

Section: Eligibility & Clinic Procedures

Subject: Separation of Duties

Separation of Program Misuse by Staff – Separation of Duties

Federal regulations [7CFR 246.4(a)(26)] require that policies and procedures must be in place for preventing conflicts of interest and potential fraud or abuse at the WIC local agency or clinic level and must include a separation of duties so that more than one employee is involved in determining eligibility for all certification criteria and issuing food benefits. Clarification provided by WIC Policy Memorandum #2016-5 states that, at a minimum, the staff person who determines income eligibility and the staff person who determines medical or nutritional risk cannot be the same person. Either person may issue food benefits. Further, having one staff member check identification or residency and another staff person conduct the remainder of the certification does not meet the regulatory intent of separation of duties.

For local agencies who are unable to separate income eligibility from nutritional/medical risk determination, the Colorado State WIC Office will conduct weekly chart reviews on **all** newly certified participants. **For this reason, the Separation of Duties Exception Log is no longer needed.**