

Division of Community Nutrition

<i>Subject:</i> Dual Participation		<i>Policy:</i> ADM 05.1 - C
<i>Reference:</i> N / A	<i>Effective:</i> August 12, 2013	<i>Supersedes:</i> December 15, 2011

I. Policy:

No participant shall receive benefits in two or more WIC programs or under two or more identities. Such dual participation is a form of program abuse and as such is subject to sanctions. Program benefits obtained or disbursed improperly will result in a claim against the participant for the full value of such benefits.

The State agency in conjunction with WIC local agencies is responsible for the following: the prevention and identification of dual participation within each local agency and between local agencies under the State agency's jurisdiction, including actions to identify suspected instances of dual participation at least semiannually. The State or local agency must take follow-up action within 120 days of detecting instances of suspected dual participation.

In areas where a local agency serves the same population as an Indian State agency or a Commodity Supplemental Food Program (CSFP) agency, and in areas where geographical or other factors make it likely that participants travel regularly between contiguous local service areas located across State agency borders, the State will enter into an agreement with the other agency for the detection and prevention of dual participation.

II. Procedure:

A. Definitions

- 1) The *terminating local agency* is the agency in whose district the participant does not / no longer reside(s), or is participating under a false identity or address.
- 2) The *sanctioning local agency* is the agency in whose districts the participant currently resides and is participating under his / her true identity and address.
- 3) The terminating and sanctioning local agencies may in some cases be the same where the participant is receiving benefits from one local agency under two identities.

B. The State WIC Office shall conduct an annual audit of Program participation and notify the local agency concerned in cases of possible dual participation.

C. The local agency shall investigate the matter.

D. The local agency shall report its findings to the State WIC Office. If abuse is confirmed by the State WIC Office:

- 1) The terminating local agency shall issue a Letter of Ineligibility, WIC-315C
- 2) The sanctioning local agency shall discuss the abuse with the participant and impose sanctions immediately in accordance with ADM 05.0-C.

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- E. The State WIC Office shall establish the claim against the participant in accordance with ADM 05.2-C