

2-4 Program Integrity

What is integrity?

Having integrity means doing the right thing in a reliable way. Integrity means following your moral or ethical convictions and doing the right thing in all circumstances, even if no one is watching you. Here is a [video on integrity](#).



Integrity is one of the fundamental values that employers seek in the employees that they hire. It is the hallmark of a person who demonstrates sound moral and ethical principles at work. Honesty and trust are central to integrity.

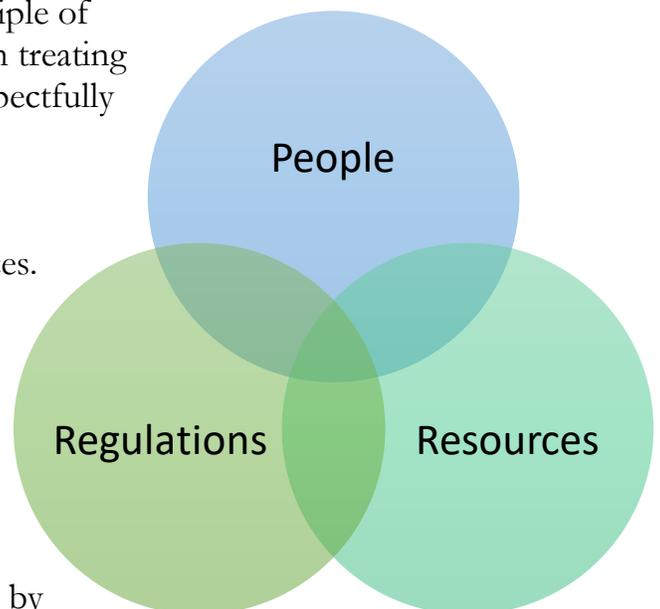
Integrity means you do what is good for individuals, your community, and the WIC program.

What is program integrity?

Program integrity just means you apply the principle of integrity to what a program does. That starts with treating participants, your co-workers, and the public respectfully and professionally.

Program integrity also means the responsible management of WIC program funds and resources. When we talk about resources, we aren't just referring to money. We are also talking about things like WIC benefits, staff time, WIC property or materials, or information we collect from participants.

In WIC, program integrity can also mean following the policies and regulations that are set by USDA and by the state WIC program.



Every staff person ensures the integrity of the WIC program by doing the following:

- Acting in a respectful and professional manner;

- Following WIC policies and guidance;
- Keeping participant information confidential;
- Using WIC program resources appropriately;
- Avoiding conflicts of interest; and,
- Ensuring accurate eligibility determination.

Acting in a respectful and professional manner

Acting professionally means you respect others regardless of their beliefs, values, race, or any other personal characteristic. A professional takes responsibility for their actions, including any consequences that might happen and how their actions will affect others.

Examples of unprofessional actions:

- Verbally or physically abusing WIC participants or other WIC program staff;
- Entering false and/or misleading information in participant records;
- Observing a co-worker doing something inappropriate, and not reporting it to your manager. (If you are not comfortable going to your manager, you can report this behavior to the State WIC office.)

Following WIC policies and guidance

Like most programs, WIC has a lot of rules and policies. Don't worry - you will learn about most of them as you complete your training. All [WIC policies](#) are posted on our website, so they are easy to find if you ever have a question. Your coordinator can answer most of your questions or you can contact the state WIC office if you need more information.

[Policy 596 – Acknowledgment of Employee Responsibility](#) is the one that requires you to follow policies and maintain program integrity. Your coordinator will have you sign a form that shows you understand your responsibilities and agree to follow all WIC policies.

How to read a policy

When you look at a policy, you will see the policy number, title, and date it was last updated at the very top.

Example policy

WIC OREGON

Policy 595
Program Integrity: Separation of Duties
July 13, 2018

POLICY
Local WIC programs shall separate staff income eligibility from risk determination.

PURPOSE
To ensure program integrity and prevent program abuse by assigning certification functions to more than one staff at the local level.

