



Policy 587

Program Integrity: Dual Participation

April 2, 2021 (Revised)

POLICY

The state WIC program and local WIC programs will work together to detect and prevent dual participation in more than one WIC program within Oregon or between other states, and between the USDA Commodity Supplemental Food Programs (CSFP) and the WIC Program.

PURPOSE

To detect simultaneous participation by participants in more than one WIC program or in CSFP and any WIC Program.

RELEVANT REGULATIONS

7 CFR §246.7(l)—Dual participation

OREGON WIC PPM REFERENCES

- ◆ [458—Appeals Process \(Fair Hearing\) for Participants](#)
- ◆ [561—Program Integrity: Replacement of Food Benefits](#)
- ◆ [590—Program Integrity: Participant Violations](#)
- ◆ [635—Participant Notification: Eligibility and Rights and Responsibilities](#)
- ◆ [636—Participant Notification: Ineligibility and Termination from WIC](#)
- ◆ [650—WIC Transfers/VOC and WIC Overseas Program](#)

TWIST TRAINING MANUAL REFERENCES:

Ch 2, 100—Client Search and Demographics

Ch 3, 804—Transfers

APPENDICES

N/A

DEFINITIONS

CSFP: Commodity Supplemental Food Program. USDA purchased food available to CSFP state agencies that store the food and distribute it to public and non-profit private local agencies. The population served by CSFP is similar to that served by WIC, but CSFP also serves elderly people, and provides food rather than the food vouchers. Eligible people cannot participate in both programs at the same time.

Dual Participation: Simultaneous participation in more than one WIC program (more than one state or more than one local clinic) or participation in any WIC program and CSFP at the same time. Dual participation occurs when benefits have been received from both programs.

Food Instrument (FI): “Food instrument” or “FI” means a WIC program electronic benefit transfer (EBT) card, or other document which is used to obtain authorized foods. Food instruments can provide either specific amounts of WIC authorized foods or formulas or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Benefit” or “CVB”).

BACKGROUND

Oregon will have agreements with neighboring states or an exception from USDA, to detect and sanction participants who are receiving WIC benefits from more than one of these states. In order to identify dual participation between WIC and the Commodity Supplemental Food Program (CSFP), CSFP sends a monthly report to the state WIC office of all their participants who may be eligible for WIC. The state office researches to see if any of the names on the report match participants in the WIC Program.

The WIC Data system allows WIC staff to search for participants in a statewide database. Staff should be diligent in completing a thorough search for participants at the time of enrollment in order to minimize the opportunity for a participant to be enrolled in more than one WIC clinic at the same time.

According to USDA federal guidelines, follow-up action must be taken within 120 days of detecting a possible case of dual participation.

PROCEDURE

Notification to participants

- 1.0 Local WIC programs shall notify participants that enrolling in and receiving benefits from more than one WIC local agency (within or outside of Oregon) at the same time is considered program abuse. Local WIC programs that also have CSFP in the same county must inform participants that they can only participate in one of the programs at a time (either CSFP or WIC) and that dual participation may result in a claim for reimbursement and disqualification from one or both programs.
 - 1.1. Local program staff must ensure that participants have read, understand and have signed the “Participant Signature Form” (form [57-629](#)) at every certification and recertification appointment. See [◆635 – Participant Notification: Eligibility and Rights and Responsibilities](#) for more information.

Adding/Transferring a new participant

- 2.0 Local WIC programs shall check for dual participation when adding or transferring a participant.
 - 2.1. Adding a participant: Follow the process in the [TWIST Training Manual, Chapter 2, Lesson 100](#)—Client Search and Demographics.
 - 2.2. Transferring a participant: Follow the process in the [TWIST Training Manual, Chapter 3, Lesson 804](#)—Transfers, and refer to [◆650 – WIC Transfers/VOC and WIC Overseas Program](#) for more information.

NOTE: For data integrity as well as prevention of dual participation, the local WIC program should follow instructions for adding and transferring participants at the time of participant contact before adding the participant to TWIST “Client Master” or as soon after as possible.

