

memo

DATE: May 31, 2017
TO: WIC Coordinators
FROM: Nutrition and Clinic Services Unit
SUBJECT: Separation of Duties – InfoView Reports and Record Reviews

Previous [Wednesday Update Memos](#) have provided information on the revised Federal Separation of Duties (SOD) requirements. Local Agencies determined what will work in their clinic and submitted SOD plans in efforts to meet the identified federal requirements. This memo offers further guidance on the **new** WIC SOD InfoView report and record reviews.

SOD Auditing Requirements

The InfoView report **Certifications Completed by One Staff Person (SOD)** has been created to assist agencies in meeting the SOD auditing requirements for participants certified by one staff person. See the [guidance document for report specifications](#). In InfoView, the report is located in the folders: Agency Management → Audits/Chart Reviews.

If your local agency has:

- **Ongoing One-Person Certifications**, where a single staff person determines both income eligibility and nutrition risk, the local agency supervisor, coordinator, or assigned designee (an individual who has the authority to change an eligibility determination) must conduct a post-certification review within 2 weeks of the certification(s) including:
 - a) All infant certification records containing infant formula, and
 - b) At least 20% of a random sample of all one staff person certifications.
- The **Certifications Completed by One Staff Person (SOD)** InfoView report displays (see [overview document](#) on page 4) the suggested SOD evaluation criteria and can meet post-certification review requirements. The supervisor, coordinator or designee should evaluate the report and determine if any of the displayed information necessitates additional record review. Further investigation of the record in the WIC Information System will provide added details for your review. If there are any suspected fraudulent certifications, alert your Supervisor and State Consultant.
- LAs must document SOD review in the WIC Information System by adding a note and selecting the note type “SOD – Reviewed,” or, keep a copy of the report electronically, or a paper copy for review during management evaluations.
- **Occasional One-Person Certifications**, the LA can follow one of two acceptable procedures:
 1. Follow the above procedures identified for one-person certifications; or,
 2. If one-person certifications occur infrequently, a LA may choose to notify their WIC Coordinator or Supervisor of the one-person certification after it occurs. The Coordinator or Supervisor will review and document in a note by selecting the note type drop down “SOD – Reviewed.” The agency can

then complete the **Certifications Completed by One Staff Person (SOD) InfoView Report** quarterly to ensure SOD is present in all clinic certifications.

- **Situations where clinics “always” have two people involved in certifications**, the recommendation is to quarterly review the **Certifications Completed by One Staff Person (SOD) InfoView** report and determine if any one-staff certifications have occurred. If there are records without SOD identified on the report, the WIC Coordinator, Supervisor or designee should review the record(s) and document the record review in the WIC Information System. Document in a note by selecting the note type drop down, “SOD – Reviewed.” If there are any suspected fraudulent certifications, alert your Supervisor and State Consultant.

Report Analysis

An overview of the **Certifications Completed by One Staff Person (SOD) InfoView** report is [here](#) and on page 4 of this document - describing columns and report criteria.

When reviewing this report, Local Agencies might consider the following questions to evaluate the record legitimacy or plausibility, and/or to determine if there is need for additional record review in the WIC Information System.

- *Is it typical for this clinic to have one-staff person certifications?*
- *Is this a normal clinic day for one-staff person certifications (e.g., not a weekend)?*
- *Is this a normal time of day for a certification and during normal clinic hours?*
- *Is the certification performed too quickly? Is the certification open too long?*
- *Is this staff person someone who is supposed to complete one-staff certifications? Is it a CPA?*
- *Participant Signature → Yes/No (if no signature is captured, investigate further.)*
- *Height:*
 - *Is this height measurement typical for this WIC participant?*
 - *Is the height the same as other height entries for the day?*
 - *Are more of the measurements than expected ending in “zero” or ½?*
- *Weight:*
 - *Is this weight typical for this WIC participant?*
 - *Is the weight the same as other weight entries for the day?*
 - *Are more of measurements than expected ending in “zero”?*
- *Hemoglobin:*
 - *Is this HGB measurement typical for this WIC participant?*
 - *Is this HGB the same as other HGB entries for the day?*
 - *Are more of the HGB measurements than expected ending in “zero”?*
- *Are there scanned documents present for a one staff person certification? → Yes/No*
- *Risk Factors: Are there several risk code 502 (transfers) assigned for this participant?*

Local Agency Frequently Asked SOD Questions:

- **Who can run the Certifications Completed by One Staff Person (SOD) InfoView report?**
 - Any WIC staff with InfoView access can run an InfoView report.
- **Who should review this SOD report?**
 - The WIC Coordinator, Supervisor or designee (an individual who has the authority to change an eligibility determination) should evaluate and review the report. After review, that staff person should document any “SOD – Reviewed” notes in the WIC Information System or keep a copy of the report for review during Management Evaluations.
- **How can a LA capture staff identification correctly in HUBERT with multiple staff performing different steps in the Certification Guided Script (CGS)?**

