
POLICY: Post Public Health Emergency (PHE) Waiver Separation of Duties File Review

Separation of duties (SOD) is defined as one staff person determining income eligibility and another, a Competent Professional Authority (CPA), determining nutrition risk eligibility at each initial certification, subsequent certification, and presume eligible complete assessment.

As part of the American Rescue Plan Act (ARPA) policy waivers allowed by the Food and Nutrition Service (FNS), this policy is in effect until September 30, 2026.

Note: Washington WIC uses the term “Post Public Health Emergency (PHE)” for the federal ARPA policy waivers.

- This policy waives the standard Separation of Duties requirement listed in 7 CFR 246.4(a)(27)(iii).
- This policy **doesn’t** waive the requirement for staff to not certify themselves, family, or friends 7 CFR 246.4(a)(27)(i) & (ii).
 - See [Volume 1, Chapter 2 – Program Compliance](#), “WIC Services for WIC Staff, Family or Friends”.

The coordinator or designated staff lead must:

1. Complete a monthly review using the following waiver file review requirements when the clinic can’t meet separation of duties for in-person or remote certification appointments:
 - a. Review all non-breastfeeding infant (infant who received full formula food benefits) certifications not meeting the SOD requirement.
 - b. Review a random 10 percent sample of the remaining initial and subsequent certifications and presume eligible complete assessments not meeting the SOD requirement.

Note: The Cascades WA WIC Separation of Duties Post PHE waiver report will automatically filter out all certifications where staff used the ProviderOne adjunctive eligibility search feature to determine income eligibility. These certifications meet the Separation of Duties requirement.

2. Complete the Post PHE Waiver Separation of Duties File Review form and keep it on file for four years.
 - Staff can keep paper copies or electronic copies of the file review forms.

- State WIC monitor staff review the SOD file review forms during the clinic's monitor.

RECOMMENDATION:

Staff are allowed and encouraged to determine income eligibility up to 30 days prior to the initial or subsequent certification to meet the SOD requirement.

- Two different staff must determine income eligibility and nutrition risk to meet the SOD requirement.
- Staff determining income eligibility prior to the subsequent certification appointment must press the Apply button for the subsequent certification for Cascades to associate the new income determination with the subsequent certification.

PROCEDURE:

The Coordinator or designated staff lead:

- A. Reviews the WA WIC Separation of Duties Post PHE Waiver report in Cascades for each clinic that can't meet the separation of duties requirement for in-person or remote WIC certification appointments.
 - The report will automatically filter out all certifications where staff used the ProviderOne adjunctive eligibility search feature to determine income eligibility.
- B. Determines the number of files to review, which equals all certifications for infants receiving full formula benefits not meeting SOD, and a random 10 percent of the remaining certifications not meeting SOD.
 - The report will display which infants received full formula benefits.

Example:

The clinic had a total of 50 certifications not meeting SOD on the WA WIC Separation of Duties Post PHE waiver report; 10 of those certifications were for infants who received full formula benefits.

The coordinator or designated staff:

- Completes the SOD review for all 10 infant certifications receiving full formula benefits.
- Randomly chooses 10% of the remaining files to review. This equals 4 files.
 - 50 certifications on the report minus 10 fully formula fed infant certifications = 40.
 - 10% of the remaining 40 certifications = 4.

- Total number of files reviewed = 14 (10 fully formula infant certifications + 4 random certifications to meet the 10% requirement of the remaining certifications).
- C. Completes a monthly review following these guidelines through the wavier period, until September 30, 2026.
- Complete the review by the end of the following month.
- Note:** Contact your Local Program Consultant (LPC) 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 Post PHE Waiver 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 Post PHE Waiver 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, then 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 Post PHE Waiver 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 and on site for one year.
 - b. Don't keep file review forms with participant personal identifying information (like names) on staff computers.

- c. Provide the file review forms when the clinic is monitored by state staff.
- E. Reports issues or concerns of potential fraud in one of the following ways.
- 1. Shares issues or concerns to the Agency Coordinator if the reviewer is a designated clinic staff lead.
 - 2. Contact the agency's Local Program Consultant at the state WIC office.

This institution is an equal opportunity provider.
Washington WIC does not discriminate.

To request this document in another format, call 1-800-841-1410.
Deaf or hard of hearing customers, please call 711 (Washington Relay) or email wic@doh.wa.gov.