
POLICY: Separation of Duties Waiver File Review

Separation of duties is defined as one staff person determining income eligibility and another, a CPA, determining nutrition risk eligibility at each initial and subsequent certification.

The coordinator or designated staff lead must complete the following waiver file review requirements when the clinic can't meet separation of duties due to COVID-19:

- Review a random 5 percent sample of initial and subsequent certifications not meeting separation of duties occurring from **June 1, 2020 through the end of the waiver period**.
 - Staff don't have to review a specific number of files for infants receiving formula.
- Complete the [Separation of Duties File Review form](#) and keep it for four years.

PROCEDURE:

The Coordinator or designated staff lead:

- A. Reviews the Separation of Duties report for each site that can't meet the separation of duties requirement due to COVID-19.
 - Clinics receive the report monthly in the clinic's Secure File Transfer Protocol (SFTP) folder.
- B. Determines the number of files to review, which equals 5 percent of the certifications not meeting separation of duties.
 1. Randomly select files to review from the clinic's report.
 2. Staff don't have to review a specific number of files for infants receiving formula on the date certified during the waiver file review period.

Example:

The clinic had a total of 160 certifications (initial and subsequent) that didn't meet the Separation of Duties requirement. Of the 160 total, 35 certifications were for infants who received formula on the day certified.

The coordinator or designated staff lead reviews 8 certifications ($160 \times .05 = 8$). The person randomly selects 8 to review. There is no requirement to select a certain number of infant certifications who received formula.

- C. Completes the review according to the following timeframes:

- June 2020 - February 2021 report: complete the 5 percent review of certifications listed on the report by June 1, 2021.
- Monthly reports from March 2021 through the waiver period: complete the 5 percent review of certifications on each report by the end of the following month.

Note: Contact your Local Program Consultant if you can't complete the review within these timeframes. The LPC will provide consultation to support the file review process.

D. Completes the following for each file review:

1. Call the participant or parent guardian one time and document on the [Separation of Duties File Review Form](#).

a. If the person answers:

- Explain this is a customer service call.
- Complete the Phone Call section of the [Separation of Duties File Review Form](#) and document responses.

Note: Completing and documenting the phone conversation meets the separation of duties file review requirement.

b. If the person doesn't answer, document the attempt in the Phone Call section. Complete the file review (see # 2 below).

Note: It's best practice to inform the participant or Parent Guardian at each certification that he or she may receive a "customer service" call in a few weeks in clinics that don't meet the separation of duties requirement.

2. Complete the file review on page 2 of the [Separation of Duties File Review Form](#) when the participant or Parent Guardian doesn't answer the phone call.

3. Keep electronic or paper file review forms and documentation to support the review process on file for four years.

a. Keep documentation accessible, on site for one year.

E. Reports issues or concerns of potential fraud in one of the following ways.

1. Report issues or concerns to the Clinic Coordinator if the reviewer is a designated clinic staff lead.
2. Contact the agency's Local Program Consultant at the state WIC office.

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