

## Division of Community Nutrition

<i>Subject:</i> <b>Separation of Duties</b>		<i>Policy:</i> <b>ADM 06.0 - C</b>
<i>Reference:</i> <b>N / A</b>	<i>Effective:</i> <b>August 12, 2013</b>	<i>Supersedes:</i> <b>February 15, 2007</b>

### I. Policy:

Separate WIC personnel shall determine income eligibility and/or issue food benefits for a participant. WIC personnel who determine income eligibility shall not also issue food benefits to the same participant during the same visit.

### II. Procedure:

- A. Separate WIC personnel shall be assigned to determine income eligibility and to issue the same participant's food benefits at certification and nutrition education visits.
- B. The following procedures shall be followed to address separation of duty concerns:
  - 1) Exceptions to the separation of duties policy shall be documented by the local agency in the WIC- 400C, Separation of Duties Exception Log ("Log").
    - a. The District Director or designee shall conduct a quarterly review of the log(s).
    - b. When problems are detected, the District Director or designee shall take immediate action to resolve the problem. This includes notifying the State WIC Office (SWO) about the nature of the problem and the action steps taken to resolve it.
    - c. The District Director or designee shall maintain these logs on file at the local agency.
- C. The local agency shall use the Separation of Duties Report in Crossroads to monitor exceptions.
  - a. On a quarterly basis, the District Director or designee shall review the Report and the Log. Any instances on the Report that are not also reported on the Log shall be investigated for disparities and reported to the SWO Operations Liaison within 30 days of the review.
  - b. The report shall explain the nature of the discrepancy, corrective actions taken to resolve the discrepancies, and measures on preventing future discrepancies.