

Guide to Separation of Duties Report

INTRODUCTION

The purpose of the Separation of Duties report is to ensure separation of duties is occurring at the Local Agency (LA) to avoid conflict of interest and to safeguard against fraud. Refer to ER# 1.07000 for further details regarding Program Integrity.

Clinics with fewer than two (2) WIC staff available to fulfill the separation of duties requirement shall complete a review of all non-breastfeeding infant certification records and a random sample of at least 20 percent of the remaining certification records within two (2) weeks of the certification. This review must be completed by a supervisor that has the authority to change an eligibility determination.

Clinics with multiple WIC staff that allow one (1) staff person to perform all eligibility and certification functions including issuing food benefits must also complete a review of records. When this option is exercised, a supervisor must conduct a review of all non-breastfeeding infant certification records and a random sample of at least 20 percent of the remaining certification records within two (2) weeks of the certification. An additional file review of 10 percent of each clinic's certification files must be conducted every six months by the State Agency (SA).

The Separation of Duties report can be used as a tool to complete the required review of all non-breastfeeding infant certification records and the 20 percent random sampling of the remaining certification records for the days during which only one (1) WIC staff person performed all eligibility and certification functions. The following criteria may be used when conducting record reviews:

- Proof of identity, income, and residency
- Transactions occurring outside regular clinic hours
- An unusual amount of like or similar nutritional risk factors
- An unusual amount of like or similar height/weight measurements
- An unusual amount of like or similar blood test results
- Duplicate addresses for participants

Potential Red Flags

- Multiple Household IDs all have the same mailing addresses
- Multiple "pending proofs" on the same day
- Checks printed on a day or time that the clinic is not open (outside normal clinic hours)
- Same risk factors selected for multiple participants

HOW TO RUN THE REPORT

Log in to [BiPortal](#) and choose the Separation of Duties report in the list to the left under WIC Reports-Local Agencies/Administrative Management.

When you have selected the report, you will see the following screen asking for the parameters of the search. For an agency that has multiple satellite sites, enter your LA site number(s) in the Start of Range and End of Range and click "Add Range". For an agency with only one site, enter your LA site number in both the Start of Range and End of Range and click "Add Range".

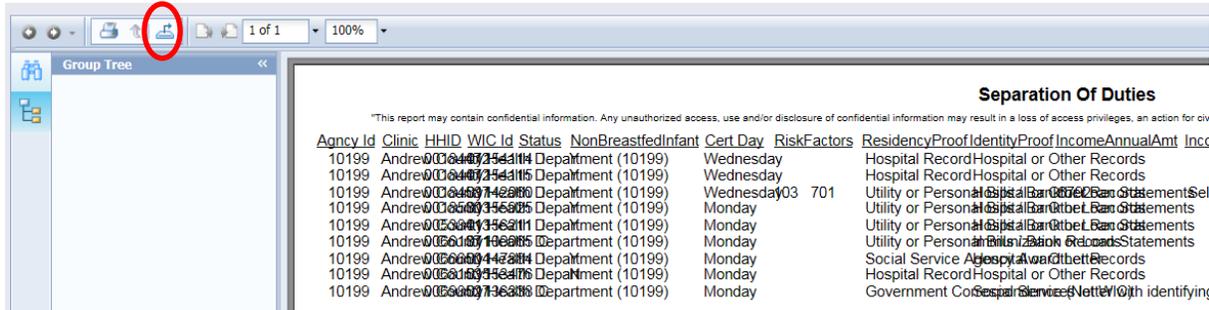
Next, enter the date range that you want to search and click "Add Range". To review one day, you may enter the same start and end date. The date format you must enter is YYYYMMDD (for example - 20170101). Click OK at the bottom of the page.

