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DATE: March 15, 2017
TO: WIC Coordinators
FROM: WIC State Staff
SUBJECT: Separation of Duties Documentation – New Note & Scan Subjects in HuBERT

The new Separation of Duties (SOD) requirements provided different options to accomplish SOD in local agencies. Agencies determined what will work in their clinics and completed a SOD plan documenting their process for complying with the new requirements. As indicated in the Memo, InfoView reports can be useful in SOD record review. To enhance documentation and assist in auditing records, two new **General Note Subjects** were added to the **Subject** drop down list (see March 1, 2017 [HuBERT Hints](#) for details):

- Separation of Duties – Income
- Separation of Duties – Review

If the staff member completing Income eligibility determination is **not** documented in the Certification Guided Script (CGS), use the **Separation of Duties – Income** drop down to document the staff involved in a note. For example, “income determination made by Jane Doe on 1/11/17” **OR** “MA verified by Jane Doe on 1/11/17.”

To document review of single-staff certification(s) (one staff person is determining both income eligibility and nutrition risk), use the **Separation of Duties – Review** drop down. Single-staff certification records requiring review include: a) all infant certification records containing formula, and b) at least 20% of a random sample of all single-staff certifications. To document the review, the local agency should select the note type **Separation of Duties – Review** drop down to record the staff name or initials completing the record review. Additional SOD information about record review and Infoview reports will be provided in a future memo.

In addition to the two new **General Note Subjects**, a new **Scan Document Type – Separation of Duties** was added to HuBERT. In single-staff certification(s) where one person is determining both income eligibility and nutrition risk, at least one personal participant document must be scanned into the WIC Information System. When scanning the document, select the **Scan Document Type – Separation of Duties** (see January 11 [Memo](#) for details).

Contact your State WIC Consultant with any questions about SOD or the use of the new **General Note Subjects** or the **Scan Document Type – Separation of Duties** drop downs.