Preventing and Detecting Dual Participation

Purpose
To prevent participants from receiving duplicate food benefits.

Authority
7 CFR Part 246.7

Policy
Each local agency (LA) shall implement preventive procedures and utilize the automated Texas WIC Information Network (WIN) System Dual Participation component to help prevent and detect dual participation.

Procedures
I. Preventing Dual Participation:
   A. At certifications and with each food instrument issuance, follow procedures for documentation of identity as stated in Policy CS:05.0.
   B. At certification, obtain the participant's written declaration that they and/or their child do not already participate in WIC. (This statement is included on the Supplemental Information Form, WIC-35-1.)

II. Detecting Dual Participation:
   A. Each LA shall review and investigate the client records identified by the WIN system as suspected dual participants.
   B. An alert record for each new client identified by the automated system as a suspected dual participant shall be electronically forwarded to that client's LA system. The record shall identify
the suspected client and the client ID, LA and clinic of the possible match. It is the responsibility of the notified LA to investigate and respond electronically to the state agency (SA). If other LAs are involved, these LAs also have the responsibility to cooperate with the new LA in their investigation. Until the investigation has been completed, the client's record is locked to prevent further issuance of food instruments.

C. The new (i.e., most recently visited) LA shall investigate the suspected dual participation prior to the next scheduled food instrument issuance.

D. It is the new LA's responsibility to determine if the lock shall be removed and to coordinate the decision with other LAs. In the case of an actual dual participation determination, the new LA shall document electronically in the WIN system who shall keep and who shall lose the client.

E. The system shall record the results of the investigation along with the user ID number of the LA staff person. If a second LA is involved, the SA shall transmit a record lock to that LA (i.e. the second LA shall lose the client). The only way to reverse this lock is to request a transfer.

Guidelines

I. Dual participant screening consists of nightly evaluation of specific data fields of new client records received at the SA against the same data fields of active client data already existing at the SA.

II. When matches are found, these client records are provided for review to the SA investigative staff. Investigative staff have 21 days to review these records to identify those which warrant further investigation at the LA level.

III. Records which have not been reviewed by SA staff within 21 days shall be automatically defaulted to a suspected dual participation status, locked, and transmitted to the new LA for investigation.
IV. Refer to the Texas WIN Reference Manual for further information.