

# Maine Center for Disease Control and Prevention

## WIC Nutrition Program

Effective: October 1, 2014

Policy No. VM-13

### Conflict of Interest

#### Authority

7 CFR §246.12(t)

5 MRSA§18(2)

#### Policy

1. This policy applies to members of the State WIC Agency staff, staff of the contracted Local Agency, and any other contracted employees of the WIC program who conduct proceedings with WIC authorized vendors.
2. “Conflict of interest” in this policy is defined as an employee participating in their official capacity in any proceeding in which, to their knowledge, any of the following have a direct and substantial financial interest:
  - 2.1 The employee, the employee’s spouse or dependent children.
  - 2.2 The employee’s business partners.
  - 2.3 A person or organization with whom the employee is negotiating or has agreed to an arrangement concerning prospective employment.
  - 2.4 An organization in which the employee has a direct financial interest.
3. “Proceeding” in this policy includes, but is not limited to: proceeding, application processing, request, hearing, ruling, determination, award, contract, claim, controversy, charge, accusation, or other matter related to action or inaction by the employee in conducting vendor related tasks.

#### Procedures

1. Annually, all employees will read and sign the Conflict of Interest Statement attached to this policy attesting to a lack of conflict of interest with the vendors with whom they interact.
2. If, in the course of their work, an employee becomes aware of a conflict of interest with a vendor with whom they are working, that employee will immediately inform their immediate supervisor who will then reassign the task to another staff member.
3. Failure to disclose a known conflict of interest may result in civil penalties as set out in 5 MRSA§18(5).