

Chapter V

Participant Investigations and Sanctions

In cases of possible fraud or abuse by a WIC participant, WIC staff investigate to determine if a violation has in fact occurred. If so, the participant may be sent a warning letter, counseled about the violation, or temporarily disqualified from WIC, depending on the violation and the State's rules. WIC agencies are expected to attempt recovery of improperly obtained benefits from participants. States use different types of staff at the State and local levels for this function. Some States have developed staff positions that are solely responsible for investigation and sanctioning of fraud and abuse. State agencies may work with law enforcement officials on participant fraud cases.

States differ in respect to guidelines for sanctions. Differences include guidelines on when to sanction, how to sanction, and cost-effectiveness in relation to collections. The more comprehensive the guidelines, the more consistency in the State's sanctioning process. Each State must balance the need to deter fraud by imposing sanctions and recovering funds with the costs and likely benefits of these activities, taking into account the potential impacts on sanctioned participants' nutritional needs, national mandates, and more local concerns.

This chapter provides a discussion of participant investigations and sanctions as reactions to, and controls against, fraud and abuse. We explore different methods of conducting investigations and administering sanctions, with a view to enhancing the effectiveness of State and local WIC agencies in these areas.

5.1 Background

This section provides a discussion of the levels of severity associated with various types of fraud and abuse, WIC Program regulations that apply to participant investigations and sanctions, and summary statistics on different types of participant sanctions and how much they are used by States.

As discussed in the previous chapters, the processes of certification, issuance, and redemption are subject to a variety of violations for which participants can be sanctioned. It is important to note, however, that what has generically been labeled as fraud and abuse includes violation with different levels of seriousness.

Minor violations by participants, those that do not involve improper receipt of benefits or diversion of benefits from the purchase of food to other purposes, include:

- Purchasing the wrong package size, variety, or brand of food
- Redeeming food instruments before or after their valid dates
- Verbal abuse of vendors or WIC staff.

These violations may be unintentional. As discussed later in this chapter, the usual response to such violations is to warn and re-educate the participant, not to impose punitive sanctions. More serious types of fraud and abuse entail the fraudulent receipt of benefits or the diversion of benefits to uses other than the purchase of food. Examples of more serious fraud and abuse include:

- Misreporting or concealing income
- Intentional dual participation
- Other falsification of certification information to obtain benefits
- Redeeming food instruments for nonapproved items such as beer or tobacco (major substitutions)
- Trafficking WIC food instruments or foods for money or trading them for other goods or services.

Any time a participant obtains benefits by fraud, the action is a criminal offense. The most serious violations warrant criminal investigations and prosecution. These are typically blatant and extensive acts of fraud or abuse perpetrated by participants, sometimes in collusion with staff or vendors. The most serious types of participant fraud and abuse include:

- Large-scale intentional dual participation (usually through the creation of false identities and the forgery of documents)
- Receipt of benefits over a long period as a result of false reporting of income or other circumstances (particularly when perpetrated by staff as participants)
- Theft of food instruments or formula from a WIC clinic
- Large-scale trafficking of WIC food instruments.

Key Provisions of WIC Program Regulations

WIC Program regulations establish a number of requirements related to participant sanctions⁵:

- State agencies are responsible for disqualifying dual participants from one of the clinics. If the dual participation is found to be intentional, the participant may be disqualified from the Program at both clinics.

⁵Regulations concerning sanctions are found at several locations in 7 CFR 246, including sections 246.7, 246.9, 246.12, and 246.23.

- Mandatory 1- year disqualification for claims totaling \$100 or more, claims from intentional dual participation, or any second subsequent claim.
- State agencies must ensure that local agencies terminate participants found to be ineligible after certification.
- State agencies must establish sanctions for other forms of abuse; these sanctions may include disqualification for up to 1 year.
- States must give 15 days’ prior notice to participants who are to be suspended or disqualified from the Program.
- States must attempt to recover improperly obtained benefits if the recovery is cost effective by State-determined criteria. The State must give written notice to participants of a claim against improperly issued benefits. The notice must include the reasons for the claim, the value of the benefits to be repaid, and the right to a fair hearing.
- The State must provide for fair hearings upon request before participants are disqualified.

5.2 Data on Sanctioning Practices

Table 5–1 contains information on the frequency with which different types of sanctions are employed. It is rare that no sanction is applied when a case of serious fraud and/or abuse is identified. The more serious the sanction, the less frequently it is applied.

