

## **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.

### **Best Practices**

This will be 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.