

**SECTION: Certification****SUBJECT: Separation of Duties at WIC Local Agencies**

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**Federal Regulations:** §246.4 (a)(26) (i)-(iii)

See also WIC -100-17 Employee Fraud and Abuse

**POLICY**

The intent of this policy to strengthen program integrity and prevent Local agency staff members from certifying themselves, relatives, or friends; it also prohibits one employee being solely responsible for determining the eligibility of an applicant for all of the certification requirements and for issuing food benefits to that same WIC participant.

CT requires at least two people be involved in the certification process for each participant. CT-WIC does not allow the person that completed the income and demographics for a participant to check the Certification complete box on the Food Prescription Screen. This is to ensure that two WIC staff are involved in determining WIC eligibility. In addition to the above requirement, a WIC staff member shall NOT be involved in his or her own eligibility determination nor in the certification of a friend, relative or member of the same household.

**POLICY BACKGROUND**

The United States Department of Agriculture (USDA) implemented the separation of duties regulatory requirement in response to an August 1999 Report by the Government Accountability Office (GAO) entitled Efforts to Control Fraud and Abuse in the WIC Program Can Be Strengthened. The purpose of this regulation is to maintain the integrity of the WIC Program by establishing adequate safeguards to prevent fraud and abuse.

**ADDITIONAL GUIDANCE:****Common Scenarios:**

Certifying relative or close friend: If a relative or close friend of an employee appears in the local agency where an employee works for WIC services, the employee is expected to excuse him/herself from any role in the certification/recertification of that relative or friend.

Employee Participants: Employees participating in the WIC Program must adhere to the same program guidelines as non-employee participants; they must be served during a time that does not conflict with them performing their WIC job functions. Since co-workers will be involved in the Certification process, the employee participant must disclose their participation to the local agency Coordinator or Designee. The Coordinator or designee is required to conduct a post review of all certification records within 2 weeks of certification. If the employee participant is the Program Coordinator or designee, another member of the local agency management team must conduct the post review of the certification records. Documentation of the post certification review must be maintained on file at the local agency for review during management evaluations.

## **SUMMARY**

WIC staff are prohibited from the following WIC certification practices:

- Certifying oneself:
- Certifying relatives or close friends; or,
- One employee determining eligibility for all certification criteria and issuing food benefits.