

memo

DATE: January 11, 2017
TO: WIC Coordinators
FROM: WIC State Staff
SUBJECT: Separation of Duties (SOD) Requirements – Implementation

Additional guidance on the Separation of Duties revised policy and procedures, local agency plan and agency implementation are now available and explained further within this memo.

What is different from the previous Separation of Duties policy?

As communicated in a previous Wednesday Update, the federal definition of SOD and requirements has changed. According to our current policy, SOD could be accomplished by one staff person reviewing identification or residency, and another staff person completing the remainder of the certification. This will no longer meet the new federal SOD requirements.

The new federal SOD policy now stipulates:

1. The staff person who determines a participant's income eligibility may not be the same person who determines that participant's medical/nutrition risk. Either person may print benefits.
2. If a clinic doesn't have SOD within the certification, records of one-staff certifications must be reviewed.

What do Local Agencies need to do?

The Local Agency must fully implement SOD in their WIC clinic(s) or complete additional record reviews for one-staff certifications to comply with the new requirements. Agencies will need to determine what will work best in their particular clinic situations, and are required to complete a SOD plan to document how their agency will comply with the new requirements. As with the previous policy, this plan will need to be submitted once every grant cycle or whenever the clinic SOD process is changed.

Completing Separation of Duties

There are a number of options to accomplish SOD in Local Agencies. We encourage you to work with your State WIC Consultant on any questions or concerns. The following are examples where SOD is accomplished:

1. During the WIC appointment, one staff person reviews and verifies income (including adjunct eligibility); that person starts the Certification Guided Script and enters the Demographic information, including income; once completed, closes the script. The CPA reopens the Certification Guided Script and completes the other portions of the certification process, including medical/nutrition risk, and finishes the certification. Either person may print vouchers.
2. One staff person reviews and determines income eligibility (including adjunct eligibility), but that person is unable to start the Certification Guided Script. They communicate the method of income determination to the CPA who completes the portions of the certification process. Documentation must be completed in the WIC Information System by indicating:

- a. Income determination was made by someone other than the CPA determining Nutrition Risk. The CPA will add a note by selecting the note type 'Separation of Duties (SOD)' in the drop down (this will be added in the WIC Information System Release on January 21st). Example note: Income determination made by Jane Doe on 1/11/17 **OR** MA verified by Jane Doe on 1/11/17.
- b. The staff person who verifies participation in MA **creates an Alert** including the date and name of the staff who verified MA. When the CPA opens the record in the WIC Information System to complete the Certification Guided Script, he/she copies the alert to a note in the participant(s) record(s) using the 'Separation of Duties (SOD)' drop down. Example alert/note: MA verified by Jane Doe on 1/11/17.
- c. A staff person verifies participation in MA the same day or just prior to the certification appointment, so does not open the Certification Guided Script.
 - If the participant has MA, the staff person then **documents this in a Note** using the "Separation of Duties (SOD)" drop down heading.
 - For a participant that does not have MA, the staff person creates an Alert so that the staff handling the certification will know that additional SOD and verification of income are needed.

3. Other similar methods.

At a minimum, it is recommended Local Agencies quarterly review SOD reports to determine if any one-staff certifications have occurred. If any records are identified without SOD, the WIC Coordinator or designee can document the record was reviewed in the WIC Information System. The InfoView report **Certifications Completed by One Staff Person** will be useful in identifying which certifications were completed by a single staff person, and need to be reviewed. Refer to InfoView reports listed below that may also be useful in reviewing records.

Documentation for One-Staff Certifications

We recognize there are some situations in which SOD is not possible or desirable. For these situations the Local Agency must determine a process for monitoring these clinics to meet the new requirements.

If a single staff person must determine both income eligibility and nutrition risk, the local agency supervisor, coordinator, or assigned designee must conduct a post-certification review within 2 weeks of the certification(s). The records requiring review include: a) all infant certification records containing infant formula, and b) at least 20% of a random sample of all one CPA certifications. Documentation must be maintained in the WIC Information System.

