

# MI-WIC POLICY

## Program Compliance

### 9.0 Program Compliance

Effective Date: 12/14/12

#### 9.02B Employee Violation Types/Sanctions

Employee Violation Type	Examples	Sanction Action	Notification of MDCH WIC
Enrolling Self in the WIC Program	Enrolling one's self into the WIC program	Immediate termination of all WIC roles. Refer to Human Resources (HR).	Immediately upon confirmation of violation
	Issuing benefits to self		
Misappropriating or altering food benefits	Altering EBT benefits; Attempted or actual use of altered EBT benefits.	Immediate termination of all WIC roles. Refer to HR.	
	Sale of or attempt to sell WIC EBT benefits or card verbally, in print, or online.		
	Theft of WIC EBT benefits		
Entering false/misleading information in client record	Falsification of data for eligibility, i.e., providing false information to receive WIC benefits for self or others.	Immediate termination of all WIC roles. Refer to HR.	
Creation of records for fictitious clients	Creation of records for fictitious clients.	Immediate termination of all WIC roles. Refer to HR.	
Intentional failure to report conflict of interest	Failure to report a conflict of interest with other WIC staff, participants, vendors, or the employee's own participation in any WIC program.	1st Violation: Warning Letter & Consultation; refer to HR.	Immediately upon 2 <sup>nd</sup> violation.
	Enrolling one's family members into the WIC program.	2nd Violation: Immediate termination of all WIC roles; refer to HR.	
Theft or destruction of property	Theft or destruction of property belonging to WIC applicants, participants, staff or vendors and/or vendor staff.	Immediate termination of all WIC roles, Refer to HR.	Immediately upon confirmation of violation.
	Use of program funds to purchase goods or services for personal use.		
Other intentional violation of regulations or policy	Unprofessional or unfair treatment toward WIC applicants, participants, other staff or WIC vendors.	1st Violation: Warning Letter & Consultation; refer to HR.  2nd Violation: Immediate termination of all WIC roles; refer to HR.	Immediately upon 2 <sup>nd</sup> violation.
	Discrimination toward WIC applicants, participants, other WIC staff and vendors due to race, color, national origin, etc. (Example: Failure to provide participants with the name and address of a WIC vendor(s)).	1st Violation: Warning Letter & Consultation; refer to HR.  2nd Violation: Immediate termination of all WIC roles; refer to HR.  Refer to MI-WIC Policy 1.09 Civil Rights.	

<b>Employee Violation Type</b>	<b>Examples</b>	<b>Sanction Action</b>	<b>Notification of MDCH WIC</b>
Other intentional violation of regulations or policy	Disclosing confidential information regarding participants to any non-WIC official or the public at-large.	Immediate termination of all WIC roles. Refer to HR.	Immediately upon confirmation of violation.
	Verbal abuse of WIC applicants, participants, other clinic staff or vendors.	1st Violation: Warning Letter & Consultation; refer to HR.  2nd Violation: Immediate termination of all WIC roles; refer to HR.	Immediately upon 2 <sup>nd</sup> violation.
	Physical abuse or verbal threat of physical abuse of WIC applicants, participants, other clinic staff or vendors.	Immediate termination of all WIC roles. Refer to HR.	Immediately upon confirmation of violation.
	Destruction of property belonging to WIC applicants, participants, WIC staff or vendors and staff.		