

## Conflict of Interest

- I. There may be no conflict of interest between WIC clinic staff and the participants of the program or with any vendor or contractor as defined by applicable State laws, regulations, and policies.
- II. A WIC staff member cannot:
  - a. Certify oneself.
  - b. Certify relatives or close friends.
  - c. Provide any part of WIC services to any member within the same household as the employee.
  - d. Determine eligibility for all certification criteria and issue checks to the same participant.
- III. Separation of Duties. To ensure a single staff member does not determine eligibility for all certification criteria and issue checks to the same participant:
  - a. Employee permissions will be set within the VISION system to allow appropriate access to certification and food benefit issuance functions.
    - i. Due to the role in the clinic, some staff may be granted security access within VISION that would allow the staff person to complete intake screens, nutrition assessment and print checks. (State approved role.) Though possible, staff should not complete all these functions for the same participant.
    - ii. Very small clinics that operate with only one staff member regularly, or due to temporary circumstances, may request an exception to the separation of duties policy from the State WIC Program Manager. If this permission has been granted it must be in writing and kept on file.
    - iii. Staff who has been approved for these exceptions must have their records reviewed quarterly (see Monitoring of Staff to Prevent and Detect Fraud).
- IV. WIC staff members, their immediate family members or local WIC agencies may not own or manage a WIC authorized store.
- V. Businesses owned or managed by WIC Staff members or their immediate family members may not be contracted to provide services to WIC agencies.