Multiple state dual participation

- 3.0 When the State WIC program identifies potential dual participation between states, the State office will conduct an investigation within 120 days of detection.
 - 3.1. The State office will do the majority of the investigation, however local program staff may be asked to do the following:
 - 3.1.1. Upon request, send the “Participant Signature Form” to the state [WIC Compliance & Civil Rights Coordinator](#).
 - 3.1.2. Assist with scheduling an appointment to interview the participant.
 - 3.1.3. Assist the participant with setting up a repayment plan if appropriate. Refer to [◆590 – Program Integrity: Participant Violations](#) for more information.

Participant disqualified from program

- 3.2. If the investigation reveals there is sufficient evidence of intentional program abuse, the participant must be disqualified for a period of one year and a claim for reimbursement will be issued by the State WIC program. Refer to [◆590 – Program Integrity: Participant Violations](#) for disqualification procedures and exceptions to mandatory disqualifications.

In-state dual participation

- 4.0 When in-state dual participation has been detected, the following action must be taken within 120 days of detection:
 - 4.1. If the dual participation is determined to be unintentional, the local agency must assist the participant in determining at which local agency they wish to continue services and ensure that they are terminated from the other local agency. The local agency must document when the participant was notified, and action was taken to terminate from the other local agency.
 - 4.1.1. If local agency staff are not sure if the dual participation is intentional or not, they should notify the state [WIC Compliance & Civil Rights Coordinator](#).
 - 4.2. If state WIC investigators determine there is sufficient evidence of intentional program abuse, the participant must be disqualified from both local agencies for a period of one year and a claim for reimbursement will be issued by the state WIC program. Refer to [◆590 – Program Integrity: Participant Violations](#) for disqualification procedures and exceptions to mandatory disqualifications.

CSFP and WIC

- 5.0 The state WIC office will determine if any CSFP and WIC dual participation participants exist. When a participant has been identified as participating in both the CSFP and WIC simultaneously, the following action will be taken within 120 days of detection.
 - 5.1. If the dual participation is determined to be unintentional, the State WIC program will contact the participant and determine in which program they wish to continue services.

- 5.1.1. If the participant decides to stay enrolled in WIC, no further action will be necessary. The State WIC program will notify CSFP to terminate them from their program immediately.
- 5.1.2. If the participant decides to stay enrolled in the CSFP, the local program must terminate the participant immediately from WIC and issue proper notification. Refer to [◆636 – Participant Notification: Ineligibility and Termination from WIC](#) for more information.
- 5.2. If state WIC investigators determine there is sufficient evidence of intentional program abuse, the participant shall be terminated from both programs and a claim for reimbursement will be issued by the State WIC program. Refer to [◆590 – Program Integrity: Participant Violations](#) for more information on participant sanctions and repayment.

Continuation/withholding of benefits

- 6.0 The local program shall not withhold monthly benefits to compensate for a claim that has been made against a participant. Refer to [◆590 – Program Integrity: Participant Violations](#) for more information about participant sanctions.
- 6.1. If a participant is disqualified, the participant must reapply to receive WIC benefits after the disqualification period has ended.
- 6.2. A participant may continue to receive benefits pending an appeal of the disqualification and claim for reimbursement. Refer to [◆458—Appeals Process \(Fair Hearing\) for Participants](#) for more information.

Intentional Participant abuse

- 7.0 If local program staff suspect intentional participant abuse of any kind, contact the state WIC program. Refer to [◆590 – Program Integrity: Participant Violations](#) for more information.

If you need this in large print or an alternate format, please call 971-673-0040.

This institution is an equal opportunity provider.

POLICY HISTORY

| Date | * Major Revision, Minor revision |
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| 4/2/2021 | Minor revisions |
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The date located at the top of the policy is the implementation date unless an “effective date” is noted on the policy. Policies will become compliance findings 6 months from the implementation date.

Release notes can be found in the corresponding document on the [Policy and Procedure Manual page](#).

***Major Revisions:** Significant content changes made to policy.

Minor Revisions: Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

Date of Origin: Date policy was initially released