

Chapter One

General Administration

Overview

Goal

The WIC Program is to provide supplemental foods, nutrition education and referrals to other health and social services as an adjunct to good health care during critical times of growth and development, in order to prevent occurrence of health problems, and to improve the health status of eligible women, infants and children.

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Section A

Administrative Responsibilities

Responsibility	Weekly	Monthly	Quarterly	Annually
General Administration Chapter 1				
Conflict of Interest Statements				*X
Certification Chapter 2				
✓ Missed Appointment Procedures				**Update
✓ Institution Compliance Procedures				Update
Food Packages General Chapter 3				
✓ Staff Listing of Individuals Authorized to Issue Food Packages				X
Food Packages Formula Chapter 4				
✓ Formula Samples Inventory		X		
Procedures for Food Instrument Security Chapter 5				
Security Protocols				Update
✓ Inventory				Update
✓ Voided	Report			Update
✓ Lost/Stolen				Update
✓ Mailing				Update
Procedures for Separation of Duties				Update
Referral And Outreach Coordination Chapter 6				
Outreach Plan				
✓ Outreach Activities Files				X
✓ Evaluate Outreach Activities				X
✓ Referral Agencies Contacted				X
Procedures For Domestic Abuse				Update

* X means must be done

** "Update" means to review and update as needed

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Section A

Administrative Responsibilities (Continued)

Participant and Staff Education Chapter 7				
Nutrition Education Care Plan				Update
Identify/develop Resources				Update
Evaluate Staff Performance				X
Training For Each Staff Member			X	
Procedures For Breastfeeding Pump				Update
Participant Disqualification and Dual Participation Chapter 8				
Dual Participation Reports		X		
Civil Rights and Non-discrimination Chapter 9				
Civil Rights And ADA Training	X-new staff			X-all staff
WIC Services Ineligible Log	X			
Procedures To Ensure Compliance				Updated
Translation Policy				Updated
Financial Management Chapter 12				
Submit CER Report		X		
Inventory WIC Purchased Property				X Due by January 31
Program Costs Chapter 13				
Caseload Management		X		
Document Expenditures by Functional Area				X
✓ Annual Cost Summary Report				X
✓ Personnel Costs Summary Sheet				X
✓ Daily Time Sheet.				X

* X means must be done

** "Update" means to review and update as needed

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Section A

Administrative Responsibilities (Continued)

<i>Records and Reports Chapter 14</i>				
Confidentiality Statements				X
Sharing Information Agreement				X
Procedures for Reporting Child Abuse				Updated

* X means must be done

** "Update" means to review and update as needed

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Section B

Local Agency Staffing

WIC Program Director/Manager

Each local agency shall designate a WIC Program Director/Manager (Director) who has previous WIC and /or community health experience. If the Director will certify potential WIC clients, or provide high-risk counseling and/or formula authorization to WIC participants, then the Director must be a Registered Dietitian.

In lieu of a Registered Dietitian and with prior approval from the State, the Local Agency shall designate a Director with a minimum of an undergraduate degree, from an accredited institution in nutrition (community nutrition, public health nutrition, nutrition education, human nutrition or nutrition science) or a related field such as home economics or biochemistry with an emphasis in nutritional science.

Note: Previous WIC and/or community health experience, and/or a Master's degree in a related subject are desirable.

Registered Dietitian

Each Local Agency shall provide a Registered Dietitian as a WIC Nutritionist, to perform high-risk counseling, formula authorization, and, as necessary, certification of clients. The Local Agency will provide the services of WIC Nutritionists in the number proportional to the agency's needs/caseload.

The WIC nutritionist will have a minimum of an undergraduate degree, from an accredited institution, in nutrition (community nutrition, public health nutrition, nutrition education, human nutrition or nutrition science) or a related field such as home economics or biochemistry with an emphasis in nutritional science.

Note: Previous WIC and/or community health experience, and/or a Master's degree in a related subject are desirable.

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Section B

Local Agency Staffing (Continued)

Breastfeeding Coordinator

Each local agency must designate a staff person to coordinate breastfeeding promotion and support activities.

Paraprofessional Certifiers/ Community Nutrition Workers or Equivalent

The Local Agency will provide nutrition/health personnel in numbers proportional to the agency's caseload. These individuals will certify applicants for participation in the Arizona WIC Program. These individuals will have the minimum of a high school degree or equivalent.

Note: Previous nutrition or health related job experience is desirable.

