

## Idaho WIC Separation of Duties WISPr Report – 440P

### 440P Report – Certified in the Last 30 Days

This report was developed to assist local agencies in identifying which clients need to receive post-reviews based on the new Separation of Duties policy. Post reviews are necessary whenever separation of duties is not possible due to only one staff person being present in the clinic. The 440P report represents clients certified within the last 30-days, but the post review needs to be completed within 2-weeks of certification.

### Idaho WIC Policy and Procedure Manual Chapter 2, Section D

*In the event that local agencies operate small clinics or satellite clinics with only one WIC staff member, or if a clinic routinely meets the separation of duties requirement, but due to unusual circumstances there is only one staff member available, the local agency must implement a post review to ensure program integrity is maintained and to identify/prevent program violations and fraud. The post review must meet the following requirements:*

- *Be performed by an individual, other than the certifier, that has the authority to change an eligibility determination. This could be the Coordinator, Supervisor, Lead, or Registered Dietitian.*
- *Be completed within two weeks of certification.*
- *Include all certification records for infants receiving any infant formula, and at least 20 percent of a random sample of the remaining certification records.*
- *Include a review of the following documentation in participant files:*
  - *Income – source and amount*
  - *Identity – full name and source of proof*
  - *Residency – physical address and source of proof*
  - *Nutrition Risk – look for an unusual amount of like or similar nutrition risk codes between participant files reviewed*
  - *Things that are unusual or inconsistent, such as an inappropriate or missing height or weight for the category, transactions occurring outside regular clinic hours, or presence of infant record with no corresponding mother participant.*

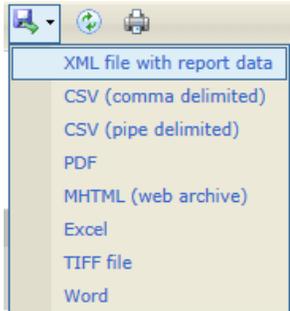
### Steps to Completing the Post Review

1. Run the report in WISPr
  - Click on Reports
  - Report Category: *Enrollment*
  - Report: *Certified in the Last 30 Days – 440*
  - Agency: *Select your agency*
  - Clinic: *Select the clinic that requires a post review*
  - Click GO

Report Category:  Report:   
Agency:  Clinic:



2. Extract to your preferred program/format. Excel was used for this example.



3. Delete or ignore rows for clients that were certified prior to the last 2 weeks. Since post reviews need to be completed within 2-weeks of certification those clients will have been included in the prior post review. In the example below, the report was run on 11/23/16 so all charts from 2-weeks prior need to be included in the post review report (11/9/16-11/22/16). The two top rows highlighted in blue can be deleted or ignored since they are not included within the 2-week timeframe.

**440P - Certified in the Last 30 Days Report**

Valid for: 10/24/2016 to 11/23/2016 Agency: 6 Clinic: 652

Idaho Department of Health & Welfare - WIC

Run Date: 11/23/2016 11:04 AM Page 1

Test Database:

Clinic 652 Jazz City										Agency 6 Southeastern Idaho Public Health				
Certified On	Client ID	Family ID	Name	Cert Start	Cert End	Catg	BF%	Cert Type	Income Valid*	Identity Valid*	Residency Valid*	NRC*	Anything Unusual*	
10/24/2016	1234567	F234567	Karl Malone	10/24/2016	10/24/2017	C		REG						
11/01/2016	345678	F240817	Greg Ostertag	11/01/2016	08/01/2017	I	0	REG						
11/09/2016	8910111	F910111	John Stockton	11/01/2016	03/31/2017	I	100	REG						
11/09/2016	2131415	F131415	David Benoit	11/01/2016	11/01/2017	C		REG						
11/10/2016	1617181	F617181	Jeff Malone	11/03/2016	05/31/2017	P		REG						
11/15/2016	9202122	F202122	Mark Eaton	11/07/2016	09/07/2017	I	25	REG						
11/16/2016	2324252	F324252	Jerry Sloan	11/07/2016	07/31/2017	P		REG						
11/21/2016	6272829	F272829	Jeff Hornacek	11/07/2016	11/07/2017	C		REG						
11/21/2016	3031323	F272829	Bryon Russell	11/07/2016	05/07/2017	I	0	REG						

\*Income = Review source and amount

\*Identity = Review full name and source of proof

\*Residency = Review physical address and source of proof

\*NRC = Look for an unusual amount of like or similar nutrition risk codes between participant files reviewed

\*Anything Unusual = Examples include: inappropriate or missing height or weight for the category, transactions occurring outside regular clinic hours, or presence of infant record with no corresponding mother participant.