- To ensure that Staff IDs are captured correctly when multiple staff perform different parts of the CGS, **only one person can be in a particular *Participant Folder* at a time**. See the March, [HuBert Hints](#) for additional guidance and examples in this situation.
- **In situations where a WIC participant is marked “Pending Proof” or “Presumptive eligibility” for income, how is SOD documented?**
 - If one staff person determines pending proof, and another staff person completes the certification, the person who determined the income pending will be indicated on the Certification History tab, however, there was not income eligibility determined at the time of certification, or
 - If a participant is marked pending proof of income and WIC staff typically document income in an “SOD –Income” note, staff should complete the “SOD – Income” note stating pending proof of income, that the participant will bring in pay stubs or proof of MA.
 - When the participant comes back the next month (adjunctive eligibility) or in three months (Presumptive eligibility) to show proof of income, WIC staff enter the income via the participant folder, and should create an income eligibility determination note by selecting the drop down “SOD –Income.”
- **How soon before or after the certification may income be documented for those situations where income cannot be recorded during the certification?**
 - Before: income may be documented in an alert, or in a “Separation of Duties – Income” note up to 21 days before the certification. Note that the certification ***should not*** be started before the participant is present for the appointment.
 - After: Best practice is to document income at the time of certification, but in situations where this is not possible, a “Separation of Duties – Income” note may be created up to 14 days after the certification is completed.

If you have additional questions, please contact your State WIC Consultant.

Certifications Completed by One Staff Person (SOD)

Tab 1 – SOD-No Reviewed Note (participants who meet report criteria and do NOT have an SOD-Reviewed Note written on or within 30 days of cert)

CLINIC ###																	
Food Type	HH ID	SWID	WIC Type	DOB	Cert Date	Cert Time	Cert Day	Cert Length	Certifier	PPT Sig	Risk Factors	Ht. In.	Ht. 8ths	Wt. Lbs.	Wt. Oz.	Hgb or Exception Reason	SOD Scan
Formula (100% need review) OR Foods (20% need review)	Household ID	State WIC ID	B, C, I, P, N - WIC Type at cert	Date of Birth	Cert Start Date during specified time period	Time CGS was started	Day of Week when CGS was started	Minutes between CGS start time and time first set of benefits issued to participant	Username of person who was recorded as having completed the CGS	Yes/No - whether an electronic signature exists for Rights & Responsibilities	All risk factors assigned at cert	Height in Inches	Height in Eighths	Weight in Pounds	Weight in Ounces	Hemoglobin value or selected exception reason	Yes/No - Separation of Duties (SOD) scanned document on same date as cert

Tab 2 – SOD-Reviewed Note (participants who meet report criteria & have an SOD-Reviewed Note written on or within 30 days of cert date)

CLINIC ###																			
Food Type	HHID	SWID	WIC Type	DOB	Cert Date	Cert Time	Cert Day	Cert Length	Staff Wrote Note	Note Date	Certifier	PPT Sig	Risk Factors	Ht. In.	Ht. 8ths	Wt. Lbs.	Wt. Oz.	Hgb or Exception Reason	SOD Scan
Formula (100% need review) OR Foods (20% need review)	Household ID	State WIC ID	B, C, I, P, N - WIC Type at cert	Date of Birth	Cert Start Date during specified time period	Time CGS was started	Day of Week when CGS was started	Minutes between CGS start time and time first set of benefits issued to participant	Staff ID of person who wrote SOD - Reviewed note on or within 30 days of cert date	Date SOD - Reviewed note was created	Username of person who was recorded as having completed the CGS	Yes/No - whether an electronic signature exists for the Rights & Responsibilities	All risk factors assigned at cert	Height in Inches	Height in Eighths	Weight in Pounds	Weight in Ounces	Hemoglobin value or selected exception reason	Yes/No - Separation of Duties (SOD) scanned document on same date as cert

Participants are included if the following criteria are met:

- Participants with one staff person recorded for all steps of CGS, including Income
- Household members (of participants with one staff person) certified during same time period with no staff person recorded for Income
- A **Separation of Duties (SOD) – Income** note has **NOT** been written within 21 days prior to, on, or up to 14 days after the cert date

Using the report:

1. An agency using a one-person certification model would expect to see results on both tabs. The first tab displays one-person certs that have not yet been reviewed and still need to have a **Separation of Duties (SOD) – Reviewed** note added. 100% of records where formula was issued and 20% of the records where food was issued should be reviewed. When a SOD – Reviewed note is added, the record will move from Tab 2 to Tab 1. The second tab displays the record(s) that have a **SOD – Reviewed** note, added on or within 30 days - of the Cert Start Date, which indicates these one-staff certs have already been reviewed.
2. An agency using a two-person certification model would normally expect to see no results when running this report. If there are report results, the agency will need to review the record(s) and add a **Separation of Duties (SOD) – Reviewed** note.