

**Local Agency Name/Number:**

**Site Number(s) using Alternate 1:**

**Site Number(s) using Alternate 2:**

**PROCEDURES:**

**Alternate 1: Site with one staff person**

- A staff person (an individual that has the authority to change an eligibility determination and not directly related to the certification) must conduct:
  - A post review of certification records for all infants receiving any amount of infant formula.
  - A post review of a 20 percent random sample of the remaining certification records within 2 weeks of the certification date.
- Documentation of the review must be maintained on file at the local agency for review during program monitoring visits.
- It is recommended that staff is rotated on a regular basis so that the same staff person is not the only one known to the participants.

**Alternate 2: Site with multiple staff and only one staff performing all eligibility and certification functions, including issuing the WIC Card and food benefits.**

- Complete the justification section (page 2) to explain how the separation of duties requirement presents a hardship to the site.
- A staff person (an individual that has the authority to change an eligibility determination and not directly related to the certification) must conduct:
  - A post review of certification records for all infants receiving any amount of infant formula.
  - A post review of 20 percent random sample of the remaining certification records within 2 weeks of the certification date.
  - The WIC LA director or designee must conduct an additional review of 10 percent of each clinic's certification records every six months.
- Documentation of the review must be maintained on file at the local agency for review during program monitoring visits.

**Submitted by:**

**Date:**

**Justification for Alternate 2**

Instructions: Briefly explain how the separation of duties requirements presents a hardship to the site.