

Conflict of Interest

- I. There may be no conflict of interest between WIC clinic staff and the participants of the program or with any vendor or contractor as defined by applicable State laws, regulations, and policies.
- II. WIC staff or local agencies may not own, operate or manage a WIC authorized store. WIC Staff may not direct or encourage participants of the program to use their WIC benefits at any particular vendor.
- III. Businesses owned or managed by WIC Staff members or their immediate family members may not be contracted to provide services to WIC agencies.
- IV. WIC Staff may not:
 - a. Disparage or harm the public image of the WIC program, its staff, participants or contractors, either publicly or privately, such as through social media posts, interviews, discussions, etc.
 - b. Sabotage or damage in any way the property, data or records of the program.
 - c. Interfere with the operations of the WIC clinic or impede or delay WIC applicants or participants from receiving services or food benefits.
 - d. Violate the confidentiality or civil rights of program applicants or participants.
 - e. Staff members involved in such incidents at the state or local agency level will be subject to discipline by their employer which may include, but not be limited to, losing the ability to be employed in the WIC program.
- V. A WIC staff member cannot:
 - a. Certify oneself.
 - b. Certify relatives or close friends.
 - c. Provide any part of WIC services to any member within the same household as the employee.
 - d. Determine eligibility for all certification criteria and issue benefits to the same participant.
- VI. Separation of Duties. To ensure a single staff member does not determine eligibility for all certification criteria and issue benefits to the same participant:

- a. Employee permissions will be set within the VISION system to allow appropriate access to certification and food benefit issuance functions.
 - i. Some staff may be approved for security access within VISION by the state WIC director that would allow the staff person to complete intake screens, nutrition assessment and issue benefits. Though possible, staff should avoid completing both the income eligibility determination and the nutrition risk assessment for the same participant.
 - ii. In very small clinics that operate with only one staff member regularly, or due to temporary circumstances, staff in a role approved by the state WIC director may complete all certification functions when necessary.
 - iii. Staff who have been approved for these exceptions will have their certification records reviewed weekly by state WIC staff and their local agency WIC director. (See *Monitoring of Staff to Prevent and Detect Fraud*).
 - iv. When possible, staff working alone on a certification should securely send copies of income/adjunct eligibility documentation to another colleague in another WIC clinic within their local agency for review and entry of the income record into VISION. Black-out any social security numbers that may be listed on the documentation.
 1. When submission to another staff within the local agency is not possible, income documentation may be securely submitted to the WIC Help Desk at the state office for review and entry.
 2. When secure submission of documentation to outside staff to complete the income record is not possible, it is highly recommended to scan copies of the income documentation into VISION in order to assist with the auditing process that will occur. DO NOT UPLOAD DOCUMENTS CONTAINING VISIBLE SOCIAL SECURITY NUMBERS!
 3. All clinics should have the equipment necessary to be able to scan documentation into VISION.