Table 5–1—Estimated percentage of participants with major violations receiving various sanctions

Type of sanction	Estimated percent of participants
Counseling	72.0
Warning letter	32.0
Suspension/temporary disqualification	25.0
Other	6.0
No sanction	0.5

Source: U.S. General Accounting Office, *Food Assistance: Efforts to Control Fraud and Abuse in the WIC Program Can Be Strengthened*, p. 45.

Note: Based on a survey that identified 7,074 participants suspected of dual participation, exchange of food instruments for nonapproved items, or misrepresentation of income, over a period of 2 years. Some participants received more than one type of sanction. Sanctions for minor abuse (i.e., redeeming food instruments outside of valid dates) tend to be more lenient.

5.3 Overview of Controls for Participant Sanctions

Table 5–2 summarizes the principal controls for the sanctioning of participant fraud and abuse. The first column identifies the basic controls that are widely or universally used, including measures required by the WIC Program. The second column identifies enhanced controls that

can improve program integrity. Some of these enhanced controls are appropriate for most or all States, while in other cases there are multiple options for enhancing controls.

Table 5–2—Requirements and controls for participant sanctions

WIC requirements and basic controls	Enhanced controls	Benefits and costs of enhanced controls
Requirement: State agencies must establish sanctions for participant abuse of the Program		
<p>Basic control: Complaints and discrepancies identified by reports receive followup by WIC staff</p>	<p>Use of specialized WIC or non-WIC staff trained in investigating fraud and abuse</p> <p>Outreach by investigative staff to encourage referrals</p> <p>Analyze MIS data to identify patterns of suspicious behavior</p> <p>Results of investigations are used to provide warnings to local agencies</p>	<p>Assigns responsibility for follow-up, and increases efficiency and effectiveness of investigations. Reduces dissonance between serving clients and enforcing Program rules. Entails cost of hiring staff with appropriate backgrounds or diversion of the time of WIC staff with appropriate backgrounds to perform investigations</p> <p>Promotes awareness and communication with local staff Requires investment of staff time, depending on frequency of outreach.</p> <p>More efficient and less obtrusive than manual review of records. Requires MIS programming and processing to support ad hoc query capability or generate reports. Cost varies depending on capabilities of MIS currently in use.</p> <p>Promotes fraud awareness and early detection. Requires investment of staff time. Could be included as part of outreach to minimize cost.</p>
<p>Basic control: Warning letter for minor abuse</p>	<p>Specific guidelines regarding which situations result in a warning letter</p> <p>Provide written warning for any substantiated fraud or abuse, with information about potential sanctions in future</p> <p>Followup with counseling or more frequent benefit pickup to monitor participation</p>	<p>Sets clear expectations for staff and participants. One-time investment of State administrative staff time to establish guidelines.</p> <p>Emphasizes message and establishes record in case of future violations. Requires investment of staff time to prepare and send letters. Effort is larger if letters are not pre-formatted.</p> <p>Ensures participant understanding of rules, determines if other problems exist.</p>

WIC requirements and basic controls	Enhanced controls	Benefits and costs of enhanced controls
<p>Requirements:</p> <p>Mandatory 1-year disqualification for claims totaling \$100 or more, claims from intentional dual participation, or any second or subsequent claim</p> <p>Mandatory written notice of intent to disqualify and right to fair hearing at least 15 days prior to action</p> <p>Mandatory written notice of disqualification and right of appeal</p>		
<p>Basic controls: Same as requirements</p>	<p>Disqualification letter should be sent by certified mail or delivered in person</p> <p>Notification of all local agencies in the State and record of disqualification in MIS</p> <p>Followup with counseling and close monitoring if participant returns</p> <p>Provide option of use of proxy to obtain benefits for an infant or child when the parent has been disqualified</p>	<p>Ensures proof of receipt. Requires small cost of postage or investment of staff time if delivering in person.</p> <p>Prevents participant from returning before end of disqualification. Requires small investment of staff time.</p> <p>Prevents further violations and provides opportunity to address related problems (e.g., drug abuse). Requires additional investment of staff time.</p> <p>Prevents loss of benefits to infants and children who are innocent of offense. Requires same amount of staff time, and represents no additional cost to the Program.</p>
<p>Requirements:</p> <p>States must initiate a claim for any benefits that are improperly obtained or disposed of by participants. Agencies must inform the participant in writing of the reasons for the claim, the value of the benefits to be repaid, and their right to a fair hearing.</p> <p>If restitution or repayment schedule is not established within 30 days of receipt of letter, States must attempt to collect until successful or unless they determine that further attempts at collection would not be cost-effective.</p> <p>States must establish standards for collection based on cost-benefit analyses.</p> <p>States must document the disposition of participant claims.</p>		
<p>Basic controls: Same as requirements</p>	<p>Automate claims requests and collections procedures</p> <p>Use collection agencies when feasible</p>	<p>Reduces labor costs, promotes consistency and facilitates accountability. Requires programming of MIS to perform this function.</p> <p>Cost to Program may be funded from amount recovered. Amount must be sufficient to be worthwhile for collection agency.</p>
<p>Requirement: Referral of instances of criminal fraud to police or prosecutors where appropriate</p>		
<p>Basic controls: Same as requirements</p>	<p>Establish agreement between investigators and prosecutors about criteria for types of cases to be</p>	<p>Establishes mutual understanding of evidence required and commitment to prosecute when appropriate.</p>

