify the PIN replacement procedure in the training material.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.18 Liability for lost benefits. Benefits will not be replaced if lost as a result of the loss or theft of the EBT card and PIN up to the point in time that the recipient reports the loss to recipient customer service. Benefits will not be replaced if lost due to fraud committed, in total or in part, by the recipient. The department shall assure the replacement of benefits lost after the recipient or representative reports to recipient customer service that the card has been lost or stolen. The department also shall assure the replacement of benefits that are lost due to system errors or malfunctions. A recipient shall follow the dispute resolution process specified in s. DWD 14.22 if he or she believes that benefit replacement is warranted.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.19 Fraudulent activity. (1) **INDIVIDUAL.** (a) An individual may be disqualified from the food stamp program for an IPV related to fraudulent EBT transactions. IPV is determined by an administrative disqualification hearing, court hearing, or disqualification agreement or waiver as provided in 7 CFR 273.16. An individual found guilty of an IPV is ineligible for one year for the first violation, 2 years for the second violation, and permanently for the third violation or for any violation involving the use of \$500 or more worth of food stamps for purposes other than which they are intended.

(b) Individuals may be fined, imprisoned or both for food stamp offenses as specified in s. 49.127, Stats., depending on the value of the food coupons and whether it is the first, second or subsequent offense.

(c) The EBT card is a financial transaction card. Financial card crimes are described in s. 943.41, Stats. Any person violating the provisions of this section is subject to the penalties described therein.

(2) **RETAILER.** A retail food store or authorized wholesale food concern may be disqualified from the food stamp program by FNS if the firm fails to handle EBT transactions in compliance with federal food stamp regulations. FNS may, in lieu of a disqualification, subject the firm to a civil money penalty. Refer to 7 CFR 278.6 for disqualification criteria and procedures.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.20 Confidentiality. The department shall take all reasonable steps to ensure that information regarding food stamp recipients will be kept confidential by the EBT vendor and the card issuer. The department shall oversee the EBT vendor's and card issuer's performance in this area.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.21 EBT system security. The department shall take all reasonable steps to ensure the security of card issuance and the electronic transfer of benefits. The department shall oversee the EBT vendor's and card issuer's performance in this area.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.22 Resolution of disputes. Recipients shall contact recipient customer service regarding EBT account transaction issues and requests for benefit replacement within 60 days from the date of the original transaction being disputed. If recipient customer service is unable to resolve the dispute or error, they will refer it to state or county dispute resolution staff. The recipient may request a hearing at any time in accordance with ch. HA 3. A description of the complete dispute resolution process shall be provided in the training material.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.23 Conversion to coupons. Food stamp groups moving out of an EBT area in Wisconsin shall have their electronic food stamp benefits converted to paper coupons as stated in 7 CFR 274.12(f)(6). The actual process will be included in the training material.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.24 Stale accounts. A stale benefit account is an account which is closed at the direction of the department because it has not been accessed by the food stamp group for three months or longer. A stale benefit account shall be made available to the food stamp group if they reapply for food stamps or contact the local economic support agency. Refer to 7 CFR 274.12(f)(7) for stale account handling procedures.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.25 Expungement. All food stamp benefits shall be expunged from the EBT account at the direction of the department if any of the following occur:

(1) Benefits have not been accessed by the household for a period of one year, or

(2) The EBT food account has been converted to food stamp coupons, or

(3) A one-person food stamp group is denied due to death of the recipient.

(4) The food stamp group loses its rights to the expunged benefits as stated in 7 CFR 274.12(f)(7).

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.26 Quest™ standards. The department shall incorporate the terms of the Quest™ operating rules of the

National Automated Clearing House Association into its contract with the EBT vendor.

Note: A copy of the QUEST™ Operating Rules may be ordered by contacting NACHA, 13665 Dulles Technology Drive— Suite 300, Herndon, Virginia 20171. Phone 1(800) 487-9180.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

DWD 14.27 Future programs. If the department decides to use the EBT system to deliver benefits for any other program it administers, the department shall designate the program by rule. The department also may enter into an agreement with any other government agency to deliver benefits paid by that agency through the use of the system.

History: Cr., Register, August, 1999, No. 524, eff. 9-1-99.

C

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The second part of the document outlines the procedures for recording transactions, including the use of double-entry bookkeeping and the preparation of journal entries. The third part of the document discusses the importance of reconciling accounts and the procedures for doing so. The fourth part of the document discusses the importance of maintaining adequate internal controls and the procedures for implementing and monitoring them. The fifth part of the document discusses the importance of maintaining adequate documentation and the procedures for organizing and maintaining it. The sixth part of the document discusses the importance of maintaining adequate communication and the procedures for implementing and monitoring it. The seventh part of the document discusses the importance of maintaining adequate training and the procedures for implementing and monitoring it. The eighth part of the document discusses the importance of maintaining adequate supervision and the procedures for implementing and monitoring it. The ninth part of the document discusses the importance of maintaining adequate reporting and the procedures for implementing and monitoring it. The tenth part of the document discusses the importance of maintaining adequate review and the procedures for implementing and monitoring it.

C

(