- Highlight any infants that are receiving infant formula (listed as Category I and BF % between 0%-75%).

#### 440P - Certified in the Last 30 Days Report

Valid for: 10/24/2016 to 11/23/2016 Agency: 6 Clinic: 652

Idaho Department of Health & Welfare - WIC

Run Date: 11/23/2016 11:04 AM Page 1

Test Database:

Clinic 652 Jazz City						Agency 6 Southeastern Idaho Public Health								
Certified On	Client ID	Family ID	Name	Cert Start	Cert End	Catg	BF%	Cert Type	Income Valid*	Identity Valid*	Residency Valid*	NRC*	Anything Unusual*	
11/09/2016	8910111	F910111	John Stockton	11/01/2016	03/31/2017	I	100	REG						
11/09/2016	2131415	F131415	David Benoit	11/01/2016	11/01/2017	C		REG						
11/10/2016	1617181	F617181	Jeff Malone	11/03/2016	05/31/2017	P		REG						
11/15/2016	9202122	F202122	Mark Eaton	11/07/2016	09/07/2017	I	25	REG						
11/16/2016	2324252	F324252	Jerry Sloan	11/07/2016	07/31/2017	P		REG						
11/21/2016	6272829	F272829	Jeff Hornacek	11/07/2016	11/07/2017	C		REG						
11/21/2016	3031323	F272829	Bryon Russell	11/07/2016	05/07/2017	I	0	REG						

- Count how many clients are remaining and multiply that number by 20% (0.2) to get the number of clients that need to be selected for a post review. In the example below there are five clients remaining, 20% of 5 is 1, so 1 more client needs to be included in the post review. Always round up if the 20% isn't a whole number (i.e. if there were 16 clients remaining, 20% of 16 is 3.2, so 4 more clients would need to be included in the post review). The client(s) should be chosen at random and highlighted on the report.

#### 440P - Certified in the Last 30 Days Report

Valid for: 10/24/2016 to 11/23/2016 Agency: 6 Clinic: 652

Idaho Department of Health & Welfare - WIC

Run Date: 11/23/2016 11:04 AM Page 1

Test Database:

Clinic 652 Jazz City						Agency 6 Southeastern Idaho Public Health								
Certified On	Client ID	Family ID	Name	Cert Start	Cert End	Catg	BF%	Cert Type	Income Valid*	Identity Valid*	Residency Valid*	NRC*	Anything Unusual*	
11/09/2016	8910111	F910111	John Stockton	11/01/2016	03/31/2017	I	100	REG						
11/09/2016	2131415	F131415	David Benoit	11/01/2016	11/01/2017	C		REG						
11/10/2016	1617181	F617181	Jeff Malone	11/03/2016	05/31/2017	P		REG						
11/15/2016	9202122	F202122	Mark Eaton	11/07/2016	09/07/2017	I	25	REG						
11/16/2016	2324252	F324252	Jerry Sloan	11/07/2016	07/31/2017	P		REG						
11/21/2016	6272829	F272829	Jeff Hornacek	11/07/2016	11/07/2017	C		REG						
11/21/2016	3031323	F272829	Bryon Russell	11/07/2016	05/07/2017	I	0	REG						



6. Now that the clients have been selected, you can complete the post review either by adding your notes in the last five columns of the spreadsheet or by using your own local agency form. If local agency form is used make sure to include all the required review items on the form. Details of what to review is included as a footnote in the 440P report. All documentation must be maintained onsite for review during State monitoring.

Please include the following in the documentation:

- Date of post review
- Signature of person completing the review (include the printed name if the signature isn't legible, electronic signature is acceptable)

7. If fraud is suspected during the post review, the Local Agency WIC Coordinator must review the participant file/chart to determine if eligibility needs to change. All fraud should be reported to the State office for follow-up guidance.

