

Title: Separation of Duties	Category: Certification
CFR Reference: 7 CFR 246.4(a)(27)	Policy Number: 8.002
Effective Date: 7/28/2016	Revised Date: 6/15/2026

POLICY STATEMENT:

The Local Agency must ensure:

1. That each participant certification is performed with separation of duties, meaning that the staff person who determines income, categorical, and residential eligibility and the staff person who determines medical or nutritional risk and issues food benefits cannot be the same person. *It is prohibited for one employee to determine eligibility for all certification criteria and issue food instruments, cash-value vouchers or supplemental foods for the same participant.*
2. A staff member must not certify themselves for WIC services.
3. A staff member must not certify relatives or friends for WIC services.

These actions are to prevent Program abuse and fraud in accordance with DC WIC policy 8.015 Violations and Sanctions.

PROCEDURE

Separation of Duties for Certifications

The Local Agency will designate one staff member to determine income, categorical, and residential eligibility and a different staff member to determine nutritional risk and issue food benefits at each WIC clinic site when possible (see below for when separation of duties is not possible).

The State Agency recommends each WIC clinic site designate a CPA and/or CPPA, to ensure timely determination of nutritional risk and food package tailoring and issuance, in accordance with 9.001 Food Benefit Issuance Overview.

When Separation of Duties is Not Possible

When separation of duties is not possible due to staffing limitations and/or conducting remote WIC services, the Local Agency must designate a staff member with a supervisory role (i.e. Local Agency Director, Nutrition Coordinator, Breastfeeding Coordinator, etc) to conduct a record review of all Infant Formula Feeding (IFF) certifications performed and at least 20 percent of a random sample of the remaining certification records within two weeks of the certifying period performed without separation of duties, in accordance with WIC Policy Memorandum #2016-5 Separation of Duties at WIC Local Agencies. Attachment 8.002A Separation of Duties Audit Form must be completed for each audit, maintained at the local agency for three years, and be made available for State Agency review as requested. Each completed record audit must have a note entered by the performing audit staff stating the record review has been completed.

This audit list can be accessed by the "Cert List for Audit" in HANDS > Reports > Program Integrity.

Staff Certifying Themselves, Relatives or Friends

These actions are prohibited for all WIC staff. If a WIC staff member requests to be certified in DC WIC, the State Agency recommends that the staff member be certified in a different local agency other than the local agency from which they are employed.



Certification Monitoring

Each quarter, the State and Local Agency will review staff activity utilizing the following reports in HANDS:

- Average Certifications Per Day
- Certifications By User
- eWIC Benefits Issued Outside of Business Hours
- Families With Five or More
- Multiple Births

REFERENCES

7 CFR 246.4(a)(27)

WIC Policy Memorandum #2016-5 Separation of Duties at WIC Local Agencies

DC WIC policy 8.015 Violations and Sanctions, 9.001 Food Benefit Issuance Overview

ATTACHMENTS & FORMS

8.002A – Separation of Duties Audit Form

