

**Indiana WIC Program
Indiana State Department of Health**

**Separation of Duties and Conflict of Interest
for WIC Employees**

Policy

The local agency staffing must prevent conflict of interest and provide separation of duties during certification, benefits issuance and verifying receipt and maintaining inventory of eWIC card stock.

Authority

7 CFR Part 246.4 (a)(26)(i)(ii)(iii)
7 CFR Part 246.12 (p)(q)

Procedures

- I. To prevent conflict of interest a WIC employee who is scheduled, or has a family member or dependent minor scheduled, for a certification appointment shall notify the WIC Coordinator or Clinic Supervisor to make arrangements for another WIC employee to complete the certification and issue the benefits.
 - A. WIC employees may provide nutrition education to relatives.
 - B. The local agency will maintain a list of WIC employees and the relatives or dependents of WIC employees who are receiving WIC.
- II. To prevent conflict of interest and provide separation of duties, at least two WIC employees will complete the certification criteria (i.e. one to perform intake and determine income eligibility and one to assess medical and nutritional risk and provide nutrition counseling). Either employee may issue benefits for an individual applying for WIC services.
- III. When only one staff person is present at a clinic and determining eligibility for all certification criteria and for issuing benefits for all clients in the clinic, an individual other than the certifier (e.g. the WIC Coordinator or designee) will conduct a post review of all non-breastfeeding infant certification records and at least 20

percent of a random sample of the remaining certification records for the clinic site within 2 weeks of the certification.

- A. A list of records will be created showing all clients certified in the clinic when only one staff person was present. The INWIC Daily Schedule for the clinic days within the timeframe may be used as a way to ensure all names are captured. This list must include at least the following information:
 - 1. Clinic site name of the records to be reviewed
 - 2. Client name
 - 3. Client ID
 - 4. Client category
 - 5. Cert start date
 - 6. Name of certifying staff
 - 7. BVT date
- B. This list of records must be retained in a hard copy file with the WIC Coordinator.
- C. The individual performing the review will indicate the records selected for review by writing their initials and the date of the review next to the client's name.
- D. Each record will be reviewed for the completion of intake including determination of income eligibility and assessment of medical and nutrition risk with documentation of Nutrition Counseling. The presence of repeat indicators that appear fraudulent or questionable should be noted on the list of records and faxed to the State WIC Office.
- E. A copy of the list of records must be kept on file for three years to document completion of oversight by the local agency.
- F. The copies on file will be audited by Indiana WIC staff during the biennial clinic review. The file audit will:
 - 1. Confirm the reviewer is initialing and dating the records looked at;
 - 2. Verify frequency of record reviews; and
 - 3. Determine if the number and type of records reviewed meet the criteria stated in this policy.
- G. Staff in these clinic sites should be rotated so that the same staff person is not the only person that is known in the clinic.

- IV. To provide accountability and separation of duties, one staff will verify receipt of eWIC card stock shipments and a second will enter the card stock numbers in the INWIC and maintain the eWIC card stock inventory.
- V. To ensure security of the eWIC card stock, all unissued card stock when not under observation will be stored inside a secured and locked cabinet or restrictive room, available only to WIC staff with limited key access.