POLICY
Local WIC program staff will not perform certification duties, issue benefits, or eWIC cards to themselves, co-workers, any person related to them, or to friends.

PURPOSE
To avoid situations of potential conflict of interest, WIC staff will not determine eligibility, issue food benefits, or eWIC cards to themselves, co-workers, any person related to them, or friends.

RELEVANT REGULATIONS
♦ §7 CFR 246.4(a)(27)—State plan, Requirements

PROCEDURE
1.0 Each local program will meet the following criteria to address situations of staff certifying and/or issuing benefits or eWIC cards to themselves, co-workers, family members, other relatives, or friends. This includes anyone seen socially, babysitters, etc.

2.0 WIC staff members must inform their WIC coordinator or clinic manager before the certification process begins that they (the staff member), a co-worker, a member of their family or other relative, or a friend, is applying for WIC.

Certification of self, coworkers, relatives and friends

3.0 WIC staff members cannot determine part or all eligibility for themselves, their family members, other relatives, friends, or co-workers. WIC staff currently employed with the WIC program will schedule all appointments for WIC services for themselves or their family members outside of their scheduled work hours.

3.1 If there are no other trained staff to determine WIC eligibility in the clinic, the certification determination will be reviewed by a clinic supervisor or manager. The supervisor or manager will ensure that the applicant meets the applicant category (pregnant, breastfeeding, infant, etc.), income, residency, and nutritional risk criteria requirements for certification. The supervisor or manager will also ensure that the appropriate food package has been assigned.

3.2 If there is no other clinic supervisor or manager to review the certification, contact your state WIC nutrition consultant. The certification will be reviewed by the state WIC nutrition consultant and the state WIC nutrition consultant will document approval in the Management Information System (MIS).

3.3 Document approval information from the WIC Program Supervisor/Coordinator, Senior Office Manager, or state WIC nutrition
consultant. The approval notes will be documented in the WIC participant’s progress notes and their WIC enrollment notes.

**Issuing benefits or eWIC cards to self, co-workers, relatives, and friends**

4.0 WIC staff members will not issue benefits or eWIC cards to themselves, co-workers, members of their family, other relatives, or friends at any point of certification, nutrition education, or visit. This includes during second and subsequent nutrition education visits and mid-certification visits.

4.1. An unrelated staff person must issue benefits and eWIC cards to these participants.

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**POLICY HISTORY**

<table>
<thead>
<tr>
<th>Date</th>
<th>* Major Revision, Minor revision</th>
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<tbody>
<tr>
<td>7/28/2010</td>
<td>Revised</td>
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<tr>
<td>3/31/2013</td>
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<tr>
<td>6/28/2019</td>
<td>Minor revision</td>
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The date located at the top of the policy is the implementation date unless an “effective date” is noted on the policy. Policies will become compliance findings 6 months from the implementation date.

*Major Revisions:* Significant content changes made to policy.

*Minor Revisions:* Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

*Date of Origin:* Date policy was initially released

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