

MI-WIC POLICY

Program Maintenance

3.0 Program Maintenance

Effective Date: 2/23/10

3.03 Dual Participation

PURPOSE: To prevent a client from enrolling and receiving program benefits at more than one WIC clinic (WIC/WIC) or Commodity Supplemental Food Program (WIC/CSFP) at a time.

A. POLICY:

1. The local agency is responsible for prevention and resolution of dual participation of clients within the WIC Program or with WIC and CSFP programs throughout the state. Dual Participation occurs when a client receives benefits from more than one WIC, or WIC and CSFP program during the same benefit month.
2. The local agency notifies the applicant/client of the illegality of participating in another WIC or CSFP program at each enrollment/certification (see 2.18A Michigan WIC Client Agreement).
3. Prevention of Dual Enrollment
 - a. At the time of application, the local agency shall document the required client information (client name, date of birth and gender) into MI- WIC for comparison with other enrollees to detect possible dual enrollment in another WIC clinic or CSFP/Focus:HOPE.
 - b. Local agencies shall take the following steps to prevent dual enrollment:
 - i. Perform a statewide search of all clients prior to performing a Precertification.
 - ii. If an existing client is identified, use that record.
 - iii. If an existing record is not identified, complete the Precertification screen.
 - iv. Resolve potential dual enrollees that occur on the Precertification screen immediately.
 1. Upon precertification, if a potential WIC/WIC dual enrollee is identified, WIC staff shall evaluate the information to determine if the client is actually a duplicate enrollee. A duplicate enrollee scenario occurs when more than one MI-WIC record exists for the same client. If the enrollee has an existing MI-WIC record, use that record.
 2. Upon precertification, if the system indicates the applicant is participating in Focus:HOPE/CSFP and the client now desires to be on the WIC program, the dual record must be resolved by selecting 'WIC' on the Resolve CSFP Dual Enrollment screen to request termination from CSFP **prior to completing certification**. Clients are permitted to receive CSFP benefits until the WIC certification can be completed.

4. Investigating and Resolving Potential System-generated Dual Enrollment Listings:
 - a. The WIC-WIC and WIC-CSFP Resolve Dual Enrollment screens and the reports derived from these matches may be accessed by authorized users at any time to determine the most recent matches. See 5a. and 6a. for frequency of MI-WIC system matches for WIC/WIC and WIC/Focus:HOPE dual enrollment.
 - b. The local agency shall review dual enrollment listings monthly, using the Resolve Dual Enrollment and Resolve CSFP Dual Enrollment screens or the WIC Dual Enrollment and WIC-CSFP Dual Enrollment reports in MI-WIC.
 - c. The local agency shall investigate/resolve each client listed as a WIC/WIC or WIC/Focus:HOPE CSFP dual enrollee within 45 days of identification by the MI-WIC system, and document the resolution on the appropriate screen.

5. Processing and Resolving WIC/WIC Dual Enrollment
 - a. The MI-WIC system detects WIC/WIC dual enrollment matches on a daily basis for clients who have an active record in the MI-WIC system.
 - b. The local agency shall record resolution of dual enrollment matches on the Resolve Dual Enrollment screen by determining which scenario applies and following the table below to resolve.

Scenario	Required Action
Not the same client	Select Resolve- Different Client
Same client; no overlapping certifications	<ol style="list-style-type: none">1. Determine which record has the most current certification information and designate that record as the active record.2. Use MI-WIC to select the resolution that will result in keeping the record with the most current information and blocking the other record.
Same client; overlapping certifications; no overlapping benefits	<ol style="list-style-type: none">1. Determine which record has the most recent benefit issuance and designate that record as the active record.2. Use MI-WIC to select the resolution that will result in keeping the record with the most current certification/benefit information remaining active and blocking the other record.