WIC requirements and basic controls	Enhanced controls	Benefits and costs of enhanced controls
	<p>prosecuted</p> <p>Assess feasibility/establish guidelines to prosecute and likely penalties before starting criminal investigations</p> <p>Use specialized WIC agency or law enforcement staff to conduct criminal fraud investigations</p>	<p>Requires investment of staff time to consult with prosecutors and establish criteria.</p> <p>Ensures cost-effective use of investigative resources. Requires use of staff who possess knowledge about State laws and prosecutions.</p> <p>Criminal cases require more varied methods and higher standard of documentation. Requires investment of staff time to investigate, or hiring of specialized staff if the needs of the State require such action.</p>

The remainder of the text focuses on these controls in the context of the sanctioning process.

5.4 Fundamental Choices Shaping Participant Sanctions

States make a series of fundamental choices that shape the process of sanctioning participants, and the kinds of controls that can be used, such as:

- which local or State staff will investigate and impose sanctions for fraud and abuse
- how the State balances the need to deter fraud and recover funds with the available resources and the potential impacts on sanctioned participants
- what the State considers the desired role of law enforcement officials.

The primary choice with regard to which WIC staff will be involved in fraud and abuse investigations and sanctions is: what will be the roles of front-line local staff and more specialized fraud control staff at the local or State level? Both types of staff have their distinctive strengths. Front-line local WIC staff members are trained in nutrition and routine program procedures, not investigative methods. Specialized staff members are more likely to have the time, training, and experience needed to conduct effective investigations and establish the necessary documentation for sanctions, particularly in criminal cases.

On the other hand, local front-line staff members often possess extensive experience with WIC participants, which enables them to identify suspicious information or patterns of behavior. Local staff members often have extensive contacts in the surrounding community, further strengthening their ability to detect possible fraud. The effectiveness of the local staff in identifying potential fraud and abuse can be strengthened by training that promotes awareness of fraud and abuse, and specific instruction in how to document information for investigators. The final decision regarding the imposition of a sanction should be made by an official with the appropriate level of

authority: disqualifications should be approved by the local agency director or an appropriate State official.

When deciding which staff will investigate and sanction fraud and abuse, States must also consider the cost of hiring specialized staff or investigators. Funding may not be available for this purpose, so supervisors or State administrative staff may be needed to fill this role. Another factor to consider is the balance between serving clients and enforcing Program rules. An investigator who is not providing WIC services may feel less dissonance between these two goals. Assignment of investigations to specialists clarifies the responsibility for this function and ensures that it does not get neglected. Specialized investigators also have the mobility to exchange experiences with the staff at many different local agencies.

State and local agency staff must deal with the conflict that exists between meeting the nutritional mission of the Program and promoting program integrity through the disqualification or prosecution of participants. When considering these sanctions, WIC staff are faced with the potential impact on participants' health. Particularly at the local level, where staff have more direct contact with participants, there may be a reluctance to take away benefits, as it may mean taking food away from persons already at nutritional risk. This decision is most sensitive when it involves denying benefits to infants or children whose parents have committed fraud or abuse. When making choices about sanctioning of participants, States must strike a balance between enforcing program rules, meeting the needs of participants, and fulfilling community expectations. Choices about sanctions, in turn, shape considerations of how much resources and effort are appropriate to devote to investigating and sanctioning of participants.

