

1.18 Separation of Duties

POLICY:

Separation of duties is required within the certification and food instrument issuance process in order to prevent fraud or abuse or the appearance of either.

PROCEDURE:

A. Separation of Duties

1. WIC personnel who are receiving WIC benefits, who have a family member participating in the WIC Program or who act as a proxy for a WIC participant may not conduct any aspect of the eligibility process or issue food instruments or **WIC Identification Folders (FD-10)** or replacements of either to himself/herself, his/her family member(s) or the person for whom he/she is the proxy.
2. WIC personnel who are responsible for the determination of eligibility for any participant (not only themselves, their family members or the person for whom they are a proxy) will not issue food instruments or **WIC Identification Folders (FD-10)**.

B. Situations where Separation of Duties is Not Possible

It is recognized that some agencies have a small staff. When coupled with employee absences or vacancies, some flexibility in maintaining separation of duties must be allowed.

1. In those situations where a separation of duties is not possible, the Local Agency Director or designee will conduct a third party review in those WIC clinics on a quarterly basis.
2. The Local Agency Director or designee will maintain a file with names of such participants and relationship to the employee by using the **Separation of Duties Log (see Attachment #1 1.18)** and assign duties in accordance with policy.

C. Compliance with the Separation of Duties Policy

Local Agency compliance with policy will be monitored during the State Agency Program Review and Local Agency Internal Review.

REFERENCES:

1. SFP 93-116, Conflict of Interest Situations

ATTACHMENTS:

1. Separation of Duties Log