

Division of Community Nutrition

<i>Subject:</i> Separation of Duties		<i>Policy:</i> ADM 06.0
<i>Reference:</i> N / A	<i>Effective:</i> July 20, 2020	<i>Supersedes:</i> August 12, 2013

I. Policy:

Separate WIC personnel shall determine income eligibility and medical or nutritional risk to the same participant during the same visit. Either person may issue food benefits.

- A. Separate WIC personnel shall be assigned to determine income eligibility and determine medical or nutritional risk to the same participant at certification or subsequent certification visits (i.e. the same person cannot complete the income screen and click the certify button on the certification summary screen).
- 1) WIC personnel designated as either a CPA or CPPA must complete the medical and/or nutritional risk eligibility.
 - 2) All documents to be scanned into the participant's record within Crossroads during the certification visit shall be scanned prior to completion of the visit to prevent documents scanned following the visit from being reported as separation of duties violations.

Any documents that need to be scanned other than income related material should be scanned by an individual other than the one that completed the income screen and should be scanned to another screen in Crossroads (i.e. Medical documentation, immunization screen, Dietary and health screen, etc.)

- B. Review of the separation of duties violations shall be documented by the local agency on the WIC-400, Separation of Duties Log. This would be listing the violations from the Crossroads Separation of Duties Report, causes for the violations, documentation of the required reviews, and corrective actions taken to prevent future violations/discrepancies. If it is determined that an applicant was certified incorrectly, the applicant will be brought back in to review his/her eligibility and the prescribed food benefits. The Separation of Duties Log must be maintained in accordance with policy ADM 11.0 Record Retention.
- C. The WIC Coordinator shall run the Crossroads Separation of Duties Report a minimum of once every two weeks and compare the report to the Separation of Duties Log (WIC-400) for ensure consistency and completeness between the two reports.(i.e. all exceptions identified on the report are properly documented on the exception log). If there are separation of duty violations on the report, the WIC Coordinator shall conduct a review of all certification records within two (2) weeks of the certification. Documentation of the reviews shall be maintained on file at the local agency
- D. In an effort to minimize the potential for Fraud and abuse, an individual other than the certifier (e.g. the WIC Local Agency Director, or Coordinator's Supervisor) must conduct a post review of all non-breastfeeding infant certification records and at least 20 percent of a random sample of the remaining certification records within 2 weeks of the certification. It is recommended that the same staff person is not the only person that

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performs this review. Documentation of this review (Refer to section C. above) must be maintained on file at the local agency for review during management evaluations.