

POLICY: The state WIC program and local WIC programs shall work together to detect and prevent dual participation in more than one WIC program within Oregon or between other states, and between CSFP and the WIC Program.

PURPOSE: To detect simultaneous participation by participants in more than one WIC program or in CSFP and any WIC Program.

RELEVANT REGULATIONS: 7 CFR §246.7 ¶(1)—Dual participation

OREGON WIC PPM REFERENCES:

- ◆458—Appeals Process (Contested Case) for Participants
- ◆560—Replacing Food Instruments
- ◆590—Participant Violations
- ◆635—Participant Notification: Eligibility and Rights & Responsibilities
- ◆653—Participant Transfers Into and Out of State
- ◆654—Participant Transfers Within State

TWIST TRAINING MANUAL REFERENCES:

Ch 2, 100—Client Search and Demographics
 Ch 3, 804—Transfers

DEFINITIONS:

<i>CSFP</i>	Commodity Supplemental Food Program
<i>Dual participation</i>	Simultaneous participation in more than one WIC program (more than one state or more than one local clinic) or participation in any WIC program and CSFP at the same time. Dual participation occurs when benefits have been received in both programs.

<i>Food Instrument (FI)</i>	“Food instrument” or “FI” means a negotiable financial instrument by which WIC benefits are provided to participants. Food instruments can provide either specific amounts of WIC authorized foods or formulas or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Voucher” or “CVV”). Food instruments are also referred to as “checks” or “vouchers.” Cash Value Vouchers are also referred to as “Fruit and Vegetable Vouchers.”
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BACKGROUND: Oregon has agreements with Washington, Idaho and California to detect and sanction participants who are receiving WIC benefits from more than one of these states. In order to identify dual participation between WIC and the Commodity Supplemental Food Program (CSFP), CSFP sends a monthly report to the state WIC office of all

Dual Participation, *cont.*

their participants who may be eligible for WIC. The state office researches to see if any of the names on the report match participants in the WIC Program.

The TWIST module in FamilyNet allows WIC staff to search for participants in a statewide database. Staff should be diligent in completing a thorough search for participants at the time of enrollment in order to minimize the opportunity for a participant to be enrolled in more than one WIC clinic at the same time.

According to USDA federal guidelines, follow-up action must be taken within 120 days of detecting a possible case of dual participation.

PROCEDURE:

Notification to participants

1.0 Local WIC programs shall notify participants that enrolling in and receiving benefits from more than one WIC clinic (within or outside of Oregon) at the same time is considered program abuse. Local WIC programs that also have CSFP in the same county must inform participants that they can only participate in one of the programs at a time (either CSFP or WIC) and that dual participation may result in a claim for reimbursement and disqualification from one or both programs.

1.1 Local program staff must ensure that participants have read, understand and have signed the “*Participant Signature Form*” (form 57-629) at every certification and recertification appointment. See ♦635 for more information.

Adding/transferring a new participant

2.0 Local WIC programs shall check for dual participation when adding or transferring a participant.

2.1 Adding a participant: Follow the process in the TWIST Training Manual, Chapter 2, Lesson 100—Client Search and Demographics.

2.2 Transferring a participant: Follow the process in the TWIST Training Manual, Chapter 3, Lesson 804—Transfers, and refer to ♦653 and ♦654 for more information.

NOTE: For data integrity as well as prevention of dual participation, the local WIC program should follow instructions for adding and transferring participants at the time of participant contact before adding the participant to TWIST “Client Master” or as soon after as possible.

Multiple state dual participation

3.0 When the state WIC program identifies potential dual participation between states, the state office will conduct an investigation within 120 days of detection.

3.1 The state office will do the majority of the investigation, however local program staff may be asked to do the following:

Dual Participation, *cont.*

- 3.1.1 Upon request, send the “*Participant Signature Form*” to the state WIC Compliance Coordinator.
 - 3.1.2 Assist with scheduling an appointment to interview the participant.
 - 3.1.3 Assist the participant with setting up a repayment plan if appropriate. Refer to ♦590 for more information.
- Participant disqualified from program*
- 3.2 If the investigators determine there is sufficient evidence of intentional program abuse, the participant must be disqualified for a period of one year and a claim for reimbursement will be issued by the state WIC program. Refer to ♦590 for disqualification procedures and exceptions to mandatory disqualifications.
- In-state dual participation*
- 4.0 When in-state dual participation has been detected, the following action must be taken within 120 days of detection:
 - 4.1 If the dual participation is determined to be unintentional, the local program must assist the participant in determining at which clinic they wish to continue services and ensure that they are terminated from the other clinic.
 - 4.2 If WIC investigators determine there is sufficient evidence of intentional program abuse, the participant must be disqualified from both clinics for a period of one year and a claim for reimbursement will be issued by the state WIC program. Refer to ♦590 for disqualification procedures and exceptions to mandatory disqualifications.
- CSFP and WIC*
- 5.0 When a participant has been identified as participating in both the CSFP and WIC simultaneously, the following action will be taken within 120 days of detection.
 - 5.1 If the dual participation is determined to be unintentional, the state WIC program will contact the participant and determine in which program they wish to continue services.
 - 5.1.1 If the participant decides to stay enrolled in WIC, no further action will be necessary. The state WIC program will notify CSFP to terminate them from their program immediately.
 - 5.1.2 If the participant decides to stay enrolled in the CSFP, the local program must terminate the participant immediately from WIC and issue proper notification. Refer to ♦635 for more information.
 - 5.2 If WIC investigators determine there is sufficient evidence of intentional program abuse, the participant shall be terminated from both programs and a claim for reimbursement will be issued by the state WIC program. Refer to ♦590 for more information on participant sanctions and repayment.

Dual Participation, cont.

***Continuation/
withholding of
benefits***

6.0 The local program shall not withhold monthly benefits to compensate for a claim that has been made against a participant. Refer to ♦590 for more information about participant sanctions.

6.1 If a participant is disqualified, the participant must reapply to receive WIC benefits after the disqualification period has ended.

6.2 A participant may continue to receive benefits pending an appeal of the disqualification and claim for reimbursement. Refer to ♦458—Appeals Process (Contested Case) for Participants for more information.

***Intentional
participant abuse***

7.0 If local program staff suspect intentional participant abuse of any kind, contact the state WIC program. Refer to ♦590 for more information. ★

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