Clerks

At the option of the Local Agency, clerks will perform administrative support within WIC clinics. Such individuals will have the minimum of a high school degree or equivalent.

Note: Previous clerical or work experience is desirable.

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Section C

Workplace Mandates

No Smoking Policy

State and Local Agencies will establish mandatory no smoking policies in each WIC clinic pursuant to the Federal Fiscal Year (FFY) 1994 Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act (Public Law 103-111).

Drug-Free Workplace

State and Local Agencies will adhere to the rules and policies established pursuant to federal drug-free workplace mandates. 5 U.S.C. § 7301, 41 U.S.C. § 701, and Presidential Executive Order No. 12564.

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Section D

Conflict Of Interest

Policy

Arizona Department of Health Services and the local agencies shall ensure that no conflict of interest exists between any WIC agency personnel and participants and/or food vendor(s) within their respective jurisdiction.

Local Agency Conflict of Interest Policy must be forwarded to the Arizona WIC for approval. When changes are made to the LA Policy, the changes must be forwarded for approval.

WIC Directors shall review their conflict of interest policy annually and ensure that all employees know the policy.

All WIC personnel (State and Local Agency) must sign a conflict of interest form upon hire and annually thereafter. It is the employee's responsibility to keep the forms updated each time a major change occurs in their personal affairs or official duties for any and all real, perceived, or potential conflicts of interest.

Each LA shall maintain a file of signed and dated conflict of interest forms that will be subject to examination at Management Evaluation visits.

WIC employees shall not engage in any activities which create a conflict of interest between the employees' assigned functions and any other interests or obligations or those of immediate family members or business associates.

WIC employees shall not engage in activities which violate federal or state laws, WIC Policies, or which, in any way, diminish the integrity, efficiency, or quality of the WIC Program.

WIC employees shall not perform their official duties in a manner that would result in preferential or discriminatory treatment to any person or vendor.

WIC employees shall not, directly or indirectly, ask for, give, receive, or agree to receive any compensation, gift, reward, or gratuity for performing, omitting, or deferring the performance of any job related duties.

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Section D

Conflict Of Interest (Continued)

WIC employees shall not abuse, misuse, or disclose confidential information in a manner that can result in a direct benefit to employee or immediate family member or business associate.

WIC employees shall not access the AIM automation system or any client files for any non-business related reason(s).

A WIC employee may not supervise another member of the employee's immediate family.

Note: Failure to comply with the terms of this policy may result in the employee being subject to appropriate disciplinary or corrective action, including dismissal and/or deactivation Citrix/AIM user accounts

NOTE: This policy does not intend to deny any employee opportunities available to all other citizens of the state to acquire private economic or other interests so long as this does not interfere with their WIC duties or disadvantage the WIC Program in any manner. Conflicts of interest are not necessarily unwarranted, unethical or illegal, nor are they always avoidable. Rather, it is the failure to disclose conflicts or potential conflicts to appropriate authorities; to comply with approved conflict of interest policies; to continue to engage in a conflict after disapproval by appropriate authorities; or to further conduct oneself in a manner that unethically hurts, hinders, or disadvantages the WIC Program that must be avoided.

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Section E

Disaster Plan

Policy

The State Agency will be responsible for the coordination of relief efforts for WIC participants in case of natural disaster and emergencies.

Local Agency will contact the State Agency to report the disaster situation to develop a local WIC disaster plan.

Procedure

The State Agency WIC Vendor Management Team Leader will coordinate with the State of Arizona Division of Emergency Management, Arizona Emergency Operations Center, vendors and volunteer agencies.

Retail System in Place

If the retail purchase system is in place in the disaster area, the Local Agency will do the following:

- Coordinate with volunteer agencies to secure temporary clinic sites, if necessary.
- Issue automated food instruments, if available
- Mail food instruments, if postal services are available.

Retail System Not in Place

If the retail purchase system is not in place in the disaster area, the State Agency will function in accordance with the State of Arizona Emergency Operations Plan.

Evacuations

Participants will be transferred to the nearest WIC clinic to their evacuation site.

Local agencies will give the evacuees precedence status regarding appointments.