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<p>Same client; overlapping certifications; receiving overlapping benefits; no dual redemptions as verified in EPPIC</p>	<ol style="list-style-type: none"> 1. If duplicate records involve more than one local agency, contact the other local agency to coordinate resolution. 2. If necessary, contact the client to determine which record to designate as active. 3. If unable to contact the client by telephone, print and send the WIC-WIC Dual Participation letter. 4. After consultation with the client and other local agency when applicable, select the appropriate resolution option to result in keeping the desired record, and blocking the other record. If possible, void any outstanding benefits. 5. If there is no response to the letter within 45 days, terminate both client records using Termination Reason Dual Part, No Response. Note: If possible, void any outstanding benefits.
<p>Same client; overlapping certifications; overlapping benefits; dual redemption verified in EPPIC</p>	<ol style="list-style-type: none"> 1. Use MI-WIC to select resolution of Investigate. 2. Notify Compliance Investigator (see Policy 9.01 Client Compliance).

- c. If more than two matches are listed, the user must resolve each pair of clients separately.
- d. If overlapping benefit redemptions involve more than one agency, contact the other local agency to coordinate resolution of dual participation (i.e. to determine investigation strategies). See 9.01 Client Compliance.
- e. For all resolution types selected, automated notes will be added to the Client Notes section of both client records reflecting action taken.

6. Processing and Resolving WIC/Focus:HOPE CSFP Dual Enrollment

- a. The MI-WIC system detects WIC/Focus:HOPE dual enrollment matches on a weekly basis, including clients actively certified in WIC who later enroll in WIC/Focus:HOPE CSFP.
- b. The local agency shall record resolution of dual enrollment matches on the Resolve CSFP Dual Enrollment screen by determining which scenario applies and following the table below to resolve.

Scenario	Required Action
Not the same client	Select Not the Same Person.
Same client; client wishes to remain on WIC	1. Select WIC. 2. This results in a notification being sent to CSFP requesting termination.
Same client; client wishes to remain on CSFP	1. Select CSFP. 2. This results in the client being automatically terminated from WIC.
Client does not contact Program or no resolution is recorded	The MI-WIC system automatically terminates the enrollee 45 days from the date of notification.

- c. The MI-WIC system automatically sends a letter to all certified clients listed on the WIC-CSFP Dual Enrollment report requiring selection of either CSFP or the WIC Program to receive supplemental foods.
 - d. For all resolution types selected, automated notes will be added to the Client Notes section of both client records reflecting action taken.
 - e. For a client who has been terminated from WIC as a result of a WIC/Focus:HOPE CSFP Dual Participation match resolution or failure to respond to the letter and subsequently chooses to participate in the WIC Program, the local agency shall contact CSFP by phone to communicate client preference of WIC. This action shall be documented as a note in the client's record.
7. Processing and Resolving WIC/non-Focus:HOPE CSFP Dual Enrollment
- a. Local agency staff shall compare client information with non-WIC system-interfaced CSFPs (non-Focus:HOPE) in their communities at least every six months to detect dual enrollment.
 - b. If a dual enrollee is identified, the client shall be notified of the illegality of dual enrollment and requested to select participation in either WIC or CSFP (See 3.03A WIC-CSFP Dual Participation Notice). The local agency shall, at the same time, place a termination reason of Dual Part, No Response with a termination date 45 days from the date of the notification in the client's record.
 - c. The local agency shall document resolution of dual matches. Retain these CSFP client listings and resolution documentation for 3 years and 150 days. (See Policy 1.06 Record Retention and Destruction)

8. If the local agency suspects WIC/CSFP dual enrollment, staff shall contact CSFP to determine if the client is receiving benefits from CSFP.
 - a. If the client is not receiving benefits from CSFP, no further action is required.
 - b. If the client is receiving dual benefits and is redeeming WIC benefits, refer the case to the local agency compliance investigator (See Policy 9.01 Client Compliance).

9. The local agency shall follow Policy 9.01 Client Compliance for clients identified as dual participants.

B. GUIDANCE

1. Dual Enrollment reports provide a mechanism to monitor dual enrollment listings.

References:

Federal Regulations: 246.7 (j)(1), 246.7 (l)

Cross-references:

- 1.06 Record Retention and Destruction
- 2.18 WIC Client Agreement
- 2.20 Notice of Ineligibility, Mid-Certification Termination and Expiration of Certification
- 9.01 Client Compliance Policy

Exhibit:

- 3.03A WIC/CSFP Dual Participation Notice