State agencies must rely on the cooperation of law enforcement officials to make arrests and conduct prosecution in cases of criminal fraud. Particularly where law enforcement resources are stretched thin, these officials may not consider typical cases of WIC fraud to be a priority, even when violations are serious from the Program's perspective. States need to establish realistic goals for the role they expect law enforcement officials to take in this process, and they need to find ways to gain their cooperation. The WIC agency needs to assess how likely local law enforcement is to follow through with prosecution before the WIC Program invests substantial time and effort in the investigation and building of a case.

States have some important options to get the cooperation they need from law enforcement officials. In some cases, a simple personal appeal by the WIC Director to the police chief or district attorney may be sufficient. A contractual agreement with law enforcement officials for prosecution of fraud cases may offer a solution to secure the commitment of personnel, but it may also entail a significant cost to the Program. Education of law enforcement on the WIC Program and its needs for help in prosecuting fraud and abuse may be helpful but requires staff time and does not guarantee action. States must adjust the amount of time and funds invested in gaining the cooperation of law enforcement to realistic expectations about how much additional cooperation these methods will actually gain them. In developing strategies and assessing this balance, State agencies can learn from each other through formal and informal channels.

5.5 Methods for Participant Investigations and Sanctions

This section discusses in more depth the basic and enhanced methods of investigating participant fraud and abuse, imposing sanctions, recovering funds, and prosecuting criminal offenses.

Investigations

Participant fraud and abuse can be discovered through review and investigation of complaint forms, MIS reports, or case reviews. Once a potential case has been identified, it must be assessed to determine the seriousness of the violation and the likelihood of an effective sanction or prosecution. If an investigation is warranted, the responsibility must be assigned to a staff member or outside investigator, and this person must gather the appropriate information from administrative records, interviews, or other sources. This information must then be evaluated to determine whether there is proof of the alleged violation.

The basic model is that investigations are the responsibility of local front-line staff or supervisors, under the direction of the clinic or local agency director. The responsible staff member consults with the director if appropriate before initiating an investigation, and the evidence is presented to the director for evaluation before a sanction is imposed. This model is certainly appropriate for minor violations, and some local agencies use it effectively for more serious cases.

Under an enhanced model for fraud and abuse investigations, local front-line staff members refer evidence of serious violations to one of the following types of investigators:

- Specialized fraud prevention and detection staff within the local agency
- Program integrity coordinator or unit within the State WIC organization
- Administrative fraud investigators attached to other State units, such as auditors or inspectors general
- Police or prosecutors operating under agreement with the State or local WIC agency.

As discussed earlier, the appropriateness of these models depends on the availability of resources and the need for more specialized staff. On balance, specialized staff are likely to produce more consistent results, particularly in more serious and complicated cases. Use of specialized staff entails a cost to the WIC Program of hiring staff with appropriate backgrounds, or diverting WIC staff with appropriate backgrounds to perform the investigations. Local agencies must be quite large to support a substantial staff of fraud investigators, but smaller agencies can have a designated fraud coordinator as a point of contact and resource.

Centralization of investigations at the State level is a way of ensuring that allegations are promptly, consistently, and objectively investigated. Centralized investigators need to establish good lines of communication with local agencies, enlisting them as their “eyes and ears.” For smaller State WIC agencies, sharing investigators with other programs may be the most cost-

effective way to secure the necessary expertise. Involvement of police or prosecutors is essential when criminal charges are to be brought.

The basic tools of investigators are the MIS, hard-copy documentation, and interviews with participants and other knowledgeable persons. Depending on applicable State laws and procedures, enhanced resources available to investigators may include:

- Earnings information from State employment security agencies
- Legal records, such as marriage licenses and arrest records
- Information submitted by participants to other programs, such as Medicaid, TANF, or food stamps.

An enhanced MIS can be an important tool for investigating fraud and abuse. The capability to perform queries on MIS certification and redemption data can be used to identify or confirm unusual patterns, targeting specific areas or cases for more in-depth investigation. For example, if there is suspicion that medical information is being falsified on a large scale, the MIS data might be analyzed to trace where participants are obtaining their medical referrals, to identify providers who provide disproportionate numbers of referrals or appear to serve many out-of-area participants. MIS data analysis can be conducted with little burden on local staff, whereas manual searches through participant records can be disruptive.

