

**Virginia Department of Health  
Division of Community Nutrition  
WIC Program**

**Conflict of Interest**

The WIC Program provides nutritional and health benefits to a large number of Virginians. It is the joint responsibility of the WIC local and central office, authorized stores and the employees of each to ensure there are no Conflicts of Interest within the service delivery process. To ensure we all have the same understanding, a conflict of interest occurs when an individual(s) or organization is involved in multiple interests, one of which could possibly corrupt the motivation for an act in the other.

All employees who are involved in or have control over the WIC service delivery process must follow the Virginia WIC Program's Conflict of Interest regulations (12VAC5-195-460) and guidelines (Virginia WIC Program Retailer Manual, C3-1); which includes:

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.