
SECTION: ADMINISTRATIVE POLICIES AND PRACTICES

SUBJECT: Program Integrity

ITEM: WIC Services for Employees and Relatives

Policy

A local agency (LA) employee is prohibited from participating in any component of the certification process and issuing food instruments (FI) to themselves, their relatives or close friends to ensure that no conflict of interest exists, and to prevent and detect staff fraud and abuse.

Required Procedure

- I. For any LA employee, their relatives or close friends applying for or participating in WIC, only the LA program manager, site supervisor or designee is authorized to:
 - A. determine their eligibility to receive WIC benefits, and
 - B. process the certification and provide appropriate nutrition education contacts including the prescribing of FI's.
- II. The LA program manager, site supervisor or designee shall:
 - A. restrict access to the participant's Integrated Statewide Information System (ISIS) record by rendering it "confidential",
 - B. secure and file the applicant's or participant's paper records separately from the general paper files, and
 - C. maintain separation of duties between prescribing, printing and removing FI's from the printer, and distributing FI's. (WPM 350- 10)
- III. The LA shall develop and implement procedures to ensure WIC program integrity is maintained when services are provided by the designee. The written procedures shall be made available to program reviewers upon request.

Definitions

Close Friend: The LA shall determine on a case-by-case basis if a WIC applicant or participant is a close friend of the WIC employee.

Designee: An individual selected by a program manager or site supervisor to act on behalf of that program manager or site supervisor when absent.

Employee: A person whose salary is paid in whole or part by WIC Program funds.

Relatives: Persons who are related by marriage or blood to include spouse, parent, children, grandchildren, grandparents, brother, sister, aunt, uncle, niece, nephew, first cousin, stepparent, stepchildren, and stepsister.

Authority

7 CFR 246.4 (a) (26)

7 CFR 246.12 (p)

7 CFR 246.26 (d) (1) (ii)

All States Memorandum 02-15