

Guide to Conflict of Interest and Separation of Duties Reporting



Introduction

The purpose of the Separation of Duties report is to ensure separation of duties occurs at the local agency (LA) to safeguard against fraud. Separation of duties means one staff member determines income eligibility, and another determines and assigns nutritional risk factors.

Conflict of interest can occur when an LA staff member completes a certification for themselves, relatives or close friends. The terms “relatives” and “close friends” must be assessed case-by-case and can vary from agency to agency. LA staff must defer to their supervisor to determine whether a person would be considered a “close friend” or “relative” and whether there is potential for conflict of interest or program integrity concerns. Refer to policy [8.1.030](#) or your district administrative technical assistance staff for further details regarding program integrity.

LAs that do not maintain separation of duties, for any reason, must complete a review of certifications that occurred on the day separation of duties was not maintained. The review(s) must:

- Be completed by a WIC coordinator, nutrition coordinator or other LA staff member approved by the state agency (SA).
- Be completed using the Separation of Duties report.
- Be completed within two weeks of the certifications.
- Include all nonbreastfeeding infant certification records.
- Include a random sample of at least 20% of the remaining certification records.

The person who completed the certification(s) must not be involved in any part of the review process.

The following criteria may be used when conducting record reviews:

- Proof of identity, residency and income.
- 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.

Potential red flags are:

- Multiple household IDs all have the same addresses.
- Multiple “pending proofs” on the same day.
- Benefits issued on a day or time that the LA is not open (outside normal LA hours).
- Same risk factors selected for multiple participants.

The individual conducting the review must indicate which certifications were reviewed by highlighting or marking the records. When the review is complete, the Separation of Duties report must be signed by the individual completing the review and retained for monitoring purposes. If the LA is able to do so, the report may be electronically signed and maintained.

The LA must notify WICMonitoring@health.mo.gov immediately if fraud or abuse appears to have occurred. This notification must include the report where fraud or abuse may have occurred.

How to Run the Report

Log in to the [BI Portal](#) and choose the Separation of Duties report in the list to the left under WIC Reports-Local Agency/Separation of Duties.

Image A is the search parameters screen for the report.

- For an agency with multiple satellite sites, enter the 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 the LA site number in both the Start of Range and End of Range and click “Add Range.”

Next, enter the date range for the search and click “Add Range.” To review one day, enter the same start and end date. The date format to use is YYYYMMDD (for example, 20240301). Finally, click “OK” at the bottom of the page.

Image A

The screenshot shows the search parameters screen for the Separation of Duties report. It is divided into two main sections: "Enter Clinic(5 digits):" and "Enter Cert Contact Create Year Month and Day (8 digits):".

Enter Clinic(5 digits):

- Start of Range:** Input field contains "80100". Below it are checkboxes for "Include this value" (checked) and "No lower value".
- End of Range:** Input field contains "80199". Below it are checkboxes for "Include this value" (checked) and "No upper value".
- Add Range:** Button to the right of the End of Range section.
- Selected Values:** A list box showing "[80100 .. 80199]". Below it are "Remove" and "Remove All" buttons.

Enter Cert Contact Create Year Month and Day (8 digits):

- Start of Range:** Input field contains "20240301". Below it are checkboxes for "Include this value" (checked) and "No lower value".
- End of Range:** Input field contains "20240329". Below it are checkboxes for "Include this value" (checked) and "No upper value".
- Add Range:** Button to the right of the End of Range section.
- Selected Values:** A list box showing "[20240301 .. 20240329]". Below it are "Remove" and "Remove All" buttons.

OK: Button at the bottom center of the screen.

The report will 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 content. To export the report into Excel, select the export icon located to the left side of the screen, see Image B.

