

ADMINISTRATIVE POLICIES AND PRACTICES WPPM #150-10

Subject: Program Integrity

Item: Conflict of Interest: Local Agencies and Vendors

PURPOSE:

To define conflict of interest (COI) between the local agency (LA) and a WIC authorized vendor.

POLICY:

I. COI Requirements

A. LAs must:

1. Establish a written COI policy and, through education and supervision of staff, ensure that no COI exists between the LA and any WIC authorized vendor.
2. Make the LA written COI policy available to CDPH/WIC upon request and in a timely manner.

II. Program Integrity

A. LA staff must:

1. Sign a COI statement upon employment, once every LA agreement cycle, and if there are any changes to an existing statement.
2. Have the supervisor sign and date the COI statement.
3. Make the completed COI statement for each LA staff member available to CDPH/WIC upon request and in a timely manner.

B. The LA may use the attached *California WIC Program Employee Conflict of Interest Statement* or develop its own COI statement provided it contains, at a minimum, the same criteria reflected in the CDPH/WIC statement.

PROCEDURES:

I. At a minimum, the LA written COI policy must:

- A. Require that LA staff be trained to refrain from directing or recommending that a WIC participant choose or stay away from a specific vendor to redeem food benefits.
- B. Require that LA staff be educated against knowingly making a decision intended to benefit or to disadvantage a specific WIC authorized vendor.
- C. Prohibit LA staff from engaging in any promotion with or receiving gifts, financial benefits, gratuities, or incentives from a WIC authorized vendor.
- D. Prohibit LA staff from accepting donated WIC authorized foods and infant formula from WIC authorized vendors or other outside entities for distribution to participants.

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- E. Prohibit an owner or spouse of an owner of a WIC authorized vendor from being employed concurrently by a LA.
 - F. Prohibit LA staff from participating in the certification and not issuing WIC food benefits to a family member or friend. Refer to WPPM 140-10.
- II. All COI issues or complaints must be reported directly to CDPH/WIC at 1-800-852-5770.

AUTHORITY:

[7 CFR §246.12\(h\)\(3\)\(xx\)](#)

[7 CFR §246.12\(t\)](#)

RESOURCE:

Employee Conflict of Interest Statement

CROSS REFERENCE:

WPPM 140-10 WIC Services for Employees and Relatives