

New Hampshire WIC Policy & Procedure Manual

Chapter 4. ORGANIZATION AND MANAGEMENT

Separation of Duties

Purpose	To assure program integrity through prevention and detection of fraud and abuse.
Policy	It is prohibited for one employee to determine all eligibility criteria for certification and issue food instruments/benefits for a participant. There must be a separation between income determination and certification of a participant.
Authority	7 CFR 246.4 (a) (27) (i-iii) USDA Memo #2016-5
Procedure	<p>All employees shall sign a Separation of Duties statement at the local agency upon hiring.</p> <p>Local agencies shall implement separation of duties within the certification process so that one employee is not responsible for determining all eligibility criteria for the same participant. (Certification criteria can be thought of as 2 parts. Part 1 includes proof of income, residency, and identity; Part 2 includes risk determination, certification, and food package assignment). With a 2 part process any staff may issue food benefits for the participant.</p> <p>Local Agencies shall adhere to the separation of duties requirement for participants certified with “proof pending” for income to ensure that another staff person reviews and documents income than the staff person who originally certified the participant.</p> <p>Separation of Duties policy/document shall be reviewed annually with all employees.</p> <p>Refer to Sample Conflict of Interest/Separation of Duties document.</p>
Exception	Any exceptions need approval by the State Agency. See Single Staff Certification Policy for guidelines and requirements.
Best Practice	Separation of Duties document shall be signed annually with all employees or a staff signature sheet indicating that it was read and agreed to.