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Section F

Abbreviations

ACADV	Arizona Coalition Against Domestic Violence
ADA	Americans with Disabilities Act of 1990
ADHS	Arizona Department of Health Services
AHCCCS	Arizona Health Care Cost Containment System (Arizona's Medicaid program)
AIM	Arizona In Motion (WIC automation system)
A.R.S.	Arizona Revised Statutes
CACFP	Child and Adult Care Food Program (Arizona Department of Education Child Care Food Program)
CDC	Centers for Disease Control and Prevention
CHIP	Children's Health Insurance Program (Kid's Care in Arizona)
CNW	Community Nutrition Worker
CPA	Competent Professional Authority
CPS	Child Protection Services
CRS	Children's Rehabilitative Services
CSFP	Commodity Supplemental Food Program
DHHS	Department of Health and Human Services
DRI	Dietary Recommended Intakes
EFNEP	Expanded Food and Nutrition Education Program
EPSDT	Early and Periodic Screening Diagnostic and Treatment Services
FDD	Food Distribution (Division of USDA)
FDPIR	Food Distribution Program on Indian Reservations
FI	Food Instrument
FNS	Food and Nutrition Service
FFY	Federal Fiscal Year
HIPAA	Health Insurance Portability And Accountability Act

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Section F

Abbreviations (Continued)

IHS	Indian Health Services
INS	Immigration and Naturalization Service
ITCA	Inter Tribal Council of Arizona, Inc.
ITS	Information Technology Services
LAN	Local Area Network
LTRS	Lawful Temporary Resident Status
M.E.	Management Evaluation
MIS	Management Information System
MOU	Memorandum of Understanding
OCDPNS	Office of Chronic Disease Prevention and Nutrition Services
OMB	Office of Management and Budget
PCE	Participant Centered Education
RD	Registered Dietitian
SSI	Supplemental Security Income
TANF	Temporary Assistance for Needy Families
TAPI	The Arizona Partnership for Immunization
USDA	United States Department of Agriculture
VENA	Value Enhanced Nutrition Assessment
VOC	Verification of Certification
WIC	Special Supplemental Nutrition Program for Women, Infants and Children
WRO	Western Regional Office

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Section G

Definitions

Introduction

This section includes definitions of words that are frequently used throughout the Arizona WIC Program Policy and Procedures Manual.

Beginning October 1, 2009, the Arizona WIC Program will begin issuing cash value vouchers/cash value food instruments for the purpose of allowing eligible participants to obtain authorized fruits and vegetables. For all intents and purposes, the Arizona WIC Program Policy and Procedure Manual refers to all coupons, vouchers, checks, and electronic benefit transfers as food instruments, except where noted otherwise.

Applicant

Applicant means pregnant women, breastfeeding women, postpartum women, infants, and children who are applying to receive WIC benefits, and the breastfed infants of applicant breastfeeding women.

Applicants include individuals who are currently participating in the program but are re-applying because their certification period is about to expire.

Alien Student

Alien students may not be excluded from WIC participation on the basis of their alien status. Participation in WIC does not impact on aliens who have been granted Lawful Temporary Resident Status (LTRS) or who are applying for such status.

WIC participation, however, may subject student aliens to deportation proceedings if it is found that they have become a "public charge." This is determined and enforced by the Immigration and Naturalization Service (INS). Therefore, if an applicant reveals their citizenship status as student alien, they should be referred to INS for counseling. Assure all applicants that WIC does NOT share citizenship information with anyone.

Children born in the United States to alien student families are U.S. citizens and are entitled to WIC benefits; this will not affect their parents' visas.

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Definitions (Continued)

Americans with Disabilities Act	The Americans with Disabilities Act of 1990 (ADA), is the Federal law promoting equal opportunities to persons with disabilities, by requiring that barriers to equal access be eliminated.
Authorized Representative	The person, other than the WIC participant, who has the authority to sign for the participants of an economic unit, who is responsible for following the WIC regulations, and may pick up and redeem WIC food instruments for authorized WIC foods.
Avoidance of Conflict of Interest	The primary means by which WIC employees maintain public confidence in the impartiality and objectivity of the WIC Program. Avoiding and preventing situations that can result in or appear to result in conflict of interests minimizes the possibility of conflict of interest.
Banking Contractor	The financial institution under contract to provide visual and computer edits of redeemed WIC food instruments.
Breastfed Infant	For categorical eligibility, any infant receiving any of its milk feedings from breast milk.
Breastfeeding Woman	For categorical eligibility, any woman feeding her breast milk to an infant(s) at least once a day.
Business Integrity	Relates to the business honesty of the Vendor's owners, officers or managers.
Cash Value Food Instrument/Cash Value Voucher	Means a fixed-dollar amount food instrument known as a check, voucher, or electronic benefit transfer (EBT) which is used by a participant to obtain authorized fruits and vegetables.
Categorical Eligibility	Individuals who are eligible for WIC services because they are pregnant, postpartum, and/or breastfeeding women, infants up to their first birthday, and children age one (1) through the last day of their fifth (5) birthday month.

