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**Program Integrity: Conflicts of Interest**

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Effective Date: June 1, 2014

Supersedes: January 1, 2011

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These guidelines define common conflict of interest issues that may arise during WIC Program participation. The State WIC Office encourages authorized retailers to contact the store's assigned Vendor Liaison to discuss conflict of interest issues not outlined in this manual.

### **I. Conflicts of Interest**

- A. Management shall seek to ensure that no conflicts of interest exist between any store personnel and any local, state, or federal WIC agency. This group includes (but is not limited to) store employees or spouses of store owners who are also employees of a local, state, or federal WIC agency.
- B. Management shall ensure that federal and state confidentiality requirements are met in addressing any potential conflict of interest, such as action involving store employees that are also eWIC cardholders.
- C. Management must remind store personnel of these conflict of interest requirements annually at minimum. Specific situations that shall be addressed during this review include:
  - 1. If a store employee (or any member of their immediate family<sup>1</sup>) is also employed by a local, state, or federal WIC agency, they must notify store management to ensure that no conflict of interest will exist in handling their job duties.
  - 2. Store personnel must not provide any gratuities including food, cash, coupons, or gift cards to employees of local, state, or federal WIC agencies.
  - 3. Store personnel must not accept food items purchased using another individual's eWIC benefit card.
  - 4. Store personnel must not redeem eWIC food benefits for themselves (as eWIC cardholders) or for members of their immediate family<sup>1</sup>.
  - 5. If an authorized retailer does not have a policy that prohibits self checkout or checkout of family members, the WIC Program expects that such a policy will be developed, communicated to all affected parties, and enforced by the retailer. Store managers must identify and communicate to affected employees how conflict of interest issues will be handled.

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**Program Integrity: Conflicts of Interest (Continued)**

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- D. If an authorized retailer identifies an actual or potential conflict of interest, they must contact the store's assigned Vendor Liaison and provide the following information:
1. Store name and WIC ID number;
  2. Contact name and phone number;
  3. Name of store employee with a potential conflict of interest;
  4. Title of store employee with a potential conflict of interest; and
  5. Brief summary of the potential conflict of interest situation.
- E. Management is encouraged to contact the store's assigned Vendor Liaison for additional guidance on any conflict of interest issues brought to their attention.
- F. The WIC Program has developed a handout to help retailers meet the annual conflict of interest training requirement. This resource is available on the WIC Program's website.

<sup>1</sup>Living in the same household.

References:

- 7 CFR §246.12(h)(3)(t)
- 7 CFR §246.26(d)
- State WIC Regulation 12VAC5-195-460. Conflict of interest.
- Retailer Agreement