

Separation of Duties**Policy No. CT- 840.06**

Effective Date: October 1, 2016

No. of Pages: 2

Policy

Local Agency (LA) staff members cannot complete any portion of the certification process or issue food benefits to themselves, relatives, or friends.

One employee cannot be solely responsible for determining the eligibility of an applicant for all the certification requirements (income and risk criteria). Food benefits can be issued by either of the individuals responsible for determining eligibility or a third individual.

LA that operationally needs to be staffed by only one employee must be approved by the State Agency (SA). In the event that one person must complete the certification process alone due to an emergency situation (absence or sickness of staff) state approval is not required but must be informed.

Local Agencies are required to report questionable certifications and benefit issuance to the participant and/or staff fraud to the State Agency within the same work week the issue is identified.

Purpose

To ensure program integrity and prevent program abuse.

Procedures

- I. The Nutrition Services Director or his/her designee may grant prior approval for an individual to certify a relative or friend in special situations.
- II. Monitor participant records when one staff person completes the certification alone or certifies a relative, compromising integrity, requiring an individual other than the certifier (e.g. the Nutrition Service Director) to using the following process:
 - A. Conduct a post review of all non-breastfeeding infant certification records.
 - B. Review at least 20 percent of the remaining certification records within two (2) weeks of the certification.
 - C. Complete the Separation of Duties Form ([see Separation of Duties Form](#)) within three (3) days of certification and submit to Operations Unit Specialist.

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- D. Maintain on file documentation of the completed Separation of Duties Form and district review at the district office.
- III. Develop and maintain on file procedures to reduce the number of certifications completed without Separation of Duties and reduce the risk of fraud when someone must certify a relative or complete the entire certification process themselves. Procedural options may include, but are not limited to the following:
- A. Rotate staff
 - B. Use video conference for a portion of the certification
- IV. Promptly remove any Local Agency employee suspected to be abusing the Georgia WIC Program from WIC certification or benefit issuance until the investigation is completed.

Authority

7 C.F.R. § 246.4(a)(27)

WIC Policy Memorandum #2016-5

Definitions/Supporting Information

Food Instrument- “Food instrument” or “FI” means a negotiable financial instrument by which WIC benefits are provided to participants. Food instruments can provide either specific amounts of WIC authorized foods or formulas or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Voucher” or “CVV”). Food instruments are also referred to as “checks” or “vouchers.” Cash Value Vouchers are also referred to as “Fruit and Vegetable Vouchers.”

Separation of Duties- A standard accountability/security practice to separate eligibility assessment (intake) and risk assessment from food instrument issuance responsibilities between more than one person.