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DATE: February 27, 2019
TO: WIC Coordinators
FROM: State WIC Staff
SUBJECT: Separation of Duties - Update

In 2016, USDA strengthened requirements regarding separation of duties (SOD) in the WIC program. In response to these changes, the State Agency (SA) reviewed policy [MOM Section 1.18](#), provided guidance, and local agencies (LA) submitted a SOD plan to describe their process. LAs implemented SOD after receiving approval for their plan, and the SA began monitoring SOD during Management Evaluations (ME) in July 2017.

During the SA's 2018 Federal Management Evaluation, SOD was again identified as a finding. Federal reviewers stated that certifications involving two staff must be evident (i.e., auditable) in the Information System. State staff identified two ways to accomplish this – using either the Certified Guided Script (CGS) or Notes, as described below.

What do Local Agencies need to do?

- **For Two-Person Certifications:** At clinics in which one person verifies income and another person completes the rest of the certification, the agency should ensure that their SOD procedures result in an *auditable record* in HuBERT (i.e., there is clear documentation in the participant record of two staff being involved).
- **One-Person Certifications:** If your agency completes one-person certifications, no changes are needed in your certification procedures.

Acceptable Options for Documenting SOD:

- **Use the CGS** – This option works well when income eligibility/MA status is verified *on the date of the certification*.
 - The person who verifies income eligibility/MA status starts the CGS, completes the Demographics and Income screens, and closes the script.
 - The second person opens and completes the CGS.Both persons must have **user role 1-CPA**.
- **Document in note** – This option works well when income eligibility/MA status is verified *prior to the certification date*.
 - A WIC staff person should document verification of income eligibility/MA status in a **Separation of Duties (SOD) – Income** note in participant's file. This person must have **user role 11-Clerical/Phone** or **user role 1-CPA** to create notes. The note can be entered within 21 days prior to, on, or up to 14 days after the certification date.
 - A different WIC staff person/CPA completes the rest of the certification.

Note: Agencies should continue to monitor records as stated in your approved SOD plan. Watch the Wednesday Update for updated information on the SOD Infoview report.

SEPARATION OF DUTIES

SOD Implementation Timeline:

- If you need to revise your plan, submit any changes by **April 1, 2019**.
- Your consultant will provide approval or notify LAs of needed changes by **May 1, 2019**.
- Monitoring revised SOD plans at MEs begins after **July 1, 2019**.

Questions and Answers

Q: If an agency uses “alerts,” where one staff person verifies income and writes an alert, then a CPA completes the rest of the certification and copies the alert to a note; does this meet SOD requirements?

A: No, even though two staff were involved in the certification, one verified income, and the CPA completed the rest of the certification. This is not auditable in the Information System and shows the same person wrote the note and completed the CGS.

Q: An agency uses instant messaging/email to communicate that income eligibility/MA has been verified by another person at the time of the appointment, and the CPA who completes the certification enters a note. Does this meet the SOD requirement?

A: No. Although SOD takes place in clinic, this practice is not auditable in the CGS or in a note. The person who verifies income eligibility/MA status must complete this step in the CGS or document the step in a note.

Q: Is it okay to assign user role 1- CPA to my clerk who verifies income eligibility/MA?

A: Yes, you may assign user role 1-CPA to your clerk if this would assist you in implementing SOD. To change a user’s role, go to the [WIC Tools](#) page. See Wednesday Update memo [MDH WIC Website URL Changes – Forms](#), for information on how to submit the WIC User Request Form with the new website URL changes. For information on roles, see [HuBERT user roles](#).

Q: Our agency uses a two-person model for SOD. Why is the staff not identified in the Income Contact in the Certification History tab?

A: If multiple members of a household are certified on the same date, the Income Contact Staff ID is only recorded for the one member who had the income entered into their CGS. The staff ID is not recorded next to Income Contact in the Certification History tab for the members for whom HuBERT automatically copied the income. See [HuBERT Hints](#). This is acceptable for SOD. An agency using a two-person model would expect to see no results when running the revised SOD report (coming soon, watch the Wednesday Update).

Q: If income and adjunctive eligibility have been verified by staff in another program (e.g. Head Start, Public Health), then a WIC staff person writes a note and a CPA completes the rest of the certification. Does this meet SOD requirements?

A: Yes, there are two separate staff identified in the Information System that completed the certification. One verified income and documented in a note, and the other completed the rest of the certification.

Q: My agency does not use “Copy Alert to Note” for SOD, and our plan meets the SOD requirement. Do I need to resubmit my plan?

A: No. You only need to submit a new plan if there are any changes.

Q: I need to revise my plan. How do I submit my plan?

A: You can change your plan online using the same link provided in your SOD notification email. If you do not have this information, contact your State WIC Consultant.

Please consult your State WIC Consultant with questions or concerns about meeting these requirements.