Policy - WRO 800-B
Action -
Information -

Subject: All States Memorandum 93-67
WIC Volunteers and Participant Confidentiality

To All Western Region State WIC Directors

Section 246.26(d)(1) of the WIC Program Regulations restricts the use or disclosure of information about WIC participants and applicants to persons directly connected with the administration or enforcement of the Program. This provision does not exclude volunteers from access to participant or applicant information. Volunteers can be considered to be directly connected to the administration of the Program. It does, however, obligate the State or local agency to ensure that volunteers who are given access to client information are well-trained and knowledgeable of the restrictions on disclosure of this information.

It is the responsibility of the State or local agency to exercise discretion in screening and selecting capable volunteers who would have access to confidential information. If, in the opinion of the State or local agency, a potential volunteer does not appear to be a good candidate for keeping information confidential, there may be other activities that the person can perform that would not include access to participant information.

Once volunteers are selected, specific confidentiality requirements governing the WIC Program should be covered in the orientation or training of volunteers. Follow-up training can be conducted periodically to remind volunteers, as well as paid staff, of the importance of maintaining the confidential nature of participant information.

Finally, State or local agencies may wish to ask volunteers to sign an agreement to protect the confidentiality of information. By signing such a form, the volunteer would agree to keep information confidential or forfeit the volunteer assignment. Such an agreement would reinforce for the volunteer the importance of maintaining confidential participant information.

These suggestions for volunteer screening, training, and signing an agreement to maintain confidentiality are meant to be examples of actions that State or local agencies can take to utilize volunteers without sacrificing confidentiality of information. We encourage you to employ additional means that are not considered in this memorandum, if necessary, to protect the confidentiality of participant information.
Please call Cecilia Tellez at (415) 705-1313 if you have any questions about participant confidentiality.

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