

**1.27** **Conflict of Interest**

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**POLICY:**

Both the Local Agency and State Agency shall ensure no undeclared Conflict of Interest or the appearance of Conflict of Interest exists for any employee of a Local Agency or State Agency. A Conflict of Interest will be deemed to exist when an employee of a Local or State WIC agency is also a participant, payee, or proxy, or who works or who has relatives who work at, or own a WIC approved grocery store.

**PROCEDURE:**

**A. Conflict of Interest**

1. Both the Local Agency and State Agency must maintain a file containing the signed **Conflict of Interest Statement (see Attachment #1, 1.27)**.
2. The Local Agency Director and State Agency Director shall ensure that every WIC employee sign and date the **Conflict of Interest Statement (see Attachment #1, 1.27)** each fiscal year, October 1<sup>st</sup> through September 30<sup>th</sup>.
3. A WIC employee who is a participant, payee, or proxy must follow Policy and Procedure **1.18, Separation of Duties**.
4. Local Agency compliance with this policy will be monitored during the State Agency Program Review and Local Agency Internal Review.

**REFERENCES:**

1. SFP 93-116, Conflict of Interest Situations
2. WIC Regulations 246.12, Food delivery systems

**ATTACHMENTS:**

1. Conflict of Interest Statement