

**SECTION: Administration****SUBJECT: Employee Fraud and Abuse**

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**Federal Regulations:** 7 CFR §246.4 (a) (26)**POLICY**

Staff fraud or abuse is an intentional or deliberate action that involves program regulations, policies, or procedures.

1. Employees participating in the Connecticut WIC Program shall have the same rights, responsibilities and obligations as any other WIC participant.
2. Employees shall not certify themselves, family members or close friends in the Connecticut WIC Program.
3. As participants in the Connecticut WIC Program, employees shall not make case file documentation notes or issue benefits (food instruments/ cash-value vouchers or eWIC cards) to themselves, family members or close friends.
4. Local Agencies must have routine clinic staffing patterns that ensure that two (2) staff people are involved in certification of each applicant and participant.
5. Separation of duties during certification must be demonstrated. No individual employee shall determine eligibility for all certification criteria and issue program benefits (food instruments, cash-value vouchers, eWIC cards or supplemental food) for the same participant.
6. When a potential conflict of interest exists, local agency staff must disclose this information to the Local Agency Coordinator.

**Procedure**

1. When WIC staff are program participants or have relatives/close friends enrolled in the program, local agency management staff shall conduct regular file audits to ensure WIC staff members are not actively documenting in the records or involved in any way with benefit issuance.
2. Any deliberate effort to defraud or abuse the Connecticut WIC Program (whether or not the employee is a WIC participant) including, but not limited to the following, shall be considered an act of employee misconduct:
  - 2.1. Illegally taking WIC benefits or eWIC cards
  - 2.2. Trafficking of eWIC cards or benefits
  - 2.3. Certifying fictitious participants
  - 2.4. Giving false/misleading information in order to become certified for WIC benefits
  - 2.5. Theft of formula or other food
3. Suspected intentional fraud or abuse shall be investigated by the Local Agency (Human Resource Department or Internal Auditor) with assistance from the State Agency, and may

require investigation through the Connecticut Office of the Attorney General and/or the local police department.

4. Action to be taken as a result of an investigation of fraud or abuse (whether or not the employee is a WIC participant), beyond sanctions applicable to WIC participants (see Policy 104-04, *WIC Participant Abuse of the WIC Program*), shall depend on Local Agency personnel policy and procedures concerning employee misconduct.
5. The State Agency shall require that the Local Agency promptly remove any Local Agency employee suspected to be abusing the Connecticut WIC Program from WIC benefit issuing or processing responsibilities until the Local Agency investigation is completed.

All reports of abuse by staff should be investigated promptly; following the procedures stated above, and the Employee Fraud and Abuse Incident Report must be completed and forwarded to the State Program Operations Monitor.