The effectiveness of investigations is magnified when investigators or managers use the results to provide warnings to local agencies about patterns of fraud and abuse, and to promote awareness among staff members. A simple way to do this is to issue notices or periodic bulletins to local staff. Staff or supervisors involved in investigations can present actual cases to local agencies, complete with a discussion of what preventive steps could have been taken, and what local staff did or could have done to assist in the investigation (i.e., documentation, reporting of suspicious cases).

These presentations can be made on-site at local agencies or in conferences of local agencies. Investigators may speak with more formal authority and breadth of experience, but peer-to-peer communications may be more effective at getting the attention of staff and motivating them to make fraud control a priority. The benefits of such a use of specialized staff time need to be weighed against the cost to the Program of the hours involved, as well as the loss of time spent conducting investigations while providing outreach. Frequency of outreach can be adjusted to maximize the effectiveness of outreach while minimizing loss of staff time to other duties. Number of clinics involved and volume of investigations required are factors for States to consider when making this decision.

Sanctions

When investigations find sufficient evidence of fraud or abuse to warrant a sanction, the responsible staff must determine the appropriate course of action. The main options are: counseling, written warnings, increased monitoring, and disqualification. As previously discussed, disqualification is usually reserved for more serious violations because of the potential adverse impact on the participant's health. One alternative to disqualification is the mandatory assignment of a proxy to pick up and redeem food instruments, particularly when the participant is an infant or child and the offender is the parent.

Sanctions are made more consistent and defensible when the State establishes clear guidelines for these determinations. These guidelines need to address both situations where federally mandated sanctions apply and those where the State has discretion. At the same time, local agencies need some discretion to adjust the response when special circumstances apply. This discretion can be delegated in the guidelines, or the State can provide a waiver process whereby it retains control over the exceptions. Either way, States require a one-time up-front investment of State administrative staff time to establish the guidelines, and periodic investments of time to update or change them as needed.

Typically when a participant has violated a rule or regulation of the WIC Program, a warning letter is sent, informing the participant what rule was violated. As an enhanced control against fraud and abuse, the warning letter should also include information about what steps will be taken or what sanctioning will occur if the behavior in question should occur again. Inclusion of this additional information in the letter requires minimal additional staff time, and even if the agency takes no other action, this sends a message to participants about the seriousness with which the WIC Program views program violations. This message is more effective if the local agency reinforces it with counseling to ensure that the participant understands the message.

There may be underlying reasons for the violation that need to be addressed, such as domestic abuse or other needs for social services. Increasing the frequency of food instrument pick-up is an effective response for certain violations, such as redeeming benefits before or after their valid dates. While both counseling and increased frequency of pick-up entail an additional investment of staff time and a potential slowing of clinic flow, both address not only the issue of prevention of fraud and abuse, but also the mission of identifying participants' other needs and making appropriate referrals.

If a participant continues to violate program rules, or if the violation is sufficiently serious, Federal or State rules may require the local agency to disqualify the participant for a certain period of time. Clear guidelines appropriate to the expectations of the Program and the community are particularly important when disqualification is a possible sanction. State agencies should take their laws and whatever special circumstances may be unique to their State into consideration when establishing these guidelines. Establishment of guidelines represents an investment by State administrative staff.

Updating guidelines represents a periodic additional investment of time, but as this is not a routine activity, it is not likely to require additional staff or divert an unreasonable amount of

staff time from other duties. In situations where a participant with dependents who are also on WIC has been disqualified, some State agencies provide the option of using a proxy to obtain benefits for the dependents, thereby preventing loss of benefits to the dependents, while at the same time enforcing sanctions on the adult participant, who is responsible for the offense.

The WIC Program requires the State or local agency to send a disqualification letter to the participant stating why the disqualification is occurring, how long it is for, and what further sanctions will be instituted if the violation occurs again. The letter must be sent at least 15 days before the effective date of the sanction, and it must advise the participant on how to exercise the right to a fair hearing. As an enhanced control to ensure that the participant receives it, the letter should be sent by certified mail or hand-delivered. In extreme cases, it may be necessary to arrange a fictitious appointment to ensure that the participant is present where the notice can be delivered.

Although these methods of delivery represent an additional cost to the Program in terms of time or dollars, they ensure that the participant received notification, and may save investigative staff time during sanctioning, as nonreceipt of the letter cannot be used as a reason to dispute sanctions. The State agency should send notification to other local agencies and record the sanction information in the MIS, to prevent the participant from returning before the end of the disqualification. This notice should explain the nature of the violation, particularly if it represents a pattern that is not familiar to other local agencies.

