

General Volume
Monitoring & Compliance Section

Program Integrity (1.07000)

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POLICY: The Local WIC Provider (LWP) shall ensure a separation of duties and avoid conflict of interests to safeguard against fraud.

The local WIC provider (LWP) shall ensure WIC employees are not providing WIC services to themselves, their relatives, and/or their close friends.

The LWP shall ensure that during the certification appointment one employee is not determining eligibility for identity, residency, income, and also issuing WIC benefits to that same participant.

Every LWP shall ensure that food instrument accountability functions are appropriately assigned and performed.

PROCEDURES:

A. Providing WIC benefits to a WIC Employee or relatives or close friends of WIC employees.

1. The local **WIC provider employee** shall not perform the following functions for themselves, their relatives or their close friends:
 - a. Determination of eligibility for the program based on identity, residency, or income.
 - b. Any portion of the health assessment which includes obtaining health/medical history and anthropometric measurements.
 - c. Nutrition education and counseling.
 - d. Food instrument issuance.
 - e. Re-evaluation of food packages and/or issuance of supplemental foods.
 - f. Serving as proxy unless a signed proxy note from the participant or guardian naming the employee as a proxy is on file for the current certification period.
2. All WIC employees shall notify their WIC Coordinator if they have a relative or a close friend applying to receive, or are receiving WIC benefits.
3. WIC employees and relatives or close friends of WIC employees must receive services during regular clinic hours. The local WIC provider may use their own discretion in determining whether services may be provided during the employee's working hours.
4. Schedule WIC appointments for local WIC provider employees, their relatives or their close friends at the time when other local WIC provider employees can perform the participating employee's function.

5. Participant records of local WIC provider employee, their relatives or close friends must be made available to the designated state staff for review in conjunction with a monitoring or consultation visit.

B. The local WIC provider shall ensure there is a separation of duties during the certification process.

1. Ensure that a minimum of two (2) employees are available to perform certification duties to ensure that one employee isn't assessing eligibility for identity, residency and income and also issuing WIC benefits to that same participant.

Examples:

a. One employee checks all 3 proofs and another employee prints the checks.

b. One employee checks two proofs and another employee checks one proof and enters a general note, then either of these two employees' could print checks.

2. The LWP shall indicate on the Local Agency Plan if compliance with these guidelines cannot be achieved, and appropriate controls shall be established.

a. Clinics with fewer than (2) WIC staff available to fulfill the separation of duties requirement shall complete the Separation of Duties Exception Log biannually. The WIC Coordinator or designated third party reviewer must every June and December review the "Separation of Duties" Crystal report and randomly select ten (10) participant records to review. The log must be completed and signed by the reviewer, stored in a central location and made available during the local agency WIC monitoring.

b. Single staff agencies, with no third party person to review participant records and complete the log, must notify the State TA staff, who will conduct the audit for the LWP.