

Section II: Local Agency Procedure Manual

IV. Local Organization and Management

B. WIC Employee Integrity

Purpose

To provide guidance to local agencies on separation of duties and reducing the risk of fraud where there is a conflict of interest.

Policy

Local agencies must ensure integrity in certification and other clinic processes.

1. Separation of Duties

- Each WIC clinic will have staffing, and clinic structure/flow, to enable a separation of duties including a division between income eligibility determination and nutrition risk code assignment during certifications.
- When adequate separation of duties is not possible, selected certification records will be audited by the State Office within two weeks, per FNS WIC Policy Memorandum #2016-5 Separation of Duties. Documentation will be maintained by the State Office.
- During Waiver Status:
 - When separation of duties is not possible, due to remote appointments, 20% of all certification records, where the income and nutrition risk contacts are completed by the same staff, will be audited by an automatic process within two weeks and documentation will be maintained.
 - Data will be pulled and ranked on a priority system, including certification duration, risk codes, card signatures, eligibility documentation, signature for participant rights and responsibilities, and income.
 - State Office Public Health Nutritionist will verify the charts that meet the high priority level threshold.

2. WIC Employee Integrity

- Local agency employees may not act as authorized representatives, alternate representatives, or proxies for participants (unless it is their own personal family or household unit that is participating).
 - A WIC employee or family member of a WIC employee may participate in the program.
 - The entire WIC certification must be completed by another WIC employee that does not have a conflict of interest or close relationship to the applicant/participant.
 - The local agency may contact the State Office to assist in completing the certification where a conflict of interest cannot be resolved with alternate staff locally.

- The appointment shall be scheduled ahead of time with the State Office staff.

3. Business Conflict of Interest

If any potential or real conflict of interest between local agency staff, either state or local, and an identified business' personnel, the local agency shall:

- Notify the State WIC Office of any potential conflicts of interest which may include, but are not limited to:
 - Employment of a staff member or spouse, son, daughter, parent or sibling of a local or state WIC agency staff member by the business within the local agency or State WIC Office jurisdiction.
 - Receiving a fee or gift from a business in exchange for providing WIC information, or WIC staff action that would materially benefit the business, or for preferentially promoting the business.
 - Receiving, either directly or through a relative, a substantial gift of financial assistance from a local business.
 - Entering into a business transaction with a local business or a staff member acquiring a pecuniary interest in a business.
- The State WIC office reserves the right to prohibit activities which compromise the integrity of the program.