It may be appropriate to provide a description or photograph of the participant, in case she attempts to enroll under a false identity. Such notification requires that some member of the staff invest the time required to compile the relevant information into a letter or email and ensure that it reaches all agencies. This process does not require a significant amount of staff time, and can be performed by clerical staff as opposed to senior staff.

Recovery of Funds

When a participant has received an overpayment (i.e., benefits she is not entitled to), the State or local agency must request repayment. Again, States need to develop and disseminate guidelines for recovery of funds, particularly if this responsibility is delegated to local agencies, to assure consistent and cost-effective practices. In developing these guidelines, the State needs to consider the resources available for follow-up (including external sources, such as collection agencies or civil prosecution), their costs, and evidence of their rates of success. An FNS workgroup has developed a helpful guide for this assessment.⁶

The basic procedures for collection of overpayments are: sending a letter explaining the basis and requesting repayment; following up by mail, telephone or other means to collect the funds; and establishing a record of the claim and the payments. By sending a letter in every instance of overpayment, the agency sends a clear message that no overpayments are acceptable. The State or local agency can minimize the ongoing cost of this step by setting up standard form letters and

⁶See the Best Practices Guide (1999) developed by the FNS Dual Participation Workgroup.

automating the process of establishing the record of the claim and sending reminders. Automation can also promote consistency and facilitate accountability for recovered funds.

The automation can be done on a simple stand-alone PC database if the collection process is centralized. The agency can still reserve the more expensive forms of followup, such as pursuit of collection by State staff or collection agencies, for instances when the expected payoff justifies them (based on the size of the claim and the availability of information and resources to collect).

A State can facilitate decisions about how far to proceed in attempting to collect a claim by reviewing the steps required under the different options, the staff time and other costs, and the likelihood of the payoff, based on experience. Once the State has completed this process, which may require some attempts at strategies with a low probability of success on a trial basis, it can establish a series of guidelines for future decisions, using such tools as decision trees.⁷

Prosecution

When an investigation of possible fraud and abuse has been conducted, and the State or local agency wants to conduct a criminal investigation and prosecute the offender, the cooperation of law enforcement authorities is needed. Criminal cases require more sophisticated and varied investigative methods (e.g., undercover observation) and higher standards of evidence, and WIC agencies lack the powers to arrest and prosecute offenders.

As an enhanced control, WIC agencies can increase the effectiveness of referrals to police and prosecutors by establishing an understanding regarding what types of cases can be prosecuted and what kinds of evidence are needed. If law enforcement officials are routinely presented with cases that they consider appropriate for prosecution, the likelihood that they will follow through with prosecution should increase. Relationships with police and prosecutors can be enhanced by formal agreements with the WIC agency. The availability of WIC funding for appropriate activities can further enhance these relationships, if this is an option for the State agency. Establishment of guidelines for pursuing criminal prosecution requires an investment of State administrative staff to communicate with law enforcement about what constitutes a criminal case and what information the Program should provide for them. In addition to this initial investment of time, the State needs to maintain communication with law enforcement to ensure that guidelines are updated in a timely manner when laws change.

Before seeking a criminal investigation, the WIC agency can enhance the chances of success by realistically assessing the chances of securing the help of law enforcement officials, obtaining an indictment, and reaching a guilty verdict. Good candidates for prosecution may be identified based on the amount of preliminary evidence, the size of the fraud (e.g., a group that creates a large number of phantom participants) or the potential deterrent value (e.g., a staff member

⁷A decision tree models a complex decision problem as a series of choices between uncertain outcomes with specified payoffs. If the probabilities of the outcomes are known or estimated, the expected values of the possible decision paths can be compared to assess the alternatives.

participating based on fraudulent reporting of income). The WIC staff members making these assessments need substantial knowledge of applicable laws and the judicial system.

Such assessments, and the role of the WIC agency in criminal investigations, can, as an enhanced control, be strengthened by the availability of specialized investigators with a law enforcement background, either as members of the WIC staff or through cooperative relationships with other organizations. Hiring of specialized investigators represents an increased cost to the Program. Investigators with extensive experience, who would be the most attractive to the Program, are likely to command higher salaries. States can offset the cost by hiring on a part-time basis, or they can ensure maximum use of the investigator's time (e.g., outreach to encourage referrals from local agencies when not busy with investigations).