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Definitions (Continued)

Certification	The process used to determine an applicant's eligibility or ineligibility for WIC services. Certification is performed at the initial application and before each certification period expires.
Certification Period	Time frame for which each category of participant is certified as eligible for services from the WIC program.
Certified Mail	U.S. Postal Service's method of delivering mail which requires a return receipt to the sender acknowledging receipt by the recipient.
Certifiers	<p>The Competent Professional Authority (CPA) on the staff at the Local Agency that is responsible for determining nutritional risk and for prescribing supplemental foods.</p> <p>Persons authorized to serve as CPA's are individuals who have documentation on file verifying they have been trained in certifying participants and prescribing supplemental foods:</p> <ul style="list-style-type: none">• Physicians• Nutritionists (B.S., B.A., M.P.H. or M.S. in nutrition, dietetics, public health nutrition, or home economics with emphasis in nutrition), Registered Dietitians• Registered Nurses• Physician's Assistants (certified by the National Committee on Certification of Physician's Assistant or certified by the State medical certifying authority)• Trained paraprofessional (community nutrition workers [CNW], health aides, etc.)
Child	For categorical eligibility, a child age one (1) through the last day of her/his fifth (5) birthday month.

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Civil Money Penalty	A monetary penalty based on violations of the Contract, the Manual, State or Federal statutes or regulations. If the violations are not fraudulent, this may be assessed against the Vendor at the discretion of the Department if participant hardship would occur if the Vendor was disqualified.
Comparable	Prices charged to WIC participants/authorized representatives for authorized foods, which must be within 140% of similar type stores.
Compliance Buys	A covert, on-site investigation in which agents of the Department or Federal WIC program anonymously redeem WIC food instruments to determine if the Vendor or Farmer is following policy and procedures as outlined in the Vendor Contract, Vendor Manual, and WIC Policy and Procedure Manual.
Confidential Information	Any information that is not reasonably available to the public. All WIC participant information is considered confidential.
Conflict of Interest	Relates to the standard of ethical conduct in the discharge of a person's duties. Conflict of Interest is defined as the interests or concerns of employees, or their immediate families or business associates, coinciding with the interests or functioning of the WIC Program. This conflict may be real, apparent, or potential, conflict of interest that arises from an activity or situation that places a WIC employee in a real, potential or apparent conflict between their private interests and their official duties and responsibilities
Conflict of Interest Requirements	Objective standards designed to eliminate potentially compromising situations, thus protecting the employee, other employees, the Local Agency, the WIC Program, vendors, and the public interest.
Department	The Arizona Department of Health Services, Division of Public Health Services, Bureau of USDA Nutrition Programs.

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Definitions (Continued)

Disqualification	The act of ending program participation of a participant, an authorized food vendor, or an authorized local agency. Disqualification can occur for administrative or punitive reasons and can be made for specified time periods.
Dual Participation	Simultaneous participation in more than one WIC program or simultaneous participation in WIC and CSFP.
Economic Unit / Household / Family	<p>A group of related or non-related individuals who are living as one economic unit that share income and consumption of goods and/or services. For the purposes of WIC, the terms “economic unit” and “family” can be used interchangeably, but economic unit is the more appropriate terminology.</p> <p>NOTE:</p> <ul style="list-style-type: none">• Residents of a homeless facility/shelter/institution are not considered an “economic unit”• More than one economic unit can live under one roof where general economic independence of the units has been determined through appropriate questioning• A pregnant woman and her unborn child(ren) are counted as two (or more, i.e., twins) persons for determination of economic unit size• A foster child is considered an economic unit of one (1) if he/she is the legal responsibility of a welfare or appropriate agency but may reside with a foster family
Endorsement	The Vendor’s identification, for banking purposes, affixed to the back of the food instrument.
Fair Hearing	The administrative review process by which a Vendor may appeal adverse action.

