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POLICY

1. WIC employees must not complete any certification activities to determine eligibility for themselves, relatives, close friends, or foster children in their care.

REGULATIONS

State plan, [246.4\(a\)\(27\)](#) - The State agency's policies and procedures for preventing conflicts of interest at the local agency or clinic level in a reasonable manner. At a minimum, this plan must prohibit the following WIC certification practices by local agency or clinic employees, or provide effective alternative policies and procedures when such prohibition is not possible:

- (i) Certifying oneself;
- (ii) Certifying relatives or close friends; or,
- (iii) One employee determining eligibility for all certification criteria and issuing food instruments, cash-value vouchers or supplemental food for the same participant.

DEFINITIONS

Refer to Acronyms and Definitions in Section 1011.


PROCEDURE

LA/VMA Policy Required Yes No

1. All WIC Program certifications and subsequent certifications for employee participants, their relatives, close friends, or foster children in their care, must be reviewed by the WIC Coordinator within two weeks.
2. The WIC Coordinator must ensure that employee participants meet all program requirements and do not participate in the determination of their own eligibility or benefit issuance.
3. In the event that the WIC Coordinator is an employee participant or foster parent, the WIC Coordinator's supervisor is responsible for reviewing the transactions and documenting the review.
4. The WIC Coordinator or WIC Coordinator's supervisor must document the review in the management information system (MIS) to confirm that proper procedures were followed.
5. The local agency must develop a written policy on handling employee participants to ensure program integrity. This policy must be kept on file and be available for review in the Local Agency Policy and Procedure Manual.

GUIDANCE

Policy Supplement Available Yes No

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RESOURCES

WIC Program Manual Sections and Policy Supplements:

- #1100: WIC Certification Overview