The screenshot displays a software interface titled "Enter Values" with two main sections for data entry:

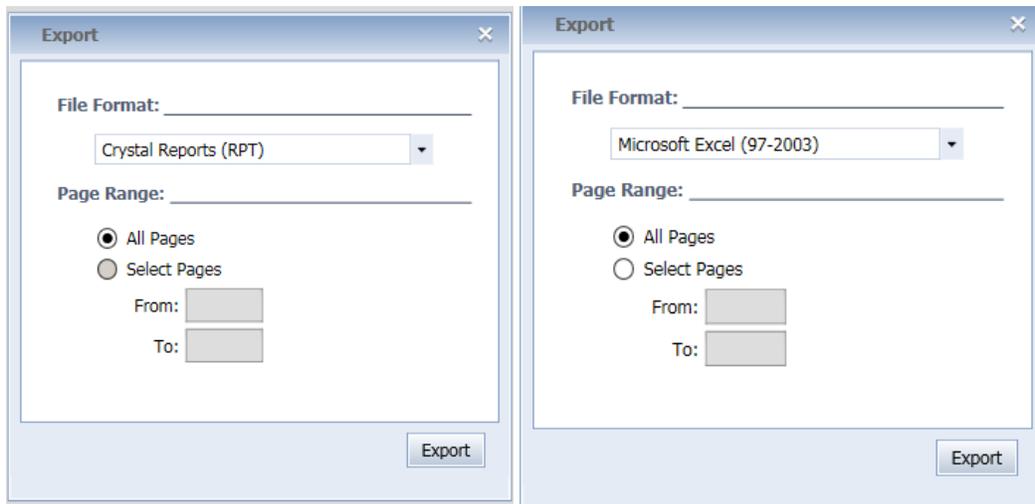
- Enter Clinic(5 digits):** This section includes a "Clinic ID" label and a note: "The value must be between 5 and 5 characters long." It features two input fields: "Start of Range: Enter a Value:" (containing "10100") and "End of Range: Enter a Value:" (containing "10199"). Below each field are checkboxes for "Include this value" (checked) and "No lower value" / "No upper value". An "Add Range" button is positioned to the right. A "Selected Values:" list below shows "[10100 .. 10199]" with "Remove" and "Remove All" buttons.
- Enter Cert Contact Create Year Month and Day (8 digits):** This section includes a note: "The value must be between 8 and 8 characters long." It features two input fields: "Start of Range: Enter a Value:" (containing "20170701") and "End of Range: Enter a Value:" (containing "20170731"). Below each field are checkboxes for "Include this value" (checked) and "No lower value" / "No upper value". An "Add Range" button is positioned to the right. A "Selected Values:" list below shows "[20170701 .. 20170731]" with "Remove" and "Remove All" buttons.

An "OK" button is located at the bottom center of the dialog box.

The report will then run for the selected dates to be reviewed. When the report opens, it will open as a Crystal report and will need to be exported into an Excel document to be able to clearly view the report columns and the report content. To export the report into Excel, you will need to select the export icon located to the left side of the screen.



The window below will open. Choose the dropdown for Microsoft Excel (97-2003) and click 'Export'.



A window will appear at the bottom of your screen, select "Open".

The report will open in Excel. At this point, all of the cells can be formatted and have the ability to be sorted, highlighted, etc. The Separation of Duties report provides all certification records completed during the selected date range. This report must be reviewed by a supervisor and will need to include all non-breastfeeding infant certification records and a random sample of at least 20% of all remaining certification records. The non-breastfeeding infant certification records can be identified in the report by a "Y" in the non-breastfed infant column. The random sample of 20% of all remaining certification records must be manually selected by the supervisor. In order to determine which records were selected for review, the random sample and all non-breastfeeding certifications should be highlighted or marked as the records that were reviewed.

The generated report will contain the following fields:

- Agency ID
- Household ID
- State WIC ID
- Cert WIC Status
- Mailing Address
- Benefit Print Date
- Benefit Print Day of the Week
- Benefit Print Time
- Certification Effective Date
- Risk Factor List
- Proof of Residency
- Proof of Identity
- Income Annual Amount
- Proof of Income
- Hematocrit
- Hemoglobin
- Child Weight Pounds
- Child Weight Ounces
- Child Length Inches
- Child Length Eighths

If it appears that fraud or abuse may have occurred, notify the SA by sending an email with the applicable details to WICLAMonitoring@health.mo.gov.

Reports must be maintained on file at the LA for review during contract monitoring. Sign and date the report in the signature box and refer to ER# 1.06000 for LA record retention requirements.