

## New Hampshire WIC Policy & Procedure Manual

### Chapter 4. ORGANIZATION AND MANAGEMENT

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#### Conflict of Interest

<b>Purpose</b>	To assure program integrity through prevention and detection of employee fraud and abuse.
<b>Policy</b>	<p>The local agency shall ensure no undeclared conflict of interest or the appearance of conflict of interest exists for any employee involved in determining WIC eligibility, certification or recertification, issuing WIC benefits. This includes WIC clinic staff and WIC participants.</p> <p>It is prohibited for a WIC local agency employee to certify oneself, a relative or close friend.</p> <p>It is prohibited to issue WIC benefits to oneself, a relative or close friend.</p> <p>WIC employees shall not be an appointment proxy for a participant.</p> <p>If a WIC employee is also employed by an authorized vendor they shall not handle or process WIC benefits at the vendor/grocery store—directly or indirectly i.e. cashier, bookkeeper, management at any level that involves WIC benefits.</p> <p>Refer to Sample Conflict of Interest/Separation of Duties document.</p>
<b>Authority</b>	7 CFR 246.4 (a) (26) (i-iii) 7 CFR 246.26(h)(3) USDA Memo #2016-5
<b>Procedure</b>	<p>All employees shall sign a Conflict of Interest statement at the local agency upon hiring.</p> <p>Clinic supervisors shall be responsible for certifying or issuing benefits to employees who are also WIC participants.</p> <p>Conflict of interest policy/document shall be reviewed annually with all employees.</p>
<b>Exception</b>	No exceptions.
<b>Best Practice</b>	All employees shall sign the Conflict of Interest/Separation of Duties document annually or a staff signature sheet indicating that it was read and agreed to.