

Maine Center for Disease Control and Prevention

WIC Nutrition Program

Effective: October 1, 2011

Policy No. OM-9

Revised: August 1, 2014

Dual Participation

Authority

7 CFR §246.4(16); §246.7(j),(l); §246.12(u)(2); and §246.23(c)(1)

Policy

1. Participating in more than one WIC program simultaneously is considered to be participant abuse.
2. The State Agency shall have written procedures to prevent and detect dual participation within each Local Agency and among Local Agencies.
3. The State Agency shall have written agreements with two Indian Tribal Organizations (ITOs) in Maine and New Hampshire for the detection and prevention of dual participation. These agreements shall be renewed annually.
4. All participants, parents or caretakers shall be informed of the illegality of dual participation during the certification process.
5. Participants found in violation due to dual participation shall be immediately terminated from participation in one of the programs.
6. In cases of dual participation resulting from intentional misrepresentation, improperly issued benefits shall be collected in accordance with 7 CFR Part 246. 23(c)(1) and the participant shall be disqualified from both programs for one year in accordance with 7 CFR 246.12(u)(2), following fair hearing procedures and the sanctioning system outlined in Policy *OM-7, Participant Abuse*.

Procedure

1. The WIC Management Information System (MIS) shall generate a *Dual Enrollment Report* which identifies possible duplicate enrollment. The report shall be compiled monthly by the State Agency.
2. The State Agency shall screen the *Dual Enrollment Report* and forward unexplained possible dual participant questions to the Local Agencies for investigation and verification.
 - 2.1. The State Agency shall inactivate one of the records upon confirmation from Local Agency staff that the records belong to the same participant.

3. The State Agency requests participant lists from the two Maine ITOs twice per year and compares the lists to participant records in the MIS. Records of possible duplicate participation shall be identified. The State Agency shall follow up with the ITO and the Local Agency involved as appropriate.
4. The State Agency shall investigate suspected dual participation with New Hampshire and/or any other state upon report from local agency staff and/or reports from other participants or the general public.
 - 4.1. Local Agency staff shall ask about participation in any other state WIC Program at enrollment appointments of families enrolling for the first time or reapplying for benefits.
 - 4.2. When asking authorized representatives to sign for program rights and responsibilities local Agency staff shall inform WIC applicants that it is illegal to participate in more than one WIC Program simultaneously.
 - 4.3. Local agency staff shall request VOC information when an applicant reports:
 - 4.3.1. recent move from another state
 - 4.3.2. recent change in custody for a child enrolled in WIC in another state
 - 4.3.3. a child receives Medicaid benefits in another state
 - 4.3.4. WIC participation in another state but applicant does not have most recent VOC information
5. Local Agencies must take follow-up action and report to the State Agency within sixty (60) days of the date of notification of dual participation.
6. All actions taken as a result of participant abuse must be documented in the participant's file. This includes, but is not limited to, verbal warnings, written warnings, suspensions, and terminations.
7. If the State Agency determines that program benefits have been obtained or disposed of improperly as the result of a participant's dual participation, the State Agency must establish a claim against the participant, as outlined in Policy *OM-7, Participant Abuse*.
8. In addition to establishing a claim, the State Agency must determine whether disqualification is required by 7 CFR Part 246.12(u)(2) and if so, follow the procedures outlined in Policy *OM-7, Participant Abuse*.