

**1.11 Prevention and Detection of Dual Participation**

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**POLICY:**

The state and local agencies are responsible for the prevention and identification of dual participation within each local agency and between local agencies, including actions to identify suspected instances of dual participation at least semiannually. Follow-up action must be taken within 120 days of detecting instances of suspected dual participation. Cases of unintentional dual participation will result in immediate termination from participation in one of the programs or clinics. Cases of intentional dual participation resulting from intentional misrepresentation or through the collection of improperly issued benefits in accordance with 246.23(c)(1) will result in disqualification from both programs in accordance with 246.12(u)(2).

The STORC computer system assists in the prevention and detection of dual participation between and within the Local Agencies to prevent participants from receiving benefits in more than one (1) WIC clinic at a time through a daily update of each local site's data system.

**PROCEDURE:**

**A. Prevention of Dual Participation**

WIC personnel will do the following to prevent dual participation.

1. Follow procedures for verification of identity (**see Policy 2.17, Verification of Participant Identification**) during each certification and class appointment.
2. Obtain the participant's written declaration on the **Participant Agreement (WIC-05)** during each certification that they do not participate in WIC in another location.

**B. Detection of Dual Participation**

WIC personnel will do the following when dual participation is detected.

1. Call the State Agency Help Desk **immediately** upon getting a "Dual Participation" STORC message to ensure that the problem is resolved correctly.
2. Help Desk may instruct WIC personnel to transfer records from another WIC clinic.
  - a) The transfer process requires twenty-four (24) hours to take effect.
  - b) The participant may be certified on paper, if necessary, and instructed to return the following day to receive food instruments.
3. Terminate the participant from one (1) WIC clinic **immediately** upon detection of dual participation and continue to provide benefits from the other WIC clinic until

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a decision regarding suspension has been made or the participant's eligibility expires.

4. The participant must be sanctioned (see Policy 1.06, Participant Sanctions) when they deliberately misrepresent participation information provided for WIC certification.
5. In cases of intentional misrepresentation, the collection of improperly issued benefits in accordance with Policy 1.06 will also be carried out.
6. Share participant information with WIC agencies in neighboring States in order to investigate and correct suspected dual participation.

**REFERENCES:**

1. WIC Regulations 246.7, Certification of Participants