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Definitions (Continued)

Farmer	An individual authorized by the Department to sell eligible fruits and vegetables to participants/authorized representatives at a farmers' market or roadside stands. Individuals, who exclusively sell produce grown by someone else, such as wholesale distributors, cannot be authorized.
First Date to Use/Last Date to Use	The date the food instrument becomes valid (issue) until midnight of the day indicated on the "Last date to Use" line on the food instrument.
Food and Nutrition Service	The Food and Nutrition Service (FNS) of the United States Department of Agriculture.
Food Instrument	A voucher, check, electronic benefits transfer card (EBT), coupon or other document which is used by a participant to obtain supplemental foods.
Food Sales	Sales of all Food Stamp/Supplemental Nutrition Assistance Program (SNAP)-eligible foods intended for home preparation and consumption, including meat, fish, and poultry; bread and cereal products; dairy products; fruits and vegetables. Food items such as condiments and spices, coffee, tea, cocoa, and carbonated and non-carbonated drinks may be included in food sales when offered for sale along with foods in the categories identified above. Food sales do not include sales of any items that cannot be purchased with Food Stamp/SNAP benefits, such as hot foods or food that will be eaten in the store.
Food Stamp/SNAP	Food Stamp/SNAP authorized by the Food Stamp Act of 1977.

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Health Professional

Health professionals include: Physicians, Registered Dietitians, Registered Nurses, Physician's Assistants (certified by the National Committee on Certification of Physician's Assistants or certified by the State medical certifying authority) and Nutritionists (B.S., B.A., or M.S. in nutrition, community nutrition, dietetics, public health nutrition or home economics with emphasis in nutrition).

The health professionals that make referrals to WIC and write prescriptions for special formulas include Physicians (M.D. or D.O.), Nurse Practitioner (N.P) or Physician's Assistants (P.A.).

Homeless Facility

- A supervised publicly or privately operated shelter (including a welfare hotel or congregate shelter) designed to provide temporary living quarters
 - A facility that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for humans
-

Homeless Individual

Person who lacks a fixed and regular nighttime residence or whose primary nighttime residence is one of the following:

- A supervised publicly or privately operated shelter (including a welfare hotel, congregate shelter, or shelter for victims of domestic violence) designed to provide temporary living accommodations
 - An institution that provides a temporary residence for individuals intended to be institutionalized
 - A temporary accommodation of not more than 365 days in the residence of another individual
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for humans
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Definitions (Continued)

Immediate Family	An employee's spouse or partner and any children, parents, brothers and sisters, grandchildren, grandparents, nieces and nephews, and same relationship of step categories, of the employee and the spouse/partner; as well as other relatives who share the employee's home or otherwise are dependent on the employee or the spouse/partner for support.
Income	Guidelines set by the federal government, which specify income allowable criteria for program participation.
Infant	For categorical eligibility, a child less than one (1) year of age.
Institution	A residential accommodation with meal service, excluding private residences and homeless facilities, designed to provide temporary living accommodations.
Local Agency	Local non-profit agencies, county health departments and tribal entities under contract with the Department to implement and enforce policies and procedures of the WIC Program.
Migrant	An individual whose principal work is in agriculture or logging (>50% of job) on a seasonal basis, and who has been so employed in the last 24 months. For the purposes of such employment, a migrant establishes a temporary abode. Only the migrant worker or those members of the family who actually travel with the migrant worker will be counted as migrants.
Notice	The mechanism by which the Department informs the Vendor Applicant or current Vendor of specific actions pertaining to the application or executed contract.

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Definitions (Continued)

- Nutritional Risk**
- Detrimental or abnormal nutritional conditions detectable by biochemical or anthropometric measurements
 - Other documented nutrition-related medical conditions
 - Dietary deficiencies that impair or endanger health; and
 - Conditions that predispose persons to inadequate nutritional patterns or nutrition-related medical conditions
-

Participant Identification Method used by WIC staff at certification and when issuing food instruments to check the identity of each participant.

Participant's Identifying Mark An "X" that a participant may use in place of a signature when signing food instruments, certification forms, requests for transfer of record, or any document requiring a signature. The Local Agency staff member will verify the individual's mark by writing "for (participant's name) by (staff member signature)."

The cashier will verify the individual's mark by writing "for (participant's name) by (cashier signature) when food instruments are redeemed at the store. The participant identification folder/transfer card will reflect the use of the "X" signature.

Policy and Procedure Manual The Arizona WIC Program Policy and Procedure Manual or Vendor Manual and all amendments thereto.

Postpartum Woman For categorical eligibility, a non-breastfeeding woman up to six months after the end of her pregnancy.

Priority Status Applicants are enrolled in WIC according to the priority category of their nutritional risk(s), according to the "Arizona WIC Program, Nutritional Risk Factors by Priority for Service."

