#### 450.60

## **Dual Participation**

#### **Prevention and Detection**

Introduction	The Iowa WIC program attempts to prevent WIC participants from receiving benefits from more than one agency in a month by requiring proof of identity and proof of residency as outlined in Policy 215.41. All Iowa WIC participants sign rights and responsibilities for participation that includes a statement that they understand they cannot get WIC foods from more than one clinic in the same month.
	Dual participation is detected through electronic monitoring of in-state files and through agreements with bordering states to share participant information electronically or by phone when fraud is suspected.
In-state detection of dual participation	A report is produced monthly that identifies all participants who have identical names, family identification numbers, or birth dates. Iowa WIC staff review electronic files of these participants and send information to both local agencies if there is an indication that the participant received and cashed benefits in both agencies in the previous month.
Detection of dual participation between states	No individual with an address outside of Iowa is provided WIC benefits by Iowa WIC agencies unless the state in which the individual has residence is first contacted.
	Copies of signed Data Sharing Agreements (DSAs) regarding exchanging participation information are on file at the State WIC office for Illinois, Minnesota, Missouri, Nebraska, Omaha Nation, South Dakota, Winnebago Tribe, and Wisconsin. A sample DSA can be found on page 3 of this policy.

### **Sanctions for Dual Participation**

# Dual participation

Upon discovering a dual participant, the participant shall immediately be terminated from participation in one of the programs or clinics as required by 7 CFR § 246.7(1)(3), and shall take follow up action on any dual participants discovered within one-hundred-twenty (120) days. If either State finds dual participation resulting from the participant's intentional misrepresentation, both State programs shall collect improperly issued benefits under 7 CFR § 246.23(c)(1) and disqualify the participant from both programs under 7 CFR § 246.12(u)(2).