



Reply to  
Attn. of: SF-111

FEB 04 1993

Subject: Policy Memorandum: 93-2  
WIC Volunteers and Confidentiality

To: Regional Directors  
Supplemental Food Programs  
All Regions

The WIC Program Regulations at Section 246.26(d)(1) restrict the use or disclosure of information about WIC participants and applicants to persons directly connected with the administration or enforcement of the program. This provision does not exclude volunteers from access to participant or applicant information. Volunteers can be considered to be directly connected to the administration of the program. It does, however, obligate the State or local agency to ensure that volunteers who are given access to client information are well-trained and knowledgeable of the restrictions on disclosure of this information.

It is the responsibility of the State or local agency to exercise discretion in screening and selecting capable volunteers who would have access to confidential information. If, in the opinion of the State or local agency, a potential volunteer does not appear to be a good candidate for keeping information confidential, there may be other activities that the person can perform that would not include access to participant information.

Once volunteers are selected, specific confidentiality requirements governing the WIC Program should be covered in the orientation or training of volunteers. Follow-up training can be conducted periodically to remind volunteers, as well as paid staff, of the importance of maintaining the confidential nature of participant information.

Finally, State or local agencies may wish to ask volunteers to sign an agreement to protect the confidentiality of information. By signing such a form, the volunteer would agree to keep information confidential or forfeit the volunteer assignment. Such an agreement would reinforce for the volunteer the importance of maintaining confidential participant information.

These suggestions for volunteer screening, training, and signing an agreement to maintain confidentiality are meant to be examples of actions that State or local agencies can use to utilize volunteers without sacrificing confidentiality of information. There are no doubt other means that State or local agencies have employed to protect the confidentiality of participant information.

A handwritten signature in cursive script that reads "Alberta C. Frost".

ALBERTA C. FROST  
Director  
Supplemental Food Programs Division