At least one personal participant document is to be scanned into the WIC Information System. When the applicant **is not adjunctively eligible for WIC**, scan an acceptable proof of income such as:

- Pay stub(s)
- W-2 forms
- Tax return
- Written statement from the employer

If the applicant is **adjunctively eligible for WIC**, scan a proof of identity such as:

- Birth certificate
- Crib card
- Health benefits (insurance) card
- Pay stub

- Photo ID: Acceptable forms include, but are not limited to, photo ID issued by governments (including tribal governments and governments of other countries), by employers and by schools
- Driver's license

At a minimum, Local Agencies are to complete a biweekly review of SOD reports for one-staff certifications to evaluate aspects of the certification process including income, identity, residency, and nutritional risk. The InfoView report **Certifications Completed by One Staff Person** should be useful in identifying records which need to be reviewed. Other Infoview report suggestions are indicated below that may also be used for further record evaluation.

When record reviews are completed as described in the local agency's SOD plan, document the review in the notes section of the participant record, selecting the note drop down 'Separation of Duties (SOD).' An example might be "SOD reviewed by Jane Doe." (The note will have a date when posted to the WIC Information System.)

A sample record review document for one-staff certifications is included in this Wednesday update.

InfoView reports that might be useful in SOD record review:

1. **Certifications Completed by One Staff Person** – used to identify participants that need to be reviewed. (found in InfoView under *Agency Management/Audits Chart Review*)
2. **ME Chart Audit** – Includes Income, ID, Residency, Physically present, CPA signature by participant. (found in InfoView under *Agency Management/Audits Chart Reviews*)
3. **Notes by Subject** – a Note Subject in the WIC Information System titled "Separation of Duties(SOD)", may be used to document income information performed by another staff member or used to indicate the chart was reviewed as follow up for one-staff person certifications. (found in InfoView under *Notes*)
4. **Benefits Issued & Certs Performed between 7PM & 7AM** - to determine if certifications are being performed and benefits issued outside of normal business hours. (found in InfoView under *Agency Management/Audits Chart Reviews*)
5. **Staff & Clinic Productivity** - This can be used to determine if a staff person is completing an inordinately high number of certifications, relative to other staff, which could indicate fictitious participants. (found in InfoView under *Staff Management*)
6. **Food & Formula Item(s) by PFDTU** – This can be used to determine infants receiving formula. **COMING SOON – Formula issued by PFDTU.** (found in InfoView under *Food & Formula*)

The State Agency will evaluate areas for SOD and one-staff certifications during management evaluations. Suggested evaluation areas include:

- Transactions occurring outside regular clinic hours.
- The length of time a client is certified and the benefits issued do not match.
- A large percentage of VOC's issued/received in comparison to other clinics during the same time period.
- A presence of infant records with no corresponding mother participants.
- Unreasonable or missing height/weight measurements and/or blood test results.
- An unusual amount of like or similar height/weight measurements and/or blood test results in a clinic's participant records.

Completing the WIC SOD Local Agency Plan

Each Local Agency will need to submit a plan that describes how SOD will be achieved in all WIC clinics.

An email to the Local Agency WIC Coordinator will be sent from MDH WIC containing a link to an electronic SOD form. Your agency will document your SOD plan and indicate how this policy will be met in your clinic(s). If your agency includes multiple clinic locations, you can indicate within the plan if each clinic will follow the same SOD process. If a clinic within your agency will follow a different process, you will need to follow the directions at the end of the form to receive an additional SOD form. A separate email will be sent the next day with an additional link for the other clinic(s) that will follow a separate SOD process.

When the SOD form is complete and submitted, a confirmation email will be sent to the WIC Coordinator and to your State Consultant. You will need to **save the link and keep a record of the website address** provided in the summary email. You can use that same link provided on the summary page for future changes to your SOD process. You may print the summary page and/or save as a PDF for your own records. When the State Agency has reviewed your submitted SOD plan, approval will be communicated in an email from your State Consultant.

Ongoing Local Agency Oversight of SOD and One Staff Certifications

Local agencies are expected to monitor clinic and staff activities to ensure that there is SOD in all clinics (or that records of one-person certifications are being reviewed) and that the plan submitted to the state agency on SOD is up to date. Oversight and monitoring activities at the local agency level will be managed and determined by the local agency WIC leadership. Management of SOD compliance during vacation leaves and staff turnover is needed to assure continued compliance. Please work with your State WIC Consultant if you have questions or concerns about ongoing oversight

SOD Submission and Review Timeline:

- **January 11, 2017:** SOD plan and instructions are available online.
- **February 15, 2017:** Due date for local agencies to submit their plans to the state agency.
- **March 16, 2017:** The state agency will notify you of plan approval or needed changes.
- **July 3, 2017:** Monitoring for SOD begins with Management Evaluations conducted after July 3, 2017.