

Purpose Outlines the guiding principles for maintaining Program strength and integrity and avoiding a conflict of interest or the appearance of a conflict of interest in the vendor management component of the Nebraska WIC Program.

**Conflict of Interest
Between WIC
Vendors and the
WIC Program**

Conflict of interest between the vendor and the State agency and/or the local agencies is defined as the following:

- The vendor's sole proprietor or any person who owns or controls more than a 10% interest in a vendor owner partnership, corporation, or other legal entity is employed by the WIC Program or has a spouse, child, parent, or sibling who is employed by the WIC Program.

A vendor is ineligible for authorization if a conflict of interest exists.

The Nebraska WIC Program Retail Vendor Agreement will be terminated if the State agency identifies a conflict of interest as defined above.

To avoid a conflict of interest with WIC vendors: Any WIC employee, or employee's spouse, child, parent, or sibling may not own or control more than 10% interest in a vendor owner partnership, corporation, or other legal entity of an authorized WIC vendor.

**Local Agency WIC
Vendor Manager as a
Participant**

Notify the State agency if the local agency WIC vendor manager is a participant and/or responsible party.

Local agency WIC vendor managers who are also WIC participants and/or responsible parties shall **not** conduct any vendor manager responsibilities related to their client record(s). This includes but is not limited to the following: Problem check review, participant sanctions, vendor sanctions, monitoring, and complaints. This process/plan for conducting vendor management responsibilities should be documented in writing and a copy sent to the State WIC office.

Another WIC staff person who has been cross trained in vendor management shall carry out these responsibilities under the direction of the State WIC staff.

WIC staff shall not serve as an alternate shopper/proxy for any WIC participant.

**WIC Vendor
Management Staff
and Relatives and
Close Friends**

Local agency WIC vendor managers and/or the State agency WIC vendor management coordinator shall **not** conduct any vendor manager responsibilities related to client record(s) of relatives and/or close friends. This includes but is not limited to the following: Problem check review, participant sanctions, vendor sanctions, monitoring, and complaints. This process/plan for conducting vendor management responsibilities should be documented in writing and a copy sent to the State WIC office.

Another WIC staff person who has been cross trained in vendor management shall carry out these responsibilities under the direction of the State WIC staff.

**WIC Vendor
Management Staff as
an Employee of an
Authorized WIC
Vendor**

The State agency WIC vendor management coordinator shall **not** be an employee of an authorized WIC vendor.

Notify the State agency if a potential local agency WIC vendor manager is also an employee of an authorized WIC vendor to discuss.

- To avoid a conflict of interest with WIC vendors: Any WIC employee, or employee's spouse, child, parent, or sibling may not own or control more than 10% interest in a vendor owner partnership, corporation, or other legal entity of an authorized WIC vendor.
- A local agency WIC vendor manager may be an employee of an authorized WIC vendor if it is determined there is no conflict of interest as outlined in this procedure.
 - A local agency WIC vendor manager who is an employee of an authorized WIC vendor shall **not** conduct any vendor manager responsibilities related to authorization, eligibility, and monitoring for that vendor. This includes but is not limited to the following: Vendor authorization, contract training, problem check review, participant sanctions, vendor sanctions, monitoring, and complaints. This process/plan for conducting vendor management responsibilities should be documented in writing and a copy sent to the State WIC office.
 - Another WIC staff person who has been cross trained in vendor management shall carry out these responsibilities under the direction of the State WIC staff.