

ADMINISTRATIVE POLICIES AND PRACTICES WPPM #150-10

Subject: Program Integrity

Item: Conflict of Interest: Local Agencies and Vendors

PURPOSE:

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

POLICY:

- I. Each LA must establish a written conflict of interest policy and, through education and supervision of its staff, ensure that no conflict of interest exists between the LA and any authorized WIC vendor. The LA must make available to CDPH/WIC upon request and in a timely manner, its written conflict of interest policy.
- II. To ensure the integrity of the program, all LA staff members must sign a conflict of interest statement upon employment and once every three years to coincide with the LA's contract cycle. The LA may use the attached *California WIC Program Employee Conflict of Interest Statement (COI)* or develop its own COI statement providing it contains, at a minimum, the same criteria reflected in CDPH/WIC's developed statement. The employee's supervisor must also sign and date the COI statement. The LA must make available to CDPH/WIC upon request and in a timely manner, the completed conflict of interest statement for each LA employee.

PROCEDURE(S):

- I. At a minimum, the written conflict of interest 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 instruments.
 - B. Require that LA staff be educated against knowingly making a decision intended to benefit or to disadvantage a specific authorized WIC vendor.
 - C. Prohibit LA staff from engaging in any promotion with or receiving gifts, financial benefits, gratuities or incentives from an authorized WIC vendor.
 - D. Prohibit an alternate or proxy from acting on behalf of more than one certified family unless otherwise authorized by the LA and documented in WIC management information system "Family Comments" screen.
 - E. Prohibit an owner or spouse of an owner of a WIC authorized vendor from being employed concurrently by WIC.
 - II. All conflict of interest issues or complaints must be reported directly to CDPH/WIC Local Integrity Unit at 1-800-852-5770.
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AUTHORITY:

[7 CFR §246.12\(h\)\(xix\)](#)

[7 CFR §246.12\(r\)](#)

[7 CFR §246.12\(t\)](#)

California WIC Program

Employee Conflict of Interest Statement

I have read and do understand the California WIC Program's Conflict of Interest policy. By signing below, I am agreeing to always follow the policy by:

1. Certifying that neither I nor any individual related to me by blood or marriage has any financial interest in any grocer authorized to accept WIC food instruments.
2. Not showing any favoritism, by oral or written communication, posters, handouts, or media presentations, towards any WIC authorized vendor.
3. Not endorsing any WIC authorized vendor or discourage WIC participants from using a specific WIC authorized vendor.
4. Not engaging in any promotions for a WIC authorized vendor.
5. Not receiving any gratuities including cash, food, or food coupons from a WIC authorized vendor.
6. Not participating in the enrollment of a family member or friend in the WIC program and not issuing WIC food instruments to a family member or friend.

☐ I do not have any conflict of interest

☐ I do have or may have a conflict of interest, which is:

Employee name (print full name)

Title

Employee signature

Date

Supervisor's signature

Date