



**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
WIC PROGRAM**

CONFIDENTIALITY STATEMENT

I. Confidentiality of Information

Confidential applicant and participant information is any information about an applicant or participant, whether it is obtained from the applicant or participant, another source, or generated as a result of WIC application, certification, or participation, that individually identifies an applicant or participant and/or family member(s). Applicant or participant information is confidential, regardless of the original source and exclusive of previously applicable confidentiality provided in accordance with other Federal, State or local law. WIC information, whether provided by the participant or observed by WIC staff, is protected under the confidentiality provisions of Section 246.26(d) of the WIC Federal Regulations.

II. Disclosure of Confidential WIC information is limited to:

- a. Persons directly connected with the administration or enforcement of the program, including persons investigating or prosecuting violations in the WIC program under Federal, State or local authority.
- b. The Comptroller General of the United States for audit and examination authorized by law.
- c. Representatives of the following programs, as authorized by the Connecticut Department of Public Health:
 - i. DSS/Medicaid/HUSKY A,
 - ii. DSS/Supplemental Nutrition Assistance Program (SNAP),
 - iii. DoAg/Farmers' Market Nutrition Program
 - iv. Office of Early Childhood-Head Start State Collaboration Office (HSSCO)
 - v. Connecticut DPH programs for which we have a signed MOU
 1. Family Health
 2. Pregnancy Risk Assessment Monitoring System (PRAMS)
 3. Immunization Program
 4. Lead and Healthy Homes Program
- d. Host organization as specified in the MOU with the local agency

III. Participant information may not be released to WIC vendors.

IV. Vendor information:

Vendor information (whether it is obtained from the vendor or another source) that identifies the vendor, other than the vendor's name, address, telephone number, website, email address, store type, and authorization status is also confidential. According to Federal WIC Program Regulations 7CFR246.26 3(e) restricted information on a vendor may only be released to:

- a. Persons directly connected with the administration or enforcement of the SNAP or WIC Program.

- b. Persons directly connected with the administration or enforcement of any Federal or State law.
- c. A vendor that is subject to an adverse action.

V. Participant records are confidential, and clinic staff must protect them from unauthorized access within the Connecticut MIS.

All personnel will respect the confidentiality of all information to which they have access and not divulge confidential information without appropriate consent or seek to obtain access to confidential information to which they are not entitled to.

Access to Connecticut’s MIS is provided for the sole purpose of facilitating staff job duties/roles. Any work done under a staff person’s access code (user ID and password) is recorded and staff is responsible for these actions.

VI. Safeguarding Confidentiality

All personal and proprietary information will be kept physically secure and maintained in strict confidence. This means that reasonable measures will be taken to prevent access by unauthorized persons, such as not leaving materials unsecured in a work area. WIC participant data (names, demographic, and nutrition information), all clinic observations, and electronic transmittal of information will be treated as confidential at all times. Confidential records will be retained in accordance with 7CFR 246.25 and destroyed in accordance with State Regulation 19a-59c-4.

All requests for confidential information not covered by an MOU or a request for confidential vendor information must be sent to the State WIC Director.

VII. Penalties

Willfully and knowingly disclosing confidential information to unauthorized persons or organizations is a misuse of Federal property and may result in prosecution to the full extent of remedies available under federal and state laws and regulations, including fines, imprisonment, or both.

Disclosing the SNAP retailer store financial data carries additional penalties under Section 9 of the Food Stamp Act and the Code of Federal Regulations Section 278.1(q).

Disclosing information on individuals is protected under the Federal Privacy Act of 1974, 5 U.S.C. 552a, and implementing regulations and policies; and may also be protected under State privacy acts.

VIII. Certification

The undersigned certifies to having read and understand the above stated confidentiality requirements covering use and disclosure of WIC Program participant and vendor data. By providing your digital signature below, this document will serve as a certified original.

Name: _____ Title: _____

Signature: _____ Date: _____

Organization: _____