1.18 Separation of Duties

POLICY:

Separation of duties is required within the certification and food benefit 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 eWIC benefits/card, who have a family member participating in the WIC Program or who act as a caregiver for a WIC participant may not conduct any aspect of the eligibility process or issue eWIC benefits/card or replacements of either to himself/herself, his/her family member(s) or the person for whom he/she is the caregiver.

2. WIC personnel who are responsible for the determination of income eligibility and medical or nutritional risk cannot be the same person. Either person may issue eWIC benefits/cards.

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 separation of duties is not possible, the Local Agency Director or designee will conduct a third party review in those WIC clinics on a bi-weekly basis.

    a. The Local Agency Director (or designee) must conduct a post review of all non-breastfeeding infant certification records and at least twenty (20) percent of a random sample of the remaining certification records within two (2) weeks of certification.

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
2. FNS Memorandum 2016-5, Separation of Duties at WIC Local Agencies

ATTACHMENTS:

1. Separation of Duties Log