



POLICY UPDATE

Separation of Duties & Conflict of Interest

Policy: Employee Duty Restriction

EMPLOYEES, FAMILY, OR FRIENDS AS PARTICIPANTS **IWPPM Ch. 2, Sect. D, Page 3**

An employee should not certify or determine eligibility for oneself, close friends, or immediate family members.

SEPARATION OF DUTIES **IWPPM Ch. 2, Sect. D, Page 4**

In a local agency with more than one staff member, there will be a procedure to ensure that the staff person who determines income eligibility for a participant does not also determine medical/nutrition risk for the same participant. Either person may issue food benefits.

CONFLICT OF INTEREST **IWPPM Ch. 2, Sect. D, Page 3**

All State and local agency staff must sign a Conflict of Interest form disclosing the name(s) and relationship(s) of participants that are close friends, immediate family members, or when they themselves are participating in WIC. Staff must also disclose any relationship between themselves and WIC authorized vendors.

Employees, Family, or Friends as Participants

An employee should not certify or determine eligibility for oneself, close friends, or immediate family members. Staff can perform other WIC duties such as issuing benefits, providing nutrition education, and completing a health screen, but this is not considered best practice in clinics with more than one staff person.

Examples of immediate family members:

- Parents
- Siblings
- Children
- Grandparents
- In-laws
- Aunts
- Step-family members

Definition of a friend:

Any close acquaintance you spend time with outside of work.

Note: WIC staff, that are also participants, should not provide any WIC services for themselves, including issuing benefits.



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Separation of Duties

PURPOSE
Clarify which certification duties need to be split between staff

In clinics with more than one staff member, the following duties must be split:

- 1st staff member – determine participant's income eligibility
- 2nd staff member – determine participant's nutrition/medical risk

Other WIC duties, including food benefit issuance, can be done by either the 1st or 2nd staff member.

Ideas for implementation:

- Additional duties for front desk staff
 - Front desk staff can welcome participants, determine income eligibility, review and document proof of ID, proof of pregnancy, and proof of residency. At the end of the appointment the front desk can provide food benefits to the participants.
 - Back office staff can complete heights, weights, hemoglobin, health/nutrition assessment, nutrition/medical risk determination, nutrition/breastfeeding education, referrals, documentation, and schedule next appointment.
- Floater reviewing income
 - Assign a staff member to float between appointments to determine income eligibility.
 - Floaters can use a laptop or tablet to enter participant income into WISPr.
 - Floaters can be assigned multiple tasks (check income, proof of pregnancy, residency, identification, immunizations, etc.) or just check income.

POST REVIEWS

Post reviews must be completed within 2-weeks of certification in one-person clinics or if there is only one staff member present in a clinic due to unusual circumstances.

Post reviews should include the following certifications completed since the last post review:

- all certification records for infants receiving any infant formula, and
- at least 20 percent of a random sample of the remaining certification records.

Post reviews should include a review of the following documentation in participant files:

- Income – source and amount
- Identity – full name and source or 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.
- Thanks 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.

If fraud is suspected, the 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.



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Conflict of Interest (COI)

NOTE
Starting 12/1/16 use the revised COI form found on the Idaho WIC website

Conflict of Interest forms should be updated yearly by all individuals that code their time to WIC and have contact with participants.

To update the form staff can either:

- Complete a new COI form each year, or
- Initial and date the most recent COI form to confirm there are no changes

Important things to know about COI:

- Supervisors should review COI forms at least once a year to ensure staff have not certified or determined eligibility for any participant(s) listed on their COI forms.
- A staff member with no conflict of interest to disclose should still submit a signed COI form stating "none" or "N/A".
- Even if no conflict of interest occurs staff should never show favoritism towards any Idaho WIC authorized vendor.

Pop Quiz

1. Heather works in a one-person clinic. Her sister Lydia comes in on the last day of the month and needs her WIC benefits. Lydia's certification doesn't expire until next month and she has already attended all of her nutrition education appointments. Can Heather issue Lydia's WIC benefits? Should Heather certify Lydia today so she doesn't have to come back for another appointment next month?

2. What two duties need to be split during certifications to meet the separation of duties requirement?

3. Sarah is the WIC Administrative Assistant, she doesn't have any family or friends on WIC, nor does she have any potential conflict of interest with an Idaho Authorized WIC vendor. Does Sarah need to complete a Conflict of Interest form?