Image B

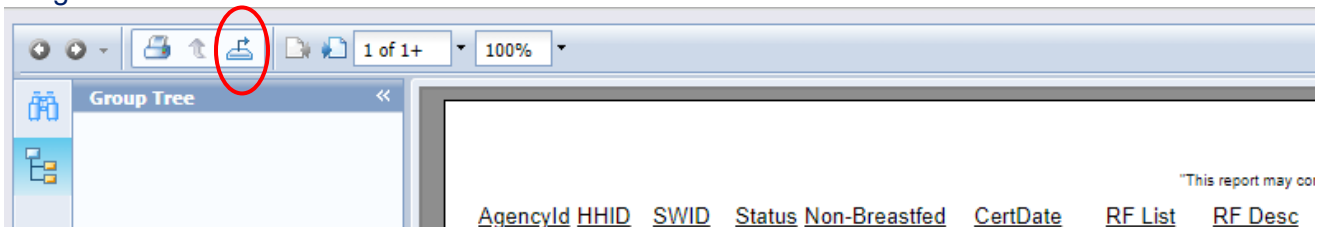
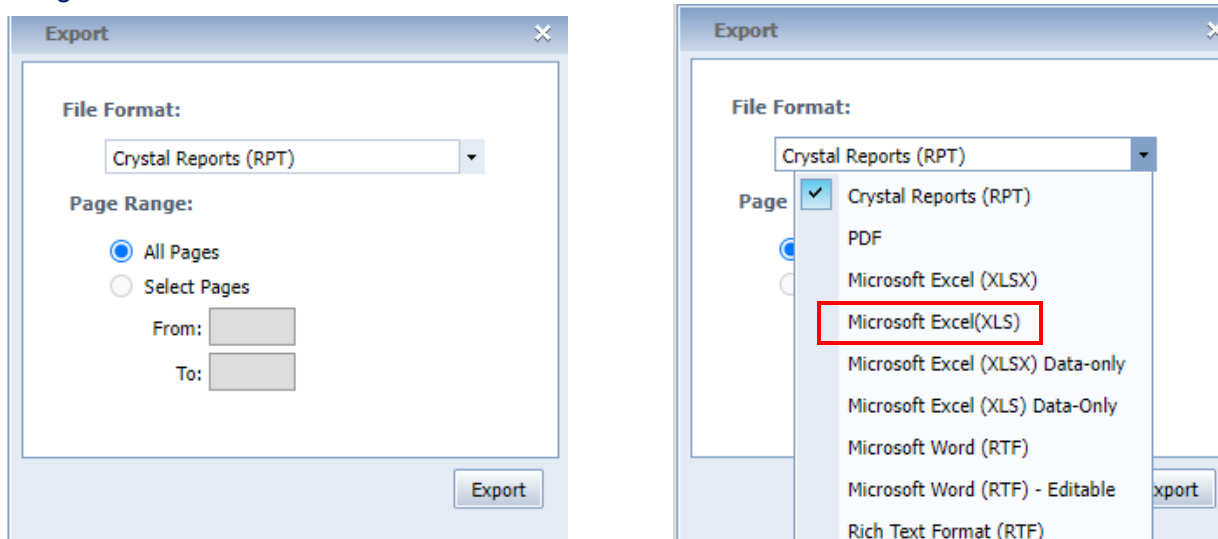


Image C shows the export window. Choose the dropdown for Microsoft Excel (XLSX) or Microsoft Excel (XLS). Then click “Export.”

Image C



A window may appear on the screen, select “Open.” The file can also be found in the Downloads folder on the computer used to pull the report.

The report will open in Excel. At this point, all the cells can be formatted, sorted, highlighted, etc.

Additional Information

- The Separation of Duties report provides all certification records completed during the selected date range.
- The nonbreastfeeding 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 individual completing the review.
- Remember to highlight or mark all certification records that were reviewed.

The generated report contains the following fields:

AgencyId	The LA site ID number.
HHID	The household ID number.
SWID	The state WIC ID number.
Status	The participant category.
Non-Breastfed	A non-breastfeeding infant certification.
CertDate	The certification date.
RF List	The risk factor number entered.
RF Desc	The risk factor description.
RFCreatedBy	The user ID of the person who entered the risk factor or information that triggered the risk factor.
RFCreatedOn	The date and time the risk factor.
Address	The address for the participant.
City	The city for the participant.
Residency Proof	The document used for residency proof.
Identity Proof	The document used for identity proof.
Annual Income	The annual income amount.
InCreatedBy	The user ID of the person who entered the income information.
InCreatedTime	The time the income information was entered.
InModBy	The user ID of the person who modified the income information.
InModTime	The time of the income modification.
Adjunct Elig. List	The type of adjunct eligibility.
Hema	The hematocrit value.
Hemo	The hemoglobin value.
Wgt Lbs	The weight.
Wgt Ozs	The weight.
Lgth	The length.
Lgth 1/8s	The length.

Additionally, the information in columns RF List, RF Desc, RFCreatedBy and RFCreatedOn correspond with one another. The first number listed in the RF List column matched the first entry in each of the other three columns.

- In Image D, risk factor 111 Overweight Women was created by userID ASTAFF on March 25, 2024 at 11:31 a.m. Risk factor 343 Diabetes Mellitus was also created by userID ASTAFF on the same day and time.

Image D

RF List	RF Desc	RFCreatedBy	RFCreatedOn
111 343	Overweight Women Diabetes Mellitus	ASTAFF ASTAFF	Mar 25 2024 11:31AM Mar 25 2024 11:31AM

- In Image E, risk factor 201 Low Hemoglobin/Hematocrit was created by ASTAFF on April 3, 2024 at 10:32 a.m. Risk factor 428 Dietary Risk Associated with Complementary Feeding Practices was created by BSTAFF on April 3, 2024 at 10:38 a.m.

Image E

RF List	RF Desc	RFCreatedBy	RFCreatedOn
201 428	Low Hemoglobin/Hematocrit Dietary Risk Associated with Complementary Feeding Practices	ASTAFF BSTAFF	Apr 3 2024 10:32AM Apr 3 2024 10:38AM