

Dual Participation**Policy No. CT- 860.02**

Effective Date: October 1, 2016

No. of Pages: 3

Policy

Participants shall not receive benefits in more than one WIC program or under more than one identity. Such dual participation is illegal and is a form of program abuse and as such is subject to sanctions. Dual participation is considered fraudulent when the State Agency (SA) determines a client has intentionally enrolled and simultaneously redeemed benefits from two programs. Program benefits obtained or disbursed improperly may result in a reimbursement claim (repayment of value of vouchers) against the participant for the full value of such benefits.

In conjunction with LA, the SA is responsible for preventing and identifying dual participation within each LA.

The SA will refer to any LA, the name of any participant who appears on a list of possible dual participants generated as per the written agreement the SA has with a bordering state. The LA shall follow the same review and investigative requirements as set forth in this policy.

Purpose

The WIC program is required to establish procedures designed to control participant violations, establish sanctions, prevent dual participation, and take follow up action. The WIC program must document the disposition of all participant abuse and claims.

Procedures

- I. Preventing Dual Participation-The Local Agency must
 - A. Notify participants that enrolling in and receiving benefits from more than one WIC clinic, within or outside of Georgia, at the same time is considered program abuse at each certification.
 - B. Allow each participant, parent, or caretaker read, or have read to them, and sign the [WIC Rights and Responsibilities](#).
 - C. Inform participants that have Commodity Supplemental Food Program (CSFP) in the same county that they can only participate in one of the programs at a time (either CSFP or WIC). Dual participation may result in a claim for reimbursement and disqualification from one or both programs.
- II. Detecting Dual Participation- Local Agency must:
 - A. Review and investigate participant records identified by Voucher Management and reporting System (VMARS) as suspected instances of dual participation for all new and transferring participants.

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- B. Complete and submit the Composite Dual Participation Report monthly to the Program Operations Unit of the SA regarding each incident that involves improperly issued benefits. The local agencies must submit the report by the 15th day of the following month.
- C. Investigate and reconcile each instance of possible dual enrollment identified in the Composite Dual Participation Report. If other local agencies are involved, they are responsible for cooperating during the course of the investigation.
- D. Complete and submit the [Dual Participation Report Investigation Form](#). Submit a copy of the signed certification form, and voucher receipts of all questionable issuance to the SA when dual participation is detected.
- E. Sign and date the Dual Participation Report by the staff person who completed the report.
- F. Waive the termination from one program after consulting with the SA, if it is determined suspension from both programs will result in a serious health risk to the participant, or agrees to an alternate caregiver or proxy for the participant.

III. State Agency Action Based on Substantiated Cases of Dual Participation

- A. When dual participation has been substantiated, the following action must be taken within 120 days of initial identification:
 - a. The SA will determine appropriate sanctions and refer the participant to Federal, State, or local authorities for possible prosecution under applicable statutes.
 - b. If the dual participation is determined to be unintentional, the local program must assist the participant in determining which clinic they wish to continue services and ensure that they are terminated from the other clinic.
 - c. The SA will issue a warning or termination letter to participants for any substantiated cases of dual participation.
- B. The SA will forward all documents to the LA to be placed in the participant's health records.

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Authority

7 CFR § 246.2; 7 CFR §§ 246.7(l)(1) – (l)(4)

Definitions/Supporting Information

CSFP- Commodity Supplemental Food Program that is administered by the United States Department of Agriculture, authorized by section 5 of the Agriculture and Consumer Protection Act of 1973, as amended, and governed by Part 247 of Title 7.

Dual participation- Simultaneous participation in more than one WIC program (more than one state or more than one local clinic) or participation in any WIC program and CSFP at the same time. Dual participation occurs when benefits have been received in both programs.

Participant Violation- any action by a participant, parent/caretaker, or alternate-proxy that violates Federal or State statutes, regulations, policies or procedures that govern the Georgia WIC Program. See 7 CFR § 246.2