

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 WIC Director must run the Separation of Duties ad hoc report in SharePoint quarterly for each clinic in their agency.
 - a. By reviewing this report, the WIC Director will be able to determine whether or not any staff has been completing all eligibility criteria and issuing checks to the same participant. This is a violation of policy and could potentially be clinic fraud.
 - b. For any staff members who have been granted an exception to the separation of duties policy by the state (staff who need to work alone), a random sample of a minimum of twenty five (25) family records from the Separation of Duties Report must be reviewed quarterly to determine:
 - i. whether they are legitimate, eligible participants and,
 - ii. whether the eligibility criteria appears to have been determined correctly.
 - c. The WIC Director:
 - i. Records the staff person's name on the Separation of Duties Exception Log.
 - ii. Records the endorser name and family ID number of the five random families on the log.
 - iii. Reviews the records in VISION to look for potential violations of these policies or indications of fraud of the program.
 - iv. A telephone call should 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.)
 - v. 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.
 - vi. Maintains the logs on file.
 - vii. If less than 25 certifications were completed by the individual staff person during the quarter, all the certification records that were completed by them alone must be reviewed.
 - d. If the WIC director is operating under a state approved role, the state office staff will complete the steps above to review the records completed by the WIC director.
- II. The Local Agency WIC Director must visit each clinic 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 quarterly 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.