RELEVANT REGULATIONS
ASM 99-94—Separation of duties in WIC of
7 CFR 246.4(a)(26)—State plan: Confli
WIC Policy Memorandum #2016-5 – Separ

OREGON WIC PPM REFERENCES

- ◆ 215 - Local Program Monitoring and Review
- ◆ 500 - Certification Introduction and Overview
- ◆ 510 - eWIC Cardholder Requirements
- ◆ 511 - Food Benefit Issuance
- ◆ 596 - Program Integrity: Acknowledgement of Employee Responsibilities
- ◆ 620 - Certification and Issuing Benefits to Relatives, Friends and Coworkers

This policy is described in detail on the pages that follow.

USDA regulations or memos the Oregon policy is based on are listed.

Lists related policies in the Policy and Procedure Manual (PPM).

Keeping participant information confidential

WIC is kind of like a doctor's office in that we collect all kinds of personal information from participants. Our job is to make sure it stays private. All information concerning participants that you learn because you are a WIC employee must be kept in confidence. That means that you cannot share it with anyone who is not a WIC staff person, except in certain circumstances.

[Policy 450 – Confidentiality](#) outlines what this means and what needs to happen before you can share participant information with anyone else. Your agency will probably have a privacy or confidentiality policy that you will also need to follow.

[Policy 901 - Data system security](#) clarifies how you keep the information you entered into the computer confidential.

Examples of not keeping information confidential:

- Talking about WIC participants with your family;
- Gossiping about WIC participants with your co-workers;
- Talking about a participant’s concerns with your agency dietitian in a hallway;
- Walking away from your computer without locking the screen;
- Talking with participants about private information where other participants can overhear or in a public place;
- Leaving a computer printout with participant names, addresses, or phone numbers on your desk; or,
- Giving information to someone on the phone without verifying their identity.

[Using WIC program resources appropriately](#)

Simply put, using WIC program resources appropriately means that they are used for work purposes only, are not wasted, and are not used for personal gain.

Examples of inappropriate use of resources:

- Using supplies or equipment purchased with Oregon WIC program funds for non-WIC activities or for non-WIC clients;
- Using WIC program goods or services for personal use;
- Issuing WIC benefits to oneself;
- Creating fake participants so you can purchase or sell benefits;
- Assigning or issuing inappropriate benefits to people you know;
- Certifying oneself, co-workers, relatives or friends in the program without a supervisor knowing.

[Avoiding conflicts of interest](#)

Conflict of interest is a situation where a decision or action you make as a WIC employee could benefit you personally, could benefit someone you know, or could put you in a position of influence or power over someone else.

You will need to report any potential conflict of interest to your manager. That includes telling your manager about any friends or family members who are on WIC in your agency. [Policy 620 – Certification and Issuing Benefits or eWIC Cards to Themselves, Co-workers, Relatives and Friends](#) tells you how to handle those situations.

Examples of conflicts of interest:

- Giving preferential treatment to specific WIC participants;
- Not telling your coordinator that your best friend is getting enrolled in WIC today; or,
- Referring participants to a grocery store your family owns.

Ensuring accurate eligibility determination

WIC depends on the information that is entered into the data system to show that participants are eligible. It is important that information entered in the computer is accurate and reflects the truth. We all must be careful that we get the right information and enter it correctly.

[Policy 595 – Program Integrity: Separation of Duties](#) requires that we have 2 WIC staff involved in every certification to make sure we correctly determine eligibility for the WIC program.

Examples of inaccurate eligibility determination:

- Using previous proof information in TWIST instead of reviewing current proof of income, identity, or residence; or,
- Using incorrect techniques to take measurements.

Learning activity



After reading the situation, decide whether the activity is okay or not, and why.

Situation	Okay	Not okay	Why?
Using office supplies to make your child’s birthday party invitations during your break.			
You use your work email to ask your relatives to buy Girl Scout cookies.			

Situation	Okay	Not okay	Why?
You check a website on your break.			
You take home a report of WIC participants, so you can make appointment reminders from your home phone in the evening.			
Your friend calls you for a WIC appointment and you squeeze her in the next day.			
You issue benefits to a mom you know that missed an appointment because you know she really needs the food.			
Discussing a participant's risk factors with your agency dietitian in her office.			
Using the WIC FAX machine to send order confirmations for your home business.			

Talk it over



After you discuss the program integrity policies with your coordinator, they will have you sign the [Employee Responsibility Form](#).