Policy

Local agency staff are prohibited from performing income eligibility and certification duties and issuing food instruments for themselves, their relatives, friends, and for any person who resides in the same household. Hence, the employee must list all relatives or individuals (friends) residing in the employee’s home that is receiving WIC benefits on the Disclosure Statement. The Disclosure Statement must be completed annually or when changes occur by all clinic employees who perform WIC services.

In clinics where there are no other trained staff to determine WIC eligibility, the certification determination will be reviewed by a clinic supervisor or manager. The WIC Nutrition Services Director must conduct a post review of all family members record within two (2) weeks of the certification. Documentation of review must be kept on file at the Local agency for review during program review/management evaluations.

Purpose

To prevent conflict of interest at the local agency and clinic level.

Procedures

I. Local Agency staff will:
   A. Complete and submit a Disclosure Statement to the Nutrition Services Director by September 30th of each year or anytime changes occur.
   B. Maintain the staff Disclosure Statements at the county health department / WIC clinic site.

II. Contact the Nutrition Service Director if there is no other clinic supervisor or manager to review the certification. The WIC Nutrition Service Director will review the certification and will document approval in the record.

III. District staff will:
   A. Review all disclosure statements during self-reviews.
   B. Review the certification and ensure that the applicant meets the applicant category (pregnant, breastfeeding, infant, etc.), income, residency, and nutritional risk criteria requirements for certification during self-reviews.
   C. Ensure that the appropriate food package has been assigned.
   D. Schedule all employee WIC appointments outside of the employees scheduled work hours.
E. Assign a non-related staff person to print and issue vouchers to WIC staff currently enrolled in the WIC program.

Authority
7 C.F.R. § 246.4(a)(27)

Definitions

Relatives - Persons who are related by marriage or blood to include spouse, parent, children, grandchildren, grandparents, brother, sister, aunt, uncle, niece, nephew, first cousin, stepparent, stepchildren, and stepsister.