

FARMERS' MARKET NUTRITION PROGRAM WPPM #800-10

Subject: Farmers' Market Nutrition Program

Item: Conflict of Interest: Local Agencies and Farmers

PURPOSE:

To define conflict of interest (COI) between the local agency (LA) and WIC-authorized farmers or farmers' markets.

POLICY:

I. COI Requirements

A. LAs must:

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

II. Program Integrity

A. LA staff must:

1. Sign a COI statement upon employment and once every LA agreement cycle.
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 *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 avoid a specific WIC-authorized farmer or farmer's market 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 farmer or farmer's market.
- C. Prohibit LA staff from engaging in any promotion with or receiving gifts, financial benefits, gratuities, discounts, or other incentives from a WIC-authorized farmer or farmer's market.

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- D. Prohibit LA staff from accepting donated or discounted WIC-authorized foods from WIC-authorized farmers or farmers' markets, or other outside entities for personal use and/or distribution to participants.
 - E. Prohibit an owner or spouse of an owner of a WIC-authorized farmer's market from being employed concurrently by a LA.
- II. All COI issues or complaints must be reported directly to CDPH/WIC at 1-800-852-5770.
- III. If COI policy and procedures, as defined above, are followed, LAs are permitted to distribute FMNP benefits at WIC-authorized farmers' markets for the sole purpose of promoting the use thereof.

AUTHORITY:

[7 CFR 248.10\(a\)\(7\)](#)

RESOURCE:

California WIC Program Employee Conflict of Interest Statement