

300.17

Collecting Fraud and Abuse Data

Overview

Policy

Local WIC agencies shall ensure ~~employee, vendor and participant,~~ **vendor, and employee** fraud and abuse information is reported to the state agency.

Purpose

The purpose of this policy is to allow the state agency to track fraud and abuse information in order to detect trends and to allocate technical assistance resources accordingly.

Examples

Below provides examples of participant, **vendor, and employee** fraud and abuse that should be reported. **(This is not a comprehensive list of types of fraud and abuse that could be seen.) If you think fraud or abuse has been committed but are not sure, you should submit a report and the State Integrity Coordinator will determine if a violation has occurred.**

Employee

Employee fraud and abuse is the intentional conduct of a State, local agency or clinic employee which violates program regulations, policies, or procedures and may include, but is not limited to:

- Misappropriating or altering food instruments ~~or Cash Value Vouchers (CVVs)~~
- Entering false or misleading information in case records, or
- Creating case records for fictitious participants.

Reference: 7 CFR 246.2

Vendor

Vendor fraud and abuse may include, but is not limited to:

- Issuing “rain checks” or credit in exchange for WIC food instruments
- Accepting the return of food purchased with WIC food instruments for cash or credit toward other purchases
- **Allowing the purchase of alcohol, alcoholic beverages, or tobacco products with a WIC food instrument**
- Charging WIC participants more than non-WIC customers or charging WIC participants more than the current shelf price.

Participant

Participant fraud and abuse may include, but is not limited to:

- **Attempting to sell** or exchange of WIC food instruments for cash or credit
- Attempting to sell, return, or exchange foods for cash or credit

- Attempting to buy or exchange items not available to the participant in the eWIC card balance (including alcohol, alcoholic beverages, or tobacco products) with a WIC food instrument
- Knowing and deliberate misrepresentation of circumstances to obtain benefits (resulting in a false determination of eligibility).

Procedure

The table below describes the procedure of collecting and reporting fraud and abuse data.

Step	Action
1	<p>The local agency must notify the State Integrity Coordinator of all suspected or reported cases of fraud or abuse of the WIC program. Local agencies will use the electronic Fraud & Abuse Reporting Form to report all suspected fraud or abuse. This form can be found on the homepage of the Iowa WIC website at https://idph.iowa.gov/wic/fraud-and-abuse-reporting-form.</p> <p>Cases of suspected and reported employee, vendor, or participant fraud or abuse that have been reported to the state office will be investigated by the State Integrity Coordinator.</p> <p>The State Integrity Coordinator will communicate with the local agency any follow-up needed and will provide information regarding the outcome of the investigation to the appropriate local agency.</p> <p>The local WIC agency must include the following when completing the Fraud & Abuse Reporting:</p> <ul style="list-style-type: none"> • Your name (first and last) • Today's Date • Your contact information (phone, e-mail) • Indicate whether you are reporting a participant, vendor or WIC staff and document the required information in that section • A description of the fraud and abuse incident. Please include as much detail as possible including where and when the incident occurred, include a link if possible, and the name of the person(s) involved. • Attach images if available A description of any photos, screen shots or other documentation of the fraud or abuse (The State Integrity Coordinator will contact you and provide instructions on how to send such files). • Provide any additional information you may have. <p>Note: Submit one form for each suspected or reported fraud and abuse activity.</p>

2	Local WIC agency staff will submit the electronic Fraud & Abuse Reporting Form as soon as possible after suspected or reported fraud and abuse. A summary of the report should be kept in the local WIC agency's files.
3	<p>The State Integrity Coordinator will investigate all suspected or reported fraud and abuse activity and will communicate with the local agency any follow-up needed and will provide information about the outcome of the investigation to the appropriate agency.</p> <p>The state WIC office will analyze the data to detect trends in fraud and abuse.</p> <p>Note: Record retention is the responsibility of the state WIC office.</p>

Form

A copy of the **Fraud & Abuse Reporting** Form can be found in Policy 300.17a.