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**SECTION: ADMINISTRATIVE POLICIES AND PRACTICES**

**SUBJECT: Program Integrity**

**ITEM: Conflict of Interest: Local Agencies and Vendors**

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## **Purpose**

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

## **Policy**

Each local agency shall establish a written conflict of interest policy and, through education and supervision of its staff, ensure that no conflict of interest exists between the local agency and any authorized WIC vendor. The local agency shall make available to the State agency staff upon request and in a timely manner, its written conflict of interest policy.

To ensure the integrity of the program, all local agency staff members shall sign a conflict of interest statement upon employment and once every three years to coincide with the local agency's contract cycle. The local agency 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 the State agency developed statement. The employee's supervisor shall also sign and date the COI statement. The local agency shall make available to the State agency staff upon request and in a timely manner, the completed conflict of interest statement for each WIC employee.

## **Authority**

7 CFR 246.12 (h)(xix), 7CFR 246.12(r), 7 CFR 246.12 (t )

## **Required Procedures**

At a minimum, the written conflict of interest policy shall:

- require that 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;
- require that staff be educated against knowingly making a decision intended to benefit or to disadvantage a specific authorized WIC vendor;

- prohibit staff from engaging in any promotion with or receiving gifts, financial benefits, gratuities or incentives from an authorized WIC vendor;
- prohibit an alternate or proxy from acting on behalf of more than one certified family unless otherwise authorized by the local agency and documented in the Integrated Statewide Information System, Family Comments screen; and
- prohibit an owner or spouse of an owner of a WIC authorized vendor from being employed concurrently by WIC.

All conflict of interest issues or complaints shall be reported directly to the State agency's Program Integrity Unit at 1-800-852-5770.

### **Authority**

7 CFR 246.12 (h)(xix), 7CFR 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