

## Monitoring of Staff to Prevent and Detect Fraud

- I. To ensure compliance to the conflict of interest and the separation of duties policy, (see Conflict of Interest) the state WIC office will run the Separation of Duties ad hoc report in SharePoint weekly. If any staff have completed both the income eligibility record and the nutrition risk assessment for the same client, their names will appear on the report along with the certification record in question.
  - a. State staff will do an initial review of this report and send a copy of the report to any local WIC directors who have subordinate staff's names listed on the report.
  - b. The local WIC director must review the report the same week it is received. For any staff members who appear on the report, the local WIC director will review the certification records to determine:
    - i. whether they are legitimate, eligible participants and,
    - ii. whether the eligibility criteria appears to have been determined correctly.
  - c. The local WIC director:
    - i. Records the staff person's name on the Separation of Duties Exception Log.
    - ii. Records the parent/guardian name and family ID number of the families listed on the report.
    - iii. Reviews the records in VISION to look for potential violations of policy or indications of fraud of the program.
    - iv. If income documentation is available, this is reviewed.
    - v. A telephone call may be made to the participant to validate the information recorded in the system and verify participation. This call may be disguised as a customer service survey call.
    - vi. The WIC director signs the log, verifying that no indications of potential fraud or abuse were detected, or if detected, were properly reported and investigated.
    - vii. Maintains the log on file at the local agency and emails a copy of the Exception Log to the state WIC operations manager to keep on file at the state.
  - d. If more than 10 certification records appear on the weekly report, contact the state WIC operations manager for guidance in auditing the records. In this situation it will not be required to audit all records on the report, but will be required to audit all certification records of infants receiving formula and a minimum of 20% of all remaining certification records listed on the report.

- e. If the local WIC director has certification records that appear on the report, the state operations manager or designee will complete the steps above to review the records completed by the local WIC director.
- II. The local agency WIC director must visit each of their clinics at least annually to monitor operations to ensure that no clinic fraud or abuse of the program is occurring.
- III. Compliance to the separation of duties policy and verification of completion of the required audits is a component of the management evaluation conducted by state staff.
- IV. Documentation of clinic fraud or abuse. If the state agency or the local agency determines that fraud or abuse of the WIC program occurred by a clinic employee, a letter describing the details of the alleged abuse, including how the employee benefited for the alleged abuse and the total dollar loss to the program, will be sent to the state WIC office.