



SECTION: Local Program Operations 595
SUBJECT: **PROGRAM INTEGRITY: SEPARATION OF DUTIES**
DATE: October 1, 2015 (*new*)

POLICY: Local WIC programs shall separate staff activities (duties) of determining participant eligibility from the issuance of WIC food benefits.

PURPOSE: To ensure program integrity and prevent program abuse by assigning certification and benefit issuance functions to more than one staff at the local level.

RELEVANT REGULATIONS: ASM 99-94—Separation of duties in WIC clinic operations
7 CFR 246.4(a)(26)—State plan: Conflicts of Interest

OREGON WIC PPM REFERENCES: ♦215—Local Program Monitoring and Review
♦500—Certification Introduction and Overview
♦510e—eWIC Cardholder Requirements
♦511e—Food Benefit Issuance
♦596—Program Integrity: Acknowledgement of Employee Responsibilities
♦620e—Certification and Issuing Benefits to Relatives, Friends and Coworkers

DEFINITIONS:

<i>Food Benefits</i>	The individual foods a participant receives on WIC for a selected month. “Food Benefits” are specific amounts of WIC authorized foods or formulas or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables.
<i>eWIC Card</i>	Magnetic stripe card used to purchase WIC authorized foods or formulas from a WIC family’s Electronic Benefit Account (EBA). Each card has a 16-digit Primary Account Number (PAN).
<i>Separation of duties</i>	A standard accountability/security practice to separate certification from food benefit issuance responsibilities between more than one person when possible.

PROCEDURE:

- Separation of duties*
- 1.0 Local programs shall establish and maintain a standard system for separation of staff duties at the clinic level as a security feature against program abuse.
 - 1.1 Assign eligibility determination and food benefit issuance duties to different staff members to avoid a single staff doing all functions of the certification process.

EXAMPLE: The staff person at the front desk determines the participant’s income eligibility, residency, and

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identity and sets up the Cardholder Account. The Competent Professional Authority (CPA) assesses risk, assigns the food package and issues the eWIC benefits.

EXAMPLE: CPA completes the certification and assigns the food package, and then the participant returns to the clerical staff person who sets up the cardholder account, issues the eWIC card and then issues benefits.

1.2 Separation of duties is not required to issue benefits, including via the phone, if eligibility has already been completely determined using separation of duties, and if food benefits have been issued at least once during a participant’s current certification. See ♦511e— Food Benefit Issuance.

Exception 2.0 In small clinics or satellite clinics where only one person is staffing a clinic, separation of duties may not always be possible.

Audit 2.1 Each local program will establish quality assurance standards and a regular monitoring system. This should include at a minimum:

- The WIC coordinator or agency designee runs the TWIST Separation of Duties Audit report monthly.
- For records where the income determination and benefit issuance was performed by the same staff person, select at least 10% of records to verify participation. See required audit form at <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Documents/separation-of-duties-audit-form.docx>
- Contact the selected participants with a “customer service” call to confirm benefits were issued to that participant.
- Contact the State with any concerns about compliance or potential fraud.

2.2 If the Separation of Duties Audit report is not available in TWIST, local programs should use the following alternative at least quarterly:

- For agencies with 1-5 clinic days in a month, use the appointment scheduler to select at least 1 day to audit.
- For agencies with 6-10 clinic days in a month, use the appointment scheduler to select at least 2 days to audit.
- For agencies with 11 or more clinic days in a month, use the appointment scheduler to select at least 3 days to audit.

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- Compare TWIST Income screen staff with Food Package Assignment screen staff.
- For records where the income determination and food package assignment was performed by the same staff person, select at least 10% of records to verify participation.
 - Contact the selected participants with a “customer service” call to confirm benefits were issued to that participant.
 - Contact the State with any concerns about compliance or potential fraud.

2.3 The state WIC program will review for compliance during the biennial WIC program review. See ♦215—Local Program Monitoring and Review.

*WIC staff who are also
WIC participants*

3.0 Local staff who are also WIC participants may not certify themselves. See ♦620—Certification and Issuing Benefits to Relatives, Friends and Coworkers.

*Certifying relatives,
friends or coworkers*

4.0 Refer to ♦620—Certification and Issuing Benefits to Relatives, Friends and Coworkers for guidelines on certification of relatives, friends or coworkers. ★

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