

Conflict of Interest/ Separation of Duties SAMPLE

I understand as a WIC employee that I must follow WIC Federal Regulations 246.4 (a)(26)(i-iii), 246.4 (a)(27), 246.26(h)(3), USDA Memo #2016-5 and NH policies in providing WIC Program services. WIC employees must adhere to these regulations and policies regarding providing services to oneself, any relatives, or friends to avoid a conflict of interest and assure separation of duties.

WIC employees are prohibited from:

- Being involved in any manner in certifying oneself, relatives or close friends.
- Issuing food benefits for FUN appointments for oneself, relatives or close friends.
- Being a proxy for any participant, including close friends and relatives.
- Accessing records of yourself or individuals with whom you are related to or close friends with.
- Working at any WIC vendor as a cashier, bookkeeper, management or any position where your employment involves you with any transactions of WIC cash value benefits or WIC food benefits.
- One employee determining eligibility for all certification criteria and issuing food benefits (including cash value benefits) for the same participant.

WIC employees must:

- Notify your director/supervisor of situations that will cause a potential conflict of interest so that alternative arrangements may be made for certification and providing WIC Services.
- Assure that at least 2 staff persons are involved in a participant's certification with a clear separation of 1) determining income/residency/identity eligibility proofs and 2) nutrition assessment, nutrition risk assessment and food package assignment/certification of the participant. With this separation, either staff may issue benefits

I understand that as an employee if I am found to be in violation of this policy I will be subject to disciplinary action up to and including potential dismissal.

Printed Name

Date

Signature