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Definitions (Continued)

Proxy	A person, other than the WIC participant/authorized representative, who is authorized by the clinic and the participant/authorized representative to sign the Proxy Certification form, and to pick up and redeem WIC food instruments.
Proxy Certification	The document completed at the WIC clinic that identifies the proxy as the person who is authorized to redeem WIC food instruments for the participant/authorized representative. The signature on the Proxy Certification form must match the clinic signature and countersignature obtained at the store or farmer location on the food instrument.
Rain Check	Any document or list which allows a participant/authorized representative to receive WIC authorized item(s) after the date the food instrument is redeemed.
Regression	A relapse in nutritional status or a nutrition-related medical condition to a formerly determined detrimental level.
Replacement Food Instrument	The negotiable food instrument used by the Department to reimburse a Vendor who has requested a second level review and is due monies.
Residency Requirement	Applicants must meet residency guidelines that require the participant to reside in Arizona, preferably in the service area of the Local Agency. The service area is defined by the Local Agency.
Retention of Records	<p>It is the Vendor's responsibility to maintain all documents and records which pertain to a Vendor's participation in the WIC Program for five (5) years after the date of the Contract.</p> <p>All records pertaining to a specific fiscal year will normally be retained for 5 years and 5 months after the federal fiscal year (FFY) ends September 30th.</p>

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Rural area	An area with a population of less than ten thousand persons according to the most recent United States Decennial Census.
Similar Type Stores	Stores that are similar in classification as determined by the store's response to questions answered on the Arizona WIC Program Vendor Application form.
Subpoena	A request for information or an appearance in court issued by the clerk of the court. It does not represent a court's ruling that WIC information must be released.
USDA	The United States Department of Agriculture, which is the Federal Department that oversees the WIC program nationally.
Urban area	An area with a population of ten thousand or more according to the most recent United States Decennial Census.
Vendor	A grocery store, military commissary, or pharmacy authorized and under Contract with the Department to redeem WIC food instruments or otherwise provide supplemental foods to WIC participants/authorized representatives.
WIC Clinic	A facility where women, infants, and children are screened and determined to be eligible to participate in the WIC Program.
WIC Food Instrument	A negotiable food instrument issued by the Arizona WIC Program and used by a WIC participant/authorized representative to receive authorized supplemental foods.
WIC Participants	Pregnant, breastfeeding or postpartum women, infants and children up to age five (5) years who are receiving WIC authorized supplemental foods, food instruments under the WIC program, and the breastfed infant of participating breastfeeding women.

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Definitions (Continued)

WIC Price/Stock Survey

The Department survey (also known as a market basket assessment) that consists of a specified group of WIC authorized food items. The Department uses the price data collected for these food items to assess competitive price, monitor retail price increases, compare wholesale to retail, monitor market trends, and for food forecasting. The price data is not used to set or establish the maximum redemption amount for food instruments.

WIC Program

The Special Supplemental Nutrition Program for Women, Infants and Children authorized by Section 17 of the Child Nutrition Act of 1966, as amended.

WIC Vendor Identification Stamp

The rubber stamp with the authorized Vendor or Farmer's unique four (4) digit identification number that is issued by the Department and used for validating WIC food instruments. Vendors and Farmers are provided with two (2) ID stamps and they both remain the property of the Arizona WIC Program.

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Appendix A: Sample Conflict of Interest Form

See following pages

**WOMEN, INFANTS AND CHILDREN PROGRAM
CONFLICT OF INTEREST DISCLOSURE STATEMENT**

I have read and do understand the Women, Infants And Children Program's (WIC) *Conflict of Interest* policy. By signing below, I am agreeing to always follow the policy.

And, to the best of my knowledge and belief, except as I have stated below, neither I nor any person with whom I have a personal, family or business relationship has a direct or indirect interest in or relationship to any individual or business that does or proposes to conduct business with WIC, including participants.

I will inform my supervisor, before any activity or discussion, if I find that I or any person with whom I have a personal, family or business, relationship may have a direct or indirect interest in or relationship to any individual or business that does or proposes to conduct business with WIC, including certification.

- I do not have any conflict of interests.

- I do have or may have a conflict of interest, which is (if needed attach separate page):

Name of Family Member or other individual posing a conflict	Relationship	Employer/Title (if applicable)
Example: John Doe	Brother	Manager at Fry's

Full Name (**printed**): _____

Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____