

Division of Community Nutrition

<i>Subject:</i> Conflict of Interest		<i>Policy:</i> ADM 06.1
<i>Reference:</i> N / A	<i>Effective:</i> August 12, 2013	<i>Supersedes:</i> June 1, 2011

1) **Policy:**

Local agency personnel and state personnel involved in the WIC eligibility / certification / food benefits process shall not certify or issue food benefits to themselves or relatives. This policy also applies to personnel who perform minimum stocking visits at WIC authorized retailers/applicants. Relatives include: spouse, parent, child, brother, sister, aunt, uncle, nephew, niece, grandparent, or grandchild. Personnel shall not have a financial interest in an authorized WIC retail store. Personnel shall not be a proxy for a participant.

2) **Procedure:**

- A. Local agencies shall maintain a list of all WIC personnel who are participants.
- B. Local agencies shall maintain a list of all WIC personnel who are related to participants.
- C. Local agencies shall maintain a list of all WIC personnel or their relatives, who have been identified as an owner or employee of a WIC authorized retailer (this includes full time, part time and seasonal employment). Employees shall be surveyed in writing and the list updated at least every 12 months and for new employees when hired.
- D. Personnel who participate in the WIC program or who have relatives as participants in the WIC program shall not issue or complete the following (or portions of the following) for themselves or relatives. If other personnel are not available at the site, the participant shall receive services at an alternate site. Refer to ADM 06.0.
 - 1) Eligibility screening (categorical, financial, residential, or proof of identity)
 - 2) Letter of Ineligibility (WIC-315)
 - 3) Participant Rights and Responsibilities Form (WIC-310)
 - 4) Request for WIC Proxy (WIC-314A)
 - 5) WIC Transfer Document(VOC)
 - 6) Issuance of WIC food benefits (eWIC)
 - 7) Food prescription assignments and changes
- E. WIC personnel shall not direct or influence participants to use a particular retail store to redeem food benefits.

Division of Community Nutrition

<i>Subject:</i> Conflict of Interest		<i>Policy:</i> ADM 06.1
<i>Reference:</i> N / A	<i>Effective:</i> August 12, 2013	<i>Supersedes:</i> June 1, 2011

- F. WIC personnel who are Program participants and work at an authorized retail store or who have relatives who own a WIC authorized retail store shall not redeem WIC food benefits at these retailers.

- G. WIC participants shall not redeem their food benefits at WIC authorized retail stores where their relatives are employed.

- I. Personnel who participate in the WIC program or who have relatives as participants in the WIC program shall only review their own records or the records of their relatives in the presence of other personnel upon receipt of a written request.

- J. The local agency shall make available to federal or state auditors the file of personnel who are participants or who have relatives in the WIC program.

- K. An onsite stocking visit shall not be completed by WIC personnel who are employed by both the Local Agency and the WIC authorized retailer being reviewed. Additionally, WIC personnel shall not complete an onsite stocking visit at any WIC authorized retailer/applicant where a relative is employed.

- L. WIC personnel shall not request or accept any type of benefit or special treatment from an authorized WIC retailer. Examples of benefits and/or special treatment would be free or reduced cost food, donations and free space in retailer's store for special event WIC stand/booth.