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| <p style="text-align: center;">Nevada WIC Department of Health and Human Services</p> |
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Effective: 10/2009

Revised: 10/2019

Policy No. GP: 2

Separation of Duties in WIC Clinic Operations

Policy

Separation of Duties (SOD) will occur during certification and re-certification appointments and is a standard security practice used in any operation in which valuable benefits change hands. At a minimum, Local Agencies (LA) shall ensure income eligibility determinations and nutrition risk determinations are performed by two different employees.

Authority

CFR § 246.4 (26)

Procedure

The following functions are required for a LA to maintain program integrity. Please note the following procedure relates solely to certification and recertification appointments. SOD is not necessary at the second nutrition education contact, high risk appointments, or infant and child health assessments.

WIC LA's will separate WIC certification elements relative to staff roles and responsibilities unless there is only one person working in a given clinic. When two or more are working, income eligibility determination and nutrition risk determination will be completed by different staff members. For example:

Employee #1: A WIC Clerk or CPA 1 will complete eligibility determination and input in the Family/Intake Panel in NV WISH to include:

- Income Eligibility: Household size, determine adjunct eligibility, income, pay frequency, etc. (Income for all declared household members is to be recorded)
- Identity
- Contact/Address

Employee #2: CPA 2 completes remaining eligibility determination in NV WISH System by:

- Completing Assessment: Anthropometrics, Blood, Nutrition Interview, and Risk Determination.
- Certification

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- Nutrition and Breastfeeding Education and Care
- Issue EBT card, assign food package(s) and issue food benefits

Alternate Separation of Duties Procedures for One Person Clinics and Two Person Clinics Where Separation of Duties is Not Possible

If a LA finds they cannot achieve SOD, a review of certification records when the SOD did not occur is required. LAs will implement the following based on clinic staffing and capabilities:

- 1. Only one staff person is present at a clinic and determining eligibility for all certification criteria and issuing food benefits for all participants in a clinic.**

In an effort to minimize the potential for fraud and abuse, an individual other than the certifier (e.g. the WIC Local Agency Director) 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 two (2) weeks of the certification. It is recommended that staff is rotated so that the same staff person is not the only person that is known to the satellite clinic. Email a copy of the WIC Separation of Duties Audit Tool Log to the SO at least bi-weekly at: WICGeneral@health.nv.gov. Documentation of this review must be maintained on file for 3 years at the LA for review during management evaluations.

2. If the LA is unable to perform both SOD and the post record review because supervising staff also provides direct WIC services (determining eligibility, determining nutrition risk, issuing benefits), the agency will secure arrangements with the State Office (SO) to perform the post review.
- 3. Clinics with multiple WIC staff that allow one staff person to perform all eligibility and certification functions including issuing food benefits.**

FNS does not recommend this method of providing WIC services as it does not meet the strict definition of separation of services. When this option is exercised, an individual, other than the certifier (e.g. the WIC

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Local Agency Director), 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 two (2) weeks of the certification. An additional file review of 10 percent of each clinic's certification files must be conducted every six months by the State Agency Director or designee, or a WIC Local Agency Director. Email a copy of the WIC Separation of Duties Audit Tool Log to the SO at least bi-weekly at: WICGeneral@health.nv.gov. Documentation of this review must be maintained on file for 3 years at the LA for review during management evaluations.

Verification of records, can be completed with customer service calls to check in, confirm appointment, request feedback etc. or via performing a chart audit in NV WISH. If a clinic only has one staff person, the additional file review of 10 percent of the clinic's certifications every six months is not required.

Monitoring of Staff to Prevent and Detect Fraud

To ensure a single staff member does not determine program eligibility for all certification criteria and medical/nutrition risk for the same participant:

1. Employee permissions will be set within the NV WISH system to allow appropriate access to income and medical/nutrition risk determination functions.
 - a. Staff working in clinics where SOD cannot occur will be approved for security access within NV WISH by the Nevada WIC Clinic Operations Coordinator that would allow the staff person to complete intake screens, nutrition assessment and issue benefits. However, when possible, staff should avoid completing both the income eligibility determination and the nutrition risk assessment for the same participant.
 - b. Using the WIC Separation of Duties Audit Tool Log (Appendix GP: B) the LA WIC Director or Manager will complete the following procedure for:
 - i. All non-SOD compliant, non-breastfeeding infant certification records;

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- ii. At least 20% of a random sample of all remaining non-SOD compliant certifications on bi-weekly basis; and
 - iii. At least 10% of each clinic's non-SOD compliant certification records must also be conducted every six months.
- c. A telephone call may also be made to validate the information recorded in the system and verify participation of a participant. This call may be identified as a customer service survey call.
- i. Record date of certification
 - ii. Record the staff person's name
 - iii. Record the participant name and family ID number of the families listed on the report.
 - iv. Contact with participant to ask valid questions relating to certification, i.e. "How was your WIC appointment at your WIC Clinic on [date]?" and "Can you verify your address?"
 - v. If unable to reach the participant, review the records in NV WISH to look for potential violations of policy or indications of fraud.
 - vi. If income documentation is available, this is reviewed.
 - vii. The WIC Director signs the log, verifying that no indicators of potential fraud or abuse were detected or, if indicators were detected, potential indicators were properly reported and investigated.
 - viii. Maintain the log on file at the LA and email a copy of the WIC Separation of Duties Audit Tool Log to the SO at: WICGeneral@health.nv.gov.

LAs are required to retain copies of all reports for three years. These reports will be reviewed during the local agency biennial Program Review or upon request.