

Separation of Duties in Extreme Circumstances

Policy

WIC Program ARPA Waiver - Separation of Duties: A waiver for 246.4(a)(27)(iii), which requires the State agency to prohibit a single employee from determining eligibility for all certification criteria and issuing food instruments, cash-value vouchers or supplemental foods for the same participant or provide effective alternative policies and procedures when such prohibition is not possible.

Caveats: This waiver does not apply to the prohibitions against certifying oneself or close friends and relatives as defined at 7 CFR 246.4(a)(27)(i) and 7 CFR 246.4(a)(27)(ii).

Conditions: Policies and procedures must ensure that program integrity is preserved by identifying, to the extent feasible, ways for certifications to be split among staff.

When separation of duties cannot be consistently achieved, the State Agency must implement through FNS-approved policies and procedures:

- Standardized review of charts that include regular single staff certification (i.e., lack separation of duties). This is allowable under this waiver for small clinics, outlying or satellite clinics or short staffing situations where the lack of SOD is a regular and expected practice. Related policies and procedures must include:
 - Requirements for review, including data elements reviewed, number or percent of certifications reviewed, frequency of reviews, and how any irregularities will be handled.
 - Who will complete the reviews.
 - Data retention criteria that ensure that reviews are available for any potential monitoring or audit timeframes (federal, state, and/or local level).

Authority

WIC Program ARPA Waiver - Separation of Duties

Procedure

One WIC staff person may determine eligibility for all certification criteria and issue food benefits only when there is not a second WIC staff person (including at the agency or at another of the agency's clinic sites) who the proofs could be sent to for review that day.

In cases where this practice is implemented, the agency WIC Coordinator (or lead staff person if the WIC Coordinator is the one to certify the person alone) must review each participant's record using pages three through six of the state agency's Clinic Services Record Audit Tool. This review tool must be uploaded to the Correspondence section of Iowa Grants (iowagrants.gov) within one week of the appointment(s).

Best Practices

Contact your nutrition consultant to discuss your situation if you find yourself needing to utilize this policy regularly.