

Separation of Duties

Policy

WIC Policy Memo: The following WIC certification practices by Local agency or clinic employees are prohibited:

- (i) Certifying oneself;
- (ii) Certifying relatives or close friends; or,
- (iii) One employee determining eligibility for all certification criteria and issuing food benefits.

Achieving separation of duties within clinics is crucial to ensuring program integrity. It is critically important to target our efforts in areas that may be susceptible to fraud or abuse. Therefore, at a minimum, the staff person who determines income eligibility and medical or nutritional risk cannot be the same person. Either person may issue food benefits.

Authority

WIC Policy Memo 2016-5 Separation of Duties at WIC Local Agencies

Procedures

A WIC staff person who has also been certified eligible to receive WIC benefits may not issue food benefits for their own household. Another staff person must issue the benefits.

In situations where only one staff person is present and the intake portion of the appointment is done ahead of time over the phone (i.e. certifications/recertifications done at hospitals, doctor offices, community events, etc. or when only one staff person is present) proofs of income and residency must be physically seen by the staff person doing the intake interview over the phone. If the participant did not submit the proofs ahead of time, the staff person with the participant should take pictures of the participant's proofs and send them back to the staff person to review. These proofs must be documented by the staff member reviewing the proofs for eligibility.

Best Practices

The traditional way of assuring separation of duties is accomplished through the following process: A Support Staff determines income eligibility; a CPA determines nutrition risk eligibility and certifies the participant (Certification Panel); and a support staff member issues the eWIC card, issues benefits to the eWIC account, and obtains a signature of receipt of benefits.