



WIC POLICY AND PROCEDURE MANUAL

Michigan Department of Community Health

Chapter/Section: Exh. 10.03D

Effective Date: 10/30/02

Issue Date: 10/30/02

10. PROGRAM COMPLIANCE

10.03 Employee Compliance

FINAL

EMPLOYEE SANCTIONS FOR ABUSE OR FRAUD

| Violation Type Code | TYPE | 1 st Violation | 2 nd Violation | Complaint Report to MDCH-WIC |
|---------------------|---|--|-------------------------------|--------------------------------------|
| 1EA | Performing duties not within the scope of assigned authority. | Warning Letter & Consultation | Refer to HR | within 10 calender days of complaint |
| 2EA | Failure to report a conflict of interest with other WIC staff, participants, vendors, or the employee's own participation in any WIC program; Enrolling self into the WIC program | Same as above | “ | same as above |
| 1ES | Unprofessional or unfair treatment toward WIC applicants, participants; other staff or WIC vendors. Discrimination toward WIC applicants, participants, other WIC staff and vendors. (Example: Failure to provide participants with the name and address of a WIC vendor(s), due to race, color, national origin, etc). | Warning Letter & Consultation | WIC Customer Service Training | “ |
| 2ES | Disclosing confidential information regarding participants to any non-WIC official or the public at-large. | “ | “ | “ |
| 3ES | Altering coupons/EBT benefits; Attempted or actual use of altered coupons/EBT benefits. | “ | Refer to HR | Immediately |
| 4ES | Conflict of Interest | “ | “ | Immediately |
| 5ES* | Enrolling one's self or family members into the WIC program. | Consultation & Termination from WIC Program* | Refer to HR | Immediately |
| 6ES* | Verbal or Physical Abuse; or Verbal threat of physical abuse of WIC applicants, participants, other clinic staff or vendors; Destruction of property belonging to WIC applicants, participants, WIC staff or vendors and staff. | Verbal: Consultation | Refer to HR | Immediately |
| | | Physical: Refer to Human Resources & Local Authorities | | |



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| 1EF* | Falsification of data for eligibility, i.e. Providing false information to receive WIC benefits for self or others | Refer to HR | | Immediately |
| 2EF* | Theft of WIC coupons or EBT benefits | Refer to HR & Local Law Enforcement* | | “ |
| 3EF* | Any of the abuses (1PA - 7PF) relating to participant abuse, when the employee is also a WIC participant. | See Exhibit 10.01F; May also refer to HR | | “ |

E = Employee A = Abuse S = Severe Abuse F = Fraud HR = Human Resources

*Remove employee from access to coupons/EBT benefits immediately, cancel password and immediately notify the MDCH/WIC Division